

1 written down anywhere?

2 A. No.

3 Q. It's my understanding that [REDACTED]
4 either came to his house alone to visit with Mr.
5 Epstein or brought other girls in their age group
6 to Mr. Epstein.

7 Were you familiar with that type of
8 recruitment process of girls bringing other girls?

9 MR. CRITTON: Form.

10 THE WITNESS: Yes.

11 BY MR. EDWARDS:

12 Q. Can you tell me more about what you know
13 about girls bringing other girls that are
14 relatively the same age to come to Jeffrey
15 Epstein's house and to use your words, have a good
16 time?

17 MR. CRITTON: Form.

18 THE WITNESS: It's hard to know who they
19 knew. But I think that was -- they feel
20 better themselves when they're in a group
21 than going by themselves, but I don't know
22 somebody recruiting.

23 BY MR. EDWARDS:

24 Q. Okay. And you've talked about, at least
25 referred to yourself I believe to the police and

1 for now we'll call it a massage -- as well as
2 anybody who brought that person over to the house,
3 they would both get paid cash. Are you familiar
4 with that?

5 MR. CRITTON: Form.

6 THE WITNESS: No.

7 BY MR. EDWARDS:

8 Q. If [REDACTED] brought another girl over to the
9 house and [REDACTED] stayed downstairs but this other girl
10 went upstairs with Mr. Epstein, which one would
11 you pay?

12 A. I don't know because I was told who to
13 pay.

14 Q. And [REDACTED] always told you?

15 A. [REDACTED] told me pay so and so.

16 Q. So if we were going to ask anybody else
17 about the exact method in terms of who would get
18 paid and for what, who would the people be? I
19 mean, other than Mr. Epstein who else could we ask
20 these questions?

21 A. [REDACTED]?

22 Q. [REDACTED]?

23 A. Yes.

24 Q. She would know this?

25 A. Yes.

1 as well today as a human ATM machine. Right?

2 MR. CRITTON: Form.

3 THE WITNESS: Something like that. I was
4 supposed to carry cash at all times.

5 BY MR. EDWARDS:

6 Q. One of the primary reasons why you
7 carried cash was to pay the girls in this age
8 group of [REDACTED] for whatever happened at the
9 house. Right?

10 MR. CRITTON: Form.

11 THE WITNESS: Yes.

12 BY MR. EDWARDS:

13 Q. That's a fair statement. Right?

14 MR. CRITTON: Form.

15 THE WITNESS: Yes.

16 BY MR. EDWARDS:

17 Q. Okay. And when [REDACTED], let's use her for
18 example, would bring somebody else to the house,
19 did you pay [REDACTED] as well as whomever she brought to
20 the house, pay them both?

21 A. No, I pay only one person.

22 Q. Okay. My understanding, and tell me if
23 this is wrong or you can corroborate this, is that
24 Mr. Epstein would pay the girl that was actually
25 performing whatever was happening in the room --

1 Q. What about Ghislaine Maxwell?

2 MR. CRITTON: Form.

3 THE WITNESS: You're talking about the
4 boss. I don't know.

5 BY MR. EDWARDS:

6 Q. To your knowledge was Ghislaine Maxwell
7 aware of these girls that are in the age group of
8 [REDACTED] coming to Jeffrey Epstein's house to
9 have a good time?

10 MR. CRITTON: Form.

11 THE WITNESS: I have to say something.
12 Mrs. Maxwell called me and told me not to
13 ever discuss or contact her again in a
14 threaten way.

15 BY MR. EDWARDS:

16 Q. When was this?

17 A. Right after I left because I call one of
18 the friends for a job and she told me this, but,
19 you know, I feel intimidated and so I want to keep
20 her out.

21 Q. What exactly did she say? First of all,
22 was this a telephone call?

23 A. Yes, she was in New York.

24 Q. She called you on your cell phone?

25 A. Yes.

1 Q. Is this the cell phone that was issued to
2 you by Mr. Epstein?
3 A. No, it was my personal phone. I was
4 already --
5 Q. Gone?
6 A. Yeah, this is three, four months down the
7 road.
8 Q. So if you left in --
9 A. February, March -- it was May or June.
10 Q. Of 2005?
11 A. Yes.
12 Q. And you got a call from Ghislaine Maxwell
13 out of the blue?
14 A. Yes.
15 Q. And do you know what prompted that
16 telephone call?
17 A. Because I contact somebody in New York to
18 get a job.
19 Q. Who was that person?
20 A. I contact Jean-Luc and I contact [REDACTED], the
21 Swedish girl, she used to be very good friends
22 with Mr. Epstein because she asked me she need
23 somebody in [REDACTED].
24 Q. What does [REDACTED] do?
25 A. [REDACTED] was a model many years ago and he

