

EXHIBIT 7

PART 2

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
CASE No.08-CV-80119-CIV-MARRA/JOHNSQN

JANE DOE NO. 2,

Plaintiff,

-VS-

JEFFREY EPSTEIN,

Defendant.

Related cases:

08-80232, 08-80380, 98-80381, 08-80994,
08-80993, 08-80811, 08-80893, 09-80469,
09-80591, 09-80656, 09-80802, 09-81092

VIDEOTAPED DEPOSITION OF JUAN ALESSI
VOLUME II

Tuesday, September 8, 2009
10:12 a.m. - 3:45 p.m.

2139 Palm Beach Lakes Boulevard
West Palm Beach, Florida 33401

Reported By:
Sandra W. Townsend, FPR
Notary Public, State of Florida
PROSE COURT REPORTING AGENCY
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P R O C E E D I N G S

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Deposition taken before Sandra W. Townsend, Court Reporter and Notary Public in and for the State of Florida at Large, in the above cause.

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(Continued from Volume I.)

VIDEOGRAPHER: We're going back on the record at 12:52.

CROSS EXAMINATION

BY MR. LANGINO:

Q. Hello. My name is Adam Langino and I represent B.B. I'll have fewer questions than the rest of everybody, since I'm going next in line. But one of the things I wanted to ask you --

MR. CRITTON: Before you get started, let me just put on my objection.

Adam, your client is B.B., who alleges that she was at Mr. Epstein's house sometime, I think, on one occasion in the summer of '03.

This witness is neither relevant, nor material, nor can it lead to the admissibility of any relevant information regarding my client. So I understand -- so you certainly can notice him, but I'll move to strike all of the questions and

1 answers in response to your questions.

2 MR. LANGINO: Thank you.

3 BY MR. LANGINO:

4 Q. One thing I wasn't sure about was the date of
5 your employment. When did you start with Mr. Epstein?

6 A. I am not sure, sir, but I think I started full
7 time on my salary, I was on the roll in 1991. 1991,
8 January 1, 1991.

9 Q. In 1991, you started full time with
10 Mr. Epstein?

11 A. Yes, working for him alone. I left all my
12 clients, I left -- dissolved my company.

13 Q. And in what year did you start part time at
14 his house?

15 A. 1990. '90.

16 Q. You mentioned earlier that some of the massage
17 therapists you paid with checks?

18 A. Yes.

19 Q. And some of the massage therapists you paid
20 with cash?

21 A. Sorry. Can you repeat the question?

22 Q. Sure. You mentioned earlier that you paid
23 some of the massage therapists with checks and some with
24 cash?

25 A. Yes, sir.

1 Q. Were there any general differences between
2 those massage therapists that you paid with checks and
3 those that you paid with cash?

4 A. No, sir. It was -- when I was there always
5 was a hundred dollars an hour rate. That was for
6 everybody.

7 Q. Did you ever hear Jeffrey Epstein talk about
8 his massages?

9 A. No, sir.

10 Q. At one point you said that you're not -- this
11 might be summarizing your testimony -- that you may not
12 be the best guesser of ages. Is that something that you
13 may have said earlier today?

14 MR. CRITTON: Form.

15 THE WITNESS: Yeah. Yeah. I think I -- you
16 can be thirties, twenties. I don't know.

17 BY MR. LANGINO:

18 Q. Do you have any children?

19 A. I have two. One is a doctor in psychology.
20 And one is a financial manager and he starts his own
21 company.

22 Q. Are either of your children female?

23 A. No.

24 Q. Do you have any grandchildren?

25 A. I have one granddaughter.

1 Q. How old is she?

2 A. She is five.

3 Q. Do you have any relative that you had spent a
4 significant amount of time with that would be a female
5 teenager?

6 MR. CRITTON: Form.

7 THE WITNESS: No, except my daughter.

8 BY MR. LANGINO:

9 Q. Cousin?

10 A. My daughter, no.

11 Q. Before when we first started speaking with
12 you, you talked a little bit about your business. Are
13 you still working?

14 A. No. I disabled.

15 Q. You owned that business; is that correct?

16 A. Yeah. Yeah. It was my -- my -- it was me,
17 only me.

18 Q. You mentioned that one of your children is a
19 doctor?

20 A. My daughter is a doctor in psychology.

21 Q. Are any of your children or any of your family
22 members continuing the business that you started?

23 A. No. They have their own business.

24 Q. You mentioned a few times today that you were
25 never told to check the identification of any of the

1 message therapists that came to give massages?

2 A. That's correct.

3 Q. How come you said that a couple of times
4 today?

5 MR. CRITTON: Form.

6 THE WITNESS: You asked me. They asked me. I
7 think I just answer questions.

8 BY MR. LANGINO:

9 Q. As you reflect back in your time working for
10 Mr. Epstein, today do you believe you turned a blind eye
11 to some of the ages of the women or females that worked
12 for Jeffrey Epstein with massages?

13 MR. CRITTON: Form.

14 THE WITNESS: Can you repeat the question?

15 BY MR. LANGINO:

16 Q. Sure. As you sit here today and reflect back
17 on your time working for Jeffrey Epstein, do you believe
18 you turned a blind eye or ignored, purposely ignored the
19 ages of the females that gave him massages?

20 MR. CRITTON: Form.

21 THE WITNESS: I don't know. I don't -- I
22 cannot -- I'm not a judge. I don't know. I don't
23 know. I don't think so. Sincerely, I don't think
24 so.

25 BY MR. LANGINO:

1 Q. When you were working for Mr. Epstein, did you
2 have any doubt that the girls who provided him massages
3 were not of the proper age or not older than 18 years
4 old?

5 MR. CRITTON: Form.

6 THE WITNESS: No.

7 BY MR. LANGINO:

8 Q. Did you keep up with Mr. Epstein's -- keep
9 informed of Mr. Epstein's criminal case while it was in
10 the paper?

11 A. Only what was on tv. What it was on tv,
12 that's how I found out.

13 Q. How do you feel about Mr. Epstein today?

14 A. I feel bad, sincerely I feel bad, because he
15 was -- with me, with my family, with my wife, he was a
16 very generous guy, extremely -- I don't know what the
17 word is in English -- but he would press for perfection.
18 I mean, and that was a very stressful job. But,
19 otherwise, I have no problems with him at all. And I
20 feel bad about it, what's happened in his life.

21 Q. Have you had any contact with Mr. Epstein
22 after you ended working there?

23 A. After I work -- after I end working with him?
24 Yes, I did.

25 When this case, when this criminal case

1 started, I got home and I had a card, a business card
2 from a police officer. I think it was Paul from the
3 Palm Beach Police Department.

4 And -- and I got scared. And I was trying to
5 find out what it's all about. Because it was an
6 occasion with Mr. Epstein that we had a disagreement.
7 We settled that. Everything was well and we went our
8 friendly ways and never heard from him again.

9 And I received this from the police department
10 that we need to talk to you. And, so, I got scared.
11 And I called the office in New York.

12 I says, I would like to speak to Mr. Epstein.

13 And he come on, and I said, I told him, I
14 says, Jeffrey, what's going on? What's happening? I
15 thought it was related to the problem that I had
16 personally with him settled.

17 And I says -- no, he says. And he says to me,
18 no, John, it's nothing to do with that, has nothing to
19 do with it. I've been -- I don't know if he told me I
20 been sued or I been -- it's a problem with me, they're
21 investigating something and I cannot talk to you. That
22 was the end. And that's it.

