



1 JANE DOE NO. 6, CASE NO: 08-CV-80994  
2 Plaintiff,  
3 Vs.  
4 JEFFREY EPSTEIN,  
5 Defendant.

6 JANE DOE NO. 7, CASE NO: 08-CV-80993  
7 Plaintiff,  
8 Vs.

9 JEFFREY EPSTEIN,  
10 Defendant.

11 [REDACTED], CASE NO: 08-CV-80811  
12 Plaintiff,  
13 Vs.  
14 JEFFREY EPSTEIN,  
15 Defendant.

16 JANE DOE, CASE NO: 08-CV-80893  
17 Plaintiff,  
18 Vs.

19 JEFFREY EPSTEIN,  
20 Defendant.

21 [REDACTED]  
22  
23  
24  
25

1 IN THE CIRCUIT COURT OF THE 15TH  
2 JUDICIAL CIRCUIT IN AND FOR  
3 PALM BEACH COUNTY, FLORIDA  
4 CASE NO. 502008CA037319XXXMB AB

5 [REDACTED],  
6 Plaintiff,

7 Vs.  
8 JEFFREY EPSTEIN.

9 Defendant.  
10 [REDACTED]

11  
12 1031 Ives Dairy Road  
13 Suite 228  
14 North Miami, Florida  
15 August 7, 2009  
16 1:15 p.m. to 5:30 p.m.

17 CONTINUED  
18 VIDEOTAPED  
19 DEPOSITION  
20 of  
21 ALFREDO RODRIGUEZ

22 taken on behalf of the Plaintiffs pursuant  
23 to a Re-Notice of Taking Continued Videotaped  
24 Deposition (Duces Tecum)  
25 - - -

1 JANE DOE NO. II, CASE NO: 08-CV-80469  
2 Plaintiff,  
3 Vs.  
4 JEFFREY EPSTEIN,  
5 Defendant.

6 JANE DOE NO. 101 CASE NO: 08-CV-80591  
7 Plaintiff,

8 Vs.  
9 JEFFREY EPSTEIN,  
10 Defendant.

11 JANE DOE NO. 102, CASE NO: 08-CV-80656  
12 Plaintiff,  
13 Vs.  
14 JEFFREY EPSTEIN,  
15 Defendant.

16 [REDACTED]  
17  
18  
19  
20  
21  
22  
23  
24  
25

1 APPEARANCES:

2 [REDACTED]  
3 [REDACTED]  
4 [REDACTED]  
5 [REDACTED]

6 Attorney for Jane Doe 2, 3, 4, 5,  
7 6, and 7.

8 [REDACTED]  
9 [REDACTED]  
10 [REDACTED]  
11 [REDACTED]

12 Attorney for Jane Doe and [REDACTED]  
13 And L.M.

14 [REDACTED]  
15 [REDACTED]  
16 [REDACTED]

17 Attorney for Jane Doe 101 and 102.

18 [REDACTED]  
19 [REDACTED]  
20 [REDACTED]

21 Attorney for [REDACTED]  
22  
23  
24  
25

1 APPEARANCES:

2 [REDACTED]  
3 [REDACTED]  
4 [REDACTED]  
5 [REDACTED]

6 Appeared via telephone.

7 BURMAN, CRITTON, LUTTIER &  
8 COLEMAN, LLP  
9 BY: ROBERT CRITTON, ESQ.  
10 515 North Flagler Drive  
Suite 400  
West Palm Beach, Florida 33401  
Attorney for Jeffrey Epstein.

11 ALSO PRESENT:

12 JOE LANGSAM, VIDEOGRAPHER  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25

1 Deposition taken before MICHELLE PAYNE, Court  
2 Reporter and Notary Public in and for the State of  
3 Florida at Large, in the above cause.  
4 - - -

5 THE VIDEOGRAPHER: This is a continuation  
6 of the deposition of Alfredo Rodriguez.  
7 Today is Friday, August the 7th, the year  
8 2009, starting time approximately 1:15 p.m.

9 Will the court reporter please swear in  
10 the witness?

11 Thereupon,

12 ALFREDO RODRIGUEZ,  
13 having been first duly sworn or affirmed, was  
14 examined and testified as follows:

15 MR. CRITTON: Before we get started just  
16 with regard to Ms. [REDACTED] represents Jane Doe  
17 101 and 102, the alleged time of her  
18 incidents as of least have been plead in the  
19 complaint for 101 is '99 -- I'm sorry, '98  
20 through 2002, with Jane Doe 102 the Spring  
21 of -- Spring/Summer of 2003. Mr. Rodriguez  
22 never even began employment until '04 and  
23 '05. I think her questioning I think -- I  
24 can't say she doesn't have standing based on  
25 the court order, but I would say it's

1 CONTINUED INDEX OF EXAMINATION

2 WITNESS DIRECT CROSS REDIRECT RE CROSS

3 ALFREDO RODRIGUEZ

4 (By Ms. [REDACTED]) 278 441, 467

5 (By Mr. [REDACTED]) 334 453, 469

6 (By Mr. Critton) 338 464

7 (By Mr. [REDACTED]) 419, 454, 468

8 (By Mr. [REDACTED]) 452

9 CONTINUED INDEX OF EXHIBITS

10 PLAINTIFF'S PAGE

11 3 Drawing 315

12 4 Photograph 327

13 5 Photograph 331

14 6 Photograph 331

15 7 Photograph 331

16 8 Photograph 331

17 9 Report 446

18 (Exhibits 4, 5, 6, 7, and 8 were retained by Ms.  
19 [REDACTED])

1 completely irrelevant and immaterial and has  
2 no probative value with regard to this  
3 particular witness based upon the two  
4 clients at least that are in suit at this  
5 point in time.

6 MS. [REDACTED]: As Mr. Critton well knows I  
7 represent a number of other clients whose  
8 cases have not been filed and I believe we  
9 do have standing to ask questions, and I do  
10 intend to do that today.

11 EXAMINATION

12 BY MS. [REDACTED]:

13 Q. Mr. Rodriguez, you stated last time that  
14 there were guests at the house, frequent guests,  
15 friends from Harvard.

16 Do you remember that testimony?

17 A. Yes, ma'am.

18 Q. And was there a lawyer from Harvard named  
19 Alan Dershowitz?

20 A. Yes, ma'am.

21 Q. And are you familiar with the fact that  
22 he's a famous author and famous lawyer?

23 A. Yes, ma'am.

24 Q. How often during the six months or so  
25 that you were there was Mr. Dershowitz there?

1 A. Two or three times.  
 2 Q. And did you have any knowledge of why he  
 3 was visiting there?  
 4 A. No, ma'am.  
 5 Q. You don't know whether or not he was a  
 6 lawyer -- acting as a lawyer or whether he was  
 7 there as a friend?  
 8 A. I believe as a friend.  
 9 Q. Were there also young ladies in the house  
 10 at the time he was there?  
 11 MR. CRITTON: Form.  
 12 THE WITNESS: Yes, ma'am.  
 13 BY MS. [REDACTED]:  
 14 Q. And would those have included, for  
 15 instance, [REDACTED] and [REDACTED]?  
 16 A. Yes, ma'am.  
 17 Q. Were there other young ladies there when  
 18 Mr. Dershowitz was there?  
 19 MR. CRITTON: Form.  
 20 THE WITNESS: Yes, ma'am.  
 21 BY MS. [REDACTED]:  
 22 Q. Do you have any idea who those young  
 23 women were?  
 24 A. No, ma'am.  
 25 Q. Were any of those the young women that

1 you have said came to give massages?  
 2 A. Yes, ma'am.  
 3 Q. And do you have any idea whether or not  
 4 Mr. Dershowitz was also receiving massages?  
 5 A. I don't know, Ma'am.  
 6 Q. I want to ask you to take this piece of  
 7 paper, please, and a pencil --  
 8 MR. [REDACTED]: Can anybody hear me?  
 9 MS. [REDACTED]: Yes. Can you hear me?  
 10 MR. [REDACTED]: I've heard nothing for  
 11 about a minute or so.  
 12 MR. CRITTON: Can you hear me now?  
 13 MR. [REDACTED]: Yes.  
 14 MS. [REDACTED]: I'm asking questions, I'm  
 15 sorry.  
 16 MR. CRITTON: Why don't we go off the  
 17 record for a second.  
 18 (Thereupon, a discussion was held off the  
 19 record.)  
 20 THE VIDEOGRAPHER: We're back on the  
 21 record.  
 22 BY MS. [REDACTED]:  
 23 Q. Mr. Rodriguez, you indicated that there  
 24 were several staircases in the house?  
 25 A. Yes, ma'am.

1 Q. Can you tell me where those were?  
 2 A. One in the kitchen, and the one in the  
 3 formal -- the main entrance. And there was one  
 4 more added later on, but there is two when I was  
 5 working there.  
 6 Q. Could you just give me a rough sketch of  
 7 the house of where the main entrance was and where  
 8 the kitchen was?  
 9 A. I'm not an architect but it's something  
 10 like this. This is the kitchen, this is the main  
 11 entrance.  
 12 Q. Will you mark the kitchen with a K,  
 13 please, and the main entrance with ME?  
 14 A. This is the pool.  
 15 Q. The pool?  
 16 A. Yes, ma'am.  
 17 Q. And in the upper left?  
 18 A. In the terrace, yeah, there was a balcony  
 19 here.  
 20 Q. And where were the staircases?  
 21 A. This is one, the kitchen, one in the  
 22 foyer, and the pool.  
 23 Q. Okay. And would you just put an F where  
 24 the foyer staircase began? And KS where the  
 25 kitchen staircase began.

1 And you said that later another staircase  
 2 was added?  
 3 A. Yeah, we rehabilitated this, you know,  
 4 but you asked me how many stairs there were, to  
 5 answer your question there were three.  
 6 Q. Three. So where was the third one?  
 7 A. The pool, this leads to the pool.  
 8 Through the outside master bedroom you could go  
 9 downstairs to the pool.  
 10 Q. Okay. A stairway then from the outside,  
 11 from outside the master bedroom?  
 12 A. Yes, ma'am.  
 13 Q. Down to the pool?  
 14 A. Yes, ma'am.  
 15 Q. One of your duties was to answer the  
 16 door. Is that correct?  
 17 A. Yes, ma'am.  
 18 Q. Which door would you answer?  
 19 A. Mainly the kitchen.  
 20 Q. And why was that, why would people mainly  
 21 come to the kitchen?  
 22 A. I'll say it was for practicable reasons  
 23 because not to go to the main -- it was shorter  
 24 because the entrance was here, so this was the  
 25 driveway and we used to take into the back door of

1 the kitchen and they will wait there.  
 2 Q. All right. Would you just put BD where  
 3 the back door of the kitchen was, please?  
 4 Now, these young women that came to give  
 5 Mr. Epstein massages, would they usually come to  
 6 the kitchen door?  
 7 A. Yes, ma'am.  
 8 MR. CRITTON: Form.  
 9 BY MS. [REDACTED]:  
 10 Q. Did any ever come to the front door?  
 11 A. Very rarely.  
 12 Q. And you would let them in the kitchen?  
 13 A. Yes, ma'am.  
 14 Q. And then how did you then turn them over  
 15 to [REDACTED]?  
 16 MR. CRITTON: Form.  
 17 THE WITNESS: I will call her.  
 18 BY MS. [REDACTED]:  
 19 Q. How would you call her?  
 20 A. On her cell phone and she will know they  
 21 were waiting in the kitchen.  
 22 Q. And would you bring them in the kitchen  
 23 and then just leave?  
 24 A. Yes, ma'am.  
 25 Q. And where would you go?

1 A. You're welcome.  
 2 Q. Could you see the pool from the staff  
 3 house?  
 4 A. No, ma'am.  
 5 Q. How would you know, or would you know  
 6 when the young women were brought downstairs after  
 7 giving the massages?  
 8 MR. CRITTON: Form.  
 9 THE WITNESS: I will hear the commotion,  
 10 some voices, but I was not told they were  
 11 leaving.  
 12 BY MS. [REDACTED]:  
 13 Q. And so did you have any duties that had  
 14 anything to do with their leaving?  
 15 A. Check the security and see if the gate  
 16 was closed, that the cars were locked because the  
 17 garage were here.  
 18 Q. Would you put a G where the garage was?  
 19 I believe you testified that you were  
 20 required to have on your person \$2,000 everyday?  
 21 A. More or less, Ma'am.  
 22 Q. And if you open the door and a young  
 23 woman was there to give a massage you would call  
 24 [REDACTED] and go back to the staff house?  
 25 A. Yes, ma'am.

1 A. To my -- to the staff house that was  
 2 here.  
 3 Q. Good, I was going to ask you to show me  
 4 where the staff house is. Just put SH.  
 5 A. It was just maybe five feet, I used to  
 6 stay here.  
 7 Q. Okay. So what you're saying, it's about  
 8 five feet from the kitchen?  
 9 A. More or less, yes.  
 10 Q. Was it connected to the house?  
 11 A. No, it's detached but it's very close  
 12 proximity.  
 13 Q. Okay. So to get to the staff house would  
 14 you come out the kitchen door?  
 15 A. Yes, ma'am. And I came through my --  
 16 there was two entrances, one through the laundry  
 17 here and one to the main entrance to the staff  
 18 house.  
 19 Q. All right. And what was your usual  
 20 pathway if you left the kitchen to enter the staff  
 21 house, how would you generally do it?  
 22 A. Normally I will come to the laundry, the  
 23 laundry was here and my office was next to the  
 24 laundry.  
 25 Q. Okay. Thank you.

1 Q. And then you believe [REDACTED] would  
 2 come in and lead the young woman upstairs.  
 3 Correct?  
 4 MR. CRITTON: Form.  
 5 THE WITNESS: I'm sorry, can you repeat  
 6 your question?  
 7 BY MS. [REDACTED]:  
 8 Q. I'll try to, yes.  
 9 When you would answer the door and there  
 10 would be a young lady there to give a massage.  
 11 A. Yes, ma'am.  
 12 Q. I believe you testified you would let her  
 13 in the kitchen.  
 14 A. Yes, ma'am.  
 15 Q. And you called [REDACTED]?  
 16 A. Yes, ma'am.  
 17 Q. And you then left her in the kitchen  
 18 alone?  
 19 A. Yes.  
 20 Q. And went to the staff house?  
 21 A. Yes, ma'am.  
 22 Q. And sometimes you heard the commotion  
 23 when the young woman was leaving --  
 24 A. Yes, ma'am.  
 25 Q. -- but you didn't necessarily see them

1 leave. Is that correct?  
 2 A. Exactly, yes, ma'am.  
 3 Q. How did you transmit the money that you  
 4 were keeping to [REDACTED] to pay those young  
 5 women?  
 6 A. [REDACTED] would tell me who to pay and how  
 7 much, that's the way we work.  
 8 Q. And when would she tell you that?  
 9 A. She will call me by phone and say I'll  
 10 give so much to so on and so forth.  
 11 Q. Okay. Was that at the conclusion of the  
 12 massage?  
 13 MR. CRITTON: Form.  
 14 THE WITNESS: Yes, ma'am.  
 15 BY MS. [REDACTED]:  
 16 Q. Okay. Then I'm a little confused because  
 17 I thought you said that you didn't see them when  
 18 they left from giving the massage.  
 19 A. She will call me and she will say pay X,  
 20 Y, or Z, and that's the way I knew how much and to  
 21 whom. But sometimes they would leave and I didn't  
 22 pay those, I don't know who paid them.  
 23 Q. Okay. So if she calls you and told you  
 24 to pay X, Y, and Z \$200, would you then go back  
 25 into the kitchen and give X, Y, and Z \$200 each?

1 A. Yes. The whole south face of the house,  
 2 but this was [REDACTED].  
 3 Q. All right. And so did she usually work  
 4 with her laptop on the dining room table?  
 5 A. She will have all over the house but she  
 6 will sit down here to work on the desk.  
 7 Q. Do you know whether she kept any lists of  
 8 names of girls to come and give massages?  
 9 A. She did, Ma'am.  
 10 MR. CRITTON: Form.  
 11 BY MS. [REDACTED]:  
 12 Q. And do you know in what form she kept  
 13 those?  
 14 A. She had notes, you know, she always have  
 15 papers, but I don't know.  
 16 Q. Do you recall seeing the papers with  
 17 telephone numbers on them?  
 18 A. A couple of times.  
 19 Q. Do you know whether she also kept records  
 20 on the computer relating to the girls?  
 21 MR. CRITTON: Form.  
 22 THE WITNESS: Yes, ma'am.  
 23 BY MS. [REDACTED]:  
 24 Q. And how do you know that?  
 25 A. Everything was recorded in -- everything

1 A. Sometimes in the kitchen, sometimes in  
 2 the driveway I will pay them in an envelope, you  
 3 know.  
 4 Q. Okay. And she would tell you how much to  
 5 pay them?  
 6 A. Yes, ma'am.  
 7 Q. Where was Ms. [REDACTED] when you would call  
 8 her to tell her that there was someone at the  
 9 kitchen door to give a massage?  
 10 A. She was inside the house so I call her on  
 11 her cell and say, Alfredo, leave them in the  
 12 kitchen, but I don't know where she was.  
 13 Q. Okay. Did she have an office?  
 14 A. No, ma'am.  
 15 Q. Did she have a computer in the house?  
 16 A. Yes.  
 17 Q. Where was her computer?  
 18 A. She had a laptop but she usually work in  
 19 the dining room.  
 20 Q. And where was the dining room?  
 21 A. All this area facing the garden facing  
 22 north -- I'm sorry, facing south, and [REDACTED]  
 23 was at her desk here.  
 24 Q. So did the dining room have large  
 25 windows?

1 we did as employees we used to record and kept in  
 2 the internal circuit we used to have among the  
 3 employees.  
 4 Q. And so would it be, if I understand you  
 5 correctly then, was there some sort of a program  
 6 so that you could access information that  
 7 Ms. [REDACTED] was putting into that program and she  
 8 could access information you put in?  
 9 A. Yes, ma'am.  
 10 Q. And did you also send each other e-mails  
 11 that way or did you use a different program for  
 12 e-mails?  
 13 A. [REDACTED] didn't send direct e-mails to me  
 14 but she will call me on her cell. But I was  
 15 supposed to send through Citrix to other  
 16 employees.  
 17 Q. E-mail them through Citrix?  
 18 A. Yes, ma'am.  
 19 Q. Okay. And who would those other  
 20 employees be, have been, I mean, while you were  
 21 there?  
 22 A. Mrs. Maxwell, Bella in New York, mostly  
 23 the main people, you know, Bella and --  
 24 Q. Lesley was --  
 25 A. Lesley, yes, the secretary, and somebody

1 else, I don't recall.  
 2 Q. Was there anyone else that you could  
 3 e-mail?  
 4 A. We could e-mail anybody in the  
 5 organization.  
 6 Q. On that particular program?  
 7 A. Yes, ma'am.  
 8 Q. And so who else would be in that  
 9 organization?  
 10 A. Other household managers from Paris or  
 11 the Island, Manhattan.  
 12 Q. Do you know whether Ms. [REDACTED] kept any  
 13 pictures of the young women who would come to give  
 14 massages on her laptop?  
 15 A. Yes, ma'am.  
 16 Q. You saw those pictures?  
 17 A. Yes.  
 18 Q. Were the pictures uniform? And by that I  
 19 mean, were they all taken, for instance, there at  
 20 the house so that they would all be fairly  
 21 standard?  
 22 MR. CRITTON: Form.  
 23 THE WITNESS: They will be all over, you  
 24 know, sometimes out of the country and  
 25 sometimes in the house.

1 A. I don't remember, ma'am.  
 2 Q. Did you ever see [REDACTED] using that  
 3 small compact camera to take a picture of the  
 4 girls?  
 5 A. Yes, ma'am.  
 6 MR. CRITTON: Form.  
 7 BY MS. [REDACTED]:  
 8 Q. When you saw her doing that where were  
 9 they, the girls?  
 10 A. The dining room, the library, the first  
 11 floor of the house.  
 12 Q. Did you ever see Ms. Maxwell taking  
 13 pictures of the girls?  
 14 A. No, ma'am.  
 15 Q. Did you ever see Mr. Epstein taking  
 16 pictures of the girls?  
 17 A. No, ma'am.  
 18 Q. Were you ever told by anyone that Mr.  
 19 Epstein sometimes took pictures of the girls?  
 20 MR. CRITTON: Form.  
 21 THE WITNESS: Yes, ma'am.  
 22 BY MS. [REDACTED]:  
 23 Q. And do you recall who told you that?  
 24 A. I think it was [REDACTED].  
 25 Q. Do you recall what she said about that?

1 BY MS. [REDACTED]:  
 2 Q. Were these pictures that were taken by  
 3 someone for the purpose of keeping them in that  
 4 program?  
 5 A. I don't know.  
 6 MR. CRITTON: Form.  
 7 BY MS. [REDACTED]:  
 8 Q. Or opposed to, for instance, one of the  
 9 young ladies bringing a picture to give to  
 10 Ms. [REDACTED]?  
 11 A. I don't know.  
 12 Q. You don't know where the pictures came  
 13 from?  
 14 A. No, ma'am.  
 15 Q. Do you know was there anyone staying in  
 16 the house who often took pictures of young women?  
 17 MR. CRITTON: Form.  
 18 THE WITNESS: There was several cameras  
 19 in the house and they were used often, but I  
 20 don't know who used them.  
 21 BY MS. [REDACTED]:  
 22 Q. Okay. Do you remember what kind of  
 23 cameras they were?  
 24 A. The small compact camera.  
 25 Q. Any other kind?

1 A. He likes photography and he likes -- like  
 2 a hobby.  
 3 Q. Do you know which camera or what kind of  
 4 camera he used to take those pictures?  
 5 A. No, ma'am.  
 6 Q. And you said I think you never saw him  
 7 taking them?  
 8 A. Yes.  
 9 Q. So --  
 10 MR. CRITTON: Yeah meaning correct?  
 11 THE WITNESS: Yes.  
 12 BY MS. [REDACTED]:  
 13 Q. Was it your understanding that he took  
 14 those pictures upstairs?  
 15 MR. CRITTON: Form.  
 16 THE WITNESS: Yes, ma'am.  
 17 BY MS. [REDACTED]:  
 18 Q. And when you had occasion to go upstairs  
 19 do you recall seeing camera equipment?  
 20 A. No, ma'am.  
 21 Q. Were you ever told that he took pictures  
 22 of the girls nude?  
 23 A. No, ma'am.  
 24 Q. Were you ever told that he liked to have  
 25 pictures taken of the girls nude?

1 MR. CRITTON: Form.  
 2 THE WITNESS: No, ma'am.  
 3 BY MS. [REDACTED]  
 4 Q. I believe you were asked before in the  
 5 deposition about the stairway leading from the  
 6 kitchen upstairs and whether or not there were  
 7 pictures on that stairway.  
 8 A. Yes, there were pictures.  
 9 Q. Were those pictures some of them of nude  
 10 young women?  
 11 MR. CRITTON: Form.  
 12 THE WITNESS: Not on the stairway, they  
 13 were in the foyer in the second -- on the  
 14 foyer and the foyer leading to the master  
 15 bedroom.  
 16 BY MS. [REDACTED]  
 17 Q. I see. Were those -- what size generally  
 18 were those pictures?  
 19 A. They were, you know, I'll say three by  
 20 five.  
 21 Q. So very large --  
 22 A. Yes, ma'am.  
 23 Q. -- pictures? Were there lots of  
 24 photographs just around the house on top of  
 25 furniture in the various rooms?

1 BY MS. [REDACTED]  
 2 Q. And was that already installed when you  
 3 came there?  
 4 A. Yes, ma'am.  
 5 Q. Where is it you -- first of all, did they  
 6 tell you where the equipment was installed?  
 7 A. No.  
 8 Q. Did you have any understanding of where  
 9 the equipment was installed?  
 10 A. No.  
 11 Q. Do you know whether or not there was  
 12 surveillance photography equipment upstairs and  
 13 downstairs?  
 14 MR. CRITTON: Form.  
 15 THE WITNESS: Yes, ma'am.  
 16 BY MS. [REDACTED]  
 17 Q. And how do you know that?  
 18 A. I read it through the FBI report after  
 19 the fact that I -- after I left the job.  
 20 Q. Before reading through the FBI report did  
 21 you have any knowledge of the fact that there was  
 22 surveillance equipment both upstairs and  
 23 downstairs?  
 24 A. No, ma'am.  
 25 Q. While you were there was there ever an

1 A. Yes, ma'am.  
 2 Q. And were any of those photographs of  
 3 young women in the nude?  
 4 A. Yes, ma'am.  
 5 Q. Did you recognize any of those young  
 6 women?  
 7 A. Yes, a couple.  
 8 Q. And who was it that you recognized?  
 9 A. [REDACTED] and some other girl from Brazil  
 10 that was in the house but I don't remember her  
 11 name.  
 12 Q. Was this a girl that would come and stay  
 13 in the house or one of the girls that would come  
 14 and give massages?  
 15 A. They will stay at the house.  
 16 Q. Stay at the house. Do you recall a  
 17 picture of the girl, of a young women nude in a  
 18 hammock?  
 19 MR. CRITTON: Form.  
 20 THE WITNESS: No, I don't remember.  
 21 BY MS. [REDACTED]  
 22 Q. Was there surveillance equipment  
 23 installed in the house?  
 24 A. Yes, ma'am.  
 25 MR. CRITTON: Form.

1 occasion when someone came to do any maintenance  
 2 or repair on the surveillance equipment?  
 3 A. Yes, ma'am.  
 4 MR. CRITTON: Object to the form of the  
 5 last question.  
 6 MS. [REDACTED] Pardon?  
 7 MR. CRITTON: Form of the last question.  
 8 BY MS. [REDACTED]  
 9 Q. Did that happen more than one time?  
 10 A. I believe so, yes, ma'am.  
 11 Q. Do you have any recollection of who came  
 12 there, either the name of the company or the name  
 13 of the person who would come to repair or do  
 14 maintenance on the video equipment?  
 15 A. We used to have a young technician from  
 16 Ohio who used to maintain all the computers and he  
 17 would be the only one dealing with those things.  
 18 Q. So he maintained the computers and the  
 19 video equipment.  
 20 A. Yes.  
 21 Q. Is that correct?  
 22 MR. CRITTON: Form.  
 23 BY MS. [REDACTED]  
 24 Q. Do you have any recollection of what his  
 25 name was?