1 married -- [REDACTED] is the mother of the girl who was
2 [REDACTED].
3 Q. Who is [REDACTED] Mr. Epstein's
4 house?
5 A. Yeah.
6 Q. All right. There is a younger girl model
7 that's [REDACTED] Mr. Epstein's house and this
8 lady [REDACTED] is her mother?
9 A. Yes.
10 Q. And at some point in time you called her
11 in New York to get a job?
12 A. That's right.
13 Q. And you also called Jean-Luc Bernell?
14 That's his name. Right?
15 A. Jean-Luc, yeah, I don't remember his last
16 name.
17 Q. Does that sound familiar to you, Jean-Luc
18 Bernell?
19 A. Yeah.
20 Q. What did [REDACTED] and/or Jean-Luc say about
21 employing you?
22 A. No, they said they're going to find out
23 and obviously the first thing they did was talk to
24 Mrs. Maxwell.
25 Q. She made a telephone call to you and what

1 precisely did she say?
2 A. She said I forbid you that you're going
3 to be -- that I will be sorry if I contact any of
4 her friends again.
5 Q. Okay. Other than you will be sorry if
6 you contact any of my friends again did she say
7 anything else about what you know about Mr.
8 Epstein and/or what goes on at his house?
9 A. She said something like don't open your
10 mouth or something like that. But you have to
11 understand, I'm a civil humble, I came as an
12 [REDACTED] to service people, and right now you
13 feel a little -- I'm [REDACTED] and I'm afraid. First of
14 all, I don't have a job, but I'm glad this is on
15 tape because I don't want nothing to happen to me.
16 This is the way they treat you, better do this and
17 you shut up and don't talk to nobody and --
18 Q. When you say this is the way they treat,
19 who specifically are you talking about when you
20 say the word they?
21 A. Maxwell.
22 Q. And usually when you say the word they,
23 you're not only talking about one person --
24 A. Wealthy people.
25 Q. Are you also putting Jeffrey Epstein in

1 that category?
2 MR. CRITTON: Form.
3 THE WITNESS: I didn't talk to him
4 directly most of the time.
5 BY MR. EDWARDS:
6 Q. What's the reason why if you were his
7 head of security that you wouldn't have more
8 direct contact with him? Why is that?
9 MR. CRITTON: Form.
10 THE WITNESS: He wanted that way, you
11 know, so, yeah, I have to talk to [REDACTED],
12 [REDACTED] is not available talk to [REDACTED] in New
13 York. He didn't want to be disturbed.
14 BY MR. EDWARDS:
15 Q. Even while you were in the same house
16 with him he still had other people you could talk
17 to directly but he was not one of them?
18 A. Yeah.
19 Q. When you were fired you were not fired
20 directly by him?
21 A. No.
22 Q. It was through somebody else?
23 A. Ms. Maxwell.
24 Q. Okay. But it was for upsetting him for
25 taking the wrong car?

1 A. Yes.
 2 Q. Okay. Ever since this communication that
 3 Ms. Maxwell made to you where she called you
 4 sometime in May or June of 2005, and have you felt
 5 threatened?
 6 A. Yes.
 7 MR. CRITTON: Form.
 8 BY MR. EDWARDS:
 9 Q. Have you felt reluctant to come forward
 10 and give truthful, honest, and full disclosure of
 11 all information that you know about this case?
 12 MR. CRITTON: Form.
 13 THE WITNESS: I said this off the record
 14 but I will say it on the record, being in
 15 the Epstein case for me resulted in two
 16 years I have -- I won't bring the names but
 17 I was in the third interview to get hired as
 18 a household manager in Palm Beach and they
 19 told me you are the Jeffrey Epstein guy.
 20 Not in the sense I did something wrong
 21 because of the scandal, so they shun the job
 22 away from me. And so I was afraid that --
 23 this is very powerful people and one phone
 24 call and you finish, so I'm the little guy.
 25 Even I'm wearing a tie I'm a -- I'm talking

1 from my heart. This is the way it is.
 2 BY MR. EDWARDS:
 3 Q. I feel for you, I'm sorry that you have
 4 to be in this position.
 5 MR. CRITTON: Move to strike this.
 6 BY MR. EDWARDS:
 7 Q. Well, when you applied for these jobs and
 8 they turned you down and gave you the reason that
 9 you're the person involved in the Jeffrey Epstein
 10 scandal, was it that they are associated or
 11 friends with Jeffrey Epstein or is it that you
 12 have information and you have this confidentiality
 13 but you're revealing some certain information that
 14 Mr. Epstein would not like?
 15 MR. CRITTON: Form.
 16 THE WITNESS: Both.
 17 BY MR. EDWARDS:
 18 Q. Both?
 19 A. Both.
 20 Q. And since then given what you just told
 21 us about these people being very powerful, are you
 22 afraid for your life given the fact that you're
 23 involved to some extent in this case?
 24 MR. CRITTON: Form.
 25 THE WITNESS: I just start thinking about