23 Q. Any other conversations with Mr. Epstein --

24 A. No.

25 Q. -- since that conversation?

1 A. No.

2 Q. At some points you were caught stealing from
3 Mr. Epstein; is that true?

4 A. We settled with him as a borrowing money from
5 him. Okay?

6 MR. BERGER: As what?

7 THE WITNESS: Borrowing.

8 MR. LANGINO: Borrowing.

9 BY MR. LANGINO:

10 Q. When you took the money from Mr. Epstein, --

11 A. Yes, sir.

12 Q. -- did he give you permission to take that
13 money?

14 A. No.

15 Q. At any point did you take a firearm from
16 Mr. Epstein?

17 A. No.

18 Q. At any point did you enter Mr. Epstein's
19 property when you were not allowed to be there?

20 A. Yes.

21 Q. And was that the incident where you took some
22 money from him?

23 A. Yes.

24 Q. Can you explain to me how you and Mr. Epstein
25 came to an agreement that the cops would not be called?

1 A. He called me and he say, John, we need to
2 talk.

3 I says, okay. Where?

4 And -- and we met at a luncheonette in Palm
5 Beach and we have a friendly conversation. He asked
6 about my kids, about my family.

7 Then -- is this related to Mr. Epstein's case?

8 Q. It is.

9 A. Because I prefer to keep this -- this -- I was
10 not incriminated. I was not -- I went to the police
11 department. I made my statement and there was no
12 charges filed.

13 I don't think I would like to continue with
14 this.

15 MR. CRITTON: Let me just put on the record as
16 I think it's completely irrelevant, immaterial,
17 it's not calculated to lead to the --

18 THE WITNESS: And it was after --

19 MR. CRITTON: Let me just finish putting my
20 objection on.

21 As I understand it, it occurred long before he
22 ever got the card from the police. I think you're
23 harassing him. I think you're trying to intimidate
24 him and I think it's inappropriate.

25 BY MR. LANGINO:

1 Q. How did you feel about Mr. Epstein being loyal
2 to you as an employee for him by not getting you into
3 further trouble with the police?

4 MR. CRITTON: Form.

5 THE WITNESS: I feel that it was part of a
6 relationship over 13 years that I did a lot of
7 extra work. And I was more or less says, hey,
8 John, you did it for me, I do it for you. And that
9 was it. And we end up as friends. We did not
10 break it apart.

11 BY MR. LANGINO:

12 Q. As you sit here today, do you have a sense of
13 personal loyalty to Mr. Epstein?

14 A. No. No. Matter of fact, that job has left me
15 a lot of sequels, psychological problems. It was
16 extremely damaging to my marriage. Right after I left
17 we broke up with my wife. I walk away. I left my
18 house. I left my family. I end up with a woman that
19 she need the money and that's why I went in there and
20 got the money.

21 And that's what I think you wanted to hear.
22 And I want to end it there.

23 I have no -- nothing -- I think my stay there,
24 in reflecting the job, I was not paid well enough for
25 what we did. And too late now.

1 Q. The overall theme of my question is: The fact
2 that Mr. Epstein chose not to get you in trouble with
3 the police further, trouble with the police --

4 A. Uh-huh.

5 Q. -- so many years ago, has today that caused
6 you or pressed upon you to maybe soften your testimony
7 or change your testimony at all?

8 A. Absolutely not.

9 Q. Have you ever spoken with any independent
10 investigators regarding the actions, the criminal
11 actions that occurred at Jeffrey Epstein's home?

12 A. Yes.

13 Q. When did that occur?

14 A. Right after I receive a card from the police
15 department, when I call Jeffrey and I ask him, what's
16 going on?

17 He says, I cannot talk to you. Somebody will
18 talk to you.

19 And then I got a call from this guy that I
20 cannot recall his name now. Talked to me and we met at
21 Carabbas. And we talked -- what? -- about 15 minutes.
22 And he asked me questions just like you guys are asking
23 me and I says exactly the same answers.

24 And he says, well, there's an investigation
25 against Jeffrey. You has nothing to do with it. You

1 have nothing to do, nothing to worry about it, but if
2 you want to hire a lawyer to protect yourself.

3 And I asked -- my question to him was, I don't
4 want to get incriminated into something that you know
5 somebody trying to incriminate me for -- for my job.

6 And he says, no, no, no. But if you want to
7 get a lawyer, that's fine.

8 And that's where I got Mr. Murrell and he just
9 came to us, to sign this, to -- that was the end of it.

10 Q. Who got Mr. Murrell for you?

11 A. Who got it? Mr. Epstein.

12 Q. When you met with this investigator at
13 Carabbas, --

14 A. Yes.

15 Q. -- did he record your conversation --

16 A. No.

17 Q. -- in any way?

18 After this meeting at Carabbas, did you meet
19 with any other investigators?

20 A. No.

21 Q. After -- during your inspection of the massage
22 room after these massages had been completed with
23 Mr. Epstein, --

24 A. Uh-huh.

25 Q. -- do you remember seeing any -- anything that

1 you would describe as blood?

2 A. No, never.

3 Q. Do you remember seeing anything that you would
4 describe as a sexual fluid?

5 A. No, never.

6 Q. When you worked for Jeffrey Epstein, the woman
7 that you were married to, what is her name or -- what is
8 her name?

9 A. The woman that I was married to?

10 Q. I think -- the reason I'm asking is because
11 earlier today when you first spoke, I thought I
12 remembered you saying that you -- both you and your
13 wife --

14 A. That's my --

15 Q. -- worked for Mr. Epstein?

16 A. It's still my wife. It's still my wife. We
17 didn't -- we got two ways away from a divorce and the
18 lawyers were taking my money by pipeline.

19 Q. And what is her name?

20 A. And we decide not to divorce and we still
21 together.

22 Q. Sorry. I missed that. But what is her name?

23 A. Maria Alessi

24 Q. Let me just look through my notes to see if I
25 have any other questions.

1 A. Okay.

2 Q. Thank you very much.

3 A. Welcome.

4 CROSS EXAMINATION

5 BY MR. MERMELSTEIN:

6 Q. Good afternoon, Mr. Alessi.

7 A. Yes, sir.

8 Q. My name is Stuart Mermelstein. I represent a
9 group of the Plaintiffs in these cases and I have some
10 questions for you as well.

11 Your wife, Maria, does she live at the same
12 address as you now?

13 A. Yes, she does.

14 Q. Now, when you began working full time for
15 Mr. Epstein, I believe you said that was around 1991; is
16 that correct?

17 A. Yes.

18 Q. Was your wife, was she hired at the same time
19 as you?

20 A. No. She was hired three years after.

21 Q. And how did that come about that your wife was
22 hired?

23 A. My wife was hired because we had a housekeeper
24 that she was doing the cleaning and she left. Then we
25 had another housekeeper, Polish girl, and she left.

1 And then by that time my kids went to college
2 and my wife was at home. And I suggest my wife to come
3 to work with me, to help me.

4 Q. So you recommended to Mr. Epstein that he hire
5 your wife?

6 A. Yes.

7 Q. And he did?

8 A. Yes, he did.

9 Q. And what were her job duties there?

10 A. Her only job duties were shopping, basically
11 the shopping, getting movie tickets, show tickets, buy
12 books, bring the food to Mrs. Epstein's -- Mr. Epstein's
13 mother, sometimes drive Mrs. Epstein to the doctors.

14 She was not involved -- and sometimes she did
15 some cleaning for me.

16 Q. Did she live with you in the upstairs
17 apartment?

18 A. Most of the nights we had an apartment right
19 across the bridge on Flagler that it was my -- my
20 property. And we had an apartment there.

21 So she went home. She didn't like to stay
22 there. But I had to stay there because my job starts
23 from 5:00 in the morning to 10:00 at night

24 Q. And did Maria leave her employment the same
25 time as you?

1 A. Yes, we did at the same time.

2 Q. You testified that you would come into the
3 bedroom and clean up after massages; is that correct?

4 A. That's correct.

5 Q. Did you -- were there occasions where you had
6 your wife help you with that?

7 A. No. No.

8 Q. Were there -- did she have occasion to go into
9 the master bedroom?

10 A. It was occasions before that she will help to
11 set up the tables once in a while, set up the oils and
12 the tables. But I will do the clean up after.

13 Q. Is there a reason for that?

14 A. I was more involved into the final appearance
15 of the house. And it was my responsibility to make sure
16 that every room was perfect after they left and before
17 they went to bed.