1 A. I don't remember, Ma'am. He came from  
 2 New Albany, Ohio.  
 3 Q. From New --  
 4 A. New Albany, Ohio.  
 5 Q. New Albany, Ohio. Did he have his own  
 6 business?  
 7 A. No, he worked for Mr. Epstein. He will  
 8 maintain all the computers.  
 9 Q. Was he there everyday?  
 10 A. No, ma'am.  
 11 Q. Do you know whether at that time Mr.  
 12 Epstein had an office in Palm Beach?  
 13 A. Not outside the house, no.  
 14 Q. Do you have any knowledge of whether or  
 15 not the video equipment was -- and I don't know  
 16 the technical term, forgive me, but was it the  
 17 kind of equipment that would record for a certain  
 18 amount of time and then record over that film?  
 19 A. I don't know.  
 20 MR. CRITTON: Form.  
 21 BY MS. [REDACTED]:  
 22 Q. You don't know?  
 23 A. No, ma'am.  
 24 MR. CRITTON: Just for clarification, I  
 25 may have misunderstood, but I thought he

1 video, even phones.  
 2 Q. Would he also repair the televisions if  
 3 they needed work?  
 4 A. No.  
 5 Q. No. Did you have any kind of intercom  
 6 system in the house?  
 7 A. Yes, ma'am.  
 8 Q. And what kind of system was that?  
 9 A. It was standard office equipment, Lucid  
 10 Technologies maybe, but it was an intercom like we  
 11 using right now.  
 12 MS. [REDACTED]: Just let the record reflect  
 13 that the witness pointed to the telephone on  
 14 the table that has a speaker phone.  
 15 THE WITNESS: Yes, ma'am.  
 16 BY MS. [REDACTED]:  
 17 Q. And did you use that in your work?  
 18 A. Yes, ma'am.  
 19 Q. And what did you use it for?  
 20 A. Mr. Epstein used to page me when he  
 21 needed me.  
 22 Q. Did you have one of those phones in the  
 23 kitchen?  
 24 A. Yes, ma'am.  
 25 Q. And was there one out in the staff house

1 said he didn't even know the video equipment  
 2 existed until he read the FBI report.  
 3 MS. [REDACTED]: He said he didn't know that  
 4 it was upstairs and downstairs, I believe.  
 5 MR. CRITTON: I thought he said he didn't  
 6 know that it even existed.  
 7 MS. [REDACTED]: I may be wrong.  
 8 BY MS. [REDACTED]:  
 9 Q. Did you know it existed before you read  
 10 the FBI report?  
 11 A. No, ma'am.  
 12 Q. I'm sorry, then I was wrong.  
 13 How did you know then that the young  
 14 technician from Ohio maintained the computers and  
 15 the video equipment?  
 16 A. Because we used to request -- there were  
 17 always problems with the computers so he came to  
 18 the house and he was the programmer. It was very  
 19 sophisticated.  
 20 MR. CRITTON: Form to the last question,  
 21 move to strike the answer as nonresponsive.  
 22 BY MS. [REDACTED]:  
 23 Q. How did you know then that he maintained  
 24 the video equipment as well?  
 25 A. Because he was in charge of computers,

1 as well?  
 2 A. Yes, ma'am.  
 3 Q. Do you know where others were in the  
 4 house?  
 5 A. Probably have like 15 phones. We used to  
 6 have three in the staff house, one in the cabana,  
 7 two in the master bedroom, one in each room,  
 8 kitchen, dining room, Mrs. Maxwell's office, the  
 9 garage.  
 10 Q. Where was Mrs. Maxwell's office?  
 11 A. Under the stairs next to the kitchen.  
 12 Q. Can you give me some idea of what size  
 13 space that was?  
 14 A. It was probably -- we change the floor.  
 15 Twelve by five, something like that.  
 16 Q. And was the computer equipment in that  
 17 space?  
 18 A. Yes, ma'am.  
 19 Q. Do you know whether Ms. Maxwell kept the  
 20 names and telephone numbers of the girls who came  
 21 to do massages?  
 22 A. Yes, ma'am.  
 23 MR. CRITTON: Form.  
 24 BY MS. [REDACTED]:  
 25 Q. Do you know that because you saw the

1 names and phone numbers?  
 2 MR. CRITTON: Form.  
 3 THE WITNESS: Yes, ma'am.  
 4 BY MS. [REDACTED]:  
 5 Q. Do you know if she kept pictures of the  
 6 girls on the computer?  
 7 A. Yes, she did.  
 8 Q. And you know that as well because you  
 9 happen to see them?  
 10 A. Yes, ma'am.  
 11 MR. CRITTON: Form to the last two  
 12 questions.  
 13 BY MS. [REDACTED]:  
 14 Q. Were they similar to the pictures that  
 15 Ms. [REDACTED] had on her computer?  
 16 MR. CRITTON: Form.  
 17 THE WITNESS: Yes, ma'am.  
 18 BY MS. [REDACTED]:  
 19 Q. Did the pictures that they kept there  
 20 look like pictures that were posed?  
 21 A. They were more casual.  
 22 Q. Did they look as though the person being  
 23 photographed knew that they were being  
 24 photographed?  
 25 MR. CRITTON: Form.

1 computer?  
 2 MR. CRITTON: Form.  
 3 THE WITNESS: Yes, ma'am.  
 4 BY MS. [REDACTED]:  
 5 Q. And did she generally have phone numbers  
 6 for those girls?  
 7 A. Yes, ma'am.  
 8 Q. And were they generally pictures of the  
 9 girls?  
 10 MR. CRITTON: Form.  
 11 THE WITNESS: No, ma'am.  
 12 BY MS. [REDACTED]:  
 13 Q. And did Ms. Maxwell have a list of the  
 14 girls who came to give massages?  
 15 MR. CRITTON: Form.  
 16 THE WITNESS: Yes, ma'am.  
 17 BY MS. [REDACTED]:  
 18 Q. Did she have telephone numbers generally?  
 19 A. Yes, ma'am.  
 20 MR. CRITTON: Form.  
 21 BY MS. [REDACTED]:  
 22 Q. Were there pictures on her computer of  
 23 the girls who came to give massages?  
 24 MR. CRITTON: Form.  
 25 BY MS. [REDACTED]:

1 THE WITNESS: No, ma'am.  
 2 BY MS. [REDACTED]:  
 3 Q. And what can you tell me about that, what  
 4 lead you to draw that conclusion?  
 5 A. They were probably taken in parties in  
 6 big reception or banquet.  
 7 MR. CRITTON: Let me offer as a  
 8 suggestion, not that you have to accept or  
 9 that you would, you're using the term young  
 10 girls generically, he has probably seen  
 11 many, many young girls, there was no --  
 12 you've used it interchangeably with just  
 13 young girls versus young girls who may have  
 14 come to -- purported to give a massage and,  
 15 therefore, that may be a different answer,  
 16 so that's part of my form objection.  
 17 MS. [REDACTED]: Okay, thank you.  
 18 BY MS. [REDACTED]:  
 19 Q. When I asked you about Ms. [REDACTED] whether  
 20 she had a list of the girls and telephone numbers,  
 21 I think I asked about those girls that came to  
 22 give massages, but let me go back and just ask it  
 23 that way.  
 24 Did you notice that Ms. [REDACTED] had a list  
 25 of the girls that came to give massages on her

1 Q. Ms. Maxwell I'm talking about.  
 2 A. Yes, ma'am.  
 3 Q. And were those pictures the more casual  
 4 ones that you described when I asked whether or  
 5 not the subject looked as though she knew she was  
 6 being photographed?  
 7 MR. CRITTON: Form.  
 8 THE WITNESS: I'm sorry, can you repeat?  
 9 BY MS. [REDACTED]:  
 10 Q. Yeah. The pictures of the young girls  
 11 who came to the house to give massages that were  
 12 on Ms. Maxwell's computer, did they appear to have  
 13 been taken when the girls knew they were being  
 14 photographed?  
 15 MR. CRITTON: Form.  
 16 THE WITNESS: I don't think they knew  
 17 they were being photographed.  
 18 BY MS. [REDACTED]:  
 19 Q. I believe you said they were more casual  
 20 pictures.  
 21 A. Yes, ma'am.  
 22 Q. Did you notice any nude photographs in  
 23 those pictures?  
 24 A. Yes, ma'am.  
 25 MR. CRITTON: Form for the last question.

1 BY MS. [REDACTED]:  
 2 Q. Among those pictures in Ms. Maxwell's  
 3 computer of the young women who came there to give  
 4 massages, were the nude photographs in that group  
 5 taken, did they appear to be taken in the house?  
 6 MR. CRITTON: Form.  
 7 THE WITNESS: No, ma'am.  
 8 BY MS. [REDACTED]:  
 9 Q. You said before they appeared to be taken  
 10 at receptions or banquets?  
 11 A. Yes, ma'am.  
 12 Q. And I'm a little confused about how they  
 13 were casual and taken while the girls were nude at  
 14 receptions and banquets?  
 15 A. What I saw there were parties in Russia,  
 16 Eastern Europe, I don't know which country, but  
 17 there were also pictures of nude girls in a  
 18 shower, for instance, in a shower stall.  
 19 Q. You said for instance, so were there  
 20 other places other than the shower?  
 21 A. Yes, ma'am.  
 22 Q. Like what?  
 23 A. Gatherings, you know, in a party. You  
 24 could tell everybody is smiling so I believe it  
 25 was a place where they're having fun.

1 Q. And was there more than one during the  
 2 time you were there?  
 3 A. Yes.  
 4 Q. Do you remember their names?  
 5 A. One wa [REDACTED] I don't remember the other  
 6 one name.  
 7 Q. Did they appear to be American?  
 8 A. Yes, ma'am.  
 9 Q. Do you know the name [REDACTED]?  
 10 A. Could be, ma'am, but I'm not sure of his  
 11 last name.  
 12 Q. Do you have any idea where those chefs  
 13 had gotten their training?  
 14 A. [REDACTED] was working in San Francisco when  
 15 he was hired.  
 16 Q. Was he still there when you left Mr.  
 17 Epstein's employ?  
 18 A. Yes, to my knowledge, ma'am.  
 19 Q. Did the chef interact with the girls who  
 20 came to give massages?  
 21 A. In the kitchen, yes.  
 22 Q. And did he often offer them some food  
 23 while they were there?  
 24 A. Yes, ma'am.  
 25 Q. Were there occasions where a girl came to

1 Q. Were any of those pictures, if you  
 2 recall, taken in the cabana?  
 3 A. I don't remember.  
 4 Q. Do you recall there being parties and  
 5 gatherings in the cabana at the house?  
 6 A. I don't remember.  
 7 MR. CRITTON: Form.  
 8 BY MS. [REDACTED]:  
 9 Q. When Mr. Epstein entertained did you have  
 10 anything to do with seeing that the bars were  
 11 stocked and that there was food that was needed  
 12 and so forth?  
 13 MR. CRITTON: Form.  
 14 THE WITNESS: There was no alcohol in the  
 15 house, only for guests. But, yeah, he will  
 16 ask sometimes for food.  
 17 BY MS. [REDACTED]:  
 18 Q. And do you ever recall him asking for  
 19 food for parties in the cabana?  
 20 A. No, ma'am.  
 21 Q. Was there a chef at the house on El  
 22 Brillo Way when you were there?  
 23 A. I'm sorry?  
 24 Q. A chef.  
 25 A. Yes, there was.

1 give a massage accompanied by another girl, or  
 2 another person, let me say?  
 3 A. Yes, ma'am.  
 4 Q. And sometimes was that other person a  
 5 woman and sometimes a man?  
 6 A. No, ma'am, always a woman.  
 7 Q. Always a woman. Usually would it have  
 8 been a woman about the same age as the young woman  
 9 coming to give the massage?  
 10 MR. CRITTON: Form.  
 11 THE WITNESS: Yes, ma'am.  
 12 BY MS. [REDACTED]:  
 13 Q. Were you ever told by Ms. [REDACTED] to pay  
 14 the person who came who didn't give a massage?  
 15 A. Yes, ma'am.  
 16 Q. Do you recall how much you paid that  
 17 person?  
 18 A. Yes, ma'am.  
 19 MR. CRITTON: Form.  
 20 BY MS. [REDACTED]:  
 21 Q. How much?  
 22 A. 300 to 500 dollars.  
 23 Q. Were some of those young women who  
 24 brought other young women for massages regulars, I  
 25 mean, did they regularly bring other young women?

1 MR. CRITTON: Form.  
 2 THE WITNESS: Yes, ma'am.  
 3 BY MS. [REDACTED]:  
 4 Q. And were there some who maybe came just  
 5 once or twice with other young women?  
 6 A. That's correct, ma'am.  
 7 Q. Now, where would the young woman who was  
 8 bringing another young woman go during the time  
 9 the person that she brought was upstairs giving  
 10 the massage?  
 11 MR. CRITTON: Form.  
 12 THE WITNESS: I will take them to the  
 13 kitchen and [REDACTED] would take them from  
 14 there.  
 15 BY MS. [REDACTED]:  
 16 Q. Do you know where she took them?  
 17 A. No, ma'am.  
 18 Q. Were they ever taken to just sit in the  
 19 living room and wait?  
 20 MR. CRITTON: Form.  
 21 THE WITNESS: I don't know, ma'am.  
 22 BY MS. [REDACTED]:  
 23 Q. These pictures of nude young women taken  
 24 in gatherings where they were smiling, did they  
 25 appear to you to be taking part in an orgy?

1 shower, I don't know whether he ever used  
 2 plural.  
 3 BY MS. [REDACTED]:  
 4 Q. Was there more than one picture of a girl  
 5 in the shower?  
 6 A. There were two girls in the shower.  
 7 Q. Two girls in the shower together?  
 8 A. Yes, ma'am.  
 9 Q. And were those two girls engaged in  
 10 something sexual?  
 11 A. Yes, ma'am.  
 12 Q. And I may have asked you this question,  
 13 forgive me if I did, did you know those two girls?  
 14 A. No, ma'am.  
 15 Q. Did Ms. Maxwell have nude pictures of  
 16 [REDACTED] on her computer?  
 17 MR. CRITTON: Form.  
 18 THE WITNESS: I don't know, ma'am.  
 19 BY MS. [REDACTED]:  
 20 Q. Did you ever meet a young woman named  
 21 Emmy who had an association with Ms. Maxwell?  
 22 MR. CRITTON: Emmy?  
 23 MS. [REDACTED]: Emmy.  
 24 THE WITNESS: I don't remember, ma'am.  
 25 BY MS. [REDACTED]:

1 MR. CRITTON: Form.  
 2 THE WITNESS: I don't know, ma'am.  
 3 BY MS. [REDACTED]:  
 4 Q. Do you know the word cavorting?  
 5 A. No, ma'am, I don't know.  
 6 Q. I need my Thesaurus. You said they were  
 7 smiling, did they appear to be having a good time?  
 8 A. Yes, ma'am.  
 9 Q. Did they appear to be doing anything  
 10 sexual?  
 11 A. Yes, ma'am.  
 12 Q. And in these instances were there girls  
 13 doing sexual things with other girls?  
 14 A. Yes, ma'am.  
 15 Q. And I'm still talking about the pictures  
 16 on Ms. Maxwell's computer.  
 17 A. Yes, ma'am.  
 18 MR. CRITTON: You're talking about the  
 19 group shots that he's mentioned from Russia  
 20 and Eastern Europe?  
 21 MS. [REDACTED]: And girls in the shower.  
 22 MR. CRITTON: Let me object to the form  
 23 then the way you just now described that.  
 24 MS. [REDACTED]: He said for instance.  
 25 MR. CRITTON: He had said a girl in the

1 Q. Did you ever have any conversations with  
 2 Ms. Maxwell about any of the women in those  
 3 pictures?  
 4 A. No, ma'am.  
 5 Q. And did you ever have a conversation with  
 6 [REDACTED] about any of the pictures of the  
 7 girls in her computer?  
 8 A. No, ma'am.  
 9 Q. You were asked last time about the creams  
 10 and lotions that Mr. Epstein typically had  
 11 available to him and you said you thought there  
 12 was a favorite one but you couldn't remember it.  
 13 A. Spa.  
 14 Q. Spa, you did say Spa.  
 15 A. Yeah.  
 16 Q. Thank you.  
 17 Where did the stairway from the kitchen  
 18 lead -- to where did it lead?  
 19 A. To the second floor between the first and  
 20 second bedrooms.  
 21 Q. Were either of those bedrooms the master  
 22 bedroom?  
 23 A. No, ma'am.  
 24 Q. Could one go up that staircase through --  
 25 could one go up that staircase and reach the

1 master bedroom?  
 2 A. Yes, ma'am.  
 3 Q. And how would you do that? If you want  
 4 to turn the page over for the upstairs you could  
 5 do that.  
 6 A. Okay.  
 7 MR. CRITTON: Are you going to mark this  
 8 as an exhibit?  
 9 MS. [REDACTED]: Uh-huh.  
 10 MR. CRITTON: Would that be Exhibit 3?  
 11 MR. [REDACTED]: I think so.  
 12 (Exhibit No. 3 was marked for  
 13 Identification.)  
 14 THE WITNESS: This is the master bedroom,  
 15 master bath, and there were one, two -- the  
 16 rest of the bedrooms were here and the  
 17 master bedroom was here. This is master  
 18 bath one and master bath two.  
 19 So the staircase came to the second floor  
 20 like this and it was between the first and  
 21 second bedroom. And you could go through  
 22 here and you enter a foyer with double doors  
 23 here, double doors here, and you enter the  
 24 master bedroom.  
 25 BY MS. [REDACTED]:

1 Q. All right. How would you get to the  
 2 master bathroom on that end?  
 3 A. You go through these double doors, go  
 4 around the bed and you gain access to the master  
 5 bedroom -- master bathroom, sorry.  
 6 Q. And then there was another master  
 7 bathroom on the other side of the room?  
 8 A. Yes, ma'am.  
 9 Q. Where generally did the massages take  
 10 place?  
 11 A. Right here, ma'am.  
 12 Q. And is that in the master bathroom?  
 13 A. Master bathroom, yes.  
 14 Q. Do you recall what color the tile was in  
 15 that bathroom?  
 16 A. There was carpet.  
 17 Q. Was there tile on the walls or marble  
 18 or --  
 19 A. There was a sauna here with marble but  
 20 outside the sauna everything was carpet, and the  
 21 walls, they didn't have any tile. Oh yes, I will  
 22 say four feet off the floor they will have marble.  
 23 Q. And do you remember what color marble it  
 24 was?  
 25 A. White.

1 Q. White. By the way, I have some more  
 2 water, would you like some?  
 3 A. Thank you, ma'am.  
 4 Q. I figure if I'm a little dry you may be  
 5 too.  
 6 I believe one of the items that you  
 7 mentioned that sometimes had to be picked up after  
 8 girls were there giving massages was a back  
 9 massager.  
 10 A. Yes, ma'am.  
 11 Q. Could you describe that for me, please?  
 12 A. It was a piece about this big.  
 13 Q. Would you say that's about 18 inches?  
 14 A. Yes, ma'am. And two prongs with the  
 15 rubber tips and a cord.  
 16 Q. Okay.  
 17 A. Or it could be detached too.  
 18 Q. Do you have any recollection of what make  
 19 that was?  
 20 A. No, ma'am.  
 21 Q. Were there any other massagers that you  
 22 recall seeing there regularly?  
 23 A. Those are the ones I remember. I think  
 24 they are from Sharper Image, but I don't --  
 25 Q. Okay. Were there often girls around the

1 pool at the house?  
 2 A. Yes, ma'am.  
 3 Q. And were these sometimes the same girls  
 4 that came to give massages?  
 5 A. Yes, ma'am.  
 6 Q. Were there girls in addition to those who  
 7 came to give massages who hung around the pool?  
 8 A. The girls who were staying at the house.  
 9 Q. Okay. And so they weren't girls who just  
 10 regularly came to hangout around the pool?  
 11 A. No, ma'am.  
 12 MS. [REDACTED]: Excuse me. Can we go off the  
 13 record for a minute?  
 14 (Thereupon, a recess was had.)  
 15 THE VIDEOGRAPHER: We're back on the  
 16 record with tape number two.  
 17 BY MS. [REDACTED]:  
 18 Q. Mr. Rodriguez, did you receive a subpoena  
 19 that asked you to bring documents with you to the  
 20 deposition?  
 21 A. Yes, ma'am.  
 22 Q. And did you bring any with you?  
 23 A. I couldn't find anything at my house.  
 24 Q. Okay. I believe we talked about a  
 25 journal that you kept, and you looked for that?

1 A. Yes, ma'am.  
 2 Q. And you couldn't find it?  
 3 A. I give it to Detective [REDACTED]  
 4 Q. [REDACTED]?  
 5 A. Yes, ma'am.  
 6 Q. You mentioned that you called Mr.  
 7 Jean-Luc Bernell about a recommendation when you  
 8 were looking for a job.  
 9 A. Yes, ma'am.  
 10 Q. And did you know him from his visits in  
 11 the home?  
 12 A. Yes, ma'am.  
 13 Q. Did you say that his wife's name was Eva?  
 14 MR. CRITTON: Form.  
 15 THE WITNESS: No, ma'am.  
 16 BY MS. [REDACTED]:  
 17 Q. Do you know what his wife's name was?  
 18 A. Eva was a model, a former model from  
 19 years past who was friend of Mr. Epstein.  
 20 Q. Do you know if she was married to Glenn  
 21 Dubin? Do you know Mr. Dubin?  
 22 MR. CRITTON: Form.  
 23 THE WITNESS: I believe, yeah, I'm not  
 24 sure, ma'am.  
 25 BY MS. [REDACTED]:

1 Q. Is she now a doctor?  
 2 A. No, she was a model, her husband could be  
 3 a doctor but I don't think she is.  
 4 Q. Okay. So is Jean-Luc Bernell married; to  
 5 your knowledge?  
 6 A. I don't know, ma'am.  
 7 Q. I think I must have gotten confused  
 8 because we were talking about the picture in the  
 9 house of the little girl who is lifting up her  
 10 skirt or her underpants, I'd forgotten what it  
 11 was.  
 12 A. Yes, ma'am.  
 13 MR. CRITTON: Form.  
 14 BY MS. [REDACTED]:  
 15 Q. And I thought you said that that was  
 16 Jean-Luc's child.  
 17 A. No, ma'am, she is Mrs. Eva.  
 18 Q. Eva's child?  
 19 A. Yes, ma'am.  
 20 Q. And she is Jeffrey Epstein's Goddaughter?  
 21 A. Yes, ma'am.  
 22 Q. Do you know where she and her mother  
 23 live?  
 24 A. They live in Manhattan.  
 25 MR. CRITTON: Form.

1 BY MS. [REDACTED]:  
 2 Q. Did they ever visit Mr. Epstein at the  
 3 home when you were there?  
 4 A. Yes, ma'am.  
 5 Q. How old was the little girl at that time?  
 6 A. Eight years old.  
 7 Q. Did the girl's father come to visit as  
 8 well?  
 9 A. Yes, ma'am.  
 10 Q. And do you remember his name?  
 11 A. No, ma'am.  
 12 Q. Do you remember hearing anything about  
 13 what he does for a living?  
 14 A. No, ma'am.  
 15 Q. Can you describe him?  
 16 A. Tall, American born, I will say 50 years  
 17 old.  
 18 Q. What color hair did he have?  
 19 A. At that time it was black with a few  
 20 white hairs.  
 21 Q. Were there drawings of nude women in the  
 22 house?  
 23 A. No, ma'am.  
 24 Q. Were there paintings of nude women in the  
 25 house?

1 A. Yes, ma'am.  
 2 Q. Did any of those appear to be  
 3 Ms. Maxwell?  
 4 A. Yes, ma'am.  
 5 Q. You mentioned that [REDACTED] who was still  
 6 working there when you left --  
 7 A. Yes, ma'am.  
 8 Q. -- was a very religious woman --  
 9 A. Yes, ma'am.  
 10 Q. -- and would sometimes be upset about  
 11 seeing pictures of nude girls or having to pick up  
 12 sex toys, et cetera.  
 13 MR. CRITTON: Form.  
 14 THE WITNESS: Yes, ma'am.  
 15 BY MS. [REDACTED]:  
 16 Q. And you said that you remembered her  
 17 crying because there was a picture of the Pope  
 18 next to a picture of a naked girl.  
 19 MR. CRITTON: Form.  
 20 THE WITNESS: Yes, ma'am.  
 21 BY MS. [REDACTED]:  
 22 Q. Do you know who that naked girl was?  
 23 A. I don't remember, ma'am.  
 24 Q. I believe David Copperfield's name came  
 25 up in the last deposition as someone who would

1 call or visit.  
 2 A. Yes, ma'am.  
 3 Q. Were you ever there when he visited?  
 4 A. Yes, ma'am.  
 5 Q. And do you remember did he spend the  
 6 night?  
 7 A. No, ma'am.  
 8 Q. Did he come for dinner?  
 9 A. Yes, ma'am.  
 10 Q. Did that happen more than one time when  
 11 you were there?  
 12 A. Yes, ma'am.  
 13 Q. Do you remember whether or not any of the  
 14 young ladies who came to perform massages also  
 15 stayed for dinner?  
 16 A. No, ma'am.  
 17 MR. CRITTON: Just so it's clear, no, you  
 18 don't remember?  
 19 THE WITNESS: No, they were not there.  
 20 BY MS. [REDACTED]:  
 21 Q. Did any of them ever stay for dinner?  
 22 Just any dinner, not the dinner with David  
 23 Copperfield.  
 24 A. You said they, the girls?  
 25 Q. The girls who came to give massages.

1 we are start with it and then you can use  
 2 the initials after that for all I care.  
 3 BY MS. [REDACTED]:  
 4 Q. Do you remember a girl named [REDACTED]?  
 5 A. I heard that name.  
 6 Q. So I will refer to her as [REDACTED] from now  
 7 on.  
 8 I'm going to show you a document, we can  
 9 mark it but I'm not going to leave it. I'm going  
 10 to take the exhibit.  
 11 MR. CRITTON: Wait a minute. Are you  
 12 going to make a copy of it?  
 13 MS. [REDACTED]: No, I'm not going to leave a  
 14 copy.  
 15 MR. CRITTON: All right. Then I object  
 16 to you showing him a document that is not  
 17 part of this record.  
 18 MS. [REDACTED]: Then object and the Judge can  
 19 rule, but I'm going to ask him to look at  
 20 this document. We can mark it as Exhibit 4.  
 21 THE WITNESS: Oh yeah.  
 22 BY MS. [REDACTED]:  
 23 Q. Do you remember this young woman?  
 24 A. Yes.  
 25 MR. CRITTON: Let's see.