1 this. Because I went through -- the first
 2 time I went to the deposition I was in Palm
 3 Beach and I did my duty, I mean, I tell what
 4 I know, but now I know there is more
 5 digging, all I want is this to be to get on
 6 with my normal life and stuff.
 7 BY MR. EDWARDS:
 8 Q. So when you come here today to testify,
 9 your main objective is to get back to your normal
 10 life and get out of the spotlight of this case.
 11 Yes?
 12 A. Yes.
 13 Q. And in doing so have you held back some
 14 of the details that you know about that happened
 15 in this case to remove yourself from the
 16 spotlight?
 17 MR. CRITTON: Form.
 18 THE WITNESS: No, sir.
 19 BY MR. EDWARDS:
 20 Q. Okay. Have you ever talked to Ghislaine
 21 Maxwell after that telephone call where she called
 22 you and you felt threatened?
 23 A. No.
 24 Q. Okay. So going back to where we started
 25 here was, does Ghislaine Maxwell have knowledge of

1 the girls that would come over to Jeffrey
 2 Epstein's house that are in roughly the same age
 3 group as [REDACTED] and to have a good time as you
 4 put it?
 5 MR. CRITTON: Form.
 6 THE WITNESS: Yes.
 7 BY MR. EDWARDS:
 8 Q. And what was her involvement and/or
 9 knowledge about that?
 10 MR. CRITTON: Form.
 11 THE WITNESS: She knew what was going on.
 12 BY MR. EDWARDS:
 13 Q. You referred to her at one point in time
 14 as Jeffrey Epstein's companion. But then later on
 15 you said that if she flew she flew on a different
 16 airplane and oftentimes or sometimes she slept in
 17 a different bed from Mr. Epstein. Did that seem
 18 unusual to you?
 19 MR. CRITTON: Form.
 20 THE WITNESS: It was odd but, I mean, and
 21 again, everything is odd in Palm Beach.
 22 BY MR. EDWARDS:
 23 Q. Okay, I don't mean to laugh.
 24 A. Mr. Epstein fly to Jet Aviation, she fly
 25 to Galaxy Aviation, but they never flew the same

1 plane, I don't know why.
 2 Q. And did you ever find out why?
 3 A. No.
 4 Q. You never really inquired why?
 5 A. No.
 6 Q. That wasn't your job?
 7 A. (Shakes head.)
 8 Q. You were just there to do your job?
 9 A. Exactly.
 10 Q. Obviously at some point in time you see
 11 these girls coming over to Mr. Epstein's house to
 12 have a good time and over time you start wondering
 13 what is going on with Mr. Epstein and these girls.
 14 Right?
 15 MR. CRITTON: Form.
 16 THE WITNESS: Yes.
 17 BY MR. EDWARDS:
 18 Q. And you understand that Mr. Epstein is a
 19 wealthy person that could have the best masseuse
 20 in the world come to his house. Yes?
 21 MR. CRITTON: Form.
 22 THE WITNESS: Yes.
 23 BY MR. EDWARDS:
 24 Q. These were not professional masseuses
 25 that were coming to his house to give massages.

1 Right?
 2 MR. CRITTON: Form.
 3 THE WITNESS: Yes.
 4 BY MR. EDWARDS:
 5 Q. They were not?
 6 MR. CRITTON: Form.
 7 THE WITNESS: They were not the best but
 8 they say they were masseuses.
 9 BY MR. EDWARDS:
 10 Q. They said that or [redacted] said that?
 11 Who is they? Is it [redacted] and Jeffrey
 12 Epstein or is it [redacted] that would come and
 13 announce themselves as masseuses?
 14 MR. CRITTON: Form.
 15 THE WITNESS: We wanted to put the title
 16 masseuse.
 17 BY MR. EDWARDS:
 18 Q. Who is we?
 19 A. We the staff and [redacted].
 20 Q. Who taught you that these girls that are
 21 in [redacted] age group should be referred to as
 22 masseuses? Who taught you that title?
 23 MR. CRITTON: Form.
 24 THE WITNESS: I just heard them, you
 25 know.

1 BY MR. EDWARDS:
 2 Q. Who heard who?
 3 A. I heard [redacted] going to be coming to give
 4 a massage.
 5 Q. Okay. When the girls would come in to
 6 Mr. Epstein's house, would you be the first one to
 7 meet them and greet them or would that be [redacted] ?
 8 A. Me.
 9 Q. And if [redacted] came would she normally come
 10 alone or with somebody else?
 11 A. Sometimes she had a companion sometimes
 12 she was by herself.
 13 Q. Given [redacted]'s age you never truly believed
 14 she was there as a masseuse; did you?
 15 MR. CRITTON: Form.
 16 THE WITNESS: From the father point of
 17 view, no.
 18 BY MR. EDWARDS:
 19 Q. And that in conjunction with the fact
 20 that when she called she gives you messages such
 21 as I have girls to bring for Mr. Epstein lead you
 22 to believe that there was something more going on
 23 then massages at Mr. Epstein's house with these
 24 girls?
 25 MR. CRITTON: Form.