18 Q. Was there anyone else who assigned your wife
19 work other than you?

20 A. No. Ms. Maxwell, sometimes she would tell my
21 wife, go buy some stuff, go get this and go get that.
22 She was mostly -- my wife was mostly out of the house.
23 She was -- this house was Mr. Epstein would says, go get
24 me this book, go get me this magazine, go get me
25 tickets, movie tickets for this show and this show and

1 this show. And she would have to travel -- and I was on
2 the phone with my wife constantly, buy this, get this,
3 get this -- and the food, and the food because it was a
4 five-star hotel.

5 Q. Did Ms. Maxwell or Mr. Epstein ever instruct
6 your wife to do housecleaning tasks?

7 A. No. I was blamed for everything.

8 Q. You were blamed for everything?

9 A. I was blamed for the good and the bad.

10 Q. Did you -- during the time your wife was
11 there, did you also have a hired housekeeper?

12 A. We have a crew of housecleaners. We have a
13 crew of people that would come to the house and do a
14 serial -- I mean, deep cleaning, you know, to the house.

15 Q. Was that every day?

16 A. Once a week -- no, it was twice a week. It
17 was Tuesday and Fridays.

18 It depends on Mr. Epstein's schedule because
19 he didn't -- he didn't want nobody at the house while he
20 was at the house. So we have to rearrange days for the
21 clean-up crew to come in. And I usually did that. As
22 soon as they left I bring the cleaning crew, get the
23 house ready and -- and get set for them for the next
24 trip.

25 Q. Did you have a housekeeper who did

1 housekeeping tasks on an everyday basis while you were
2 employed there?

3 A. No.

4 Before my wife went in?

5 Q. No. After your wife.

6 A. No. No. Not a full-time housekeeper.

7 Q. But you said your wife was hired after the
8 housekeeper left?

9 A. Yes.

10 Q. But -- so the person who left before your wife
11 came, was she doing housekeeping chores?

12 A. Yes, she was doing the housekeeping chores.

13 Q. Well, who did it then after your wife became
14 employed there, because she wasn't doing the
15 housekeeping?

16 A. I was. I was doing it and then we hire people
17 for to help us.

18 Q. So you were the main person doing the
19 housecleaning?

20 A. Yeah.

21 Q. And during -- between that time that your wife
22 started and when you left the employment, was there a
23 separate housekeeper employed during that time?

24 A. No. Full time? No.

25 Q. Full-time housekeeper?

1 A. No.

2 Q. What about a part-time housekeeper?

3 A. No. Like I told you, daily basis we call this
4 company. And then they will come in with four or five
5 girls and clean the whole house.

6 Q. This is the crew you were talking about?

7 A. The crew.

8 Q. But the crew didn't come when Mr. Epstein was
9 there?

10 A. Right.

11 Q. So on an everyday basis when Mr. Epstein was
12 there, you were the only person who was cleaning?

13 A. Me -- yeah, or my wife will help.

14 Q. At your instruction?

15 A. That's right.

16 Q. But you don't ever remember her cleaning up
17 after massages?

18 A. No. No.

19 Q. Is it possible that you instructed her to
20 clean up?

21 A. It's possible, but --

22 MR. CRITTON: Form. Asking him to speculate.

23 BY MR. MERMELSTEIN:

24 Q. You can answer.

25 A. It's possible.

1 Q. When girls would come to give a massage, where
2 would they come in the house? Would they come to the
3 front door?

4 A. Mostly came to the back kitchen door.

5 Q. The back kitchen door?

6 A. Uh-huh.

7 Q. Okay. And is there a bell there? Would they
8 knock or how would they --

9 A. There's a door bell.

10 Q. A door bell? They would ring the door bell?

11 A. Uh-huh.

12 Q. And who generally would answer the door?

13 A. Me or my wife.

14 Q. So you would let them in?

15 A. Uh-huh.

16 MR. CRITTON: Stuart, can I just ask you? You
17 use the term, girls. I assume you just mean, that
18 means female woman. It can mean anything? It has
19 no age bracket to it?

20 MR. MERMELSTEIN: That's correct. I'm not
21 referring specifically to ages right now.

22 THE WITNESS: No.

23 BY MR. MERMELSTEIN:

24 Q. So as I understand it, the girl would come to
25 the kitchen entrance, which is the service entrance,

1 correct?

2 A. Uh-huh.

3 Q. You have to say yes or no.

4 A. Yes, sir.

5 Q. If you answer uh-huh, that's not clear, so you
6 have to answer yes or no.

7 A. Okay.

8 Q. And you would typically open the door?

9 A. Yes, sir.

10 Q. And what would happen then?

11 A. Then I will keep her in the kitchen and go to
12 Mr. Epstein and find out where they want to have the
13 massage, or if it was for him or for Ms. Maxwell. And I
14 immediately, if they were repeat girls that are -- they
15 will know exactly where to go. And I will go up with
16 them, set the tables, and they will wait for him or her
17 to go in the room and they sit there until they come up.

18 Q. So did you generally already know that they
19 were coming at the time that they knocked on the door?

20 A. Yes, uh-huh.

21 Q. So you had an appointment schedule?

22 A. Yeah. Because most of the times I was doing
23 the calling, you know. I called J., come in at 3:00
24 this afternoon. And she will told me, no, I cannot, get
25 somebody else. And I knew it the time they were coming.

1 So I was expecting them most of the time.

2 Q. So you would expect them, they would come in
3 and then you would escort them upstairs?

4 A. Uh-huh.

5 Q. So --

6 A. I'm sorry, sir.

7 Q. Yes?

8 A. Yes.

9 Q. But first you would find Mr. Epstein and check
10 to see if he's ready or find Ms. Maxwell to check to see
11 if she's ready?

12 A. Yes.

13 Q. And which staircase would you -- would you
14 take them up?

15 A. Either way.

16 Q. You would take them either the main staircase
17 or the servant staircase?

18 A. Yes.

19 Q. Why would you take the main staircase, since
20 you're already in the kitchen?

21 A. That's what I says, either way. We can go
22 through the main staircase or we go to the kitchen
23 staircase. So we use both.

24 Q. Okay. Well, I'm talking specifically to
25 escort a girl upstairs.

1 A. I escort the girls up there either way, both
2 ways.

3 Q. And, so, when you walked to the upstairs
4 bedroom, let's take the example of when Mr. Epstein is
5 getting a massage?

6 A. Yes.

7 Q. Mr. Epstein wouldn't be up there yet; is that
8 correct?

9 A. That's correct.

10 Q. He would be downstairs somewhere?

11 A. Uh-huh.

12 Q. Would there be a place --

13 MR. CRITTON: Form.

14 BY MR. MERMELSTEIN:

15 Q. -- where he would normally be while, you know,
16 he's waiting for the massage to be set up and ready?

17 A. Yes.

18 Q. Where is that? Where would he be?

19 A. Either at his desk or the pool house.

20 Q. And those were on the first floor?

21 A. Yes.

22 Q. And, so, when you arrived at the top of the
23 stairs with the girl for the massage, what would you do
24 then?

25 A. Go back to my duties.

1 Q. You would just leave? Would the massage table
2 already be set up?

3 A. He knew already that the girls -- the girl
4 went upstairs and it was up to him to come up.

5 Q. Did you have conversations with any of these
6 girls?

7 A. Sometimes.

8 Q. What kind of things would you talk about?

9 A. Regular things. Nothing that I can remember.
10 Nothing. Just...

11 Q. Did any of them ever tell you their ages?

12 A. No, sir.

13 Q. Did any of them ever assure you that they were
14 18?

15 MR. CRITTON: Form.

16 BY MR. MERMELSTEIN:

17 Q. Or over?

18 A. No, sir.

19 Q. No one ever mentioned anything about age?

20 A. No, sir.

21 Q. How did the girls appear to you? Did they
22 appear to be very young?

23 MR. CRITTON: Form.

24 THE WITNESS: Again, the same question you ask
25 me. Everybody ask me the same thing. They could

1 have been 16 or 20. Most of them were, I would
2 says, over 20. And some woman, it was over 60.
3 And one time she came to the door. The husband was
4 waiting outside. And Ms. Maxwell saw this woman,
5 that somebody recommend her. And Maxwell says to
6 me, John, you have to find an excuse. We don't
7 want her.