1 A. No, ma'am.  
 2 Q. In the earlier part of the deposition you  
 3 stated that you didn't drive the girls but then  
 4 later you remembered that you did sometimes have  
 5 to drive them.  
 6 A. Yes, ma'am.  
 7 Q. Do you remember a young woman named [REDACTED]  
 8 who came there?  
 9 A. Yes, I do remember.  
 10 MS. [REDACTED]: And again, we're going to  
 11 have the same agreement, if we use a girl's  
 12 name it will be shown on the transcript as  
 13 the initials only.  
 14 MR. [REDACTED]: Agreed.  
 15 MR. CRITTON: Why don't you give him the  
 16 initials? Because in reading the transcript  
 17 we could end up with 25 [REDACTED] or [REDACTED] or [REDACTED]  
 18 in looking at it by just using the first, I  
 19 am just offering a suggestion because none  
 20 of us will remember who in the heck these  
 21 people are.  
 22 MS. [REDACTED]: So you're asking me to give  
 23 both names so we would have two initials?  
 24 MR. CRITTON: He may not recognize either  
 25 the first or the second name but as long as

1 BY MS. [REDACTED]:  
 2 Q. And was she one of the ones who came to  
 3 the house to give massages?  
 4 A. Yes, ma'am.  
 5 Q. Do you remember her name?  
 6 A. No, ma'am.  
 7 Q. Is it possible she was [REDACTED].?  
 8 MR. CRITTON: Form.  
 9 THE WITNESS: I hear that name but I  
 10 cannot say for sure.  
 11 BY MS. [REDACTED]:  
 12 Q. Okay. Did she come often to the house?  
 13 A. Yes, ma'am.  
 14 Q. Were you ever aware of her being  
 15 photographed?  
 16 A. No, ma'am.  
 17 Q. I asked you about David Copperfield  
 18 before and let me ask you again. In thinking  
 19 about it is it possible that you remember that she  
 20 was there for dinner with David Copperfield?  
 21 MR. CRITTON: Form, asked and answered.  
 22 THE WITNESS: Possible, yes, ma'am.  
 23 BY MS. [REDACTED]:  
 24 Q. Did you ever meet her parents?  
 25 A. No, ma'am.

1 Q. I'll take the pictures back.  
 2 MR. CRITTON: Just put on the record that  
 3 my client obviously could be here at the  
 4 deposition, or anyone's clients could be  
 5 here at the deposition and have full access  
 6 to the information that's being provided, by  
 7 taking the photograph back I'm not going to  
 8 be able to provide to that client, nor will  
 9 I have possession of it so I could discuss  
 10 that photograph, it's now been explored with  
 11 this witness.  
 12 (Exhibit No. 4 was marked for  
 13 Identification.)  
 14 BY MS. [REDACTED]:  
 15 Q. Do you recall that on occasion you drove  
 16 this young woman to or from Mr. Epstein's house?  
 17 MR. CRITTON: Form.  
 18 THE WITNESS: I don't remember, ma'am.  
 19 BY MS. [REDACTED]:  
 20 Q. Do you ever recall driving her by the  
 21 airport and showing her Jeffrey Epstein's plane?  
 22 MR. CRITTON: Form.  
 23 THE WITNESS: Yes, ma'am.  
 24 BY MS. [REDACTED]:  
 25 Q. Do you ever recall one time perhaps by

1 BY MS. [REDACTED]:  
 2 Q. You mentioned last time that Mr. Epstein  
 3 asked you to go and rent a car for one of the  
 4 girls who gave him massages.  
 5 A. Right.  
 6 Q. Do you know if that was [REDACTED].?  
 7 A. I'm not hundred percent sure, ma'am.  
 8 Q. Do you know how long that girl kept the  
 9 car?  
 10 A. A couple of months.  
 11 Q. Did she bring it back to you or did she  
 12 turn it in at the agency?  
 13 A. She brought it back to me.  
 14 Q. Did you ever have any knowledge of Mr.  
 15 Epstein helping this girl with her college  
 16 applications?  
 17 MR. CRITTON: Form.  
 18 THE WITNESS: I believe Mr. Epstein was  
 19 giving her money for good grades, that's  
 20 what I -- she told me, I understood that.  
 21 BY MS. [REDACTED]:  
 22 Q. Was this the girl that you were  
 23 instructed by Mr. Epstein to take roses to at the  
 24 completion of her graduation?  
 25 A. I don't remember exactly, ma'am, but

1 accident seeing her naked?  
 2 MR. CRITTON: Form.  
 3 THE WITNESS: Yes, ma'am.  
 4 BY MS. [REDACTED]:  
 5 Q. How did that happen?  
 6 A. I told [REDACTED] to go upstairs because I  
 7 saw Mr. Epstein leave, so we rushed upstairs to  
 8 clean and this girl was sleeping naked in the  
 9 sauna, she fall asleep there, there was nobody  
 10 else there.  
 11 MR. CRITTON: Can I ask just for  
 12 clarification, is he talking now about the  
 13 person he thought was [REDACTED] but he wasn't sure  
 14 or the person that's in photo four?  
 15 MS. [REDACTED]: The person that's in  
 16 photo four.  
 17 THE WITNESS: Yes.  
 18 MR. CRITTON: Okay, thank you.  
 19 BY MS. [REDACTED]:  
 20 Q. And just so we're clear, do you think  
 21 this is [REDACTED], but you're not sure?  
 22 MR. CRITTON: Form.  
 23 THE WITNESS: I heard the name so many  
 24 times but I know I took her, you know, in  
 25 the Suburban, so it was her.

1 there were so many faces, you know, but I cannot  
 2 say a hundred percent.  
 3 Q. But it's possible that this is the same  
 4 girl?  
 5 A. Yes, ma'am.  
 6 MR. CRITTON: Form.  
 7 BY MS. [REDACTED]:  
 8 Q. And thinking about it carefully you still  
 9 believe she kept that car for two months?  
 10 A. Yes, ma'am.  
 11 Q. Do you recall an encounter with this same  
 12 girl when you saw a strange vehicle in the  
 13 driveway one day?  
 14 MR. CRITTON: Form.  
 15 THE WITNESS: Yes, ma'am.  
 16 BY MS. [REDACTED]:  
 17 Q. And what happened then?  
 18 A. I saw, you know, an old car that didn't  
 19 belong to the house so I went to the police  
 20 department, so the police department follow me and  
 21 they with flashlight they went into the driver and  
 22 ask her because she was -- I forgot I was suppose  
 23 to pay her but it was late at night, 8:00 p.m.,  
 24 something like that, 8:30, so I recognize her and  
 25 I said to the police department I know this girl,

1 so I paid her and she went off.  
 2 Q. Do you recall how much you paid her?  
 3 A. Between two and 300 dollars, I believe.  
 4 Q. How often was Mr. Epstein in Palm Beach  
 5 during the period you were there?  
 6 A. He will stay two months -- I mean, two  
 7 weeks out of the month.  
 8 MS. [REDACTED]: If I could please have these  
 9 marked as Exhibits 5 through 8.  
 10 (Exhibit No's. 5, 6, 7, and 8 were  
 11 marked for Identification.)  
 12 MR. CRITTON: Do you want them in the  
 13 order you gave them?  
 14 MS. [REDACTED]: It doesn't matter.  
 15 BY MS. [REDACTED]:  
 16 Q. Would you look, please, at the exhibit  
 17 that has been marked as number -- what is it;  
 18 five?  
 19 A. Five.  
 20 Q. Five. Do you recall seeing this young  
 21 woman at the house when you were there?  
 22 A. Yes, ma'am.  
 23 Q. And do you recall her name?  
 24 A. No, ma'am.  
 25 MR. CRITTON: Let the record reflect it's

1 Q. Possibly but you're not sure?  
 2 A. Yes, ma'am.  
 3 Q. Okay. Would you look, please, at the two  
 4 photographs that have been marked as Composite  
 5 Exhibit 7?  
 6 Do you recall seeing this girl come to  
 7 the house to give massages?  
 8 A. I don't remember, ma'am.  
 9 Q. Okay. That's perfectly all right.  
 10 MR. CRITTON: Who does that purport to  
 11 be; number seven?  
 12 MS. [REDACTED]: [REDACTED].  
 13 BY MS. [REDACTED]:  
 14 Q. The last one is exhibit what?  
 15 A. Eight.  
 16 Q. Eight. Do you recall seeing this girl  
 17 come to the house to give massages?  
 18 A. No, ma'am.  
 19 Q. Okay.  
 20 MS. [REDACTED]: I don't have any other  
 21 questions right now. If anybody else wants  
 22 to go, if I could just reserve that if I  
 23 find something.  
 24 MR. [REDACTED]: I don't know who's next,  
 25 this is [REDACTED], I have a couple of

1 written on the photographs is a name, so  
 2 it's already being suggested to him, I think  
 3 that's inappropriate.  
 4 MS. [REDACTED]: It shouldn't be there, I'm  
 5 sorry. If I can erase it I will, I didn't  
 6 realize it was on there.  
 7 MR. CRITTON: It's on all of them, Cathy.  
 8 MS. [REDACTED]: You're right, sorry.  
 9 BY MS. [REDACTED]:  
 10 Q. Looking at the girl in number five, if I  
 11 told you that her name was [REDACTED], would that  
 12 refresh your recollection as to who she was?  
 13 A. No, ma'am.  
 14 Q. Would you look, please, at the girl in  
 15 the picture that's been marked as Exhibit 6?  
 16 Do you ever recall seeing that girl come  
 17 to the house to give massages?  
 18 A. I cannot guarantee that, Ma'am.  
 19 Q. I understand, it's not the best picture  
 20 in the world either, you can't see.  
 21 MR. [REDACTED]: I don't know that I  
 22 understood the answer. You can't guarantee  
 23 it?  
 24 THE WITNESS: I cannot guarantee it, sir.  
 25 BY MS. [REDACTED]:

1 questions.  
 2 MR. CRITTON: All right, you're up.  
 3 MR. [REDACTED]: Hold on one second,  
 4 [REDACTED], they're going to put a microphone  
 5 by the phone.  
 6 MR. [REDACTED]: I only have a couple of  
 7 questions.  
 8 (Thereupon, an interruption was had.)  
 9 THE VIDEOGRAPHER: We're back on the  
 10 record.  
 11 EXAMINATION  
 12 BY MR. [REDACTED]:  
 13 Q. Back on the record. Sir, my name is  
 14 [REDACTED] and I just have a couple of  
 15 questions for you.  
 16 Do you remember a young girl coming to  
 17 the house by the name of [REDACTED] or [REDACTED]  
 18 A. I hear that name, sir.  
 19 Q. You know the name, does that ring a bell  
 20 at all?  
 21 A. I hear the name in the house.  
 22 Q. Can you associate that name with a girl?  
 23 A. Yes, sir.  
 24 Q. I'm sorry?  
 25 A. Yes, sir, yes, I do.

1 Q. Do you remember whether she came to the  
 2 house on more than one occasion?  
 3 A. I heard her name several times from  
 4 [REDACTED] sir, but beyond that I cannot say anything  
 5 else.  
 6 Q. Okay. Who have you talked to about your  
 7 knowledge of Mr. Epstein in the last year?  
 8 A. My wife.  
 9 Q. Anyone else?  
 10 A. No, sir.  
 11 Q. Well, you talked to Mr. Critton.  
 12 A. We have a conversation in West Palm  
 13 Beach.  
 14 Q. Yes. So you talked to your wife, you  
 15 talked to Mr. Critton?  
 16 A. Yes.  
 17 Q. Had you talked to anyone else in the last  
 18 year about Epstein?  
 19 A. No.  
 20 Q. Did you talk to Mr. Goldberger?  
 21 A. Yeah, I called Mr. Goldberger first  
 22 before I talked to Mr. Critton.  
 23 Q. Okay. So we have your wife, we have Mr.  
 24 Critton, and we have Mr. Goldberger.  
 25 Do we have anyone else that you talked to

1 A. I give him a list of notes that I used to  
 2 take from frequent people -- I mean, people who  
 3 used to frequent the house and -- I'm sorry, it's  
 4 been a few years, I don't remember, but it was  
 5 those years, like it was a file with my personal  
 6 notes because he told me it was very important and  
 7 he kind of said can I borrow this from you, and he  
 8 still has those documents, sir.  
 9 Q. So even though they pertain to Mr.  
 10 Epstein you kept those notes at your residence?  
 11 A. Yes, sir.  
 12 Q. Okay. Where in your residence did you  
 13 keep those notes before you gave them to the  
 14 Detective?  
 15 A. In my bedroom.  
 16 Q. Did you have a file cabinet or --  
 17 A. No.  
 18 Q. -- chester drawers or something?  
 19 A. No, they were laying next to some other  
 20 papers that I have.  
 21 Q. Did the other papers pertain to Mr.  
 22 Epstein?  
 23 A. No, no, nothing else related to Mr.  
 24 Epstein.  
 25 Q. I'm just confused as to why you told us

1 in the last year?  
 2 A. No, sir.  
 3 Q. How about Mr. Epstein of course?  
 4 A. No.  
 5 Q. Where did you usually keep the journal  
 6 with the names of the girls, in what part of the  
 7 house?  
 8 A. In the staff house.  
 9 Q. Sorry?  
 10 A. The staff house, the guest house.  
 11 Q. Right. But you said you had a journal at  
 12 your own residence with the names of the girls.  
 13 A. I give the whole journal and all the  
 14 information regarding this case, sir, to Detective  
 15 [REDACTED] sir.  
 16 Q. Okay. And the materials that you gave to  
 17 the Detective, were they kept -- were any of them  
 18 kept at your own personal residence?  
 19 A. Yes, they were with me, sir.  
 20 Q. Okay. When you gave the materials to the  
 21 Detective, did all of the materials you gave to  
 22 him come from your residence?  
 23 A. Yes.  
 24 Q. Do you remember exactly what you gave to  
 25 him?

1 before that you had a journal at home and today  
 2 you say that you gave everything to the Detective.  
 3 MR. CRITTON: Form. You also may have  
 4 missed a portion of his earlier testimony if  
 5 you couldn't hear something, but go ahead.  
 6 MR. [REDACTED]: Most likely.  
 7 THE WITNESS: What I said was I thought I  
 8 had some information, and then I look with  
 9 my daughter and we couldn't find anything,  
 10 and I remember now that I put everything in  
 11 the file that I give to Detective [REDACTED].  
 12 BY MR. [REDACTED]:  
 13 Q. Did anyone help you assemble those papers  
 14 to give to the Detective?  
 15 A. No, sir.  
 16 MR. [REDACTED]: I don't have any other  
 17 questions.  
 18 CROSS EXAMINATION  
 19 BY MR. CRITTON:  
 20 Q. Mr. Rodriguez, my name is Bob Critton and  
 21 I represent Mr. Epstein as you're aware, I have a  
 22 few questions for you.  
 23 What I would like to remind you at the  
 24 start of this is if you know something, tell us,  
 25 if you don't know something tell us that.

1 You're not required to speculate, you're  
 2 not required to guess, you're not required to  
 3 assume because some lawyers ask you a leading  
 4 question or suggested in a report or like the  
 5 police report like Mr. [REDACTED] and Mr. [REDACTED]  
 6 did, that did you tell the police officers X, Y,  
 7 or Z without showing you the statement. You're  
 8 not required to guess, I want personal knowledge,  
 9 not speculation. Do you understand?  
 10 A. Yes, I do.  
 11 Q. All right. Now, when Mr. [REDACTED] and --  
 12 Mr. [REDACTED] is here today for Mr. [REDACTED],  
 13 but you remember a lawyer asked you some questions  
 14 last time you were here?  
 15 A. Yes.  
 16 Q. That is he started and he went on for a  
 17 few hours. Do you recall that?  
 18 A. Yes, I remember.  
 19 Q. He asked you do you remember telling the  
 20 police officer Y, X, or Z.  
 21 Do you remember that? Do you remember  
 22 that's how he phrased his question?  
 23 A. Yes, yes.  
 24 Q. He never showed you a statement that you  
 25 made to the police department; did he?

1 marked up, no, you can't.  
 2 MR. CRITTON: I just want to show him.  
 3 Thank you, Cathy.  
 4 BY MR. CRITTON:  
 5 Q. This is the first what Ms. [REDACTED] was kind  
 6 enough to provide is the first part of your  
 7 deposition, it was transcribed by the court  
 8 reporter and provided by all counsel.  
 9 Do you understand that?  
 10 A. Yes, I understand that.  
 11 Q. And no one has provided that to you yet  
 12 today; have they?  
 13 A. No.  
 14 Q. Now, I think you told us that with the  
 15 police officers you gave a taped statement.  
 16 Did I understand you correctly?  
 17 A. Yes.  
 18 Q. And the only conversation that you had  
 19 with the police officers, and it may have been a  
 20 state attorney, it was somebody named Ms. Weiss  
 21 who I think was referenced in the questions, the  
 22 only time that you talked with at least Officer  
 23 [REDACTED] and the State Attorney's Office from Palm  
 24 Beach County was in a taped statement.  
 25 Is that correct?

1 A. I'm sorry?  
 2 Q. He didn't show you a document that said,  
 3 question, you know, what is your name; answer, my  
 4 name is Alfredo Rodriguez --  
 5 MR. [REDACTED]: Object to the form of the  
 6 question.  
 7 MR. CRITTON: You need to let me finish  
 8 it first.  
 9 MR. [REDACTED]: I'm sorry, I thought you  
 10 were.  
 11 BY MR. CRITTON:  
 12 Q. He never showed you a statement of what  
 13 the question was and the answer that you gave.  
 14 True?  
 15 MR. [REDACTED]: Object to the form of the  
 16 question.  
 17 THE WITNESS: I don't exactly understand  
 18 your question.  
 19 BY MR. CRITTON:  
 20 Q. Do you know what a deposition is?  
 21 A. Yes, I am.  
 22 Q. That's what you're doing here.  
 23 MR. CRITTON: Could I borrow your  
 24 deposition for just a minute?  
 25 MR. [REDACTED]: The transcript? It's

1 A. No.  
 2 Q. Did you talk with them separate and apart  
 3 from that?  
 4 A. Yes, I did.  
 5 Q. Okay. Did they tape that statement?  
 6 A. No.  
 7 Q. You told us you also spoke with  
 8 representatives of the FBI?  
 9 A. Yes.  
 10 Q. Okay. And you distinguished between the  
 11 FBI and between Officer [REDACTED]?  
 12 A. Yes.  
 13 Q. So how many times did Officer [REDACTED], or  
 14 Detective [REDACTED], I think he's from the Palm  
 15 Beach Police Department speak with you?  
 16 A. Like three or four times.  
 17 Q. But he only took one statement?  
 18 A. One taped.  
 19 Q. I'm sorry, one taped statement?  
 20 A. Yes.  
 21 Q. All right. So as to whether or not if  
 22 you said something to Officer [REDACTED] or not that  
 23 you would be able to confirm, that would only have  
 24 been in a taped statement, one taped statement out  
 25 of the three, approximately three times he spoke

1 with you.  
 2 MR. [REDACTED]: Form.  
 3 MR. [REDACTED]: Form.  
 4 BY MR. CRITTON:  
 5 Q. Is that correct?  
 6 A. Yes, correct.  
 7 MR. [REDACTED]: Object to the form.  
 8 MR. [REDACTED]: Join.  
 9 BY MR. CRITTON:  
 10 Q. And when we were here, I think it was  
 11 last week or the last ten days anyway -- I could  
 12 tell you. On July 29th of this year, and Mr.  
 13 [REDACTED] started with your deposition and then  
 14 others asked questions, when Mr. [REDACTED] and I  
 15 think Mr. [REDACTED] asked questions about did you  
 16 tell Officer [REDACTED] X, Y, or Z, they didn't show  
 17 you a statement, they didn't give you like a  
 18 transcript like this and say see what the question  
 19 and see what the answer is?  
 20 A. No.  
 21 MR. [REDACTED]: Form.  
 22 MR. [REDACTED]: Object to the form of the  
 23 question.  
 24 BY MR. CRITTON:  
 25 Q. And you haven't had an opportunity to see

1 Q. When Officer [REDACTED] took -- spoke with  
 2 you on those approximately two times when he did  
 3 not take a taped statement, did he ever present  
 4 anything for you, anything in writing that he had  
 5 written to say, Mr. Rodriguez, I would like you to  
 6 review this to make certain that I took down  
 7 correctly what you said?  
 8 A. No, sir.  
 9 Q. If he had offered to do that would you  
 10 have read what he wrote down to determine whether  
 11 or not he took down that which you had said or  
 12 told him?  
 13 MR. [REDACTED]: Object to the form.  
 14 THE WITNESS: Probably I will read it  
 15 first.  
 16 BY MR. CRITTON:  
 17 Q. All right. And if in fact he had  
 18 recorded something incorrectly or recorded in a  
 19 particular way that he wanted it phrased and it  
 20 was not accurate, would you have told him that?  
 21 MR. [REDACTED]: Object to the form.  
 22 THE WITNESS: No, I never told him that.  
 23 BY MR. CRITTON:  
 24 Q. Listen to my question.  
 25 If he, Officer [REDACTED], had taken down

1 your taped statement since you gave it many years  
 2 ago?  
 3 A. No, sir.  
 4 Q. Would you agree that your taped statement  
 5 would probably be a little more accurate than your  
 6 testimony today because of the time period that  
 7 has transpired?  
 8 A. That's correct.  
 9 MR. [REDACTED]: Object to the form.  
 10 MR. [REDACTED]: Object to the form of the  
 11 question.  
 12 BY MR. CRITTON:  
 13 Q. When you spoke with the FBI over at  
 14 Greens -- I think it was Greens Pharmacy?  
 15 A. Yes.  
 16 Q. Did they take a statement from you, that  
 17 is, did they have a tape recorder or did they just  
 18 make notes?  
 19 A. They took notes.  
 20 Q. All right. Did you sign anything?  
 21 A. No, sir.  
 22 Q. That is like did they take notes of what  
 23 you said and then you signed it to say yep, that  
 24 accurately reflects what I said?  
 25 A. No, I didn't sign anything.

1 what you said and it was not accurate, that is, he  
 2 put his interpretation of what you said, would you  
 3 have told him that's not accurate, Officer  
 4 [REDACTED]?  
 5 MR. [REDACTED]: Form.  
 6 MR. [REDACTED]: Object to the form.  
 7 THE WITNESS: I will tell him.  
 8 MR. CRITTON: Go ahead and change. We're  
 9 going to change the tape. We do have time.  
 10 Cathy, could I borrow back the  
 11 photographs, please?  
 12 While you're giving me those back, would  
 13 it be correct that you're going to keep --  
 14 you took as you did with photograph  
 15 number four you took back five, six, seven,  
 16 and eight, and you're going to keep those  
 17 and not allow me or anyone else to have a  
 18 copy of them?  
 19 MS. [REDACTED]: Yes.  
 20 MR. CRITTON: You're going to be equally  
 21 restrictive: right?  
 22 MS. [REDACTED]: Right.  
 23 MR. CRITTON: All right. Thank you.  
 24 BY MR. CRITTON:  
 25 Q. You were shown photograph five of a lady,

1 ■■■, and I think you told us that you had seen  
 2 her, you recognized her photograph.  
 3 A. Yes, I did.  
 4 Q. On how many occasions did you ever see  
 5 her at the Epstein home?  
 6 A. More than three times.  
 7 Q. More than three?  
 8 A. Yes, sir.  
 9 Q. That's as accurate as you can be?  
 10 A. Yes.  
 11 Q. More than three?  
 12 A. More than three.  
 13 Q. Whether it was four or five you don't  
 14 know, but more than three?  
 15 A. More than three, sir.  
 16 Q. In terms of ■■■'s age, did you ever ask  
 17 her what her age was?  
 18 A. No, sir.  
 19 Q. Did she appear to you to be someone at  
 20 least from seeing her and recalling her that she  
 21 appeared at least to you to be while a young woman  
 22 appeared to be someone who was 18 or older?  
 23 A. No, sir.  
 24 Q. Okay. Well, did you ever say anything to  
 25 the police or did you ever -- were you ever

1 concerned about that such that you told someone?  
 2 A. No, sir.  
 3 Q. Haven't you told the police, sir -- let  
 4 me strike that, let me ask it this way.  
 5 In your taped statement that you gave to  
 6 the police did you not tell them that all of the  
 7 girls appeared to you to be 18 or above?  
 8 A. Sir, as far as when all these actions  
 9 that were taking place I was under an environment  
 10 that I thought I was going to be -- in other  
 11 words, I was afraid of any reprisal Mr. Epstein  
 12 and Mrs. Maxwell if I say something that is any  
 13 idea of me because I have this confidentiality  
 14 agreement. What I saw that they were very young,  
 15 but I cannot say that they were 18 and old.  
 16 Q. Right. Let me just take you back to my  
 17 question again and see if you can answer my  
 18 question.  
 19 MR. CRITTON: Could you please read it  
 20 back?  
 21 (Thereupon, a portion of the record was  
 22 read by the reporter.)  
 23 THE WITNESS: I think I told the police  
 24 that.  
 25 BY MR. CRITTON:

1 Q. I'm sorry?  
 2 A. Yes, I did, I told the police.  
 3 Q. And at the time that you spoke with the  
 4 police and gave them a statement, isn't it true,  
 5 Mr. Rodriguez, that you were no longer employed by  
 6 Mr. Epstein?  
 7 A. Yes.  
 8 Q. And you understood that you were required  
 9 to tell the police officers the truth at that  
 10 time?  
 11 A. Yes.  
 12 Q. And if I understood your testimony I  
 13 believe from July 29th through today, you at no  
 14 time asked any of these girls how old they were.  
 15 True?  
 16 A. No.  
 17 Q. And as to whether the girls were under 18  
 18 or 18 or over 18, you really didn't know one way  
 19 or the other at the time. Would that be a fair  
 20 statement?  
 21 A. Yes.  
 22 MR. ■■■: Object to the form of the  
 23 question.  
 24 BY MR. CRITTON:  
 25 Q. On Exhibit 6 there is a person who's

1 covered, the lady that Ms. ■■■ asked you about I  
 2 believe was on the right-hand side of the  
 3 photograph. There is a young lady on the  
 4 left-hand side with a black hat on.  
 5 Do you recognize her at all?  
 6 A. No, I don't recognize her.  
 7 Q. Okay. Thank you. With regard to the  
 8 photograph four that you saw that you think  
 9 possibly might be ■■■, I think you told us that  
 10 you recall seeing that woman in the sauna at Mr.  
 11 Epstein's house on one occasion and she was naked.  
 12 A. Yes.  
 13 Q. Was that near the end of your employment  
 14 or the middle or the front end?  
 15 A. I saw her on January 2005, sir, and I was  
 16 terminated in March, so that was two months prior.  
 17 Q. And did you ever tell anyone that you had  
 18 seen her naked in the sauna?  
 19 A. I told ■■■.  
 20 Q. Okay. And what did ■■■ say?  
 21 A. She was surprised.  
 22 Q. Okay. Did you wake the young lady up in  
 23 the sauna?  
 24 A. No.  
 25 Q. And do you know how old the young lady

1 was at that time?  
 2 A. No, I didn't know.  
 3 Q. If I was to tell you she was born in  
 4 December of '86 which would have made her 18 at  
 5 the time, and you would say, not surprised?  
 6 MS. [REDACTED]: Objection, form.  
 7 MR. [REDACTED]: Object to the form of the  
 8 question.  
 9 MR. [REDACTED]: Join.  
 10 THE WITNESS: I would say I wouldn't  
 11 know.  
 12 BY MR. CRITTON:  
 13 Q. Other than telling [REDACTED] did you say  
 14 anything to anyone else when you saw [REDACTED], the  
 15 lady you believe was [REDACTED] naked in the sauna?  
 16 A. I believe I mentioned that to my wife.  
 17 Q. All right. Anyone else?  
 18 A. No.  
 19 Q. And did [REDACTED] continue -- assuming it was  
 20 [REDACTED], did she continue to sleep in the sauna, that  
 21 is, she didn't know you were there?  
 22 A. She never knew that I was there.  
 23 Q. She didn't at least acknowledge that she  
 24 knew. Correct?  
 25 A. Yes, correct.