1 THE WITNESS: When I was working I didn't
 2 have the time to realize that, but now
 3 you're out and you start -- yes, it is more
 4 than that.
 5 BY MR. EDWARDS:
 6 Q. And when [redacted] would come over and she would
 7 bring a companion, who would lead them to the area
 8 -- I guess it's the upstairs bedroom, who would
 9 lead them up there, would it be [redacted] or would it
 10 be yourself?
 11 MR. CRITTON: Form.
 12 THE WITNESS: [redacted].
 13 BY MR. EDWARDS:
 14 Q. Let's say two of them come over, I know
 15 that there is numerous times that she is coming
 16 three or four times a week for the six month
 17 period that you're there, but if it is [redacted] and
 18 another companion, and that other companion would
 19 usually be roughly her age. Right?
 20 MR. CRITTON: Form.
 21 THE WITNESS: It was something like that.
 22 BY MR. EDWARDS:
 23 Q. I mean, there were not people bringing
 24 over massage tables to give him a massage, these
 25 were girls who were [redacted] age, approximately,

1 go but we can take a break.
 2 THE VIDEOGRAPHER: We're off the record.
 3 (Thereupon, a recess was had.)
 4 THE VIDEOGRAPHER: We're back on the
 5 record, tape number five.
 6 BY MR. EDWARDS:
 7 Q. I stopped with knew the girls -- sorry.
 8 I stopped with the sentence in the police
 9 report, page 71, he delivered a dozen roses to
 10 [REDACTED] High School.
 11 And that's something you told us about
 12 earlier. Right?
 13 A. Yes.
 14 Q. Then it says, he knew the girls were
 15 still in high school and were of high school age.
 16 Speaking of the girls who were coming
 17 over labelled as masseuses, is that something --
 18 (Thereupon, an interruption was had.)
 19 BY MR. EDWARDS:
 20 Q. The statement is, he knew the girls were
 21 still in high school and were of high school age.
 22 That's something you agree with?
 23 MR. CRITTON: Form, out of context.
 24 THE WITNESS: I saw them in high school.
 25 BY MR. EDWARDS:

1 Q. The girls that we were talking about, and
 2 I'm talking about [REDACTED], specifically, but
 3 these are girls that looked of high school age to
 4 you.
 5 MR. CRITTON: Form.
 6 THE WITNESS: It's hard to say.
 7 BY MR. EDWARDS:
 8 Q. That wouldn't shock you though?
 9 MR. CRITTON: Form.
 10 THE WITNESS: No.
 11 BY MR. EDWARDS:
 12 Q. Doesn't surprise you?
 13 A. No.
 14 MR. CRITTON: Form.
 15 BY MR. EDWARDS:
 16 Q. I asked Rodriguez about the massages, he
 17 felt there was a lot more going on than just
 18 massages.
 19 Is that something you told him?
 20 MR. CRITTON: Form.
 21 THE WITNESS: Yes.
 22 BY MR. EDWARDS:
 23 Q. Do you know if it was a feeling that --
 24 well, let me ask you this way.
 25 Did you ever talk about that feeling that

1 there was more going on than just massages with
 2 anybody else that worked at the house?
 3 A. No.
 4 Q. Did you talk about that with anybody
 5 else?
 6 A. No, nothing. This is the first time that
 7 I said this openly because I was subpoenaed and
 8 there were these things, you know.
 9 Q. Right. And right now is the second time
 10 you said it openly because you're subpoenaed
 11 again?
 12 A. Yes.
 13 MR. CRITTON: Form.
 14 BY MR. EDWARDS:
 15 Q. Otherwise you have not expressed those
 16 feelings to anybody else?
 17 A. No.
 18 Q. What about when you spoke with Mr.
 19 Epstein's attorneys or investigators, did you talk
 20 to them about that?
 21 A. No.
 22 Q. And why did you choose not to tell them
 23 that you felt there were more -- that there was
 24 more going on in the bedroom with these young
 25 girls than just massages?

1 MR. CRITTON: Form.
 2 THE WITNESS: The only reason I contacted
 3 the attorneys was to see what's my position
 4 because I didn't have money to go to an
 5 attorney myself.
 6 BY MR. EDWARDS:
 7 Q. Why would you feel like you may need an
 8 attorney though if you didn't do anything wrong?
 9 A. I didn't need an attorney.
 10 Q. You were just frightened by the process?
 11 A. The process and the people who was
 12 involved in this.
 13 Q. The people involved meaning Ghislaine
 14 Maxwell and Jeffrey Epstein?
 15 MR. CRITTON: Form.
 16 BY MR. EDWARDS:
 17 Q. I'll ask you, which people are you
 18 talking about?
 19 A. Ghislaine Maxwell.
 20 Q. And were you still frightened because of
 21 the threat that she --
 22 A. I don't think so now, you know, I'm
 23 protected because I'm doing this publicly.
 24 Q. Okay. Well, going back to my other
 25 question about why didn't you reveal to Mr.

1 Epstein's investigators that you felt there was
2 more going on in the bedroom than just massages?

3 MR. CRITTON: Form.

4 THE WITNESS: Because they were more
5 interested in how much I know, they didn't
6 ask me anything else, and I told them
7 exactly what I knew and what I was doing.