8 So I had to pay this woman and find an excuse
9 that they going to have to go. And she -- they
10 never had a massage with her.

11 But there was -- most of them were womans.

12 They were not girls.

13 BY MR. MERMELSTEIN:

14 Q. So the woman who was over 60 was sent away;
15 she was rejected, correct?

16 MR. CRITTON: Form.

17 THE WITNESS: It was -- I was told to send her
18 away.

19 BY MR. MERMELSTEIN:

20 Q. And it was your understanding when you were
21 told to send her away, it was because of her age,
22 correct?

23 MR. CRITTON: Form.

24 THE WITNESS: I don't know. I don't know. I
25 was told to send her away.

1 BY MR. MERMELSTEIN:

2 Q. What was your understanding as to why they
3 were sending her away?

4 MR. CRITTON: Form. Asked and answered nine
5 times now.

6 MR. MERMELSTEIN: He hasn't -- he hasn't
7 answered my question yet.

8 MR. CRITTON: He has.

9 MR. MERMELSTEIN: Go ahead.

10 THE WITNESS: Why?

11 BY MR. MERMELSTEIN:

12 Q. Please answer the question.

13 A. Can you repeat the question?

14 Q. What was your understanding as to why they
15 sent her away?

16 MR. CRITTON: Form.

17 THE WITNESS: My understanding was either they
18 were busy or they didn't want her.

19 BY MR. MERMELSTEIN:

20 Q. What was your understanding as to why they
21 didn't want her?

22 MR. CRITTON: Form. Harassing.

23 THE WITNESS: I don't know. I didn't -- I
24 didn't make too much of it.

25 BY MR. MERMELSTEIN:

1 Q. But every other woman or female who came over
2 to give a massage was much, much younger, correct?

3 A. Yes.

4 Q. So this 60 year old woman was a significant
5 exception, correct?

6 MR. CRITTON: Form. Argumentative.

7 BY MR. MERMELSTEIN:

8 Q. You can answer.

9 A. I don't know how to answer that question. You
10 ask me to --

11 Q. Let me ask you this.

12 MR. CRITTON: Why don't you let him answer the
13 question before you interrupt him.

14 BY MR. MERMELSTEIN:

15 Q. All right. Go ahead. Please answer. It
16 didn't look like you were --

17 A. I don't know how to answer that question, you
18 asking me what is your opinion of that.

19 And I told you, my opinion of that, either
20 they saw the girl -- I don't think Mr. Epstein ever saw
21 the woman. But Ms. Maxwell saw the woman in the
22 kitchen. And she told me, John, pay her and send her
23 away.

24 Q. Okay.

25 A. That was it.

1 Q. So Ms. Maxwell looked at the woman?

2 A. Right.

3 Q. Did she have a conversation with her?

4 A. No.

5 Q. She just looked at her and then said to you to
6 send her away, correct?

7 A. Yeah. Pay her and send her away.

8 Q. Do you recall seeing women who came to give
9 massages who were in their 50s?

10 A. Yes.

11 Q. There were women in the 50s?

12 A. Yes.

13 Q. How often did that happen?

14 A. Not too often, but it was -- it was woman that
15 they were in the 50s. I says, again, could have been
16 49, 45. I don't know. I don't know the ages, but it
17 older woman.

18 Q. How many middle-age women do you recall coming
19 over to give massages?

20 MR. CRITTON: Form.

21 THE WITNESS: I don't remember how many, but I
22 would says D.D.

23 D.D. was, I would says, in the 40s. And she
24 came very, very often. And I understand she was a
25 massage specialist and a yoga instructor, too, at

1 the same time.

2 So that was one of -- and there was another
3 woman that she was supposed to be a teacher at the
4 school of massage therapy that I can't remember her
5 name. But that's it. I mean...

6 BY MR. MERMELSTEIN:

7 Q. So those two you remember who were older?

8 A. Two. And it was a couple guys that were older
9 that -- some guys that were older, too, guys.

10 Q. Did Mr. Epstein ever have massages done by
11 men?

12 A. Yes

13 Q. And did Mr. Epstein ever have massages done by
14 these older women?

15 A. Yes.

16 Q. When you escorted the female in this case for
17 the massage to the upstairs bedroom -- correct? -- you
18 would then leave?

19 A. Yes.

20 Q. You would then walk back downstairs?

21 A. Yes.

22 Q. Correct?

23 And would you then -- would you -- you had
24 already told Mr. Epstein that she's there, correct?

25 A. That's correct.

1 Q. And at some point later then Mr. Epstein would
2 come upstairs, correct?

3 A. That's correct.

4 Q. And where would you go?

5 A. To my duties, to the kitchen or to my office.

6 Q. And I think you testified earlier that the
7 doors of the bedroom would be closed during this
8 massage?

9 A. He would close the door.

10 Q. So Mr. Epstein, when he would arrive upstairs,
11 would close the door?

12 A. Yes, sir.

13 Q. And about how long would the massage last
14 generally?

15 A. Usually an hour.

16 Q. And what would happen at the end?

17 A. They would come down. Most of the repeat
18 girls, they would bring the towels themselves and dump
19 it by the kitchen by the laundry room we had there, in
20 order to help us. Other girls, they just left it up
21 there and they would come down.

22 Either Mr. Epstein will pay or I will pay
23 them.

24 Q. Did they --

25 A. Or Ms. Maxwell will pay them.

1 Q. Did Mr. Epstein walk down with the girls or
2 did he stay upstairs?

3 A. Sometimes, sometimes no. Sometimes he took a
4 nap or he took a shower. I don't know what they did in
5 the room. I don't know. I don't know. Sometimes he
6 went down right away. Sometimes he stay up there.

7 Q. So when they came down, they would go to the
8 kitchen; is that correct?

9 A. Yeah, most of it.

10 Q. And were you there waiting for them or did you
11 have --

12 A. My office was right next to the kitchen, so I
13 was there -- and the kitchen was the focal point of the
14 house basically. So they have to go to the kitchen
15 either to get pay or to go to their cars.

16 Q. Did you converse with any of the girls when
17 they came down after the massage?

18 A. Very little. Very little.

19 Q. Did you ever observe a girl who appeared
20 upset, surprised, shocked, anything of that nature when
21 they came down?

22 A. Never. Never.

23 Q. And sometimes you would pay them, correct?

24 A. That's correct.

25 Q. How much would you --

1 A. A hundred dollars a massage.

2 Q. A hundred dollars a massage? Were there ever
3 any exceptions?

4 A. That's the -- I never pay any more than a
5 hundred dollars per massage.

6 Q. Were there times when two girls came?

7 A. Two girls came at the same time?

8 Q. Correct.

9 A. Yeah. There were times when two girls come in
10 at the same time and one will go to one room, the other
11 will go to the other room. Or one -- I would set up two
12 tables in his room or I will ask him, where you want to
13 set the massages? He will told me, set in the blue room
14 and set them in my room. Or set them in Ghislaine's
15 room and the red room, depends on who people were there.
16 But there were times where two of the girls at the same
17 time, yes.

18 Q. Was there ever occasions where there was a
19 girl who waited downstairs while one -- while the other
20 girl went upstairs?