1 correct?  
 2 A. I think so, sir.  
 3 Q. All right. I assume that in over the  
 4 course of your life separate and apart from your  
 5 wife you've seen a naked woman before.  
 6 A. Yes.  
 7 Q. And I assume that in your 50 some odd  
 8 years -- how old are you, sir?  
 9 A. 55.  
 10 Q. In your 55 years you've seen pictures of  
 11 naked women both photographs, paintings, statues.  
 12 Would that be a fair statement?  
 13 A. Yes.  
 14 Q. And in terms of at least in this  
 15 particular case there is all sorts of -- as you  
 16 know there is testimony, and you've been asked a  
 17 number of questions about sex related issues, that  
 18 is whether you saw in photographs or whether you  
 19 saw anyone engaged in any type of sexual activity.  
 20 Correct?  
 21 A. Correct.  
 22 Q. And I assume that you understand that men  
 23 and women -- we'll start there first, that men and  
 24 women actually do have sex in this world?  
 25 A. Yes.

1 Q. You were asked by Ms. [REDACTED] -- I'm just  
 2 going to cover a couple of things as long as I'm  
 3 staying with Cathy here -- whether [REDACTED], you  
 4 had told us something about the picture of the  
 5 Pope near a picture of a naked person, naked  
 6 woman. That's what [REDACTED] told you, you never  
 7 saw those photos. Correct?  
 8 A. I did see the pictures.  
 9 Q. You did see the pictures?  
 10 A. Yes.  
 11 Q. And the photos that you saw of the naked  
 12 woman that was near the Pope's photograph, was  
 13 that someone that you knew or just a picture of a  
 14 naked woman?  
 15 A. It was somebody -- somebody that was a  
 16 visitor in the house, but I don't know her name.  
 17 Q. And the visitors, that would have been  
 18 one of the plane women, you described the women  
 19 who came in on planes, or that they came with Mr.  
 20 Epstein from time to time?  
 21 A. They came with Mr. Epstein from time to  
 22 time.  
 23 Q. All right. And those are women that I  
 24 think you testified at your last deposition all  
 25 appeared to be in their 20's or older. Is that

1 Q. That comes as no grand surprise to you?  
 2 A. No.  
 3 Q. And you understand that people actually  
 4 enjoy sex from time to time?  
 5 A. Yes.  
 6 Q. Are you familiar with that concept at  
 7 least?  
 8 A. Yes.  
 9 Q. All right. And what may be typical  
 10 sexual activity for one man and woman, or whatever  
 11 the permutation might be, another couple, or  
 12 another man and woman, or another man or woman may  
 13 consider to be unusual or overly aggressive.  
 14 MS. [REDACTED]: Objection to form.  
 15 BY MR. CRITTON:  
 16 Q. True?  
 17 A. It depends on your point of view.  
 18 Q. That's what I mean. Everyone has a  
 19 different point of view about sex and what may be  
 20 considered typical sexual activity for someone,  
 21 someone else may consider that's a bit  
 22 adventurous?  
 23 MR. [REDACTED]: Object to the form.  
 24 THE WITNESS: Yes.  
 25 BY MR. CRITTON:

22 (Pages 351 to 354)

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 7115 Rue Notre Dame, Miami Beach, FL 33141

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1 Q. I'm not trying to make you a sex expert.  
 2 Also, I assume that when you've been in  
 3 CVS or Walgreens, for that matter Publix or Winn  
 4 Dixie I assume that you've -- I don't want to  
 5 assume anything.  
 6 Have you ever been in an aisle where  
 7 you've actually seen condoms being sold?  
 8 A. Yes.  
 9 Q. And where lubricants are being sold?  
 10 A. Yes.  
 11 Q. And as well as massage oils and other  
 12 types of oils actually are sold in those kinds of  
 13 stores?  
 14 A. Yes.  
 15 Q. And they're available so that someone  
 16 walking through Walgreens or Publix or CVS could  
 17 actually take it off the shelf, put it in their  
 18 cart, go up and pay for it and take it home?  
 19 A. Yes.  
 20 Q. All right. In the photographs that you  
 21 talked about, and if I understood you correctly,  
 22 at least during the time that you were there, Mr.  
 23 Rodriguez, in '04 and '05 there were -- you said  
 24 that there were -- I think you said downstairs --  
 25 and I'm talking about really from the kitchen area

1 you say her name?  
 2 A. Yes, her mother.  
 3 Q. Okay. It's Eva's daughter, there was a  
 4 picture where someone it looked like was pulling  
 5 on their swimsuit?  
 6 A. Yes.  
 7 Q. Do you recall ever seeing the old  
 8 Coppertone --  
 9 A. Yes.  
 10 Q. Let me ask the question. I know you know  
 11 what this is.  
 12 Have you ever seen the old Coppertone  
 13 commercials and billboards that used to be  
 14 plastered all over certainly Florida and other  
 15 places where there is a cute little girl who  
 16 appears to be two, three, four years old and  
 17 someone is pulling down at least a portion of her  
 18 swimsuit so she's exposing a small portion of her  
 19 cheek is exposed?  
 20 A. Yes.  
 21 Q. Okay. Is that what the picture of the  
 22 young girl looked like that is Mr. Epstein's God  
 23 daughter?  
 24 A. More or less, yes.  
 25 Q. All right. And downstairs in the kitchen

1 up the back stairway, or what would be the kitchen  
 2 stairway to the upper floor, there was I think you  
 3 said, but correct me if I'm wrong, please, that  
 4 you don't recall seeing there being any pictures  
 5 or photographs of any nude women. Is that  
 6 correct?  
 7 A. They were not nude women in the  
 8 staircase.  
 9 Q. That's all I'm talking about right now.  
 10 In that area you never saw any pictures, or  
 11 photographs, paintings, any type of depiction of a  
 12 nude woman on that staircase going upstairs.  
 13 Correct?  
 14 A. Correct.  
 15 Q. All right. And I think you said  
 16 downstairs you saw a picture of -- the only  
 17 picture that you saw of I'd say of a younger child  
 18 that displayed some form of -- I don't want to say  
 19 nudity because it's probably not that, but of some  
 20 portion of their body that was exposed, and I  
 21 think you described it as her cheek.  
 22 A. Yes, that's upstairs.  
 23 Q. That's upstairs?  
 24 A. Upstairs.  
 25 Q. And that was -- was it Eva; is that how

1 were there any pictures of women in any stage of  
 2 undress?  
 3 A. No.  
 4 Q. And then I think you said as you walk  
 5 upstairs, or as you walked up the stairway from  
 6 the kitchen at the top of the landing, I think you  
 7 described -- did you describe it as the foyer?  
 8 A. Yes.  
 9 Q. Okay. But it's really the landing, the  
 10 upstairs landing?  
 11 A. Yes.  
 12 Q. I think you said there were -- there was  
 13 -- were or was a three by five picture or  
 14 pictures?  
 15 A. Yes.  
 16 Q. Of women in some stage of undress?  
 17 A. Yes.  
 18 Q. Okay. And when you say three by five, I  
 19 assume you meant three feet?  
 20 A. Three feet.  
 21 Q. By five feet?  
 22 A. Yes.  
 23 Q. Were they photographs?  
 24 A. Yes, they were photographs.  
 25 Q. And I think you also told us that you

1 didn't recognize who those people were. Is that  
 2 correct?  
 3 MR. [REDACTED]: Object to the form.  
 4 THE WITNESS: I knew this particular girl  
 5 because it was the daughter of Mrs. Eva.  
 6 BY MR. CRITTON:  
 7 Q. Okay. And is that the picture you're  
 8 talking about?  
 9 A. This is the picture I'm talking about.  
 10 Q. Okay. And that was a three by five?  
 11 A. Yes.  
 12 Q. All right. And the only thing that you  
 13 could see was a portion, that is of her other than  
 14 say her waist or her shoulders or her arms or  
 15 something, that's one where you could see kind of  
 16 like the Coppertone commercial, a picture of her  
 17 cheek?  
 18 A. Yes. Part of her buttocks.  
 19 MR. [REDACTED]: Object to the form.  
 20 BY MR. CRITTON:  
 21 Q. Okay. And was there another picture at  
 22 the top of the foyer, large one, or is that the  
 23 only one that you can recall?  
 24 A. There were two of the same girl in  
 25 different poses.

1 Q. But showed the same thing?  
 2 A. Yes.  
 3 Q. Okay. As you walked through into -- then  
 4 if I understood it correctly, you go to the pretty  
 5 much to the end of the hallway, then you go  
 6 through another small vestibule, double doors, two  
 7 sets of double doors, and as you go straight ahead  
 8 then you make a left around the bed and then you  
 9 end up in the bathroom.  
 10 A. Yes.  
 11 Q. In the bathroom -- in the bathroom or in  
 12 that location were there any pictures of any women  
 13 in any stage of undress?  
 14 A. Yes.  
 15 Q. All right. And were any of those  
 16 pictures, did they involve -- or were they of any  
 17 of the girls that have been described as women who  
 18 came over to give Mr. -- purportedly to give Mr.  
 19 Epstein a massage?  
 20 A. Yes.  
 21 Q. And do you remember who any of the names  
 22 of any of those people were?  
 23 A. No.  
 24 Q. And the pictures you saw, where were they  
 25 located?

1 A. Inside his closet, the walk-in closet.  
 2 Q. And those pictures, I think you called it  
 3 a mosaic?  
 4 A. Yes.  
 5 Q. And of the mosaic, approximately how many  
 6 pictures were in the mosaic?  
 7 A. 16 or 20.  
 8 Q. Okay. And of those pictures how many did  
 9 you recognize?  
 10 A. About three or four.  
 11 Q. All right. Were they -- as to who those  
 12 people were, you don't know, you just recognized  
 13 three or four of them?  
 14 A. Mr. Epstein when he was younger, and then  
 15 different girlfriends, but I didn't recognize  
 16 except the ones --  
 17 Q. Okay. You said three or four of those  
 18 were pictures of the girls who came over to give a  
 19 massage?  
 20 A. Yes.  
 21 Q. Okay. But as to who those girls were you  
 22 don't know as you sit here today?  
 23 A. No, sir.  
 24 Q. And as to what their ages were you don't  
 25 know?

1 A. No, sir.  
 2 Q. That's correct?  
 3 A. That's correct.  
 4 Q. And as to what they depicted in the  
 5 photographs of the girls were they in different  
 6 stages of undress?  
 7 A. Yes.  
 8 Q. Was everyone undressed to some degree,  
 9 that is, they were described as nude, or at least  
 10 the questions asked were these people nude? Were  
 11 they actually nude or someone may have had their  
 12 top off?  
 13 A. There were two girls completely naked in  
 14 a shower in a sexual act.  
 15 Q. Is that the one when Ms. [REDACTED] asked you  
 16 questions, that's one of the photographs that you  
 17 were talking about?  
 18 A. No, sir.  
 19 Q. That was a different --  
 20 A. Different one.  
 21 Q. Okay. And the mosaic that you saw where  
 22 you saw two girls involved in a sexual act, do you  
 23 know where that photograph was taken?  
 24 A. I think it was taken in one of the rooms  
 25 in the house because there is an oval bathtub, but

1 I don't know which room, sir.  
 2 Q. Okay. Did you recognize both the girls  
 3 or just one of the girls?  
 4 A. The two girls.  
 5 Q. Then there were -- there was one or two  
 6 other photographs of girls that you recognized?  
 7 A. Yes.  
 8 Q. Okay. And were they fully unclothed or  
 9 did they have some degree of clothes on and/or  
 10 off?  
 11 A. They were naked.  
 12 Q. All right. And all of the remaining  
 13 pictures at least within that mosaic were of  
 14 individuals that you did not know?  
 15 A. No, sir.  
 16 Q. And that you did not recognize as having  
 17 been at the house. Is that correct?  
 18 A. Yes, that's correct.  
 19 Q. You were also asked about some -- let me  
 20 switch for just a minute.  
 21 You were asked about a vibrator that you  
 22 saw, and I think you described it as a back  
 23 massager that was approximately 18 inches long  
 24 that had a couple of rotating heads on it.  
 25 A. Yes.

1 pilots, masseuses, chefs, so she have a copy of  
 2 the black book with herself and as well as the  
 3 computer.  
 4 Q. Did you ever go on Ms. Maxwell's computer  
 5 to see what she had in it?  
 6 A. Yes.  
 7 Q. And was that something you were allowed  
 8 to do?  
 9 A. No.  
 10 Q. Okay. You actually went in her office?  
 11 A. Yes.  
 12 Q. And was her computer on so that you  
 13 didn't need to access the password?  
 14 A. It was off.  
 15 Q. Okay. So you just turned it on?  
 16 A. Yes, sir.  
 17 Q. And then you were able to access her  
 18 computer?  
 19 A. Exactly.  
 20 Q. And what possessed you to go in and to  
 21 access her personal computer?  
 22 A. I needed to send some documents to the  
 23 New York office and it was the only computer  
 24 working in the house.  
 25 Q. Okay. And how many occasions did you use

1 Q. And I think you ultimately came up with  
 2 the idea as it was something you had seen at like  
 3 a Sharper Image store.  
 4 A. Yes, sir.  
 5 Q. Have you ever seen one of those types of  
 6 devices, that is a back massager with the rotating  
 7 heads also sold -- well, let me ask you this.  
 8 Strike that last question.  
 9 Have you ever been to Brookstone?  
 10 A. Yes.  
 11 Q. Okay. Have you ever seen a massager like  
 12 that at Brookstone?  
 13 A. Yes.  
 14 Q. Okay. You were asked whether Ms. Maxwell  
 15 kept the names of any of the girls who came to  
 16 give massages on -- let me ask it this way.  
 17 I think you were asked whether  
 18 Ms. Maxwell ever kept the names of any of the  
 19 girls who came to give massages and I think your  
 20 response was yes.  
 21 A. Yes.  
 22 Q. Okay. Did she keep them on a pad of  
 23 paper, did she keep them in a notebook, did she  
 24 keep them in a computer?  
 25 A. We used to have internal books for

1 her computer?  
 2 A. Several times.  
 3 Q. Was she ever aware that you used her  
 4 computer?  
 5 MR. [REDACTED]: Form.  
 6 THE WITNESS: I don't think so.  
 7 BY MR. CRITTON:  
 8 Q. Did you ever ask Ms. Maxwell for  
 9 permission to use her computer?  
 10 A. I was the house manager, I believe I was  
 11 supposed to use everything in the house to  
 12 accomplish my duties, in that case sending  
 13 financial reports or e-mails.  
 14 Q. So would you have been -- did you ever  
 15 use Mr. Epstein's computer?  
 16 A. No.  
 17 Q. Okay. But you used Ms. Maxwell's  
 18 computer?  
 19 A. Yes.  
 20 Q. Did you ever use Ms. [REDACTED] computer?  
 21 A. Yes.  
 22 Q. In looking at Ms. Maxwell still, you went  
 23 into Ms. Maxwell's computer with at least the idea  
 24 of sending some documents?  
 25 A. Yes.

1 Q. Up to New York?  
 2 A. Yes.  
 3 Q. Were you going to pdf them?  
 4 A. Yes.  
 5 Q. And did she have a fax machine -- not a  
 6 fax machine, a copy machine in her office as well?  
 7 A. Yes.  
 8 Q. Okay. So how would you generally do  
 9 that? Would you do that through a Microsoft  
 10 program?  
 11 A. Through Citrix.  
 12 Q. Through Citrix. All right. With Citrix,  
 13 and that is, if you said you saw some names of  
 14 individuals on her computer if you were just going  
 15 to pdf some documents up to New York why would you  
 16 of -- what would of caused you to have seen any  
 17 names on her computer?  
 18 MS. [REDACTED]: Objection to form.  
 19 THE WITNESS: All the calls that came to  
 20 358 El Brillo, they came through the  
 21 telephone, they have a transcript somehow  
 22 that they connect to the computer, so you  
 23 can pull it and you register the time, who  
 24 called, who didn't call, and you can pull  
 25 this at your request. So I used to use that

1 to go back to some calls that they were  
 2 requesting, especially when the hurricane  
 3 season happened.  
 4 BY MR. CRITTON:  
 5 Q. Okay. So if I understand, even the  
 6 computer you used would have had that same  
 7 feature?  
 8 A. No, no, it was totally different. Mine  
 9 was slower and all the time was breaking down  
 10 that's why we have the guy from Ohio came and  
 11 fixed the computers.  
 12 Q. Okay. Were there other computers that  
 13 you used that had that feature, that is that --  
 14 A. Only [REDACTED], Mrs. Maxwell, and the staff  
 15 house.  
 16 Q. Staff house being yours?  
 17 A. The guest house, yes, my office.  
 18 Q. So you could go out to your guest house  
 19 then and look for the same information?  
 20 A. No.  
 21 Q. All right. I don't understand but why  
 22 don't we take a break because we're almost out of  
 23 tape.  
 24 (Thereupon, a recess was had.)  
 25 THE VIDEOGRAPHER: We're back on the

1 record with tape number three.  
 2 BY MR. CRITTON:  
 3 Q. Mr. Rodriguez, I was asking you about  
 4 Ms. Maxwell's computer and you told me how you  
 5 went on the computer.  
 6 If she was out of town would she take her  
 7 computer with her?  
 8 A. No.  
 9 Q. It was something she left there?  
 10 A. Yes.  
 11 Q. All right. And when you went on to pdf,  
 12 I think you said it was really one time that you  
 13 saw the names of some of these girls?  
 14 A. Yes.  
 15 Q. And if I understand it correctly, it was  
 16 -- did it have the name and then a phone number?  
 17 A. Yes.  
 18 Q. And was that something that was  
 19 automatically downloaded from the system?  
 20 A. Yeah, from the phone system to the  
 21 computer so we have a transcript.  
 22 Q. When you say a transcript, the fact that  
 23 Sally Jones, phone number 561, whatever it was,  
 24 called.  
 25 A. It was a transcript of the phone calls of

1 the house, we can get it from the computer.  
 2 Q. Okay. And I'm distinguishing,  
 3 transcript, it would tell you the name and phone  
 4 number, it wouldn't tell you what was said?  
 5 A. It was the message also.  
 6 Q. Okay. Now I understand. And so  
 7 Ms. Maxwell when you said she had the names of  
 8 some of these girls who may have given massages,  
 9 or at least were what you called earlier girls  
 10 that gave massages, or females that gave massages,  
 11 she would have had it because that was information  
 12 that was downloaded from the Citrix system into  
 13 her computer?  
 14 A. Yes.  
 15 MS. [REDACTED]: Objection, form.  
 16 BY MR. CRITTON:  
 17 Q. Okay, I understand. Now, you said she  
 18 also had some pictures. Is that that one time you  
 19 also saw pictures?  
 20 A. Yes.  
 21 Q. And were you going through her computer  
 22 at that time?  
 23 A. No.  
 24 Q. The question is, if all you were going to  
 25 do was try to pdf some financial information to

1 New York what were you doing getting to names and  
 2 phone numbers and then pictures of girls?  
 3 A. I was trying to get some information. I  
 4 was working the computer and I just happen -- they  
 5 have the icon of the file and I open and it was  
 6 right there, so I was not looking but, you know,  
 7 it was already accessible to me.  
 8 Q. And how many photographs did you then  
 9 scroll through to look at?  
 10 A. Probably 30.  
 11 Q. Okay. And why?  
 12 A. Just curiosity, sir.  
 13 Q. So again, you never told anyone other  
 14 than your wife?  
 15 A. No.  
 16 Q. Correct?  
 17 A. Yes, correct.  
 18 Q. Of the pictures that you saw, if I  
 19 understood it correctly, some of those were  
 20 pictures of -- well, I think you said some of them  
 21 reflected parties or banquets?  
 22 A. Yes.  
 23 Q. I think you described some of the  
 24 pictures gatherings that appeared to be either in  
 25 Russia or Eastern Europe?

1 Q. Okay. Were any of the photographs that  
 2 were in -- again, I'm talking about Ms. Maxwell's  
 3 computer now, were those photographs of  
 4 individuals who were any of the girls or ladies  
 5 that came over to give massages?  
 6 A. No. They stay at the house.  
 7 Q. Okay. So the photographs that you saw on  
 8 Ms. Maxwell's computer of females in any state of  
 9 undress or at parties or at banquets, those were  
 10 all of individuals who would fly in with Mr.  
 11 Epstein at various periods of time that had  
 12 traveled with him?  
 13 A. That's correct.  
 14 Q. Okay. Those are the girls that you told  
 15 us I think at your last deposition and reaffirmed  
 16 here today, those girls all appeared to be in  
 17 their 20's?  
 18 A. Yes, sir.  
 19 Q. All right. Now, you were also asked some  
 20 questions, a lot of questions about surveillance.  
 21 And if I understood your testimony, and this is  
 22 where it goes back to what do you know, what don't  
 23 you know, what were you speculating on, what did  
 24 you know at the time, what do you know now, at  
 25 least I need you to distinguish that for me so

1 A. Yes.  
 2 Q. All right. And then you talked about a  
 3 picture of two girls in the shower that you didn't  
 4 know the girls. Correct?  
 5 A. Yes.  
 6 Q. That's correct?  
 7 A. That's correct.  
 8 Q. All right. And that in all of the  
 9 photographs that you saw the individuals seemed to  
 10 be having a good time?  
 11 A. Yes.  
 12 Q. All right. Would it be a correct  
 13 statement that in none of the photographs did  
 14 anyone seem to be distressed or disturbed or show  
 15 any type of negative emotion, at least from what  
 16 you observed?  
 17 A. That's correct.  
 18 MS. [REDACTED]: Objection, form.  
 19 BY MR. CRITTON:  
 20 Q. And in terms of the photographs that you  
 21 did see, were any of the photographs that you saw,  
 22 did they appear -- did they appear to have been of  
 23 women that you had seen fly in with Mr. Epstein on  
 24 his plane?  
 25 A. Yes.

1 that I know what you knew at the time, and as  
 2 distinct from what you may have read in the  
 3 newspaper or been told by some lawyer or someone  
 4 else that may not be accurate. Okay?  
 5 A. Yes, sir.  
 6 Q. With regard to the -- with regard to  
 7 surveillance equipment, if I understood your  
 8 testimony today is you were completely unaware of  
 9 the existence of any surveillance equipment in the  
 10 house during the 2004/2005 time period that you  
 11 worked there. Is that correct?  
 12 A. Yes.  
 13 Q. And therefore, where it was, what may  
 14 have existed, whether it in fact actually did  
 15 exist, whether anyone maintained it, you have no  
 16 personal knowledge whatsoever. Is that true?  
 17 A. That's true.  
 18 MR. [REDACTED]: Object to the form.  
 19 BY MR. CRITTON:  
 20 Q. You talked about pictures of two women  
 21 who you saw in the house who were nude, one was  
 22 [REDACTED]?  
 23 A. Yes.  
 24 Q. And you knew [REDACTED] was someone who was in  
 25 her 20's?

1 A. Yes.  
 2 Q. All right. And then you saw another  
 3 picture of a Brazilian woman who had traveled or  
 4 flown on the plane before?  
 5 A. Yes.  
 6 Q. All right. And she also appeared to be a  
 7 woman to you not only in the photograph but from  
 8 your having seen her who appeared to be in her  
 9 20's?  
 10 A. Yes.  
 11 Q. Excuse me. Thank you. You talked about  
 12 [redacted]'s computer. Was she hooked into your  
 13 main system?  
 14 A. Not to my office in the staff house but  
 15 she was hooked into the main house.  
 16 Q. Okay. The same Citrix system?  
 17 A. Yes.  
 18 Q. And you said that [redacted] had pictures of  
 19 women on her computer that you saw. Is that  
 20 correct?  
 21 A. Yes.  
 22 Q. Okay. And were those the same types of  
 23 pictures that Ms. Maxwell had, that is, females,  
 24 pictures of females who had traveled in with Mr.  
 25 Epstein from his plane?