8 BY MR. EDWARDS:

9 Q. Okay. You were asked by Mr. Mermelstein
10 when he was asking you about the meeting with Mr.
11 Epstein's investigators he said, did they make any
12 threat or did they threaten you, and you paused
13 and said I don't believe so.

14 A. Yeah, I think they didn't tell me
15 anything that I will feel -- they told me that
16 they want to know what I know and if I need an
17 attorney.

18 Q. Okay. Did you find that strange at all
19 that they offered you an attorney?

20 A. I went to have dinner at my house and I
21 told this to my wife and she told me, Alfredo, you
22 don't need an attorney, so I called him the next
23 day and that was it.

24 Q. You called the investigators?

25 A. Yes. I declined, I don't need an

1 attorney.

2 Q. If we want to know the exact names of the
3 investigators that you met at Don Shula's and at
4 your house, how would we get that information, do
5 you have it somewhere?

6 A. Probably I have it in the house.

7 Q. So if we do have to come back here and
8 finish this up, the next time would you be able to
9 bring that?

10 A. I think so.

11 Q. Okay. Do you know where in your house
12 that you have it, I mean, have you kept it in a
13 certain place?

14 A. I have to look.

15 Q. All right. After the sentence that we
16 left off it says, he, speaking of Mr. Rodriguez,
17 would clean Mr. Epstein's bedroom after the
18 alleged massages and would discover massagers
19 slash vibrators and sex toys scattered on the
20 floor.

21 Can you tell us what types of sex toys
22 that you found scattered on the floor after the
23 massages with these young girls?

24 MR. CRITTON: Form.

25 THE WITNESS: Like I explain, there was a

1 massage with a handle with two rubber things
2 that you can do massage yourself, this was
3 always on the floor, maybe one or two.

4 BY MR. EDWARDS:

5 Q. Okay. When you say this is always on the
6 floor, do you mean 24 hours a day it's on the
7 floor?

8 A. No, no, no, after each massage. Because
9 I assume the masseuses or anybody they were doing,
10 they were taken out of the closet wherever they
11 belong and they would leave there. So [REDACTED] and
12 myself, we always find this on the floor.

13 Q. And this is a massager that belongs to or
14 is owned by Mr. Epstein?

15 A. Yes.

16 Q. This isn't something that these girls
17 would bring over to the house?

18 A. No, no, it's in the house, it's part of
19 the inventory.

20 Q. And that statement is a few statements
21 after you felt that there was a lot more going on
22 than just massages, is there something about that
23 object being left on the ground and the type of
24 object that it was that also lead you to believe
25 that there is something more going on here than

1 just massages?

2 MR. CRITTON: Form.

3 THE WITNESS: Yes.

4 BY MR. EDWARDS:

5 Q. What about it, just tell us?

6 MR. CRITTON: Form.

7 THE WITNESS: I thought they were having
8 a good time, I never thought it was
9 something done against anybody's will, but
10 of course, you know that it's more than
11 massage.

12 BY MR. EDWARDS:

13 Q. Right, I'm just asking you to explain how
14 you know that.

15 MR. CRITTON: Let me just move to strike
16 his last answer as speculation. Form as to
17 your statement.

18 THE WITNESS: You're [REDACTED] years old and
19 it's -- you're an old -- you know, it's just
20 instinct.

21 MR. CRITTON: Move to strike.

22 BY MR. EDWARDS:

23 Q. It was obvious to you?

24 A. Yes.

25 MR. CRITTON: Form.

1 BY MR. EDWARDS:
 2 Q. He also said he would wipe down the
 3 vibrators and sex toys and put them away in the
 4 armoire.
 5 MR. CRITTON: Form.
 6 THE WITNESS: These things have a tip,
 7 they have the cream, they have all kinds of
 8 cream for giving massage.
 9 BY MR. EDWARDS:
 10 Q. How many of these massagers or vibrators
 11 would you wipe down?
 12 MR. CRITTON: Form.
 13 THE WITNESS: This big one all the time.
 14 BY MR. EDWARDS:
 15 Q. Right. Other than the big one all the
 16 time did you wipe down at any time any of the
 17 other sex toys or vibrators?
 18 A. No.
 19 MR. CRITTON: Form.
 20 BY MR. EDWARDS:
 21 Q. So if there were any other sex toys or
 22 vibrators or I believe you used the term dildo
 23 earlier that were ever used, those are items that
 24 you did not find on the floor and were put away in
 25 the armoire?