21 A. No.

22 Q. That never happened?

23 A. I cannot remember.

24 Q. Was there ever an occasion where you paid a
25 girl who waited and didn't actually give a massage?

1 A. No.

2 Q. That never happened?

3 A. Never happened.

4 Q. You mentioned that Mr. Epstein put you in
5 contact with Mr. Murrell; is that correct?

6 MR. CRITTON: Form.

7 THE WITNESS: Not Mr. Epstein.

8 BY MR. MERMELSTEIN:

9 Q. Huh?

10 A. It wasn't Mr. Epstein.

11 Q. Mr. Epstein's investigator put you in contact
12 with Mr. Murrell?

13 A. That's correct. He gave me his name.

14 Q. And did you pay Mr. Murrell out of your own
15 pocket?

16 A. No, I didn't pay nothing.

17 Q. Who is -- what was your understanding as to
18 who was paying for Mr. Murrell?

19 A. I don't know. I don't know who was paying for
20 it.

21 Q. You never asked Mr. Murrell who was paying his
22 bill?

23 A. No, he never send me a bill.

24 Q. Did you think that Mr. Murrell was doing it
25 for free?

1 A. I don't know.

2 Q. You don't know. As far as you know,
3 Mr. Murrell could have been providing you legal services
4 for free?

5 A. No, I don't think it was provided me for free.
6 I don't think he ever -- that question ever come out of
7 Mr. Murrell. I was in Mr. Murrell's office for about
8 ten minutes.

9 And he says, well, I meet you tomorrow
10 there -- and that's it -- in order to protect you so
11 they don't incriminate you in any way. We left it at
12 that. He never send me a bill. He never send me -- I
13 never talk to Mr. Murrell again, never saw him again.

14 Q. And you never had any kind of understanding
15 with him as to how --

16 A. No.

17 Q. -- how his bill was going to be paid?

18 A. No.

19 Q. Did you sign any kind of what we call, a
20 retainer agreement, anything where you hired him?

21 A. No.

22 MR. CRITTON: Just so you know, you have an
23 attorney -- nobody's going to tell you this
24 apparently.

25 You have an attorney/client privilege. Any

1 conversation that you had with Mr. Murrell, you and
2 your wife, is completely protected, as long as you
3 want to assert that privilege.

4 You can either assert it or not assert it.
5 That's your right. But nobody's apparently going
6 to tell you that, at least Mr. Mermelstein is not
7 going to tell you that.

8 MR. MERMELSTEIN: Well, I was trying to
9 avoid --

10 MR. CRITTON: Well, you're asking questions of
11 what he said.

12 MR. MERMELSTEIN: I'm not asking them what
13 they said.

14 MR. CRITTON: Same thing.

15 MR. MERMELSTEIN: I'm asking him how he got
16 paid.

17 MR. CRITTON: No, you were -- read back your
18 questions where you were.

19 Anyhow, that's a right you have, so...

20 So much for the law.

21 MR. MERMELSTEIN: I was not asking him what
22 was said during any conversation. I asked him if
23 he signed a retainer. That's a fair question.

24 BY MR. MERMELSTEIN:

25 Q. Do you remember a girl who came to give

1 messages there by the name of A.C.? Does that name
2 sound familiar at all?

3 A. No.

4 Q. Do you remember an A.?

5 A. No.

6 Q. What about a J.M.? Do you remember anyone by
7 the name of J.M.?

8 A. No.

9 Q. Was it frequent that girls would come just
10 once and not appear again?

11 A. Frequently.

12 Q. These girls that would come, would they come
13 with their own equipment or supplies?

14 A. No. Some girls, they come in with a table,
15 the new girls they come in with a table. And I would
16 told them, no, you don't need the table. They will
17 leave it in the kitchen because we have tables in every
18 room in the house.

19 Q. Some of the girls, the first time they came
20 they didn't have anything, right?

21 A. They come with that table, one of the tables
22 they hang it in the shoulders, portable tables. But we
23 didn't have portable tables in the room. They were all
24 custom-made tables.

25 Q. Did some girls come without -- for the first

1 time without any supplies at all, whether equipment or
2 lotions or anything of that nature?

3 A. Probably.

4 Q. Did you have a question in your mind as to
5 whether they were professional at this business?

6 A. No.

7 Q. At massaging?

8 A. No.

9 Q. Why not?

10 A. It was not my job.

11 MR. CRITTON: Form.

12 BY MR. MERMELSTEIN:

13 Q. You just didn't think about it?

14 MR. CRITTON: Form.

15 THE WITNESS: If I was told that a girl is
16 coming, my job was to open the door, let her in and
17 let Mr. Epstein decide where he wants his massage.
18 And that was the end of it.

19 BY MR. MERMELSTEIN:

20 Q. Are you aware that sexual conduct between an
21 adult male and an underage female is criminal; it's
22 against the law?

23 MR. CRITTON: Form.

24 THE WITNESS: Of course I do.

25 BY MR. MERMELSTEIN:

1 Q. Did you have any concerns while you were
2 working there that criminal acts were occurring with the
3 girls who were coming to the door?

4 MR. CRITTON: Form.

5 THE WITNESS: I had no idea what was going on
6 between them.

7 BY MR. MERMELSTEIN:

8 Q. Let me just give you some other names. Tell
9 me if you recognize any of these names.

10 M.L.?

11 A. (Nods head.)

12 Q. Name does not ring a bell?

13 A. (Nods head.)

14 MR. CRITTON: You have to answer out loud.

15 BY MR. MERMELSTEIN:

16 Q. You need to say yes or no.

17 A. No.

18 Q. V.Z.?

19 A. Can you repeat that?

20 Q. V. would be the first name. Z. would be the
21 second name?

22 A. No.

23 Q. Y.L.?

24 A. No.

25 Q. V.A.?

1 A. No.

2 Q. F.P.?

3 A. No. None of those girls' --

4 Q. None of those girls ring a bell at all?

5 A. -- name familiar to me.

6 Either they came one time, one day and they
7 didn't even told me their names or -- or he paid for it
8 that I don't have -- but none of those names sound
9 familiar to me.

10 Q. You testified that there were -- about the sex
11 toys that you would pick up after -- after there were
12 massages, correct?

13 MR. CRITTON: Form.

14 BY MR. MERMELSTEIN:

15 Q. The vibrators, correct?

16 MR. CRITTON: Form.

17 BY MR. MERMELSTEIN:

18 Q. You can answer.

19 A. Yes.

20 Q. And you mentioned there was a basket with
21 these vibrators or toys in them, correct?

22 A. Yes.

23 Q. Where was the basket kept?

24 A. In Ms. Maxwell's closet.

25 Q. And that was in the master bedroom?

1 MR. CRITTON: Form.

2 BY MR. MERMELSTEIN:

3 Q. Or off the master bathroom?

4 A. Her bathroom.

5 Q. Huh?

6 A. Her bathroom.

7 Q. And the closet was -- the entrance to the
8 closet was in her bathroom?

9 A. That's correct.

10 Q. And it was a portable basket, she could move
11 it around, correct?

12 A. Uh-huh.

13 Q. You have to say yes or no.

14 A. Yes, sir.

15 Q. And -- and that's where the, I think you used
16 the word dildo, correct? That's where they were
17 located?

18 A. Yes, sir.

19 Q. Was there occasions where you would -- the
20 dildo, one or more dildos would be out and you would
21 clean them up after a massage that only Mr. Epstein had,
22 not Ms. Maxwell?

23 A. It was -- I will says that it was about three
24 or four occasions that I had to take this dildos and put
25 it back where they supposed to be. And I took it with

1 gloves and towels and stick it in the sink and throw it
2 in there.

3 Sometimes Ms. Maxwell will have a massage.
4 And sometimes I find it after she's supposed to have a
5 massage, those things. And also when Mr. Epstein had
6 the massage. So I don't know who use it on who.
7 Because sometimes they all disappear up there,
8 Mr. Epstein, Ms. Maxwell and whoever was up there.