1 names and addresses of -- let me start over.  
 2 Strike that.  
 3 If I understood your testimony, you said  
 4 that [redacted] had pictures -- start again.  
 5 You said that [redacted] had the names and  
 6 phone numbers of some of the massage girls.  
 7 A. Yes.  
 8 Q. Or at least of the people that you  
 9 thought may have been called to give massages.  
 10 A. Yes.  
 11 MS. [redacted]: Form.  
 12 MR. [redacted]: Form.  
 13 BY MR. CRITTON:  
 14 Q. And was that in the same format that you  
 15 saw on Ms. Maxwell's computer?  
 16 A. No.  
 17 Q. Okay. What occasion would you have been  
 18 -- have had to use [redacted]'s computer?  
 19 A. She will instruct me to get some  
 20 information from her desk or telephone numbers, so  
 21 I will.  
 22 Q. And that's where you would have seen it?  
 23 A. Yes.  
 24 Q. I think you testified at your last  
 25 deposition, or the start of your deposition that

1 A. This were different pictures.  
 2 Q. Okay. Were any of hers of any of the  
 3 girls who came in on the plane, or the ladies or  
 4 women?  
 5 A. No.  
 6 Q. What were her pictures of?  
 7 A. They were young women modeling, you know.  
 8 I don't remember seeing nudity on [redacted]  
 9 computer.  
 10 Q. All right. Hers, when I say hers, the  
 11 photographs that [redacted] had on her computer  
 12 were all of individuals who appeared -- or not  
 13 appeared, but were dressed and appeared to be  
 14 modeling?  
 15 A. Yes.  
 16 Q. Would it be a correct statement that none  
 17 of the women that you saw, that is the pictures of  
 18 the women that you saw on [redacted] computer were  
 19 any of the girls, women, whoever came to give  
 20 massages? Is that correct?  
 21 MR. [redacted]: Object to the form.  
 22 MS. [redacted]: Form.  
 23 THE WITNESS: That's correct.  
 24 BY MR. CRITTON:  
 25 Q. You said that [redacted] you thought also had

1 the number of women that you remember came over to  
 2 give massages was something eight to ten, twelve,  
 3 I don't remember, what's your best recollection?  
 4 A. Can you repeat that, please?  
 5 Q. Of the women, of different women that you  
 6 knew came over to give massages during the time  
 7 that you worked for Mr. Epstein, '04 to '05,  
 8 during that time period, approximately how many  
 9 women were there?  
 10 MR. [redacted]: Object to the form.  
 11 THE WITNESS: To give massages?  
 12 BY MR. CRITTON:  
 13 Q. Yes, sir.  
 14 A. Fifteen, yeah.  
 15 Q. So something between one and fifteen of  
 16 the names you would have seen on Ms. [redacted]  
 17 computer along with a phone number?  
 18 MR. [redacted]: Form.  
 19 THE WITNESS: Yes.  
 20 BY MR. CRITTON:  
 21 Q. Do you remember how many you would have  
 22 seen?  
 23 A. Fifteen.  
 24 Q. Okay. You also told us earlier today  
 25 that you saw [redacted] from time to time taking

1 pictures in the dining room and the library.  
 2 A. Yes.  
 3 Q. Photographs.  
 4 A. Yes.  
 5 Q. Okay. Was she taking -- the pictures she  
 6 took were people who were clothed?  
 7 A. Yes.  
 8 Q. And were any of the pictures that she  
 9 took of any of the girls that you ever -- let me  
 10 strike that.  
 11 If I understood your original testimony  
 12 -- I don't want to say original. If I understood  
 13 your testimony from July 29th to what you told us  
 14 today as to the women who did come to give  
 15 massages they'd knock or somehow you would be  
 16 aware that they were at the back door, you would  
 17 punch the security code and lead them into the  
 18 kitchen.  
 19 A. Yes.  
 20 Q. Okay. When you brought them into the  
 21 kitchen you would say, hi, they would say hi back  
 22 to you, or something to that, short greeting,  
 23 you'd offer them water, there was never any  
 24 alcohol in the whole house other than I think you  
 25 said for one person at one time. Is that a fair

1 statement?  
 2 A. Yes.  
 3 Q. All right. You left the kitchen, you  
 4 understood [REDACTED] came down, and what  
 5 happened thereafter you don't have any personal  
 6 knowledge whatsoever?  
 7 A. That's correct.  
 8 MR. [REDACTED]: Form.  
 9 BY MR. CRITTON:  
 10 Q. At some point in time Ms. [REDACTED] might  
 11 contact you and say pay such and such X amount of  
 12 dollars, she is now getting ready to leave.  
 13 A. Yes.  
 14 Q. That maybe one. Another set of  
 15 circumstances might be you use the word commotion,  
 16 you might hear a commotion, I assume you don't  
 17 mean -- well, let me ask you, when you say  
 18 commotion, do you mean a disturbance, something  
 19 that was seriously like raised voices or merely  
 20 you just heard some people talking?  
 21 A. Conversation of people leaving.  
 22 Q. Okay. Not a commotion in the form of a  
 23 disturbance but a commotion in the sense that you  
 24 heard people talking?  
 25 A. Yes.

1 Q. Regular conversation?  
 2 A. Yes.  
 3 Q. And, therefore, you might interject  
 4 yourself back in because you've been asked to pay  
 5 someone or to let them out?  
 6 MR. [REDACTED]: Form.  
 7 THE WITNESS: Yes, I was called to pay  
 8 them.  
 9 BY MR. CRITTON:  
 10 Q. All right. And when you hear that  
 11 conversation that would be another way that you  
 12 would know that the women were leaving?  
 13 A. Yes.  
 14 Q. And sometimes they'd leave without you  
 15 even being involved, if I understood it correctly?  
 16 A. That's correct.  
 17 Q. So, the only places that you ever saw the  
 18 women who came to give massages would be -- of the  
 19 some fifteen women during the time you were there  
 20 would be either when you let them into the house  
 21 and escorted them into the kitchen or as they were  
 22 leaving?  
 23 A. Yes.  
 24 Q. And I think you described one instance  
 25 earlier today is that you may have had [REDACTED] in the

1 car, in the Suburban?  
 2 A. Yes.  
 3 Q. And that's the only person that you can  
 4 remember having driven any place, that is, of the  
 5 women who were described as having given massages?  
 6 MR. [REDACTED]: Objection.  
 7 MS. [REDACTED]: Objection, form.  
 8 THE WITNESS: Sir, I have to clarify  
 9 that. I drove a lot of girls, but I don't  
 10 remember the names associated with the  
 11 faces. But this particular girl [REDACTED] or  
 12 others [REDACTED] whatever, I remember driving in  
 13 the Suburban, but I cannot say this was --  
 14 BY MR. CRITTON:  
 15 Q. Let me clarify because what I want to be  
 16 clear is, is I do remember you testifying that  
 17 when some of the 20 plus year old models or  
 18 females would fly in with Mr. Epstein they might  
 19 want to go shopping, they might want to go to the  
 20 store, they may want to go to the drug store, they  
 21 may want to go to the beach, wherever they wanted  
 22 to go and you would drive them.  
 23 A. Yes.  
 24 Q. All right. And then I remember in  
 25 response to Ms. [REDACTED] questions today she asked

1 you about having driven [REDACTED], and you recalled  
 2 having had her in the Suburban specifically.  
 3 A. Yes.  
 4 Q. Do you remember any of the other girls,  
 5 women who came to give massages ever having driven  
 6 them, or is [REDACTED] the only one that you remember?  
 7 MR. [REDACTED]: Form.  
 8 THE WITNESS: I only remember [REDACTED] right  
 9 now for the fact that I was driving by the  
 10 airport and I showed her Mr. Epstein's  
 11 plane.  
 12 BY MR. CRITTON:  
 13 Q. All right. Which really takes me back to  
 14 really where I started with this series of  
 15 questions.  
 16 You saw the girls, the women who came in  
 17 to give the massages, when they came in if you  
 18 were advised or if you heard conversation and you  
 19 saw them you would see them when they left?  
 20 A. Yes.  
 21 Q. And you saw [REDACTED] because she was in the  
 22 Suburban on at least one occasion?  
 23 A. Yes.  
 24 Q. And, therefore, you never saw these  
 25 girls, these women who gave the massages in the

1 Q. All right. Ms. [REDACTED] asked you about Mr.  
 2 Dershowitz being present in Mr. Epstein's home,  
 3 and I think she asked -- and I think that you said  
 4 Mr. Epstein was a -- and he and Mr. Dershowitz  
 5 were friends?  
 6 A. Yes.  
 7 Q. She also I think asked was Mr. Dershowitz  
 8 ever there when one of the women who gave a  
 9 massage was present in the home?  
 10 A. I don't remember that.  
 11 Q. That's what I want to clear up. Is it  
 12 your testimony that Mr. Dershowitz was there when  
 13 any of the women came to Mr. Epstein's home to  
 14 give a massage?  
 15 A. Yes.  
 16 MR. [REDACTED]: Form.  
 17 BY MR. CRITTON:  
 18 Q. As to whether any of those women were  
 19 ever associated with Mr. Dershowitz would it be a  
 20 correct statement that you have absolutely no  
 21 knowledge?  
 22 A. I don't know, sir.  
 23 Q. You don't know?  
 24 A. I don't know, sir.  
 25 MS. [REDACTED]: Form.

1 dining room or the library. Would that be a fair  
 2 statement?  
 3 A. That's correct.  
 4 MR. [REDACTED]: Form.  
 5 BY MR. CRITTON:  
 6 Q. All right. So, therefore, the pictures  
 7 that you saw [REDACTED] taking of girls, women,  
 8 either in the dining room or library, those were  
 9 other individuals other than those who may have  
 10 given or who came for massages. Is that correct?  
 11 MS. [REDACTED]: Form.  
 12 MR. [REDACTED]: Form.  
 13 THE WITNESS: It's confusing, sir,  
 14 because there were a bunch of girls. I  
 15 don't know which one they were but I saw her  
 16 taking pictures of the groups.  
 17 BY MR. CRITTON:  
 18 Q. As to whether they were people who came  
 19 in on the planes or there may have been a massage  
 20 girl or more than one woman who gave a massage,  
 21 you just don't know as you sit here, you'd just be  
 22 speculating. Is that correct?  
 23 MR. [REDACTED]: Form.  
 24 THE WITNESS: I don't know.  
 25 BY MR. CRITTON:

1 BY MR. CRITTON:  
 2 Q. Okay. Were you in any way attempting in  
 3 your response to Ms. [REDACTED] to imply that Mr.  
 4 Dershowitz had a massage by one of these young  
 5 ladies?  
 6 A. I don't know, sir.  
 7 Q. You have no knowledge?  
 8 A. No, sir.  
 9 Q. And you certainly weren't implying that  
 10 that occurred, you just have no knowledge.  
 11 Correct?  
 12 MR. [REDACTED]: Form.  
 13 THE WITNESS: I don't know.  
 14 BY MR. CRITTON:  
 15 Q. Sorry?  
 16 A. I don't know.  
 17 Q. I think in response to one of Ms. [REDACTED]  
 18 questions you responded that -- let me ask it this  
 19 way.  
 20 You never saw Mr. Epstein ever take  
 21 photographs of anyone. Would that be a correct  
 22 statement?  
 23 A. Yes.  
 24 Q. Would it be a correct statement you never  
 25 saw Mr. Epstein initiate a phone call to anyone?

1 A. To place a phone call?  
 2 Q. Yeah. Did you ever see him place a phone  
 3 call?  
 4 A. Yes.  
 5 Q. If in fact, maybe it was this way, is  
 6 that you never saw him call someone to schedule a  
 7 massage appointment. Correct?  
 8 A. That's correct.  
 9 Q. I think you said that Ms. [REDACTED] told you  
 10 that Mr. Epstein would take photographs. Did I  
 11 understand you correctly?  
 12 A. I'm sorry, can you repeat that?  
 13 Q. Did Ms. [REDACTED] ever tell you that Mr.  
 14 Epstein took a photograph of anyone?  
 15 A. No, she said to me Mr. Epstein is like  
 16 he's an amateur photographer.  
 17 Q. Okay. I may have misunderstood you then.  
 18 Let me clarify that testimony.  
 19 It's your testimony that Ms. [REDACTED] told  
 20 you that Mr. Epstein is an amateur photographer?  
 21 A. Yes.  
 22 Q. She never told you that -- or let me  
 23 strike that.  
 24 Is it correct that she never told you  
 25 that Mr. Epstein took photographs of any of the

1 girls, women, who came over to give him a massage?  
 2 A. That's correct.  
 3 Q. All right. Mr. Rodriguez, other than Mr.  
 4 Epstein I think you told us you had worked for a  
 5 lady named Ms. Hammond?  
 6 A. Yes.  
 7 Q. And you had worked for a gentleman --  
 8 A. Sidney Bowman.  
 9 Q. Is he the gentleman from Fisher Island?  
 10 A. No, Arturo Torres.  
 11 Q. All right. In addition to Ms. Hammond up  
 12 in Palm Beach you worked for other individuals as  
 13 well?  
 14 A. I did it part-time but I don't have her  
 15 name right now, sir.  
 16 Q. During your career as a -- let me strike  
 17 that.  
 18 Had you worked other than those places,  
 19 Mr. Arturo --  
 20 A. Arturo Torres, yes.  
 21 Q. Arturo Torres, Ms. Hammond, the other  
 22 individual you can't remember, and Mr. Epstein,  
 23 have you worked for other individuals as an estate  
 24 manager or general house manager?  
 25 A. No, sir.

1 Q. Of the time that you've done that  
 2 approximately how many years does that include in  
 3 your working life?  
 4 A. Eight years, ten years.  
 5 Q. All right. And have you worked for --  
 6 have you been in other circumstances where you  
 7 have worked around -- well, let me step back.  
 8 With all of the individuals that you  
 9 mentioned, estate manager, house manager, has this  
 10 been for individuals who have or at least appear  
 11 to have substantial wealth?  
 12 A. Yes.  
 13 Q. And as part of your duties, or not duties  
 14 but as part of being a house manager or general  
 15 manager for an estate do you interact with other  
 16 estate managers?  
 17 A. Yes.  
 18 Q. And do you assist each other from time to  
 19 time if someone needs help?  
 20 A. That's correct.  
 21 Q. And I assume that you've been in other  
 22 estates in Palm Beach and probably in Fort  
 23 Lauderdale and other locations?  
 24 A. Yes.  
 25 Q. As part of during your working career did

1 you ever work in restaurant or a personal services  
 2 type business where you would provide like  
 3 catering or something like that to other wealthy  
 4 individuals?  
 5 A. I did.  
 6 Q. Give us a little of your background if  
 7 you could then, Mr. Rodriguez.  
 8 A. I work in Long Island, Montauk Lake Club  
 9 and Marina, a very exclusive country club where  
 10 Mr. Nixon used to spend his summers, [REDACTED]  
 11 Nixon. I worked for Leona Helmsley in New York.  
 12 Very demanding lady. And then Mr. Torres in Texas  
 13 in his ranch and as well as Fisher Island. And I  
 14 was a general manager of one of his restaurants in  
 15 San Antonio, Texas. This is the most high profile  
 16 people that I worked for.  
 17 Q. Okay. When you worked for Ms. Helmsley,  
 18 Leona Helmsley, she used to have the Helmsley  
 19 Palace and she with her husband, Harry Helmsley, I  
 20 think they owned a number of real estate in  
 21 addition to hotel properties.  
 22 A. That's correct.  
 23 Q. When you would -- I think you described  
 24 her as a demanding person?  
 25 A. Yes.

1 Q. All right. In terms of these wealthy  
 2 people that you've worked for, these individuals,  
 3 do they all have, that is at least in terms of Mr.  
 4 Epstein, the way that his household was managed,  
 5 was it similar to other set of circumstances that  
 6 you've been involved with?  
 7 MR. [REDACTED]: Object to form.  
 8 THE WITNESS: They have a common ground,  
 9 yes.  
 10 BY MR. CRITTON:  
 11 Q. All right. And in terms of you talked  
 12 about Mr. Epstein that there was some sort of a  
 13 manual or a procedure book with regard to his  
 14 house.  
 15 A. House manual, yes.  
 16 Q. A house manual. Did other houses have  
 17 house manuals as well? Is that reasonably -- I  
 18 mean not common but it's something that you've  
 19 seen before?  
 20 MR. [REDACTED]: Form.  
 21 THE WITNESS: I know a lot of houses do  
 22 but that was the only estate that we have a  
 23 house manual.  
 24 BY MR. CRITTON:  
 25 Q. And other individuals like where you've

1 about what they do?  
 2 MR. [REDACTED]: Object to the form.  
 3 THE WITNESS: Yes.  
 4 BY MR. CRITTON:  
 5 Q. And have you worked at other locations,  
 6 that is, in the other houses that you've worked  
 7 where they have massage tables?  
 8 A. Yes.  
 9 Q. And in those other locations where they  
 10 had a massage table, were they similar to the  
 11 massage table that was in Mr. Epstein's home?  
 12 A. Yes, sir.  
 13 Q. All right. Almost same make and model?  
 14 A. Same type, yes.  
 15 Q. And did other individuals in houses that  
 16 you worked at and other places where you helped  
 17 out other estate managers, would those individuals  
 18 have massages from time to time?  
 19 A. Yes.  
 20 Q. So having a massage or a massage table in  
 21 someone's house that you might -- that lives in  
 22 Palm Beach or Montauk or New York or something,  
 23 would you consider that unusual?  
 24 MR. [REDACTED]: Form.  
 25 THE WITNESS: No.

1 worked similar to Mr. Epstein -- now, Mr. Epstein  
 2 was single?  
 3 A. Yes.  
 4 Q. All right. And him having a lot of -- or  
 5 bringing a lot of attractive women and other  
 6 people to his house, I assume that didn't offend  
 7 you in any way?  
 8 MR. [REDACTED]: Object to the form.  
 9 THE WITNESS: No, sir.  
 10 BY MR. CRITTON:  
 11 Q. At least based upon your experience in  
 12 dealing with other individuals either of some  
 13 notoriety like Ms. Helmsley or when you said the  
 14 club that you worked up is in Montauk --  
 15 A. Montauk Lake Club and Marina.  
 16 Q. Right. You ran into separate and apart  
 17 from [REDACTED] Nixon were there a lot of people,  
 18 corporate people, business people?  
 19 A. Yes.  
 20 Q. People of substantial resources and  
 21 wealth?  
 22 A. Yes.  
 23 Q. Have you found at least in your  
 24 experience that most of those people are pretty  
 25 discreet about -- when I say discreet, private

1 BY MR. CRITTON:  
 2 Q. I think you told me at least in Mr.  
 3 Epstein's home other than for one guest he didn't  
 4 have any type of alcohol in the house. Is that  
 5 correct?  
 6 A. That's correct.  
 7 Q. Was that basically you understood that  
 8 that was one of the policies and procedure, no  
 9 alcohol in the house?  
 10 A. Yes.  
 11 Q. And did you ever see any type of illegal  
 12 or inappropriate drugs?  
 13 A. No, sir.  
 14 Q. And was that another policy or procedure,  
 15 absolutely no drugs of any kind?  
 16 A. No smoking in the house.  
 17 Q. All right. So no drugs, no smoking, no  
 18 alcohol?  
 19 A. Yes.  
 20 Q. Was that pretty typical for other Palm  
 21 Beach places that you were familiar with?  
 22 A. No.  
 23 Q. All right. And other places you'd always  
 24 find alcohol?  
 25 A. Yes.

1 Q. All right. And you might find drugs?  
 2 A. Yes.  
 3 Q. And some pretty wild parties?  
 4 A. Yes.  
 5 Q. Now, with regard to the women who came to  
 6 give massages, of those women, of those  
 7 approximately fifteen that you described, how many  
 8 of them came more than one -- more than one  
 9 occasion?  
 10 MR. [REDACTED]: Form.  
 11 THE WITNESS: I'd say more than half.  
 12 BY MR. CRITTON:  
 13 Q. So maybe seven, eight, nine, ten?  
 14 A. Yes.  
 15 Q. Of those people that came on -- of those  
 16 seven to ten that came on more than one occasion,  
 17 did those individuals come on many occasions?  
 18 A. Yes.  
 19 Q. And as to the women who were -- who you  
 20 understood were coming to give the massages --  
 21 MR. [REDACTED]: Form.  
 22 MR. CRITTON: I'm not done yet.  
 23 THE VIDEOGRAPHER: I need to go off the  
 24 record for a second.  
 25 (Thereupon, an interruption was had.)

1 MR. [REDACTED]: Object to the form.  
 2 BY MR. CRITTON:  
 3 Q. And I don't know whether he asked, do you  
 4 remember a person named [REDACTED].?  
 5 A. Yes.  
 6 Q. And would she call from time to time  
 7 asking if she could come to give a massage just  
 8 like [REDACTED].?  
 9 MR. [REDACTED]: Object to the form.  
 10 THE WITNESS: Yes.  
 11 BY MR. CRITTON:  
 12 Q. So at least those two individuals, they  
 13 were overtly, that is, they were asking whether  
 14 they could come to give Mr. Epstein a massage.  
 15 Correct?  
 16 A. They will call and they will say I need  
 17 to talk to [REDACTED], and [REDACTED] fifteen minutes later  
 18 will tell, Alfredo, we're going to have a massage  
 19 with so and so.  
 20 Q. So either [REDACTED] or [REDACTED] would call to ask  
 21 if they could come and then a massage would be set  
 22 then they would show up?  
 23 A. That's correct, sir.  
 24 Q. Okay. And from time to time they would  
 25 bring other people as well?

1 THE VIDEOGRAPHER: We're back on the  
 2 record.  
 3 BY MR. CRITTON:  
 4 Q. Mr. Rodriguez, I want to turn to the --  
 5 stay with the women who came to give or at least  
 6 were called to give the massages.  
 7 You were shown a number of message pads,  
 8 I think Mr. [REDACTED] who represents a number of  
 9 -- or at least certainly Jane Doe 2 and some  
 10 others, you were identified or shown a bunch of  
 11 message pads that had I think in most instances  
 12 your initials, A.R. Do you recall that?  
 13 A. Yes, I do.  
 14 Q. I think one of the individuals that you  
 15 identified that called often was [REDACTED].?  
 16 A. Yes.  
 17 Q. Which is one of Mr. [REDACTED] clients.  
 18 This lady called on a regular basis, or  
 19 at least from looking at your pad she would call  
 20 on a pretty regular basis. Is that true?  
 21 A. Yes.  
 22 Q. And she and others who are reflected on  
 23 those message pads, they were calling to come to  
 24 give massages. Correct?  
 25 A. Yes.

1 A. That's correct.  
 2 Q. Both [REDACTED] and [REDACTED].?  
 3 A. Yes.  
 4 Q. Of the females that -- the women that  
 5 came to the house, did you ever see anyone force  
 6 any of these women onto the property?  
 7 A. No, sir.  
 8 Q. Did you ever see anyone force them into  
 9 the house?  
 10 A. No.  
 11 Q. Did you ever see anyone force them into  
 12 the kitchen?  
 13 A. No, sir.  
 14 Q. Did you ever use any force, any type of  
 15 intimidation or coercion to bring them into the  
 16 house and get them into the kitchen?  
 17 A. No, sir.  
 18 Q. Did you ever observe Ms. [REDACTED] using any  
 19 force or intimidation or coercion --  
 20 A. No, I did not.  
 21 Q. -- with any of these individuals?  
 22 A. I did not.  
 23 MR. [REDACTED]: Object to the form.  
 24 BY MR. [REDACTED]:  
 25 Q. Did Ms. [REDACTED] -- let me use the initials

1 that way it will show up correctly.  
 2 Did [REDACTED] ever use from what you saw, did  
 3 she ever use any force or coercion or intimidation  
 4 with any of the women that she brought to the  
 5 house?  
 6 MR. [REDACTED]: Form.  
 7 MR. [REDACTED]: Object to the form.  
 8 THE WITNESS: No, sir.  
 9 BY MR. CRITTON:  
 10 Q. Okay. I'm just talking about what you  
 11 observed during the time. And you know what I  
 12 mean by force?  
 13 A. Yes.  
 14 Q. You know what I mean by intimidation?  
 15 A. Yes.  
 16 Q. Could to be verbal intimidation or  
 17 coercion, either verbally or using some form of  
 18 her body, or their bodies.  
 19 A. Yeah, I understand that.  
 20 MR. [REDACTED]: Form.  
 21 MR. [REDACTED]: Form.  
 22 MS. [REDACTED]: Objection, form.  
 23 BY MR. CRITTON:  
 24 Q. When [REDACTED] brought individuals to the  
 25 house, did you ever see her use any force or

1 intimidation or coercion from what you could  
 2 observe with those women who had come to give a  
 3 massage?  
 4 A. No.  
 5 MR. [REDACTED]: Form.  
 6 MR. [REDACTED]: Form.  
 7 MS. [REDACTED]: Form.  
 8 BY MR. CRITTON:  
 9 Q. With any of the fifteen women that you  
 10 observed who came to the home to give massages  
 11 during the time period '04 through I think you  
 12 said February of '05, the time period I think was  
 13 it August, Mr. Rodriguez --  
 14 A. August.  
 15 Q. -- August of '04 through February of '05?  
 16 A. March of '05.  
 17 Q. Through the beginning of March '05?  
 18 A. Yes.  
 19 Q. Okay. That's the time period I'm  
 20 focussing on.  
 21 Of the approximately fifteen women that  
 22 you came to see to give massages that you let in  
 23 the back door after punching the security code,  
 24 did any of them ever appear to be scared?  
 25 A. No.

1 Q. Did any of them ever appear to be  
 2 frightened?  
 3 MR. [REDACTED]: Form.  
 4 THE WITNESS: No.  
 5 BY MR. CRITTON:  
 6 Q. Did any of the women appear to be  
 7 fearful?  
 8 A. No.  
 9 Q. Did any of them appear to be  
 10 uncomfortable in coming into the house?  
 11 MR. [REDACTED]: Form.  
 12 THE WITNESS: No.  
 13 BY MR. CRITTON:  
 14 Q. At any time did any of them express to  
 15 you verbally that they were in fear when they came  
 16 into the house?  
 17 A. No, sir.  
 18 Q. Did any one of the fifteen girls that  
 19 came to the back door, then into the kitchen, and  
 20 prior to your leaving them in the kitchen say, Mr.  
 21 Rodriguez, or Alfredo, or sir, could you get me  
 22 out of here?  
 23 A. No, sir.  
 24 Q. Did any of them tell you verbally that  
 25 they were uncomfortable?

1 A. No.  
 2 Q. Did anyone say help me or I'm scared?  
 3 A. No.  
 4 Q. Did all of them appear to be at least  
 5 when they came to the back door in a reasonably  
 6 good mood?  
 7 A. Yes.  
 8 Q. They all appeared to be happy?  
 9 A. Yes.  
 10 Q. Smile, I'd say interact with you verbally  
 11 in your greetings?  
 12 A. That's correct.  
 13 Q. Did any one of the fifteen girls that you  
 14 observed during the August '04 through March 2005  
 15 time period from your personal observation appear  
 16 to be there -- appear to be at the Epstein home  
 17 not voluntarily?  
 18 MR. [REDACTED]: Object to the form.  
 19 MR. [REDACTED]: Object to the form.  
 20 THE WITNESS: No.  
 21 BY MR. CRITTON:  
 22 Q. Did any one of the fifteen women who came  
 23 to give the massage ever tell you that they had  
 24 been forced to come to the house or coerced into  
 25 coming to the house?

1 A. No.  
 2 MR. [REDACTED]: Form.  
 3 BY MR. CRITTON:  
 4 Q. For those women -- I think I need -- let  
 5 me strike that.  
 6 On some occasions you'd see the women  
 7 come down from upstairs because you would either  
 8 let them out of the house or you might give them  
 9 an envelope that had money in it. Is that  
 10 correct?  
 11 A. Yes.  
 12 Q. Did any of those -- Mr. [REDACTED] asked you  
 13 some questions -- I think it was Mr. [REDACTED],  
 14 whether they had sat down and had anything to eat,  
 15 whether they had cereal or anything like that.  
 16 A. Yes.  
 17 Q. Did you ever observe any of those women  
 18 before they went upstairs eating anything at the  
 19 house?  
 20 A. Sometimes.  
 21 Q. And I think he used -- he meaning Mr.  
 22 [REDACTED], used cereal and ice cream.  
 23 A. Yes.  
 24 Q. And he said, if I recall from the last  
 25 deposition, kids like ice cream.