1 MR. CRITTON: Form.
 2 THE WITNESS: [REDACTED] told me I did this,
 3 I did that.
 4 BY MR. EDWARDS:
 5 Q. So tell us what did [REDACTED] tell you?
 6 A. She find toys on the floors, she have to
 7 clean them.
 8 Q. Did she tell you when she found the toys
 9 on the floor?
 10 A. After his massages, you know.
 11 Q. With the young girls that we're talking
 12 about?
 13 A. Yes.
 14 Q. Okay. And when did [REDACTED] tell you
 15 that?
 16 A. Almost every other time when she found
 17 it, you know, Alfredo I found this thing again
 18 because she despised to clean this, she had to put
 19 the gloves or whatever.
 20 Q. Okay. So it sounds like you had an
 21 actual conversation about this where she's
 22 describing she doesn't want to clean it.
 23 A. Because I told her to tell me up to date
 24 on things that are not normal, so she told me, you
 25 know, I found this, I found that, or some

1 underwear she brought it to the laundry and we
 2 used to label it.
 3 Q. Just so that the record is clear as to
 4 what we're talking about with this and that, I
 5 want you to tell us what [REDACTED] would tell you
 6 specifically, I found this and then would she show
 7 you what it was?
 8 A. No, she didn't show me, she said I
 9 cleaned this and I put it away, it was a vibrator.
 10 Q. Did she describe the vibrator for you so
 11 that you knew which one she was talking about?
 12 A. The vibrator that a female would use for
 13 personal use.
 14 Q. Not the same long one that you've been
 15 describing?
 16 A. No.
 17 Q. One that is a penis shaped vibrator.
 18 MR. CRITTON: Form.
 19 THE WITNESS: Yes.
 20 BY MR. EDWARDS:
 21 Q. That's what she was talking about?
 22 A. Yes.
 23 Q. And did she tell you on how many
 24 occasions after these --
 25 A. Several times.

1 Q. And can you explain to us why it is that
 2 -- and maybe it's just I don't understand the
 3 process of cleaning the room who went in first and
 4 second and whatever, but my question is why is it
 5 that she would always be the one to encounter the
 6 penis shaped vibrators and you would encounter
 7 this other longer vibrator?
 8 MR. CRITTON: Form.
 9 THE WITNESS: Because it was her job to
 10 clean the room. When she was busy she will
 11 ask me, Alfredo, can you help me carry, I
 12 have a lot of towels, because there were
 13 mountains because being an older woman I
 14 help her carry to the -- and put the towels
 15 downstairs, take it to the laundry. But she
 16 told me I found these things, I clean it, I
 17 put it in that armoire, they're over there.
 18 So she will give me -- we used to
 19 communicate all those little details, but it
 20 was her job to be in the room first.
 21 BY MR. EDWARDS:
 22 Q. And what did she say about liking or
 23 disliking the fact that she had to clean these
 24 vibrators?
 25 A. She didn't like to clean those.

1 Q. Did she tell you why?
 2 A. Because, you know, she knew what they
 3 were for and probably she despised to clean
 4 objects.
 5 Q. Did she ever make any comments about how
 6 young the girls were that were in the room with
 7 Mr. Epstein just before she had to go in and clean
 8 these vibrators?
 9 MR. CRITTON: Form.
 10 THE WITNESS: No.
 11 BY MR. EDWARDS:
 12 Q. Is the age of the girls that were coming
 13 over and going behind closed doors with Mr.
 14 Epstein a subject that ever came up between you
 15 and [REDACTED]?
 16 A. Sometimes.
 17 Q. And what would the conversation consist
 18 of?
 19 A. She will be surprised and say some of the
 20 girls are too young, and I said -- we just wonder,
 21 you know, but we comment each other.
 22 Q. Did it ever -- as a father did it ever
 23 occur to you that maybe I should say something or
 24 I shouldn't be here or I shouldn't be apart of
 25 this considering how young they are and how old he

1 is?
 2 MR. CRITTON: Form.
 3 THE WITNESS: Yes.
 4 BY MR. EDWARDS:
 5 Q. Is that something that on more than one
 6 occasion you thought to yourself this is just
 7 wrong?
 8 MR. CRITTON: Form.
 9 THE WITNESS: Yes.
 10 BY MR. EDWARDS:
 11 Q. And did you ever have a conversation with
 12 [REDACTED] about the fact that that's not right?
 13 A. We had.
 14 Q. And [REDACTED] stayed there and she's still
 15 employed there?
 16 A. I believe she was.
 17 Q. And did she ever mention to you that she
 18 thought that the situation was wrong and that she
 19 was contemplating --
 20 A. She was a deeply religious --
 21 MR. CRITTON: Form to the last question.
 22 THE WITNESS: -- [REDACTED] girl
 23 -- lady, and one day she came crying because
 24 she found a picture of the Pope next to
 25 naked girl, both pictures, and she said it's