9 Q. So as I understand it, you couldn't isolate a
10 particular instant where --

11 A. I cannot.

12 Q. -- Ms. Maxwell wasn't there, only Mr. Epstein
13 had gotten a massage and then you found the sex toys?

14 A. I cannot isolate that.

15 Q. But it's possible that either Mr. Epstein used
16 it or Ms. Maxwell used it; is that correct?

17 MR. CRITTON: Form. Form.

18 THE WITNESS: I have no idea to know.

19 MR. MERMELSTEIN: All right. I have nothing
20 further.

21 MR. BERGER: How about if we take a break?
22 Would you like a break for a couple minutes?

23 THE WITNESS: No, that's fine.

24 MR. BERGER: Mr. Willits, would it be possible
25 if I could sit there, because I've got a couple

1 Exhibits I'm going to show him?

2 MR. WILLITS: Sure.

3 MR. BERGER: Thanks.

4 CROSS EXAMINATION

5 BY MR. BERGER:

6 Q. Okay. Good afternoon, sir.

7 A. Afternoon, sir.

8 Q. My name is William J. Berger and I represent
9 three of the Plaintiffs in this case.

10 Did you ever hear of the name C., a young
11 woman named C.?

12 A. No, sir.

13 Q. How about a young woman named T.?

14 A. No, sir.

15 Q. Okay. You know, you've referred several times
16 to a falling out or a disagreement that you had with
17 Mr. Epstein?

18 A. Yes.

19 Q. Was that in -- was that the year that you left
20 his employment?

21 A. Right after -- right after I left.

22 Q. So you had a falling out with him after you
23 left his employment?

24 A. Yes.

25 Q. Well, why did you leave his employment?

1 A. Why?

2 Q. Yeah.

3 A. Because I was sick. I was extremely sick. I
4 was bleeding, internally bleeding, and I was bleeding
5 from my butt and I have fistulas in my colon. And I was
6 sick of the job and we had enough. We had good pay, but
7 we had enough of the job, especially because of
8 Ms. Maxwell's attitude towards us.

9 Q. Now, you said you had good pay, but we had
10 enough. What was your pay in 2002?

11 A. 2002, right before I left? I think it was 50,
12 either 55, something like that. And my wife was 30 or
13 35. I could be wrong.

14 Q. So you think that you were paid \$55,000 in
15 2002?

16 A. Uh-huh.

17 Q. Is that correct?

18 A. That's correct.

19 Q. And you believe your wife was paid how much?

20 A. Thirty, \$30,000.

21 Q. \$30,000 in 2002?

22 A. Uh-huh.

23 Q. Is that correct?

24 A. Yes, sir.

25 Q. How about 2001, what was your salary and your

1 wife's?

2 A. Same thing.

3 Q. Okay. And in 2000?

4 A. I was at the same. It never -- we never got
5 raises. We never got --

6 Q. I think you said at the very beginning --

7 A. Yes.

8 Q. -- of the deposition that you were paid 45,000
9 when you were first hired full time?

10 A. Yeah.

11 Q. In 2002, you were earning 55,000?

12 A. Uh-huh.

13 Q. So you did get some raise?

14 A. Yeah. In the matter of 11 years. Yeah, but
15 we didn't get a raise every six months or every year in
16 any specific date. And the raises were set by the
17 company. Automatically they would come from New York.
18 It was not a negotiate point between me and Mr. Epstein.

19 Q. And then you said earlier with me, you said we
20 had enough, you and your wife. You said, we had enough;
21 is that correct?

22 A. That's correct.

23 Q. What do you mean by that?

24 A. It was extremely stressful job. It was a lot
25 of pressure on us -- on me, on me -- I have to

1 correct -- on me. Everything was blamed on me. If a
2 chef cook a bad meal, it was my fault. And if the table
3 was not proper set royalty style, it was my fault. And
4 the hours were terrible, never have a holiday, Saturdays
5 and Sundays. We were working between 60 and 70 hours a
6 week. And my health was, I think, the most important
7 thing. And also the relation with my wife, it was a big
8 factor in us leaving the company.

9 Q. Now, you said that you were blamed for things?

10 A. Yes, sir.

11 Q. Who would blame you? Who is it that would say
12 that you were blamed?

13 A. I don't know who did the blaming, but I will
14 get my ass chewed out by Ms. Maxwell --

15 Q. She was the one?

16 A. Most of the times, yes.

17 Q. Who else did that?

18 A. Sometimes I had disagreements with him.

19 Q. "Him," being, who?

20 A. Mr. Epstein.

21 Q. About what?

22 A. Simple things. For me, it's stupid things,
23 nothing -- if this paper -- if this pencil was not put
24 in right there, they will complain.

25 Q. Okay. And is it correct that you left the

1 employment of Mr. Epstein in December of 2002? Does
2 that sound correct?

3 A. That's correct.

4 Q. And the -- now, were you arrested in 2003?

5 A. I was never arrested.

6 Q. You did speak to the police?

7 A. Yes.

8 Q. And you did have your statement taken at the
9 State Attorney's Office?

10 A. Yes.

11 Q. But you -- but that was by an Assistant State
12 Attorney, correct?

13 A. Yes.

14 Q. The questioning?

15 A. (Nods head.)

16 Q. Is that correct?

17 A. That's correct.

18 Q. You spoke separately with police officers
19 though, correct?

20 MR. CRITTON: Form.

21 BY MR. BERGER:

22 Q. In other words, the date of that statement is
23 in October of 2003; is that correct?

24 A. Yes.

25 Q. And by "that statement," I mean, the

1 transcript that I gave you earlier?

2 A. At what date, sir?

3 MR. MERMELSTEIN: 2005.

4 MR. BERGER: I'm sorry. You're correct.

5 Thank you. Sorry.

6 THE WITNESS: 2005.

7 MR. BERGER: In fact, let's -- Ms. Reporter,
8 would you mark the transcript if anybody needs it?

9 MR. CRITTON: It's Exhibit 2 now?

10 MR. BERGER: Is that how you're doing it, just
11 consecutively?

12 MR. CRITTON: Yeah, let's do it; otherwise,
13 it's going to be an awful mess, have five different
14 Exhibit number 1s by everybody.

15 (Exhibit number 2 was marked for
16 identification purposes.)

17 BY MR. BERGER:

18 Q. You see Exhibit 2? It's a transcript; is that
19 correct?

20 A. That's correct.

21 Q. Is that the transcript of the sworn statement
22 that you gave to the Assistant State Attorney in 2005?

23 A. Yes, sir.

24 Q. And during the lunch break, did you have an
25 opportunity to read it?

1 A. Yes, sir.

2 Q. And do you remember that you were placed under
3 oath when you gave that statement?

4 A. Yes, sir.

5 Q. And is everything that you say in here
6 truthful and correct?

7 A. As far as I know, yes, sir.

8 Q. Okay. Now, in connection with the incident in
9 October of 2003 involving Mr. Epstein's house and your
10 entering his house, that incident?

11 A. It was in October 2003?

12 Q. When do you remember that it was?

13 A. I can't remember.

14 Q. Okay. All right. You spoke with police
15 officers in connection with that though, correct?

16 A. I went to the Palm Beach Police Department.

17 Q. Why did you go to the --

18 A. I speak to one officer.

19 Q. And why did you go there?

20 A. Because Mr. -- when I spoke to Mr. Epstein and
21 we settle the dispute, Mr. Epstein says, you just need
22 to go to the police department and make a statement.

23 MR. WILLITS: Could I have Exhibit number 2,
24 please?

25 Thank you.

1 BY MR. BERGER:

2 Q. Let me see if I understand this correctly.

3 I think you testified earlier that you found a
4 card or you were given a card from a police officer; is
5 that correct?