1 them stop and have anything to eat or did you  
 2 always see them at the end, that is they're ready  
 3 to go?  
 4 A. I didn't know, they came from downstairs,  
 5 they went to the kitchen, but I didn't know they  
 6 were there because I was in the guest house.  
 7 Q. Okay, that's my question. You only  
 8 observed them either if you heard conversation or  
 9 [REDACTED] had called you and said would you pay such  
 10 and such?  
 11 A. Yes.  
 12 Q. At which time you would give them the  
 13 envelope with money?  
 14 A. Yes.  
 15 Q. In that set of circumstances they were on  
 16 their way basically to leave?  
 17 A. Yes.  
 18 Q. When you saw them leave did any of them  
 19 at any time, any of the ones that you saw during  
 20 August of '04 through March of '05 appear to you  
 21 to be scared?  
 22 A. No, sir.  
 23 Q. Did any girls, women ever appear to have  
 24 been injured in any way?  
 25 MR. [REDACTED]: Form.

1 A. Yes.  
 2 Q. Do you remember him asking you that?  
 3 A. Yes.  
 4 Q. Are you familiar that teenagers like ice  
 5 cream?  
 6 A. Yes.  
 7 Q. Are you familiar that people who are 20  
 8 and 30 years old like ice cream?  
 9 A. Yes.  
 10 Q. Are you familiar that older people, even  
 11 our age, Mr. Rodriguez, like ice cream too?  
 12 A. Yes.  
 13 Q. Okay. And when the individuals would sit  
 14 there, and that is these women who would come over  
 15 to give a massage and they would -- you would  
 16 observe them eating, did they appear to be  
 17 comfortable?  
 18 A. Yes.  
 19 MR. [REDACTED]: Form.  
 20 BY MR. CRITTON:  
 21 Q. Did they appear to be interacting with  
 22 either you or the chef?  
 23 A. Yes.  
 24 Q. When any of those women would come over  
 25 to give massage came downstairs, did you ever see

1 THE WITNESS: No, sir.  
 2 BY MR. CRITTON:  
 3 Q. Did anyone appear to be in shock?  
 4 A. No, sir.  
 5 Q. Was anyone ever crying?  
 6 A. No, sir.  
 7 Q. Was anyone disheveled or appeared to be  
 8 unhappy?  
 9 A. No, sir.  
 10 Q. Did all of them appear, that is the ones  
 11 that you saw leave the house that you had an  
 12 opportunity to observe during that time period,  
 13 did they appear to be approximately the same  
 14 personality, same demeanor that they had had when  
 15 they came into the house?  
 16 MR. [REDACTED]: Form.  
 17 THE WITNESS: Yes.  
 18 BY MR. CRITTON:  
 19 Q. Did anyone ever tell you when they came  
 20 down the stairs that they had been injured?  
 21 A. No.  
 22 Q. I'm talking about the young lady, the  
 23 women who had given the massages that you saw  
 24 actually leave the house, that is you had some  
 25 interaction with, either some interaction as they

1 were leaving the house, did anyone ever tell you  
 2 that they had been injured?  
 3 A. No, sir.  
 4 Q. Did they ever tell you that they had been  
 5 forced to do something against their will?  
 6 A. No.  
 7 Q. Did they ever tell you that they had been  
 8 forced to do something inappropriate?  
 9 A. No.  
 10 Q. Did they ever tell you that they had been  
 11 assaulted in any way?  
 12 A. No.  
 13 Q. Did they ever tell you that they had been  
 14 inappropriately touched?  
 15 A. No.  
 16 MR. [REDACTED]: Form. This is a  
 17 cumulative. He's already told you the  
 18 limited contact he had. This is totally  
 19 inappropriate line of questions.  
 20 MR. CRITTON: Is that a form objection?  
 21 MR. [REDACTED]: You're exceeding the scope  
 22 of the direct because nobody asked him --  
 23 MR. CRITTON: Form, you get form in  
 24 federal court, that's what you get. Give me  
 25 your form.

1 MR. [REDACTED]: Form.  
 2 THE WITNESS: No.  
 3 BY MR. CRITTON:  
 4 Q. Did you ever hear anyone yell rape or  
 5 assault or battery?  
 6 MR. [REDACTED]: Form.  
 7 THE WITNESS: No.  
 8 BY MR. CRITTON:  
 9 Q. Did you ever hear anyone yell out in  
 10 anger?  
 11 A. No.  
 12 Q. You've gone online, Mr. Rodriguez, and  
 13 looked at various articles or postings that have  
 14 been made regarding these cases. Is that a fair  
 15 statement?  
 16 A. I'm sorry?  
 17 Q. If I understood your testimony from July  
 18 29th and a little bit today, is that you've gone  
 19 online and read some articles and/or what the  
 20 police report may have said, that is, you've read  
 21 information that you've -- about these lawsuits  
 22 after the time that you left Mr. Epstein's  
 23 employment.  
 24 A. Yes.  
 25 Q. Correct?

1 MR. [REDACTED]: Form, cumulative.  
 2 MR. CRITTON: Great. Why don't you let  
 3 me finish the question and then you can  
 4 object to it.  
 5 Could you give me back what my last  
 6 question was, please?  
 7 (Thereupon, a portion of the record was  
 8 read by the reporter.)  
 9 THE WITNESS: No.  
 10 BY MR. CRITTON:  
 11 Q. Did they ever tell you that they had been  
 12 sexually assaulted in any way?  
 13 MR. [REDACTED]: Form.  
 14 MR. [REDACTED]: Form.  
 15 THE WITNESS: No.  
 16 BY MR. CRITTON:  
 17 Q. I'm sorry?  
 18 A. No.  
 19 Q. At any time did you hear anyone -- strike  
 20 that.  
 21 As to the women who came to give a  
 22 massage, did you ever hear anyone scream?  
 23 A. No, sir.  
 24 Q. Did you ever hear anyone cry out what  
 25 sounded like to you help?

1 A. Yes.  
 2 Q. And, therefore, you have at least seen  
 3 certain allegations and what people say occurred,  
 4 or at least their recitation of what may have  
 5 occurred at Mr. Epstein's home.  
 6 A. Yes.  
 7 Q. You have no personal knowledge one way or  
 8 the other.  
 9 MR. [REDACTED]: Object to the form.  
 10 MR. [REDACTED]: Form.  
 11 BY MR. CRITTON:  
 12 Q. Correct?  
 13 A. That's correct.  
 14 Q. Are you also aware that the individuals  
 15 who have filed lawsuits want in some instance  
 16 millions of dollars?  
 17 A. Yes.  
 18 Q. Okay. Are you aware that some of them  
 19 are now claiming that they were sexually  
 20 assaulted?  
 21 A. Yes.  
 22 Q. And battered?  
 23 A. Yes.  
 24 Q. And you have no information, no personal  
 25 knowledge in that regard. Is that true?

1 A. Yes.  
 2 MR. [REDACTED]: Form.  
 3 MR. [REDACTED]: Form.  
 4 BY MR. CRITTON:  
 5 Q. All right. Were you aware of the  
 6 backgrounds of any of these women who came over to  
 7 give massages?  
 8 MR. [REDACTED]: Form.  
 9 THE WITNESS: No, sir.  
 10 BY MR. CRITTON:  
 11 Q. Well, have you -- did any one of the  
 12 females who ever came to give massages, did they  
 13 ever tell you that they were prostitutes?  
 14 A. No, sir.  
 15 Q. Did they ever tell you that they had been  
 16 lead into a life of prostitution?  
 17 MR. [REDACTED]: Form.  
 18 THE WITNESS: No.  
 19 BY MR. CRITTON:  
 20 Q. Did they ever tell you about their family  
 21 life, whether it involved prostitution, abuse,  
 22 prior posttraumatic stress syndrome, drugs,  
 23 alcohol, abuse by individuals, physical abuse as  
 24 well as verbal abuse?  
 25 A. No, they didn't tell me.

1 the property in your car?  
 2 A. I was pulling over from Publix so I  
 3 turned around and I went to the police and say --  
 4 Q. Okay. You were coming back to the home  
 5 when you saw that car there?  
 6 A. Exactly.  
 7 Q. And they sent -- they, the police, sent a  
 8 police car with you to come there?  
 9 A. Yes.  
 10 Q. Did you and the police officer walk up to  
 11 the car?  
 12 A. The police went first.  
 13 Q. All right. And if I understand that,  
 14 that was in January of '05?  
 15 A. Yes.  
 16 Q. And when you did that then did you follow  
 17 behind the police officer to see who was in the  
 18 car?  
 19 A. Yes.  
 20 Q. And then you recognized that as [REDACTED].?  
 21 A. Yes.  
 22 Q. And [REDACTED] said she had come back or was  
 23 there to get some money?  
 24 A. Yes.  
 25 Q. And did you in fact give her money?

1 Q. And, obviously, you have no personal  
 2 knowledge one way or the other --  
 3 A. No, sir.  
 4 Q. -- with regard to what their backgrounds  
 5 were before they ever met or came in contact with  
 6 Mr. Epstein?  
 7 A. No, sir.  
 8 Q. Did any person, female, who came to give  
 9 a massage at the Epstein home, did anyone ever  
 10 come downstairs and say, Mr. Rodriguez, or sir,  
 11 call the police?  
 12 MR. [REDACTED]: Form.  
 13 MR. [REDACTED]: Form.  
 14 THE WITNESS: No, sir.  
 15 BY MR. CRITTON:  
 16 Q. I think you said on one occasion you saw  
 17 someone parked in a vehicle inside the gate that  
 18 you didn't recognize.  
 19 A. Exactly.  
 20 Q. You called the police?  
 21 A. Yes, I did.  
 22 Q. Did you go to the police or you called  
 23 the police and they came?  
 24 A. I went to the police department.  
 25 Q. So how did you -- did you actually leave

1 A. Yes, I did.  
 2 Q. And I think you said you told the police  
 3 officer you recognized her?  
 4 A. Yes.  
 5 Q. Did you have to get permission to pay her  
 6 or did you just pay her?  
 7 A. No, because [REDACTED] told me already but I  
 8 forgot she was going to be that late, so that was  
 9 my concern in calling the police.  
 10 Q. Okay. And that person who came, do you  
 11 have any idea what her age was at that time?  
 12 A. That night?  
 13 Q. Right, January of '08.  
 14 A. No, no.  
 15 Q. I'm sorry, January of '05.  
 16 A. No.  
 17 Q. You mentioned some conversations that you  
 18 had had with [REDACTED] who was I think she was one  
 19 of the house -- the main housekeeper.  
 20 A. Yes.  
 21 Q. And [REDACTED] told you a number of thoughts  
 22 that she had. Is that correct?  
 23 A. Yes.  
 24 Q. And as to [REDACTED] what she told you about  
 25 -- let me strike that.

1 I think you told us, you were asked  
 2 questions about sex toys, I think you certainly  
 3 described the back massagers. Correct?  
 4 A. Yes.  
 5 Q. I think you said the only sex toys that  
 6 you ever saw were in the armoire at the end of Mr.  
 7 Epstein's bed.  
 8 A. Yes.  
 9 Q. Okay. And whatever other sex toys that  
 10 to which there was a reference, that's something  
 11 that [REDACTED] told you. Is that correct?  
 12 A. That's correct.  
 13 Q. You were asked at the last deposition, I  
 14 don't remember who asked the question, but whether  
 15 you had ever seen pornography on any computer. I  
 16 think one of your responses was you saw some  
 17 photos of a naked woman who appeared to you to be  
 18 a model.  
 19 A. Yes.  
 20 Q. Okay. Do you consider every photograph,  
 21 picture, painting of a naked nude woman to be  
 22 pornography?  
 23 MR. [REDACTED]: Form.  
 24 MS. [REDACTED]: Objection, form.  
 25 THE WITNESS: I consider -- well, if it's

1 a frontal picture it's pornography, I will  
 2 look at my way.  
 3 BY MR. CRITTON:  
 4 Q. In your view?  
 5 A. Yes.  
 6 Q. So if you looked at -- I don't remember  
 7 whether Playboy still has -- say a Playboy that  
 8 has a frontal nudity shot of a woman, you would in  
 9 essence say that Playboy is selling pornography?  
 10 A. Yes.  
 11 Q. Therefore, every person who buys a  
 12 Playboy that has over the last umpteen tens of  
 13 years that has a frontal picture of a woman in the  
 14 nude would be purchasing pornography whether it's  
 15 from CVS, or Walgreens, or Eckerd as they existed,  
 16 or any grocery store that sells them?  
 17 A. Yes.  
 18 MS. [REDACTED]: Objection, form.  
 19 MR. [REDACTED]: Form.  
 20 MR. [REDACTED]: Form.  
 21 BY MR. CRITTON:  
 22 Q. The photographs -- I'm sorry, the  
 23 pictures that you saw in the computer, I think you  
 24 were able to draw those up or bring those up from  
 25 your own computer.

1 A. To bring the pictures from my computer?  
 2 Q. Let me rephrase the question. I thought  
 3 what you said last time was that as to the  
 4 pictures that you did see of naked women -- of a  
 5 naked woman or naked women on the computer, that  
 6 you've looked at those photographs through your  
 7 computer.  
 8 A. No.  
 9 Q. Okay. Then I may have misunderstood you.  
 10 Was your reference to Ms. Maxwell's computer that  
 11 you made at the last deposition?  
 12 A. Yes.  
 13 Q. Okay. Your computer that you had either  
 14 in the staff house or that you --  
 15 A. Didn't access.  
 16 Q. You couldn't access those files?  
 17 A. That's correct.  
 18 Q. All right, now I'm with you. So the  
 19 photographs you've talked of the nude individuals,  
 20 or the naked women, were the photographs that  
 21 we've already talked about with both, i.e., in  
 22 Ms. Maxwell's computer?  
 23 A. Yes.  
 24 Q. Thank you for clearing that up.  
 25 I'm going to ask you to assume that [REDACTED].

1 who you've described as having come to Mr.  
 2 Epstein's house on three or four times a week for  
 3 a period of time, one of her claims in this case  
 4 is that she has been emotionally traumatized by  
 5 her contact with Mr. Epstein. Just assume that to  
 6 be true for purposes of this question.  
 7 Did you ever observe any what you would  
 8 have seen as emotional trauma or any type of  
 9 disturbance with [REDACTED] on the many times she came  
 10 to your house?  
 11 MR. [REDACTED]: Form.  
 12 THE WITNESS: I didn't see any.  
 13 BY MR. CRITTON:  
 14 Q. Does it make sense to you that a person  
 15 who claims emotional trauma would continue to come  
 16 back to the house, does that make sense to you,  
 17 sir?  
 18 MR. [REDACTED]: Form.  
 19 MR. [REDACTED]: Form.  
 20 MR. [REDACTED]: Object to the form of the  
 21 question.  
 22 THE WITNESS: I'm not a psychologist.  
 23 MR. [REDACTED]: Can you state your answer,  
 24 I didn't hear it?  
 25 THE WITNESS: Yeah, I'm not a

1 psychologist, I don't know.  
 2 MR. CRITTON: I have no further  
 3 questions.  
 4 REDIRECT EXAMINATION  
 5 BY MR. [REDACTED]:  
 6 Q. Mr. Rodriguez, I don't know if we covered  
 7 this last time, I think that we did not, but can  
 8 you tell us during the period of time when you  
 9 worked at that house at El Brillo, Mr. Epstein's,  
 10 what cars did he own or were in the driveway?  
 11 A. We have two Suburbans, two Mercedes 600,  
 12 and a Cobra, and a motorcycle.  
 13 Q. And which, if any, did he drive?  
 14 A. He preferred the Mercedes or any of the  
 15 Suburbans.  
 16 Q. All right. Do you know where he owns  
 17 homes?  
 18 A. Yes.  
 19 Q. Where?  
 20 MR. CRITTON: Form.  
 21 THE WITNESS: Paris, New York City, El  
 22 Brillo, Saint James Island -- I'm sorry, an  
 23 Island in the Caribbean, and a ranch in New  
 24 Mexico.  
 25 BY MR. [REDACTED]:

1 Q. What's the address?  
 2 A. 22 Foch Avenue, Paris. F-O-C-H.  
 3 Q. Okay. Do you know a telephone number for  
 4 Balsone?  
 5 A. No, I don't remember, sir.  
 6 Q. All right. How did it come up that you  
 7 talked to him about whether or not Mr. Epstein had  
 8 massages at that house?  
 9 A. He came on two occasions and stay with me  
 10 for a week because Mr. Epstein wanted me to get  
 11 into his style of running the house, and he was  
 12 good enough to give me some inside information,  
 13 what he likes and doesn't like, so he told me the  
 14 same thing was in Paris.  
 15 Q. And I think that you described Mr.  
 16 Epstein usually had about two massages a day, or  
 17 at least we were calling them massages.  
 18 A. Yes, sir.  
 19 MR. CRITTON: Form.  
 20 BY MR. [REDACTED]:  
 21 Q. And did Mr. Balsone describe it in a  
 22 similar fashion --  
 23 A. Yes.  
 24 Q. -- in Paris?  
 25 And did he also tell you that the girls

1 Q. Have you been to any of the other  
 2 properties?  
 3 A. No.  
 4 Q. Do you know the house managers at any of  
 5 the other properties?  
 6 A. Yes.  
 7 Q. And who are they?  
 8 A. Balsone in Paris, good friend of mine  
 9 from Brazil. And the people in New York give me  
 10 the briefing when I came aboard. There is a  
 11 couple from the Philippines. And I talked to the  
 12 couple that used to own the Island -- I mean who  
 13 used to manage the Island, a couple from South  
 14 African. Balsone was closer to me.  
 15 Q. Have you talked to Balsone about whether  
 16 or not Mr. Epstein has massages when he is at that  
 17 place?  
 18 A. Yes, I did.  
 19 Q. And what did he say about that?  
 20 A. That he had a lot of massages over there  
 21 too.  
 22 MR. CRITTON: Mr. Balsone was which one?  
 23 THE WITNESS: Baslone was the house  
 24 manager of Paris, 22 Foch Avenue.  
 25 BY MR. [REDACTED]:

1 were very young in age that he was receiving these  
 2 massages from?  
 3 MR. CRITTON: Form.  
 4 THE WITNESS: Yes.  
 5 BY MR. [REDACTED]:  
 6 Q. Did he indicate whether or not -- or how  
 7 old these girls were?  
 8 A. No, he didn't told me.  
 9 Q. Just that the age group was similar to  
 10 the age group that he was interested in in Palm  
 11 Beach?  
 12 MR. [REDACTED]: Form.  
 13 THE WITNESS: Yes.  
 14 BY MR. [REDACTED]:  
 15 Q. And did you talk to any of the house  
 16 managers in New York?  
 17 A. No.  
 18 Q. Who was the house manager in New York at  
 19 the time when you were the house manager at El  
 20 Brillo?  
 21 A. His nickname was Jo-Jo, but I don't  
 22 remember. Jo-Jo and his wife, but I don't  
 23 remember his name, sir.  
 24 Q. Do you know whether Mr. Epstein would  
 25 have massages when he was in New York at his New

1 York house?  
 2 A. He will have massages.  
 3 MR. CRITTON: Form.  
 4 BY MR. [REDACTED]:  
 5 Q. And are we still talking about a habit of  
 6 two a day?  
 7 MR. CRITTON: Form.  
 8 THE WITNESS: I don't know that.  
 9 BY MR. [REDACTED]:  
 10 Q. Okay. So for the time period when you  
 11 have been familiar with Mr. Epstein and known his  
 12 habits, is it fair to say that he would have  
 13 roughly two girls a day in that same age group  
 14 wherever he was?  
 15 A. Yes.  
 16 MR. CRITTON: Form.  
 17 BY MR. [REDACTED]:  
 18 Q. All right. And have you talked to  
 19 anybody that has given you similar information  
 20 from his Island home?  
 21 A. No.  
 22 Q. Do you know any of the girls that have  
 23 been over to his Island?  
 24 A. Yes.  
 25 Q. And who are they?

1 Q. And is your understanding that Mr.  
 2 Epstein was intimate with any of those girls?  
 3 MR. CRITTON: Form.  
 4 THE WITNESS: Yes.  
 5 BY MR. [REDACTED]:  
 6 Q. With all of them?  
 7 MR. CRITTON: Form.  
 8 THE WITNESS: Yes.  
 9 BY MR. [REDACTED]:  
 10 Q. With [REDACTED] as well?  
 11 A. Yes.  
 12 MR. CRITTON: Form.  
 13 BY MR. [REDACTED]:  
 14 Q. With [REDACTED]?  
 15 A. Yes.  
 16 MR. CRITTON: Form.  
 17 BY MR. [REDACTED]:  
 18 Q. And the girls who would come over on the  
 19 airplane?  
 20 MR. CRITTON: Form.  
 21 THE WITNESS: Yes.  
 22 BY MR. [REDACTED]:  
 23 Q. Did you ever have occasion to go into the  
 24 bedroom and find the vibrators or back massagers  
 25 out after Mr. Epstein was in the room with any of

1 A. [REDACTED], the girls who used to stay at the  
 2 home in El Brillo used to go over there to the  
 3 Island.  
 4 Q. When he would have these girls -- I guess  
 5 we've kind of categorized them as the girls who  
 6 would come over with him on an airplane and stay  
 7 at the house.  
 8 A. Yes.  
 9 Q. When they would be staying at the house  
 10 would he also have the local Palm Beach girls  
 11 coming over that you were told to call masseuses?  
 12 A. Yes.  
 13 Q. So these girls that came on the airplane  
 14 with him, were they also -- did they also have  
 15 knowledge that these young girls were coming over  
 16 to give massages?  
 17 MR. CRITTON: Form.  
 18 THE WITNESS: Yes, sir.  
 19 BY MR. [REDACTED]:  
 20 Q. Okay. Who are the girls from the  
 21 airplane other than [REDACTED] that you remember?  
 22 A. [REDACTED]. There were so many, sir, I don't  
 23 recall right now. But [REDACTED] is for sure, [REDACTED]  
 24 was one of the main girlfriends, but I don't  
 25 remember that.

1 the girls that came over on the plane?  
 2 MR. CRITTON: Form.  
 3 THE WITNESS: Yes.  
 4 BY MR. [REDACTED]:  
 5 Q. So that's something that would be out  
 6 after the girls that came over on the plane or the  
 7 girls that came over for the massages?  
 8 A. Yes.  
 9 MR. CRITTON: Form.  
 10 BY MR. [REDACTED]:  
 11 Q. And at the time when you were house  
 12 manager you had a 15-year old daughter?  
 13 A. Yes.  
 14 Q. Did she live down here?  
 15 A. In New Jersey.  
 16 Q. Okay. When Alan Dershowitz was at the  
 17 house I understood you to say that these local  
 18 Palm Beach girls would come over to the house  
 19 while he was there but you're not sure if he had a  
 20 massage from any of those girls.  
 21 A. Exactly.  
 22 Q. And what would he do while those girls  
 23 were at the house?  
 24 MR. CRITTON: Form.  
 25 THE WITNESS: He will read a book with a

1 glass of wine by the pool, stay inside.  
 2 BY MR. [REDACTED]:  
 3 Q. Did he ever talk to any of the girls?  
 4 A. I don't know, sir.  
 5 Q. Certainly he knew that they were there?  
 6 MR. CRITTON: Form.  
 7 THE WITNESS: I don't know, sir.  
 8 BY MR. [REDACTED]:  
 9 Q. Do you know how [REDACTED] knows Mr.  
 10 Epstein?  
 11 A. No, sir.  
 12 Q. Or how long she's known him?  
 13 MR. CRITTON: Form.  
 14 THE WITNESS: She was on board two years  
 15 or a year and a half before I came on board.  
 16 BY MR. [REDACTED]:  
 17 Q. Okay.  
 18 A. So it's probably 2003 or 2.  
 19 Q. All right. You mentioned this Citrix  
 20 system.  
 21 A. Yes.  
 22 Q. Is that a system that was used to operate  
 23 the phones and the computers?  
 24 A. The computers mainly.  
 25 Q. All right. But you then also described

1 some system where someone would call on the  
 2 telephone and that would be automatically  
 3 downloaded to the computer?  
 4 A. Yeah, you can retrieve who called in a  
 5 transcript written who called, what's the message,  
 6 the time so you have it on a piece of paper, you  
 7 can print it out.  
 8 Q. Is it your understanding that is also  
 9 part of the Citrix system?  
 10 A. Yes.  
 11 Q. All right. Did you have an e-mail?  
 12 A. Right now, yes.  
 13 Q. No, when you were working at --  
 14 A. Yes, I did.  
 15 Q. -- Mr. Epstein?  
 16 And did [REDACTED] have an e-mail?  
 17 A. Yes.  
 18 Q. And did all of the e-mails end the same  
 19 way such as Epstein's house dot com or something?  
 20 A. Yes.  
 21 Q. Okay. What was [REDACTED] e-mail?  
 22 A. I don't remember.  
 23 Q. What was your e-mail?  
 24 A. Staff house -- I don't remember, sir.  
 25 Q. Do you recall how it ended? I mean

1 usually it's Yahoo dot com or at Bellsouth dot  
 2 net.  
 3 A. It was very uncommon. I don't remember,  
 4 sir.  
 5 Q. Did everybody in the -- I think you  
 6 called it the organization, did everybody have  
 7 e-mails?  
 8 A. Yes.  
 9 Q. Okay. Would that include [REDACTED]?  
 10 A. Yes.  
 11 Q. All right. And did Mr. Epstein have an  
 12 e-mail?  
 13 A. Yes.  
 14 Q. Did you ever correspond with Mr. Epstein  
 15 by e-mail?  
 16 A. Yes.  
 17 MR. [REDACTED]: You can go ahead.  
 18 THE WITNESS: That's the only one that I  
 19 remember.  
 20 THE VIDEOGRAPHER: Okay, we're off the  
 21 record.  
 22 (Thereupon, a recess was had.)  
 23 THE VIDEOGRAPHER: We're back on the  
 24 record with tape number four.  
 25 BY MR. [REDACTED]:

1 Q. Mr. Rodriguez, what was Mr. Epstein's  
 2 e-mail?  
 3 A. Jeep project at something -- Jeep  
 4 project -- I can't remember it right now.  
 5 Q. Okay. In the course of this next 10 or  
 6 15 minutes --  
 7 A. I can recall.  
 8 Q. -- if it comes to you just tell me. So  
 9 it was Jeep project --  
 10 A. Like Jeep, the brand name Jeep, Jeep  
 11 project at -- I can't remember.  
 12 Q. Okay. Was that his only e-mail to your  
 13 knowledge?  
 14 A. No.  
 15 Q. He had other e-mail addresses?  
 16 A. Yes.  
 17 Q. Do you know what any of his other e-mail  
 18 addresses were?  
 19 A. No, I don't remember.  
 20 Q. Do you know who the carriers were for the  
 21 other e-mail addresses owned by Jeffrey Epstein?  
 22 A. No, sir.  
 23 Q. Whether it was Yahoo or hot mail or --  
 24 A. No, none of those.  
 25 Q. Okay. Was this Jeep project e-mail run

1 through the Citrix system?  
 2 A. Yes.  
 3 Q. Okay. And was there a certain company  
 4 that came out and fixed the actual Citrix system?  
 5 A. Yes.  
 6 Q. And who was that?  
 7 A. We used to have our own in-house  
 8 technician from Ohio.  
 9 Q. The same guy you were telling us about  
 10 before?  
 11 A. Yes.  
 12 Q. All right. He would fix the video  
 13 equipment or the --  
 14 A. Computers mainly.  
 15 Q. And if the Citrix system broke down too  
 16 then he would be in charge of it?  
 17 A. He was the only one dealing with this, we  
 18 couldn't hire anybody else.  
 19 Q. Do you know why that is?  
 20 A. No. It was too many lines into the house  
 21 from many properties.  
 22 Q. And do you know who that person is,  
 23 remember his name now?  
 24 A. I don't remember, sir.  
 25 Q. I understood you to say at some point in

1 at the house did any of these girls, these local  
 2 Palm Beach girls come over to the house as well?  
 3 A. They were earlier, sometimes they will  
 4 leave and he will stay for dinner.  
 5 Q. All right. And you remember there was  
 6 one time where maybe [REDACTED] stayed for dinner with  
 7 David Copperfield?  
 8 A. That's correct.  
 9 Q. Was there ever a time where [REDACTED] and  
 10 David Copperfield were in a bedroom together?  
 11 A. I don't think Mr. Copperfield went  
 12 upstairs.  
 13 Q. When the police came to the driveway with  
 14 [REDACTED] in the car, what did you tell the police, if  
 15 anything, that you were paying [REDACTED] for?  
 16 A. They asked me whose this people, and I  
 17 said they're a masseuse.  
 18 Q. Okay. Why would you tell them that  
 19 they're a masseuse, that's the name you were  
 20 supposed to call them?  
 21 MR. CRITTON: Form.  
 22 THE WITNESS: Yes.  
 23 BY MR. [REDACTED]:  
 24 Q. And for these massages you were paying  
 25 between 300 and 500 dollars each time?