1 a lack of respect. So, you know, she was
 2 shocked. So obviously she needed a job but
 3 she expressed her --
 4 MR. WILLITS: I'm sorry, I did not hear
 5 that, could the witness repeat that?
 6 THE WITNESS: I was just talking about
 7 [REDACTED], deeply religious staff member that
 8 worked with me and she told me one occasion
 9 that she was crying because the picture of
 10 the Pope was next to a naked girl.
 11 MR. WILLITS: Okay.
 12 BY MR. EDWARDS:
 13 Q. Okay. Besides [REDACTED] did you ever have
 14 a conversation with anybody else that works in the
 15 house about the young age of the girls and Mr.
 16 Epstein being in the bedroom and the fact that
 17 there are sex toys on the floor afterwards being
 18 wrong?
 19 MR. CRITTON: Form.
 20 THE WITNESS: Nobody else inside the
 21 house was allowed except just the two of us,
 22 so I never commented on this with anybody.
 23 BY MR. EDWARDS:
 24 Q. All right. The next sentence starts a
 25 new paragraph, Epstein ordered Rodriguez to go to

1 the Dollar Rent a Car and rent a car for the same
 2 girl he brought the roses to.
 3 I guess we're talking about A.
 4 So that she could drive herself to
 5 Epstein's house without incident. Rodriguez said
 6 the girl always needed rides to and from the
 7 house.
 8 Are those statements you agree with?
 9 MR. CRITTON: Form.
 10 THE WITNESS: I took her a few times to
 11 her house.
 12 BY MR. EDWARDS:
 13 Q. You took [REDACTED] to and from her house?
 14 A. In [REDACTED].
 15 Q. Okay. Did she say anything in the car to
 16 you about what was going on in the bedroom with
 17 Mr. Epstein?
 18 A. I always try to keep the conversation to
 19 a minimum when I was with them because it was my
 20 job, you know, I didn't want to talk so the
 21 conversation was minimal.
 22 Q. And these are girls that you're talking
 23 to that are roughly the same age as a daughter
 24 that you have?
 25 A. Yeah.

1 MR. CRITTON: Form.
 2 BY MR. EDWARDS:
 3 Q. And so you never inquired of them as to
 4 what was going on behind closed doors?
 5 A. Never.
 6 Q. Other than [REDACTED] did you take any of the
 7 other girls to or from -- and the girls I'm
 8 talking about are these young girls that are
 9 roughly the same age as [REDACTED], that you
 10 labelled masseuses.
 11 Did you take any of them to or from their
 12 homes on any occasion?
 13 MR. CRITTON: Form.
 14 THE WITNESS: Probably a couple of times.
 15 BY MR. EDWARDS:
 16 Q. Do you remember if you ever took [REDACTED] or [REDACTED]
 17 to or from their homes?
 18 A. I don't remember but if it was somewhere
 19 in [REDACTED] or [REDACTED], probably,
 20 yes.
 21 Q. All right. And the homes you would take
 22 these girls to, can you describe the neighborhood?
 23 A. They were blue collar neighborhoods.
 24 Q. Much different than Mr. Epstein?
 25 MR. CRITTON: Form.

1 THE WITNESS: Very different.
 2 MR. CRITTON: Argumentative.
 3 BY MR. EDWARDS:
 4 Q. Did any of the girls ever talk to you in
 5 the car about anybody else that they ever gave a
 6 massage to?
 7 A. No, they were very private.
 8 Q. Rodriguez referred to himself as a human
 9 ATM machine and was ordered by Epstein to maintain
 10 a minimum balance of \$2,000 on him at all times.
 11 That's something you've told us already.
 12 Right?
 13 MR. CRITTON: Form.
 14 THE WITNESS: Yeah.
 15 BY MR. EDWARDS:
 16 Q. When a girl would come by the house and
 17 Mr. Epstein was either not in the residence or was
 18 not at home at the time Rodriguez was to provide
 19 the girl, in parenthesis, masseuse, several
 20 hundred dollars for their time and to notify
 21 Epstein the amount they were given.
 22 MR. CRITTON: Form.
 23 THE WITNESS: Well, I have to give this
 24 report to the comptroller in New York to
 25 keep track of the cash. I never talk to Mr.

1 Epstein.
 2 BY MR. EDWARDS:
 3 Q. Okay. But this is talking about a
 4 situation where girls come to the house, and these
 5 young girls come to the house and Mr. Epstein is
 6 not at the house at all. That happened?
 7 MR. CRITTON: Form.
 8 THE WITNESS: Well, they left and --
 9 BY MR. EDWARDS:
 10 Q. Wait. Who are you talking about?
 11 A. Mr. Epstein, the girls, and [REDACTED], they
 12 go away.
 13 Q. You're talking about a different set of
 14 girls now, now you're talking about the girls that
 15 fly with him on the airplane.
 16 A. Exactly. But they're out of the house.
 17 But [REDACTED] will call me and leave me instructions
 18 on my phone that I have to pay so and so and they
 19 will be there this evening or this afternoon,
 20 that's why there was nobody in the house but I
 21 still have to pay them.
 22 Q. Okay. Would these girls usually arrive
 23 by taxicab and you would have to pay them?
 24 MR. CRITTON: Form.
 25 THE WITNESS: Sometimes taxi and