6 A. That's correct.

7 Q. And as a result of that, you called
8 Mr. Epstein, correct?

9 A. That's correct.

10 Q. Before you got that card, did you have any
11 idea that the police were involved in your life?

12 A. No.

13 MR. CRITTON: Form.

14 BY MR. BERGER:

15 Q. And you called Mr. Epstein after you got that
16 card, correct?

17 A. Yes.

18 Q. Now, how did you get it? Was it mailed to
19 you?

20 A. No. It was putted in my door. I was not
21 home. And they went to my house and they left it in the
22 door.

23 Q. And did it have a note on it, please call?

24 A. Yes.

25 Q. Or was it just a card?

1 A. It was a -- it was a Palm Beach Police
2 Department, please call.

3 Q. Okay. And you didn't call though; you called
4 Mr. Epstein first, right?

5 A. Yeah. Because I was scared.

6 Q. Why were you scared?

7 A. Because I thought it was of the incident that
8 happens previously.

9 Q. And what was that incident?

10 A. You know that incident.

11 Q. I'd like to hear you describe it for me.

12 A. That incident is, I went to the house and I
13 got some money.

14 Q. What time of day did you go to the house?

15 A. Night.

16 Q. Was anybody home?

17 A. No.

18 Q. Where did you get the money?

19 A. Out of his bag.

20 Q. Out of his?

21 A. Bag.

22 Q. Bag. Briefcase? Bag?

23 A. Briefcase.

24 Q. Briefcase?

25 A. Yes.

1 Q. How did you -- did you know that there was
2 money in the briefcase?

3 A. Yes.

4 Q. How did you know that?

5 A. Because I replenish that case many times
6 before.

7 Q. Now, how many months after you left
8 Mr. Epstein's employment did this occur?

9 A. I don't have -- I would says, three to four
10 months.

11 Q. I would just ask a favor of you. The court
12 reporter needs to see your face so she can understand
13 what you're saying. She's looking -- you put your hand
14 in front of your mouth. That's all.

15 Now, when you worked for Mr. Epstein, did you
16 learn that he kept money in that briefcase?

17 A. Yes.

18 Q. And, so, when you went to his house on that
19 occasion, did you just assume that there would be money
20 in the briefcase?

21 A. Yes.

22 Q. And -- and did you take money out of that
23 briefcase?

24 A. Yes.

25 Q. Now, is that the only time that you took money

1 out --

2 A. No.

3 Q. -- of his briefcase?

4 A. It was twice.

5 Q. When was the other time?

6 A. Couple weeks before.

7 Q. What time of day was that?

8 A. At night.

9 Q. And how much did you take out the first time?

10 A. It was a total of \$6,300.

11 Q. That's for both times?

12 A. Yeah.

13 Q. Can you break them down?

14 A. I think one time was \$1,500. Another time was
15 the rest.

16 Q. Now, you left in December of 2002 and then
17 there were these two incidents that you just described?

18 A. Uh-huh.

19 Q. Did you have any contact with Mr. Epstein in
20 between leaving his employment and the first of these
21 two instances?

22 A. None.

23 Q. And as far as you knew, did anybody see you
24 take the money on either occasion?

25 A. None.

1 Q. And, so, when you saw the card from the
2 police, you assumed it had to do with these two
3 instances?

4 A. Yes, sir.

5 Q. And there was no other reason why you thought
6 it had to do with Mr. Epstein?

7 A. No, sir.

8 Q. And when you called him, did you discuss these
9 two incidents with him?

10 A. When I call Mr. --

11 Q. You said you got the card --

12 A. No.

13 Q. -- and then you called him?

14 A. No, we did not discuss that money or nothing
15 involved.

16 I ask him, what's going on, Jeffrey? What's
17 happening? I got this and I thought that this was all
18 over.

19 No, he says, John, it has nothing to do with
20 that money.

21 Q. Did you ever read the incident report by the
22 police, the Palm Beach Police Department? Did you ever
23 read it?

24 A. No.

25 MR. CRITTON: Regarding what?

1 MR. BERGER: Regarding these incidents.

2 BY MR. BERGER:

3 Q. You never read it?

4 A. No.

5 Q. Let me hand you this.

6 MR. CRITTON: Is there an extra copy?

7 MR. BERGER: Yeah.

8 BY MR. BERGER:

9 Q. What I'm showing you, have you ever seen this
10 before?

11 A. No.

12 MR. BERGER: Let's have this marked as Exhibit
13 3, please.

14 MR. CRITTON: Can I keep this?

15 (Exhibit number 3 was marked for
16 identification purposes.)

17 BY MR. BERGER:

18 Q. It appears to be about 20 pages and it has,
19 Palm Beach Police Department Incident Report, on the top
20 page.

21 Turn to the third page.

22 And you see where it starts the narrative, the
23 paragraph? Do you see where that starts?

24 A. Yes, sir.

25 Q. And it says: "On Sunday, October 5, '03 at

1 approximately 8:24 hours, I was dispatched to a burglary
2 at 358 El Brillo Way."

3 Do you see that?

4 A. Yeah.

5 Q. Now, October 5, 2003, do you recall that that
6 was about when the time you took the money from
7 Mr. Epstein's briefcase was?

8 A. Yes. I don't recall. But if they say it, I
9 have to agree with it.

10 Q. Well, you left in December of 2002. And
11 before I showed you this document, you said that these
12 incidents occurred about three or four months later. So
13 apparently they occurred more than three or four months
14 later; is that correct?

15 A. Apparently, yes.

16 Q. Well, now after -- after looking at this, sir,
17 do you actually recall that it occurred more than three
18 or four months later?

19 A. After looking at this?

20 Q. Yeah.

21 A. It could be.

22 Q. But do you actually remember it being more
23 than three or four months?

24 A. I don't remember if it was more than three
25 months.

1 Q. Okay. Okay. Now, if you look further down,
2 you'll see it says, quote, Epstein further advised a
3 black Glock handgun was taken from the book shelf
4 located behind the desk, unquote.

5 Do you see that?

6 A. Yes.

7 Q. Did you take a black Glock handgun from him?

8 A. Absolutely not.

9 Q. Do you know if anybody did?

10 A. No, sir.

11 Q. Is this the first time that you ever heard
12 that Mr. Epstein may have told the police --

13 A. No. This question I was asked by the police.

14 Q. Okay. Now, you see the next sentence? It
15 says: "Epstein advised he suspected cash had been taken
16 from his briefcase on two other occasions while he was
17 in town for the weekend. The first was over the Labor
18 Day weekend, August 30 to September 1. The second time
19 was a weekend in mid-September 2003."

20 Do you see --

21 A. Yeah.

22 Q. -- the mention of those two incidents?

23 A. Uh-huh.

24 Q. Yes?

25 A. Uh-huh.

1 Q. You've got to say yes or no.

2 A. Yes, sir.

3 Q. Now, look up at the top of that paragraph.

4 You see where it says: "After" -- it's about the fourth
5 sentence -- "Epstein advised that on Saturday evening,
6 October 4, 2003, he left his briefcase at his desk and
7 went to bed at approximately 12:30 a.m. Epstein said
8 when he left his briefcase, it contained approximately
9 \$5,000 U.S. currency."

10 A. Uh-huh.

11 Q. Do you see that?

12 A. Yes.

13 Q. And then it goes further on, it says -- after
14 a sentence or two, it says: "Epstein stated at
15 approximately 7:15 hours on Sunday, October 5, 2003,
16 while sitting at his desk, he noticed the briefcase had
17 been opened and some of the cash was missing. Epstein
18 believed approximately \$3,500 was taken from the
19 briefcase."

20 Do you see that?

21 A. Yes.

22 Q. Now, when you read this whole paragraph here,
23 do you agree that Mr. Epstein is -- and assuming that
24 the police took this down accurately -- that Mr. Epstein
25 is describing three separate instances --

1 A. No.

2 Q. -- where he believes money was taken?

3 MR. CRITTON: Form.

4 THE WITNESS: I don't agree with this.

5 BY MR. BERGER:

6 Q. No?

7 A. No.

8 Q. Well, he says: "The first" -- at the bottom,
9 it says: "The first was over Labor Day weekend, August
10 30 to September 1, 2003."

11 You see it says that at the bottom? The very
12 bottom.

13 "The first was over Labor Day weekend,
14 August 30 to September 1, 2003."

15 Do you see that?

16 A. Uh-huh.

17 Q. Yes or no?

18 A. Yes.

19 Q. And then it says: "The second time was a
20 weekend in mid-September 2003."

21 Do you see that?

22 A. Yes.

23 Q. And then above, do you see where he talked
24 about October 4, 2003? You see mention of that? Or
25 October 5, 2003?

1 A. Right here.

2 Q. Right in the middle, it says: "Epstein stated
3 at" -- yes.

4 A. No. I don't agree with this. I never saw
5 this.

6 Q. I'm not asking -- that's not what I'm asking.
7 What I'm saying, sir, do you see though that
8 the police report refers to three instances; is that
9 correct?