1 time that you saw photographs of some of the girls  
 2 that were at the house to give massages on  
 3 Ms. Maxwell's computer.  
 4 A. Yes.  
 5 Q. And --  
 6 MR. CRITTON: Form to the last question.  
 7 BY MR. [REDACTED]:  
 8 Q. And do you know which of the girls?  
 9 A. No, sir.  
 10 Q. Was [REDACTED] one of them?  
 11 MR. CRITTON: Form.  
 12 THE WITNESS: I cannot guarantee that, I  
 13 cannot say hundred percent, sir.  
 14 BY MR. [REDACTED]:  
 15 Q. Was A. one of them?  
 16 A. Could be, sir.  
 17 Q. How about [REDACTED].?  
 18 A. It's the same thing, I cannot say a  
 19 hundred percent, sir.  
 20 Q. I think that you used the phrase there  
 21 were so many girls.  
 22 A. Yes, sir.  
 23 Q. That you're not sure which ones you saw?  
 24 A. No, sir, so many names.  
 25 Q. Okay. While David Copperfield was ever

1 A. Yes, sir.  
 2 Q. And that's usually for an hour up in the  
 3 bedroom with Mr. Epstein?  
 4 A. More or less, yes.  
 5 Q. You never told your 15-year old daughter  
 6 at the time that she could come over to Mr.  
 7 Epstein's for \$500 an hour?  
 8 A. No, sir.  
 9 MR. CRITTON: Form.  
 10 BY MR. [REDACTED]:  
 11 Q. Why is it that you never asked your  
 12 daughter to come over if it's just a massage?  
 13 MR. CRITTON: Form.  
 14 THE WITNESS: My daughters are too clean  
 15 for that, sir.  
 16 BY MR. [REDACTED]:  
 17 Q. Too clean to give a massage?  
 18 MR. CRITTON: Form.  
 19 THE WITNESS: They are good students,  
 20 they are in another type of environment,  
 21 sir, we are poor but you know, they're good  
 22 students.  
 23 BY MR. [REDACTED]:  
 24 Q. It's because you knew there was more than  
 25 a massage going on in the bedroom?

1 MR. CRITTON: Form.  
 2 THE WITNESS: Yes, sir.  
 3 BY MR. [REDACTED]:  
 4 Q. What are some of Mr. Epstein's companies,  
 5 if you know the names?  
 6 A. Well, he was the Price -- Price Com, it  
 7 was one of his companies, he had a phone company  
 8 in Palm Beach. A lot of offshore companies that  
 9 I don't recall, sir.  
 10 Q. When you say Price Com --  
 11 A. Price dot Com, he owned that for awhile.  
 12 And the local phone company in Palm Beach was his  
 13 but then he sold it again. But there is too many.  
 14 Q. As house manager you're obviously at his  
 15 house every single day, did you inquire as to what  
 16 he did in terms of making money?  
 17 A. No, sir, I only got through the internet  
 18 because I put his name on Google and then I find  
 19 out the rest of his companies.  
 20 Q. So during the day when he would go to the  
 21 cabana I think that you described last time that  
 22 he would work there?  
 23 A. He would work there.  
 24 Q. Do you know what he would do in terms of  
 25 working?

1 telephone numbers of various girls that were  
 2 referred to as masseuses, did that also give you  
 3 access to the girls that were coming over to Mr.  
 4 Epstein's house in Paris and New York and New  
 5 Mexico?  
 6 MR. CRITTON: Form.  
 7 THE WITNESS: We used to have a book in  
 8 every car, in every plane, in every boat  
 9 that Mr. Epstein with all the names of all  
 10 these people so it was not necessarily a  
 11 secret.  
 12 BY MR. [REDACTED]:  
 13 Q. When we're talking all these people, are  
 14 we talking about --  
 15 A. Masseuses and, you know, chefs, the  
 16 important people in the life of Mr. Epstein, you  
 17 know, used to have a black book with all the  
 18 names.  
 19 Q. So there were many black books?  
 20 A. Yes.  
 21 Q. And do you know where those black books  
 22 are now?  
 23 A. There were tons of those in the house  
 24 but, you know, I don't know.  
 25 Q. Okay. And did each one of them have

1 A. No, that was very private. I would put  
 2 his coffee there and I would shut the door.  
 3 Q. And [REDACTED] had a work station or  
 4 work computer within the house?  
 5 A. Yes.  
 6 Q. What did she do in terms of work?  
 7 A. She will set appointments for comedy  
 8 shops, movies. I will get the tickets but, you  
 9 know, she was appointments for the masseuse, or  
 10 travel arrangements with the pilots, that type of  
 11 thing.  
 12 Q. And would she keep track of all of the  
 13 girls who were coming to his house in Palm Beach  
 14 or at the other houses as well?  
 15 MR. CRITTON: Form.  
 16 THE WITNESS: All of the houses.  
 17 BY MR. [REDACTED]:  
 18 Q. All right. So if he was going to be in  
 19 Paris and he wanted girls over in that house she  
 20 would keep track of that as well?  
 21 MR. CRITTON: Form.  
 22 THE WITNESS: Exactly.  
 23 BY MR. [REDACTED]:  
 24 Q. And when you talked about seeing [REDACTED]  
 25 [REDACTED] computer and seeing the names and

1 handwritten names and numbers or were these  
 2 computer printouts so they were the same?  
 3 A. They were very organized. Once in awhile  
 4 they used to be updated, so we used to have these  
 5 books with obsolete dates, you know, so we discard  
 6 them and have the new ones.  
 7 Q. By obsolete dates are you saying that  
 8 there were girls that came over and then they no  
 9 longer came over anymore?  
 10 A. That's correct.  
 11 MR. CRITTON: Form.  
 12 BY MR. [REDACTED]:  
 13 Q. Okay. So if a girl that was coming over  
 14 for a period of time got too old and was no longer  
 15 able to come over and somebody else took her place  
 16 then her page would disappear from that book?  
 17 MR. CRITTON: Form.  
 18 THE WITNESS: I believe so, sir.  
 19 BY MR. [REDACTED]:  
 20 Q. You were asked about other homes that you  
 21 worked at for other wealthy people and asked if  
 22 these other homes had a massage table.  
 23 A. Yes.  
 24 Q. And you said that they did?  
 25 A. Yes.

1 Q. And you said that that was -- the massage  
2 table was similar in kind to that used by Mr.  
3 Epstein?  
4 A. That's correct.  
5 Q. And others had massage oils and that was  
6 similar in kind to Mr. Epstein's as well?  
7 A. Yes.  
8 Q. And you didn't think that the massage  
9 table at a home was unusual?  
10 A. No.  
11 Q. All right. Did any of the other houses  
12 where you worked have masseuses that were 14, 15,  
13 and 16 years old?  
14 MR. CRITTON: Form.  
15 THE WITNESS: No, sir.  
16 BY MR. [REDACTED]:  
17 Q. And did any of the other homes where you  
18 worked have different girls of that age coming  
19 every single day?  
20 A. Yes.  
21 MR. CRITTON: Form.  
22 BY MR. [REDACTED]:  
23 Q. They had different girls?  
24 A. Yes.  
25 Q. Okay. And how old were the girls that

1 would come to these other homes?  
2 A. They seem older.  
3 Q. Older than the ones that would come to  
4 Mr. Epstein's home?  
5 A. Yes.  
6 Q. And did you ever work at a place where  
7 there would be girls calling up on the phone to  
8 say I have girls to bring him and --  
9 A. No, sir.  
10 Q. -- coming over in teams --  
11 A. No.  
12 Q. -- or pairs?  
13 A. No.  
14 Q. So there were a lot of things about Mr.  
15 Epstein's house and his arrangement that were very  
16 unusual compared to the other places where you  
17 worked?  
18 MR. CRITTON: Form.  
19 THE WITNESS: Yes.  
20 BY MR. [REDACTED]:  
21 Q. And there were no drugs and alcohol or no  
22 wild parties at Mr. Epstein's house, that is  
23 somewhat different from some of the other places  
24 where you worked?  
25 A. Yes.

1 MR. [REDACTED]: I don't have anything else.  
2 MS. [REDACTED]: I have a few.  
3 EXAMINATION  
4 BY MS. [REDACTED]:  
5 Q. Mr. Rodriguez, I may have missed  
6 something. Did you say that there weren't any  
7 wild parties ever at El Brillo Way?  
8 A. I never saw what was going on inside the  
9 house, Ma'am.  
10 Q. So you don't know whether there were or  
11 were not?  
12 A. No, ma'am.  
13 Q. There wasn't just one massage table  
14 there; was there?  
15 A. We used to have two and we have an extra  
16 reserve, I think there were three in the house.  
17 Excuse me, I'll take that back. All the bedrooms  
18 used to have one.  
19 Q. Okay. Thank you. Did you ever hear  
20 about a girl named [REDACTED].?  
21 A. No, no, ma'am.  
22 Q. And those pictures on Ms. Maxwell's  
23 computer, did you ever see one of a girl naked in  
24 a hammock?  
25 MR. CRITTON: Form. Asked and answered.

1 THE WITNESS: I saw on a book not on a  
2 computer.  
3 BY MS. [REDACTED]:  
4 Q. You saw a picture of a girl naked in a  
5 book or on a book?  
6 A. The book was done for [REDACTED] and she was  
7 on the hammock, that's the only one I saw.  
8 Q. I'm sorry, the book was done for [REDACTED].?  
9 A. She was on the cover.  
10 Q. Then there were other people inside the  
11 book?  
12 A. Yes, ma'am.  
13 Q. And in that book there was a picture of a  
14 girl naked in a hammock?  
15 A. Yes.  
16 Q. Where did [REDACTED] keep that book?  
17 A. There were a few of those examples but I  
18 don't know where she kept it.  
19 Q. Was it laying around the house somewhere?  
20 A. Yes.  
21 Q. Downstairs?  
22 A. Downstairs, yes, ma'am.  
23 Q. Did [REDACTED] keep scrapbooks or photograph  
24 books --  
25 A. Yes.

1 Q. -- of friends, girls?  
 2 A. Yes, ma'am.  
 3 MR. CRITTON: Form.  
 4 BY MS. [REDACTED]:  
 5 Q. Do you remember there being a young man  
 6 who would bring girls to the house named Tony  
 7 Figueroa?  
 8 A. No, ma'am. The only person that I saw  
 9 that night [REDACTED] was at the house, she was driving  
 10 the car, but I didn't see any males.  
 11 MR. CRITTON: You said he, he being whom?  
 12 BY MS. [REDACTED]:  
 13 Q. I didn't quite understand that either.  
 14 Tony Figueroa was driving.  
 15 A. She was with this girl that night [REDACTED] I  
 16 think that's the only time I saw a male at the  
 17 house, ma'am.  
 18 Q. And you're talking about the night when  
 19 you came and found the old car in the driveway?  
 20 A. Exactly, yes, with the police, yes.  
 21 Q. How did you remember that it was Tony  
 22 Figueroa?  
 23 A. It's the only person, male that I  
 24 remember.  
 25 Q. But you don't know his name?

1 A. No, no, no, Ma'am.  
 2 Q. Got you. Thank you.  
 3 MR. CRITTON: Can I ask one quick?  
 4 There was a man with [REDACTED], you don't know  
 5 who it was?  
 6 THE WITNESS: That's the only male that's  
 7 been to the house, so when she asked me the  
 8 question I assume, you know.  
 9 MR. CRITTON: Do you know who Tony  
 10 Figueroa is?  
 11 THE WITNESS: No, sir.  
 12 MR. CRITTON: Okay. Now I think I  
 13 understand. Thank you. Sorry, Cathy.  
 14 MS. [REDACTED]: That's okay.  
 15 BY MS. [REDACTED]:  
 16 Q. I asked you earlier if the chef's name  
 17 could have been [REDACTED] and I was wrong, I  
 18 wanted to ask you a different name.  
 19 Could it have been [REDACTED]  
 20 A. I don't remember his last name.  
 21 Q. Do you remember an assistant of some sort  
 22 who worked there for awhile when you were there  
 23 named [REDACTED]?  
 24 A. Yes.  
 25 Q. What did she do?

1 A. [REDACTED] was like [REDACTED], she was between  
 2 [REDACTED] and me, I guess. She was to help [REDACTED] in  
 3 her duties.  
 4 Q. And is that what your understanding was  
 5 as to what [REDACTED] did?  
 6 A. I'm sorry?  
 7 Q. Was it your understanding that [REDACTED] was  
 8 there to help [REDACTED] with her duties?  
 9 A. No, [REDACTED] was.  
 10 Q. [REDACTED] was. Okay.  
 11 Have you spoken to any lawyers or  
 12 investigators about this case since you were  
 13 deposed last?  
 14 A. No, ma'am.  
 15 Q. I believe Mr. Critton was asking you  
 16 questions relating to the incident when [REDACTED] was  
 17 in a car in the driveway and you went and got the  
 18 police and he was speaking of that time as being  
 19 in January of '05. Do you remember when it was?  
 20 A. I will put that in that month, ma'am, but  
 21 I cannot guarantee.  
 22 Q. Let me just show you something that we  
 23 can mark as the next exhibit.  
 24 I would just ask that if -- yes, the name  
 25 is in here that we redact it to show just the

1 initials.  
 2 MR. [REDACTED]: We're going to attach this;  
 3 right?  
 4 MS. [REDACTED]: Yes.  
 5 MR. CRITTON: You're going to let us have  
 6 this one?  
 7 MS. [REDACTED]: Yes. With initials.  
 8 (Exhibit No. 9 was marked for  
 9 Identification.)  
 10 BY MS. [REDACTED]:  
 11 Q. Have you ever seen this report?  
 12 A. I saw it typed, not handwritten like  
 13 this.  
 14 Q. Did the police bring you one that was  
 15 typed?  
 16 A. No, the only time I saw my own report was  
 17 on the internet because my daughter told me do you  
 18 know that you're in Palm Beach and this and that,  
 19 so I was in New York on vacation and that's why I  
 20 read it but this is the first time I'm looking at  
 21 this.  
 22 Q. Okay.  
 23 MR. [REDACTED]: Do you have extra copies?  
 24 MS. [REDACTED]: I do, I don't want to give  
 25 them out, I'd rather -- I don't mind them

1 attaching it to the deposition as long as it  
 2 has just the initials.  
 3 THE WITNESS: This is the report when I  
 4 called to the police to the house?  
 5 BY MS. [REDACTED]:  
 6 Q. Let me let you look at it, I'd rather you  
 7 tell us if it is.  
 8 A. This is why I was fired. This is the  
 9 reason I was let go.  
 10 MR. CRITTON: There is no question right  
 11 now. I'm sure there will be.  
 12 MR. [REDACTED]: I'll ask it if you want.  
 13 THE WITNESS: I'm thinking out loud.  
 14 BY MS. [REDACTED]:  
 15 Q. Did you notice the date on this report?  
 16 A. November 28th, yes, ma'am.  
 17 Q. And do you have any reason to believe  
 18 that that's not accurate?  
 19 A. No, that's it, yeah.  
 20 Q. And as you look at other information on  
 21 the report do you see anything else that's not  
 22 accurate?  
 23 A. Let me finish reading this, please.  
 24 Q. Sure.  
 25 MR. CRITTON: Let me just object to the

1 Q. Can you tell me what you mean by that?  
 2 A. Mr. Epstein used to give a lot of gifts  
 3 to the police department, so we used to have  
 4 certain leeway in terms of speeding or some other  
 5 things. So he used to put a baseball cap Palm  
 6 Beach Police Department on the dashboard.  
 7 So when he saw I called the police for my  
 8 own safety because I was carrying cash, I  
 9 explained that to him, and he say why you called  
 10 the police, and I said because I saw a clunker in  
 11 the driveway and it's dark. In Palm Beach there  
 12 is no nights. So I called for my own safety. I  
 13 was coming from Publix buying my groceries and I  
 14 had cash in my pocket. And I said I called the  
 15 police because I was concerned about my own  
 16 safety.  
 17 And I recognized the girl and I figured  
 18 because I remember [REDACTED] told me earlier that day  
 19 -- it was a hectic day, he just left Palm Beach  
 20 and I was catching up with my breath, you know, I  
 21 went to buy my groceries, and I explained that.  
 22 So he was upset that this will spill, you know, to  
 23 the public or the street. But I didn't realize  
 24 this was written or something, you know.  
 25 Q. You were not fired though until sometime

1 form. Can I look at your copy, please?  
 2 THE WITNESS: This is the first time I  
 3 saw this.  
 4 BY MS. [REDACTED]:  
 5 Q. Have you had a chance now to read it?  
 6 A. Yes, ma'am.  
 7 Q. Okay. Does this report accurately  
 8 describe what occurred that evening?  
 9 A. Yes, ma'am.  
 10 MR. CRITTON: Form.  
 11 BY MS. [REDACTED]:  
 12 Q. Did you overhear the conversation between  
 13 [REDACTED] and the policeman?  
 14 A. Yes, ma'am.  
 15 Q. And is that part accurate as well?  
 16 A. Yes.  
 17 Q. And then your conversation with Mr. --  
 18 with [REDACTED] --  
 19 A. Yes, ma'am.  
 20 Q. -- is that accurately reported here as  
 21 well?  
 22 A. Yes, ma'am.  
 23 Q. Now you stated that this is why you got  
 24 fired.  
 25 A. Yes, ma'am.

1 in March?  
 2 A. Exactly, yes. But he gave me -- Mr.  
 3 Epstein used the word I'm going to give you -- he  
 4 make fun of my Spanish and he said (speaking in  
 5 Spanish).  
 6 And I said, yes, Mr. Epstein. Okay, I'll  
 7 give you one more chance. And I said what's going  
 8 on. But, you know, it meant a few words, I  
 9 couldn't talk to him too much, but this was it.  
 10 Because, you know, I have to say this for  
 11 myself, you know, I never did something illegal, I  
 12 was working hard to please him and sometimes more  
 13 than I was supposed to, many hours beyond my  
 14 duties, and so -- but he was concerned about this.  
 15 And I say, Mr. Epstein, you told me  
 16 safety is the paramount of this house, in this  
 17 case it was me, but obviously he didn't care about  
 18 me, it was his safety.  
 19 MR. CRITTON: Form. Move to strike.  
 20 BY MS. [REDACTED]:  
 21 Q. Can you translate for me what you said a  
 22 moment ago in -- I don't know --  
 23 A. In Spanish he said "conose" amnesty, but  
 24 he used the word "conose amnistia", I'll give you  
 25 amnesty so you have a chance to continue working

1 with me.  
 2 But I didn't ask him why. He just came  
 3 fast. You're always in the run, you have to be on  
 4 your toes, and the next thing he said I took the  
 5 wrong Suburban and they let me go.  
 6 But I never find out what happened  
 7 because I have to say this. Being so many people  
 8 in the house I didn't know if I displease one of  
 9 the girls, or something I said or I did, I don't  
 10 think so. So they let me go very mysteriously.  
 11 But this is it.  
 12 Q. I understood you to say that Mr. Epstein  
 13 gave lots of gifts to the police department.  
 14 A. Yes, ma'am.  
 15 Q. And you said something about a baseball  
 16 cap.  
 17 A. Well, the police department used to give  
 18 us in retribution dozens of baseball caps with the  
 19 Palm Beach Police Department, you put one of those  
 20 on the dashboard you don't get a ticket.  
 21 Q. Oh.  
 22 A. Stuff like that. Key rings and so on and  
 23 so forth. There is -- everybody knows this, I  
 24 don't think it's a secret. Mr. Epstein give  
 25 \$85,000 simulator for the police to shoot, you

1 her do you believe under the influence of drugs?  
 2 A. No.  
 3 Q. Did you ever see steroids in the house?  
 4 A. No.  
 5 MR. [REDACTED]: Thank you.  
 6 MR. [REDACTED]: Do you have anything,  
 7 [REDACTED]  
 8 MR. [REDACTED]: Yes.  
 9 MR. [REDACTED]: Okay, shoot.  
 10 EXAMINATION  
 11 BY MR. [REDACTED]:  
 12 Q. Mr. Critton asked you several questions  
 13 about the females who you were told to refer to as  
 14 masseuses. And when he asked you those questions  
 15 he referred to them often as women.  
 16 Did you think of those masseuses as  
 17 women?  
 18 MR. CRITTON: Form.  
 19 THE WITNESS: Yes.  
 20 BY MR. [REDACTED]:  
 21 Q. Why?  
 22 A. Because I saw them, they were females.  
 23 Q. What is your definition of a woman?  
 24 A. Person of the opposite sex, I'm a male.  
 25 Q. Is a three-year old a woman?

1 know, and it was returned after the scandal broke  
 2 out.  
 3 MR. CRITTON: Move as nonresponsive to  
 4 any question. Move to strike.  
 5 MS. [REDACTED]: I don't have any other  
 6 questions.  
 7 EXAMINATION  
 8 BY MR. [REDACTED]:  
 9 Q. Mr. Rodriguez, do you know where the main  
 10 server, the main computer server was located  
 11 inside the house?  
 12 A. In the garage.  
 13 Q. Do you know the names of any of the  
 14 programs -- computer programs --  
 15 MR. [REDACTED]: I am missing something.  
 16 Whose questioning now?  
 17 MR. [REDACTED]: [REDACTED]  
 18 BY MR. [REDACTED]:  
 19 Q. Do you know the names of some of the main  
 20 computer programs that are used as part of your  
 21 routine as the house manager of the house?  
 22 A. The main computers?  
 23 Q. Programs.  
 24 A. Besides Citrix, no, sir.  
 25 Q. Regarding [REDACTED], did you ever see

1 A. Yes.  
 2 Q. Okay.  
 3 MR. [REDACTED]: I don't have any other  
 4 questions.  
 5 MR. [REDACTED]: I do but only just to  
 6 follow-up with this police report that we've  
 7 just been provided which I'm not sure if it  
 8 has a designation.  
 9 MR. CRITTON: Exhibit 9.  
 10 MR. [REDACTED]: Okay.  
 11 EXAMINATION  
 12 BY MR. [REDACTED]:  
 13 Q. You were asked by Mr. Critton about [REDACTED].  
 14 who we were referring to as [REDACTED] in this  
 15 deposition, and her date of birth is [REDACTED]  
 16 And Mr. Critton was indicating to you earlier that  
 17 at the time that you had this dealing with her in  
 18 the driveway that she was 18 years old. It  
 19 appears that this occurred November 28, 2004,  
 20 which would indicate that she is [REDACTED] years old.  
 21 I think the question that was asked of  
 22 you is, are you surprised by that, so I'll ask you  
 23 the same question?  
 24 A. No, sir.  
 25 Q. All right. This report that you have

1 indicated is accurate or accurately reflects the  
2 events of that night, I want to make sure that Mr.  
3 [REDACTED] hears and that we go through it and you  
4 can elaborate on any part of it. Okay.

5 On Sunday, 11/28/2004, at approximately  
6 19:00 hours, so we're talking about 7:00 at night,  
7 the property manager of 358 El Brillo Way, Alfredo  
8 Rodriguez, came to the station to complain there  
9 was a strange vehicle parked in the driveway.

10 A. Yes.

11 Q. That's true?

12 A. Yes.

13 Q. When Officer [REDACTED] and I, this is  
14 Officer [REDACTED] talking, arrived at 358 El Brillo,  
15 we located a white female later identified as  
16 [REDACTED], date of birth 12/30/86 waiting in the  
17 driveway.

18 A. That's correct.

19 Q. Okay.

20 MR. CRITTON: Form. Are you asking him  
21 whether the statement is correct or that  
22 you're reading it correctly?

23 BY MR. [REDACTED]:

24 Q. No, the statement is correct.

25 A. Yes.

1 Did you get that impression that [REDACTED] was  
2 very nervous in her car when the police showed up?

3 A. Yes.

4 Q. Was that an indication to you that she  
5 realized that there were police there and that  
6 there was some form of illegal activity that she  
7 was involved in at Jeffrey Epstein's house?

8 MR. CRITTON: Form.

9 THE WITNESS: Yes.

10 BY MR. [REDACTED]:

11 Q. [REDACTED] cell phone rang, she answered it  
12 quickly, said, in quotes, "I can't talk, I can't  
13 talk, I'm at school, I got to go."