1 sometimes their own cars.
 2 BY MR. EDWARDS:
 3 Q. And you mentioned that you would
 4 sometimes be the person to call them a cab.
 5 Right?
 6 A. Yes.
 7 Q. How did you know which cab service to
 8 use?
 9 A. We used to have in the house two or three
 10 numbers and people knew the house because
 11 sometimes it was hard to -- it was easy to get
 12 lost to get to the house.
 13 Q. So were there certain taxicab drivers
 14 that you would ask to come specifically?
 15 A. Yes.
 16 Q. Who?
 17 A. I don't remember, but they knew the house
 18 right away, it's like Joe, come here, I need you.
 19 Q. Would you have that name of that person
 20 that would typically drive these girls, you know,
 21 in taxicabs to and from the house anywhere?
 22 MR. CRITTON: Form.
 23 THE WITNESS: I don't think so.
 24 BY MR. EDWARDS:
 25 Q. Do you remember whether it was Yellow Cab

1 Cab Company?
 2 A. West Palm Beach Taxi. No, it's not
 3 Yellow. Could be Yellow, but I don't know.
 4 Q. Would Mr. Epstein have the names or the
 5 list?
 6 A. Probably.
 7 MR. CRITTON: Form.
 8 BY MR. EDWARDS:
 9 Q. Anybody else?
 10 A. [REDACTED]
 11 Q. [REDACTED] would have?
 12 A. Yes.
 13 Q. In addition to Mr. Epstein obviously
 14 knowing who's coming to and from the house, would
 15 [REDACTED] also be familiar with the names of the girls
 16 and who they were?
 17 A. Yes.
 18 Q. In addition to [REDACTED] and Mr. Epstein
 19 would Ghislaine Maxwell be familiar with the names
 20 of some of these girls?
 21 MR. CRITTON: Form.
 22 THE WITNESS: Yes.
 23 BY MR. EDWARDS:
 24 Q. Are these names kept in a database in a
 25 computer system?

1 A. Could be.
 2 MR. CRITTON: I'm sorry, did you say
 3 could be?
 4 THE WITNESS: Yeah.
 5 MR. CRITTON: Move to strike as
 6 speculation.
 7 BY MR. EDWARDS:
 8 Q. When you say could be, why do you say
 9 that?
 10 A. Because there were too many and they were
 11 very organized and there is nothing you write on a
 12 piece of paper.
 13 Q. When you say they were very organized,
 14 are we talking --
 15 A. Mr. Epstein and [REDACTED].
 16 Q. Anybody else beside Mr. Epstein and
 17 [REDACTED], I guess beside [REDACTED] that would do the
 18 scheduling to coordinate the times these girls
 19 would come to the house?
 20 A. I'm sorry, anybody else you say?
 21 Q. Right, aside from [REDACTED].
 22 A. No, no.
 23 Q. And do you know what role, if any, [REDACTED]
 24 [REDACTED] ever played in any of what would go on
 25 behind the bedroom door with Mr. Epstein?

1 A. [REDACTED] was the number one girlfriend for
 2 Mr. Epstein. Very sweet girl, and she was always
 3 -- she would come over to the house but different
 4 girls with her all the time.
 5 Q. Okay. But [REDACTED], that's somebody who
 6 lives in [REDACTED]?
 7 A. [REDACTED], I believe, yes, her address is in
 8 [REDACTED].
 9 Q. So how often would she stay at 358 El
 10 Brillo?
 11 A. Very often.
 12 Q. Usually every time when Mr. Epstein was
 13 there?
 14 A. Yes.
 15 Q. And she would for the most time fly on
 16 the plane with Mr. Epstein?
 17 A. Yes.
 18 Q. And it would be her and Mr. Epstein and
 19 oftentimes some other girls?
 20 A. Exactly.
 21 Q. Where some points I think earlier when
 22 Mr. Mermelstein was asking you questions where
 23 there was some confusion we're talking about
 24 two different sets of girls, the girls that would
 25 come over and be labelled masseuses from the Palm

1 Beach area, and the girls that would fly on the
 2 plane with Mr. Epstein and Ms. [REDACTED].
 3 So, what I'm asking you is what, if any,
 4 involvement did [REDACTED] have with the
 5 girls that would arrive and be labeled as
 6 masseuses behind closed doors with Mr. Epstein?
 7 MR. CRITTON: Form.
 8 THE WITNESS: He was the second -- the
 9 first role was [REDACTED] and she was always --
 10 [REDACTED] is a very shy person so she will be in
 11 the background.
 12 BY MR. EDWARDS:
 13 Q. Did you ever know of [REDACTED] [REDACTED] to
 14 engage in -- to be in the room with Mr. Epstein
 15 while any of these young girls were up there?
 16 MR. CRITTON: Form.
 17 THE WITNESS: Yeah.
 18 BY MR. EPSTEIN:
 19 Q. How often do you remember [REDACTED] and Mr.
 20 Epstein being in the room with any of these young
 21 girls?
 22 A. I would say most of the time.
 23 Q. [REDACTED] would go up there too?
 24 A. Yeah.
 25 Q. Did you ever believe that [REDACTED] was