10 A. No.

11 Q. Okay. But it's correct that the police report
12 refers to three instances, correct?

13 MR. CRITTON: Form.

14 BY MR. BERGER:

15 Q. The police talk about three instances, right?

16 A. That's correct.

17 MR. CRITTON: Form.

18 BY MR. BERGER:

19 Q. Now, how many times did you take cash from
20 Mr. Epstein?

21 A. Twice.

22 Q. So do you have any idea what he's talking
23 about here?

24 A. No.

25 Q. Now, the first time that you took cash, was it

1 on August 30 to September 1, 2003?

2 A. I can't remember.

3 Q. Or September -- mid-September 2003?

4 A. I can't remember.

5 Q. Okay. Is the third incident accurate where it
6 talks about October 5 or October 4, 2003?

7 A. I don't know if it's accurate or not, but I
8 know that I went to the house twice.

9 Q. Not three times?

10 A. Not three times.

11 Q. Any idea why Mr. Epstein would talk about
12 three times?

13 A. No idea, sir.

14 Q. And any idea why he would talk about a Glock
15 handgun?

16 A. No, sir.

17 MR. CRITTON: Form.

18 BY MR. BERGER:

19 Q. Now, you said that -- that you had a -- okay.
20 I've put this aside. I'm going to ask you another
21 question, so why don't you -- I don't want to distract
22 you.

23 Now, you said that your disagreement or your
24 falling out with Mr. Epstein was after you left his
25 employment. Do you remember saying that?

1 A. Yes. After -- after this incident.

2 Q. And what did that disagreement have to do
3 with? Did it have to do with these incidents?

4 A. Of course. I screw it up.

5 Q. Okay. And do you know who Mr. Adam Fetterman
6 is?

7 A. Yes.

8 Q. Who is he?

9 A. He's my lawyer.

10 Q. And did Mr. Epstein pay for Mr. Fetterman's
11 legal services for you?

12 A. No. I pay on my own pocket.

13 Q. Now, let me ask you some questions about some
14 property in Palm Beach County, Mr. Alessi.

15 Do you remember that in or around 1983 you and
16 your wife bought a home at Bilbao Street in Royal Palm
17 Beach?

18 A. I didn't bought it. I build it.

19 Q. You built it. You didn't buy it?

20 A. No.

21 Q. And do you remember that in April of 1995, you
22 and your wife purchased a single-family home in -- on
23 Northumberland Court in Wellington? Do you remember
24 that?

25 A. It was a lot.

1 Q. It was a lot. Okay.

2 A. Yes, we purchase that.

3 Q. Okay.

4 MR. CRITTON: What was the first date you gave
5 about built home?

6 MR. BERGER: July 1983.

7 MR. CRITTON: Thank you.

8 BY MR. BERGER:

9 Q. And does the purchase price of \$22,600; is
10 that correct --

11 A. Sounds familiar.

12 Q. -- for the -- for the Northumberland Court
13 lot; is that correct?

14 A. Uh-huh.

15 Q. Yes or no?

16 A. What date was that?

17 Q. April of 1995.

18 A. That's correct.

19 Q. Now, do you recall that in December of 1997
20 you and your wife bought apartment number 1902 at 1515
21 South Flagler Drive --

22 A. That's correct.

23 Q. -- in West Palm Beach; is that right?

24 A. Yes, sir.

25 Q. And does the purchase price of \$105,000; is

1 that accurate?

2 A. That's correct.

3 Q. Now, do you recall that in November of 1998
4 you and your wife bought apartment 1901 at 1515 South
5 Flagler?

6 A. Yes.

7 Q. And the purchase price was \$159,000?

8 A. That's correct.

9 Q. So in -- so did you -- as of November of 1998,
10 did you own both apartment 1902 and apartment 1901 at
11 the 1515 building?

12 A. Yes. But I didn't own the house in Royal Palm
13 Beach. I didn't -- I sold that. With that money we
14 bought that apartments.

15 Q. You built the house at the Royal Palm Beach
16 address?

17 A. Yes.

18 Q. After buying the lot?

19 A. Yes. We bought the lot years, years back.

20 Q. Now, in October of 2001, do you remember
21 buying a multi-family residential property at Yarmouth
22 Drive in Wellington?

23 A. I still have it.

24 Q. And do you remember the purchase price being
25 \$310,000?

1 A. Yes, sir.

2 Q. And this is while you worked for Mr. Epstein,
3 correct? 2001, October 2001?

4 A. Yeah.

5 Q. And you still own it; is that what you said?

6 A. Yes.

7 Q. And is that a rental apartment building?

8 A. Yeah, it's a rental.

9 Q. And now, do you recall that in September of
10 2002 you and your wife purchased a multi-family
11 residential property at Sequoia Drive in West Palm
12 Beach?

13 A. That's correct.

14 Q. And the purchase price was \$590,000? Do you
15 remember that?

16 A. Yes.

17 Q. And then in October of 2004 you bought the --
18 you bought a multi-family residential property -- strike
19 that.

20 In October of 2004 your wife purchased a
21 multi-family residential property at 6791 Fairway Lakes
22 Drive, Boynton Beach?

23 A. That is not correct. That is a house.

24 Q. That's where you live now?

25 A. That's where we live now.

1 Q. And that's just a single-family home?

2 A. That's a single-family home.

3 Q. Okay. And now, did Mr. Epstein contribute any
4 money to the purchase of any of these properties?

5 A. He contribute the -- he contribute the \$20,000
6 towards the purchase of the first property.

7 Q. Well, the first property was back in 1983?

8 A. No. No. The first property at 1515 South
9 Flagler Drive.

10 Q. That's apartment 1902?

11 A. 1902.

12 Q. Did he contribute any other money towards any
13 of the other properties?

14 A. No.

15 Q. So you paid \$590,000 for the property at
16 Sequoia Drive without the assistance of Jeffrey Epstein?

17 A. That's correct. I had a loan, took a big loan
18 on that.

19 Q. So he had absolutely nothing to do with your
20 purchase of that property?

21 A. Nothing.

22 Q. And he contributed nothing towards any -- to
23 the purchase of any of the other properties that I
24 mentioned?

25 A. Nothing.

1 Q. Okay.

2 MR. BERGER: Mark this as Exhibit 4, please.

3 (Exhibit number 4 was marked for
4 identification purposes.)

5 BY MR. BERGER:

6 Q. Look at Exhibit 4, sir. It's two pages. And
7 it's from Florida Department of State, Division of
8 Corporations?

9 A. Yeah.

10 Q. And would you turn to the next page, the
11 second page?

12 On the second page, do you see your signature
13 and your wife's?

14 A. Yes.

15 Q. And do you recognize this as an application
16 for registration of a fictitious name?

17 A. Yes.

18 Q. And is that -- did you and your wife apply for
19 registration of a fictitious name?

20 A. Right. This was done by our lawyer,
21 Fetterman.

22 Q. And was that done in January of 2003? Look in
23 the upper right.

24 A. Yes.

25 Q. Is that correct?

1 A. Uh-huh.

2 Q. Yes?

3 A. Yes.

4 Q. And the fictitious name was Las Villas Alessi
5 Properties, correct?

6 A. That's correct.

7 Q. And did Jeffrey Epstein have anything
8 whatsoever to do with the registration of this
9 fictitious name?

10 A. Absolutely nothing.

11 MR. BERGER: Mark this as the next Exhibit.
12 (Exhibit number 5 was marked for
13 identification purposes.)

14 MR. WILLITS: Spell the name of that last --

15 MR. BERGER: It's Las Villas, V-I-L-L-A-S,
16 Alessi Properties.

17 MR. WILLITS: Thank you.

18 BY MR. BERGER:

19 Q. The next Exhibit, sir, has papers from the
20 Department of State, Division of Corporations. Do you
21 see it makes reference to Alessi Properties, LLC? Up at
22 the top.

23 It says: "Detail by officer/registered agent
24 name." And then under that it says, "Florida limited
25 liability company."