14 Did you hear that part of it?

15 A. Yeah.

16 Q. Okay. That's obviously a lie. Right?

17 MR. CRITTON: Form.

18 BY MR. [REDACTED]:

19 Q. She's saying she's at school when really  
20 she's right in front of Jeffrey Epstein's house?

21 A. Yes.

22 Q. And again, another indication that she's  
23 doing something she shouldn't be doing. Right?

24 MR. CRITTON: Form.

25 MS. [REDACTED]: Object to the form.

1 Q. That's what you understood me to ask you?

2 A. Yes.

3 Q. Okay. Rodriguez arrived at that time and  
4 stated he did remember [REDACTED] was there to pick up --  
5 was coming there to pickup an envelope the  
6 homeowner, Jeffrey Epstein, left for her.

7 And that's correct as well. Right?

8 A. Yes.

9 MR. CRITTON: Form.

10 BY MR. [REDACTED]:

11 Q. This document right here, is it  
12 refreshing your recollection as to that night?

13 A. Yes.

14 MR. CRITTON: Form.

15 BY MR. [REDACTED]:

16 Q. Rodriguez quickly entered the house then  
17 returned with a sealed envelope with [REDACTED] first  
18 name on it.

19 A. Yes.

20 Q. Do you remember who wrote her first name  
21 on that envelope?

22 A. I did.

23 Q. Okay. The envelope appeared to have  
24 money in it, in my opinion. [REDACTED] was very nervous  
25 with us standing there.

1 BY MR. [REDACTED]:

2 Q. If she was a masseuse and was at  
3 someone's house in relation to pick up money from  
4 a massage she had given, that's not the typical  
5 answer that you would expect. Right?

6 MR. CRITTON: Form.

7 THE WITNESS: That's right.

8 BY MR. [REDACTED]:

9 Q. Okay. It didn't shock you or surprise  
10 you as Mr. Critton asked you earlier that she  
11 would make up a tale or a lie about her  
12 whereabouts considering what she was doing.  
13 Right?

14 A. No.

15 MR. CRITTON: Form.

16 BY MR. [REDACTED]:

17 Q. Then hung up, talking about Ms. [REDACTED] I  
18 asked her who it was on the phone, she stated it  
19 was her mom. I asked her how she knows Epstein.  
20 [REDACTED] stated the following. She works at [REDACTED]  
21 [REDACTED] in the [REDACTED] Mall, she met  
22 Epstein through a female friend at work, Epstein  
23 allows them to come over any time and use the  
24 house and pool. Then she quickly left.

25 Did you hear that conversation?

1 A. Yes, they were next to me.  
 2 Q. Okay. Is that the entire substance of  
 3 that conversation between Ms. [REDACTED] and the police  
 4 officer?  
 5 A. Yes.  
 6 Q. She didn't mention that she comes over to  
 7 his house and goes into a bedroom with Mr.  
 8 Epstein. Right?  
 9 MR. CRITTON: Form.  
 10 THE WITNESS: No.  
 11 BY MR. [REDACTED]:  
 12 Q. And she didn't tell the police officer  
 13 that she is a masseuse; did she?  
 14 A. No.  
 15 Q. And that didn't surprise you either; did  
 16 it?  
 17 A. No.  
 18 MR. CRITTON: Form.  
 19 BY MR. [REDACTED]:  
 20 Q. I then asked Rodriguez what was in the  
 21 envelope, Rodriguez was hesitant but -- what is  
 22 that word?  
 23 A. But then.  
 24 Q. But then I said it was drugs and he  
 25 quickly said it was money. Is that accurate?

1 Q. I asked what kind of job [REDACTED] performs,  
 2 Rodriguez smiled and says she is a massage  
 3 therapist.  
 4 A. Yeah.  
 5 Q. Why did you tell him that?  
 6 MR. CRITTON: Form.  
 7 THE WITNESS: Because I understood she  
 8 came to give massage.  
 9 BY MR. [REDACTED]:  
 10 Q. Well, that's what somebody had told you?  
 11 A. Yes.  
 12 Q. At this point in time though you knew  
 13 that more was going on than a massage?  
 14 MR. CRITTON: Form.  
 15 BY MR. [REDACTED]:  
 16 Q. Right?  
 17 MR. CRITTON: Form.  
 18 THE WITNESS: That's right.  
 19 BY MR. [REDACTED]:  
 20 Q. I asked -- this is the police officer  
 21 talking, I asked which muscle she rubbed.  
 22 Do you remember the police officer asking  
 23 that?  
 24 A. Yes.  
 25 Q. And you knew what he was implying.

1 A. That's correct.  
 2 Q. When he first asked you what was in the  
 3 envelope were you nervous?  
 4 A. No, because I was trying to -- I didn't  
 5 want to disclose these private things with the  
 6 police so that's why I was concerned about that.  
 7 Q. When you're talking about private things,  
 8 the fact that there are young girls coming over?  
 9 MR. CRITTON: Form.  
 10 THE WITNESS: It was late, you know,  
 11 exactly.  
 12 BY MR. [REDACTED]:  
 13 Q. I'll let you answer. What are the  
 14 private things that you were nervous to tell the  
 15 police?  
 16 A. This was inside the compound, the  
 17 property itself, so you have to keep  
 18 confidentiality, and the police was there, that's  
 19 why. Not that I was doing something wrong but I  
 20 was trying to keep them --  
 21 Q. I'm not suggesting that you were doing  
 22 something wrong.  
 23 A. Exactly. So he asked me is there any  
 24 drugs there, and I said, no, it's just money.  
 25 That's all I said.

1 Right?  
 2 MR. CRITTON: Form.  
 3 THE WITNESS: Yeah.  
 4 BY MR. [REDACTED]:  
 5 Q. That it was obvious to him that she was  
 6 over there to sexually please Mr. Epstein. Right?  
 7 MR. CRITTON: Form.  
 8 THE WITNESS: That's correct.  
 9 BY MR. [REDACTED]:  
 10 Q. And that's coming from a police officer  
 11 who's not the house manager. Right?  
 12 MR. CRITTON: Form.  
 13 THE WITNESS: That's right.  
 14 BY MR. [REDACTED]:  
 15 Q. You knew right away what he was asking  
 16 and you say, Rodriguez laughed said, in quotes,  
 17 "off the record, he, Epstein, has many young girls  
 18 come over for that," end quote.  
 19 Do you remember telling him that?  
 20 MR. CRITTON: Form.  
 21 THE WITNESS: Yes.  
 22 BY MR. [REDACTED]:  
 23 Q. And when you were saying come over for  
 24 that, it was --  
 25 A. Massage or something.

1 Q. -- to sexually please Mr. Epstein.  
 2 Right?  
 3 MR. CRITTON: Form.  
 4 THE WITNESS: Yes.  
 5 BY MR. [REDACTED]:  
 6 Q. I mean, that's what you were telling the  
 7 police officer.  
 8 MR. CRITTON: Form.  
 9 THE WITNESS: Yes.  
 10 BY MR. [REDACTED]:  
 11 Q. Okay. There's always a different girl at  
 12 the pool or inside with him when he's here.  
 13 MR. CRITTON: Form.  
 14 THE WITNESS: Yes.  
 15 MS. [REDACTED]: You left out a word, young.  
 16 BY MR. [REDACTED]:  
 17 Q. Sorry, I'll read the last sentence again.  
 18 There's always a different young girl at  
 19 the pool or inside with him when he's here.  
 20 Do you remember telling the police  
 21 officer that?  
 22 A. Yes.  
 23 MR. CRITTON: Form.  
 24 BY MR. [REDACTED]:  
 25 Q. And that's true. Right?

1 Q. And as to -- it was read to you by Mr.  
 2 [REDACTED] and he then asked you a number of  
 3 questions whether you remembered something.  
 4 Correct?  
 5 A. Yes.  
 6 Q. Okay. Just so I'm clear, he's asking you  
 7 to speculate on what may or may not have occurred  
 8 upstairs in the bedroom. I want to be very clear.  
 9 Mr. Rodriguez, were you ever up in the  
 10 bedroom to observe whatever went on between a  
 11 masseuse and Mr. Epstein or anyone else for that  
 12 matter at any time?  
 13 MR. [REDACTED]: Form.  
 14 THE WITNESS: No, sir.  
 15 BY MR. CRITTON:  
 16 Q. And so when Mr. [REDACTED] asked you, you  
 17 were aware that sexual activity or may have been  
 18 sexual activity occurring upstairs, you have no  
 19 personal knowledge, you're just speculating;  
 20 aren't you, sir?  
 21 MR. [REDACTED]: Form.  
 22 MR. [REDACTED]: Object to the form.  
 23 THE WITNESS: I never saw them.  
 24 BY MR. [REDACTED]:  
 25 Q. And therefore you can only speculate --

1 A. Yes.  
 2 Q. When he's at the house there is always a  
 3 young girl inside with him.  
 4 MR. CRITTON: Form.  
 5 BY MR. [REDACTED]:  
 6 Q. Right?  
 7 A. That's right.  
 8 Q. Okay. And whether the company line is to  
 9 call them a masseuse, you knew that these girls  
 10 were young and were up in the bedroom with Mr.  
 11 Epstein to sexually please Mr. Epstein.  
 12 MR. CRITTON: Form.  
 13 THE WITNESS: That's right.  
 14 MR. [REDACTED]: I don't have anything else.  
 15 We've already attached this; right? Here is  
 16 the one that can be attached.  
 17 MR. [REDACTED]: Who is next?  
 18 MR. CRITTON: Me.  
 19 RE-CROSS EXAMINATION  
 20 BY MR. CRITTON:  
 21 Q. Mr. Rodriguez, looking at Exhibit 9 which  
 22 is the police report that was prepared on November  
 23 28, 2004, this is the first time you've seen it.  
 24 Correct?  
 25 A. That's correct.

1 MR. [REDACTED]: Object to the form.  
 2 MR. CRITTON: I need to ask the question  
 3 first.  
 4 MR. [REDACTED]: It was the earlier  
 5 question.  
 6 BY MR. CRITTON:  
 7 Q. All right. If you did not see what was  
 8 going on you can have no personal knowledge.  
 9 True?  
 10 MR. [REDACTED]: Object to the form.  
 11 MR. [REDACTED]: Object to the form.  
 12 THE WITNESS: Yes.  
 13 BY MR. CRITTON:  
 14 Q. And, therefore, what you're doing is  
 15 speculating or guessing what may have been  
 16 occurring. True?  
 17 MR. [REDACTED]: Form.  
 18 MR. [REDACTED]: Form.  
 19 MR. [REDACTED]: Form.  
 20 THE WITNESS: I use my age together.  
 21 BY MR. CRITTON:  
 22 Q. I'm not saying that you don't, but  
 23 without having personal knowledge you're best  
 24 guessing what may have occurred up there between  
 25 Mr. Epstein and one of the massage women, or for

1 that matter anyone else who was upstairs?  
 2 A. Yes.  
 3 MR. [REDACTED]: Form.  
 4 MR. [REDACTED]: Form.  
 5 MR. [REDACTED]: Object to the form.  
 6 MR. CRITTON: Thank you.  
 7 MS. [REDACTED]: I just have a couple of  
 8 questions.  
 9 EXAMINATION  
 10 BY MS. [REDACTED]:  
 11 Q. Following up on that, you did however see  
 12 this same young woman asleep naked in the sauna?  
 13 A. Yes, ma'am.  
 14 Q. And you did along with [REDACTED] find and  
 15 -- and you did also find sex toys and massagers of  
 16 various kinds and creams scattered around on  
 17 several occasions after these young women had been  
 18 upstairs with Mr. Epstein?  
 19 MR. CRITTON: Object to form, asked and  
 20 answered about six times.  
 21 THE WITNESS: Yes.  
 22 MS. [REDACTED]: No other questions.  
 23 MR. [REDACTED]: Sorry, last one. It has  
 24 nothing to do with this report.  
 25 EXAMINATION

1 A. Yes.  
 2 MR. [REDACTED]: Nothing else.  
 3 MR. [REDACTED]: Is it my turn?  
 4 MR. [REDACTED]: Yes.  
 5 EXAMINATION  
 6 BY MR. [REDACTED]:  
 7 Q. Mr. Rodriguez, you mentioned the last  
 8 time about a lady who was an obvious professional  
 9 masseuse by the name of [REDACTED] Do you remember  
 10 that?  
 11 A. Yes, I do remember.  
 12 Q. Did you ever pay her?  
 13 A. Yes, sir.  
 14 Q. Okay. How much did you pay her?  
 15 A. It was between 200 and 500, sir, but  
 16 somewhere in that -- between those two amounts.  
 17 Q. For [REDACTED]  
 18 A. Yes, sir.  
 19 MR. [REDACTED]: Okay. I don't have any  
 20 other questions.  
 21 MR. CRITTON: You have a right to read  
 22 this deposition when the other part is typed  
 23 and make any changes that you want. Would  
 24 you like to do that? It's your right a  
 25 hundred percent. The court reporter can

1 BY MR. [REDACTED]:  
 2 Q. During Mr. Critton's questioning he asked  
 3 you about whether or not we had ever shown you a  
 4 previous taped statement that you had given to a  
 5 police officer, and we did not do that; did we?  
 6 A. No.  
 7 Q. We can represent to you that we don't  
 8 have it to show it to you otherwise we would like  
 9 to do that.  
 10 However, he asked you did you tell the  
 11 police officers at that time that the girls  
 12 appeared to be 18 years or older, and I believe  
 13 that you said when you gave the statement to the  
 14 police that you did; right, say that?  
 15 A. Yes.  
 16 Q. And I wrote, I put it in quotes, you said  
 17 that because you were fearful of reprise from  
 18 Ms. Maxwell and Mr. Epstein.  
 19 A. That's correct.  
 20 MR. CRITTON: Form.  
 21 BY MR. [REDACTED]:  
 22 Q. Okay. Is everything that you've said  
 23 today and told us today, is it true?  
 24 A. Yes.  
 25 Q. To the best of your knowledge?

1 provide you or whoever set your  
 2 deposition --  
 3 THE WITNESS: I tried to be truthful.  
 4 MR. CRITTON: All you have to do is tell  
 5 her you would like to waive. Do you waive  
 6 the reading and signing?  
 7 MR. [REDACTED]: You can either read or you  
 8 can waive reading?  
 9 THE WITNESS: I don't understand what I  
 10 have to do.  
 11 MR. CRITTON: Why don't we go off the  
 12 record and you can explain it to him.  
 13 MR. [REDACTED]: We can go off the record.  
 14 THE VIDEOGRAPHER: Off the record.  
 15 (Thereupon, a discussion was held off the  
 16 record.)  
 17 THE WITNESS: Waive.  
 18 (Thereupon, the deposition was concluded  
 19 at 5:30 p.m.)  
 20 - - -  
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1 THE STATE OF FLORIDA, )  
2 COUNTY OF DADE. )

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I, the undersigned authority, certify that ALFREDO RODRIGUEZ personally appeared before me on the 7th day of August, 2009 and was duly sworn.

WITNESS my hand and official seal this 18th day of August, 2009.

\_\_\_\_\_  
MICHELLE PAYNE, Court Reporter  
Notary Public - State of Florida

CERTIFICATE

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The State Of Florida, )  
County Of Dade. )

I, MICHELLE PAYNE, Court Reporter and Notary Public in and for the State of Florida at large, do hereby certify that I was authorized to and did stenographically report the deposition of ALFREDO RODRIGUEZ; that a review of the transcript was not requested; and that the foregoing pages, numbered from 270 to 472, inclusive, are a true and correct transcription of my stenographic notes of said deposition.

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

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

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

DATED this 18th day of August, 2009.

\_\_\_\_\_  
MICHELLE PAYNE, Court Reporter

































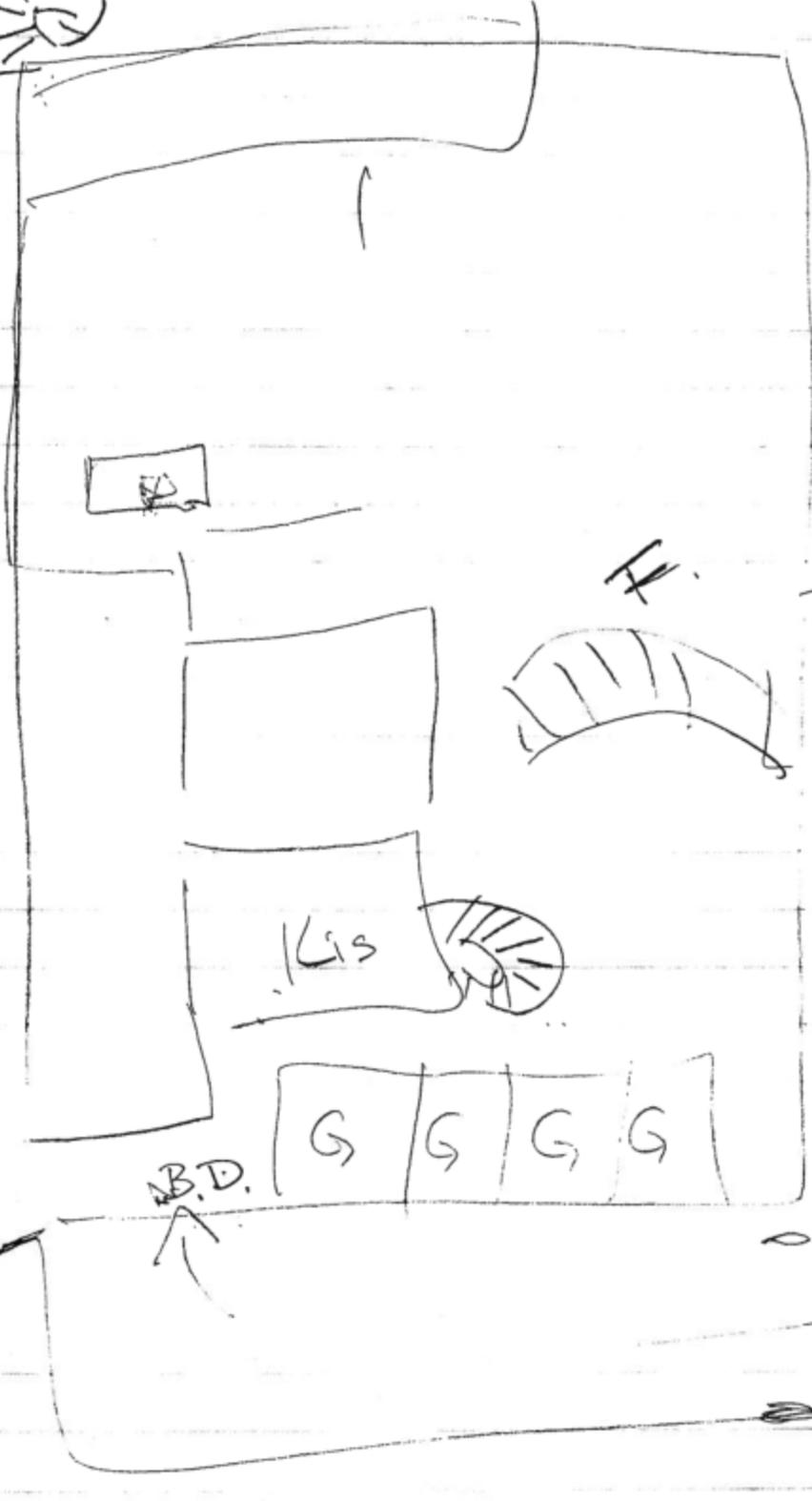






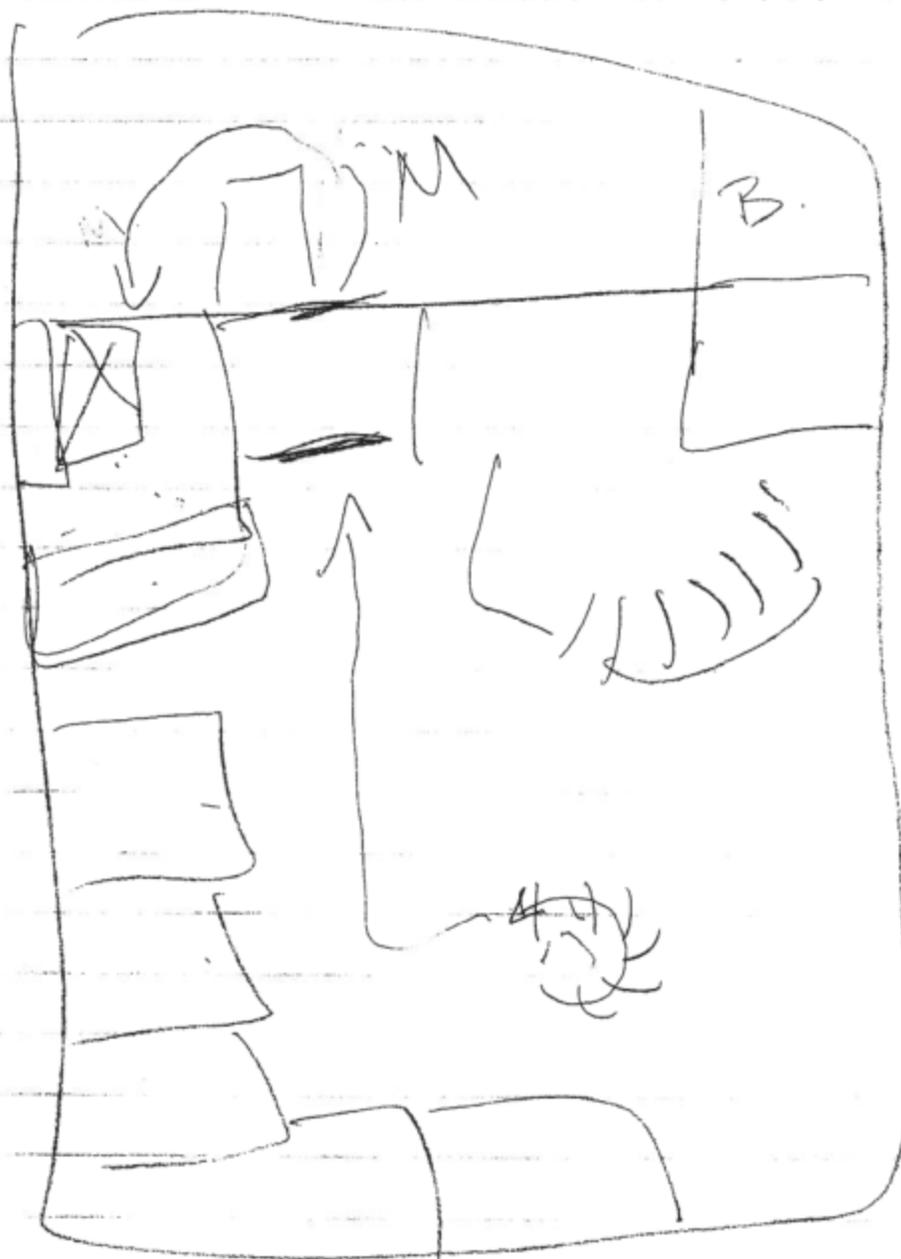
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EXHIBIT #3 8-7-09



E.C. BRILLO

CONFIDENTIAL



**CONFIDENTIAL**

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Page 73 of 74

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PALM BEACH POLICE DEPARTMENT  
INTELLIGENCE REPORT

FILE #: \_\_\_\_\_ DATE: 11-28-04  
CASE #: \_\_\_\_\_  
CONFIDENTIAL (X/N): YES

OFFICER NAME: [REDACTED] I.D. # 8443

SUBJECT NAME: (LAST) Epstein (FIRST) Jeffrey (M.I.) N  
DATE OF BIRTH: 01-20-53 RACE: white SEX: male

SOURCE NAME: (LAST) Rodriguez (FIRST) Alfredo (M.I.) -  
CONTACT INFORMATION (TELEPHONE) - -  
EVALUATION OF SOURCE: RELIABLE \_\_\_\_\_ UNRELIABLE \_\_\_\_\_ UNEVALUATED X

SOURCE IDENTIFICATION: PRIVATE CITIZEN X LAW OFFICER \_\_\_\_\_ OTHER \_\_\_\_\_  
CRIMINAL SOURCE \_\_\_\_\_ GOVT AGENCY \_\_\_\_\_

INFORMATION ACQUIRED BY: PERSONAL KNOWLEDGE X NEWS MEDIA \_\_\_\_\_  
HEARSAY/RUMOR X DOCUMENTS \_\_\_\_\_

INFORMATION: On Sun, 11-28-04, at approx 1900hrs, the property manager of 358 El Brillo way, Alfredo Rodriguez came to the station to complain there was a strange vehicle parked in the driveway at 358 El Brillo. When Ofc Koerner and I arrived at 358 El Brillo, we located a white female later identified as [REDACTED] del 17-30-06 waiting in the driveway. Rodriguez arrived [REDACTED] at that time and stated he did remember [REDACTED] was coming there to pick up an envelope the house was Jeffrey Epstein left for her. Rodriguez quickly entered the house then returned with a sealed envelope with [REDACTED] (first) name on it. The envelope appeared to have money in it, in my opinion [REDACTED] was very nervous with us standing there. [REDACTED] cell phone rang. She answered it quickly, said "I can't talk, I can't talk, I'm at school, I gotta go" then hung up. I asked her who it was, she stated it was her mom. I asked how she knew Epstein. [REDACTED] stated the following: she works at [REDACTED] in the [REDACTED] and mall. She met Epstein the a female friend of work. Epstein allows them to come over anytime and use the house and pool. Then she quick left. I then asked Rodriguez what was in the envelope. Rodriguez was hesitant but when I said it was drugs, he quickly said it was money. I asked what kind of job [REDACTED] performs. Rodriguez smiled and said she is a massage therapist. I asked [REDACTED] which must be she rubbed. Rodriguez laughed and said "off the record, he (Epstein) has many young girls come over for that". "there's always a different young girl at the pool or inside with him when he's here."

INFORMATION CONTENT: VERIFIED \_\_\_\_\_ UNVERIFIED X EXPLAIN \_\_\_\_\_  
PARTIALLY VERIFIED \_\_\_\_\_ SIMILAR INFO FILED \_\_\_\_\_

EVALUATED BY SUPERVISOR (INITIALS) [REDACTED]

RECOMMENDED FOLLOW-UP BY SUPERVISOR: DETECTIVE TO VERIFY SOURCE TO VERIFY \_\_\_\_\_ ANALYZE AND EVALUATE \_\_\_\_\_ FILE OF \_\_\_\_\_

EXHIBIT #9 Rodriguez 11-7-04

CONFIDENTIAL