

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

CASE NO. 15-CV-07433-RWS

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VIRGINIA L. GIUFFRE,

Plaintiff,

v.

GHISLAINE MAXWELL,

Defendant.

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June 1, 2016

9:12 a.m.

C O N F I D E N T I A L

Deposition of JOHN ALESSI, pursuant
to notice, taken by Plaintiff, at the
offices of Boies Schiller & Flexner, 401
Las Olas Boulevard, Fort Lauderdale, Florida,
before Kelli Ann Willis, a Registered
Professional Reporter, Certified Realtime
Reporter and Notary Public within and
for the State of Florida.

1 JOHN ALESSI

2 A. She was a -- she was very avid with
3 photographs. She had this high-tech camera. She
4 was constantly taking photographs. Not only
5 photographs, but I think it was -- she had this
6 special camera. I don't know what was it. She took
7 photographs, yes.

8 Q. In fact, you described her as a fanatic
9 about photographs?

10 A. Exactly. Yes.

11 Q. You would agree --

12 A. Because of the equipment that she had.
13 She had this fantastic equipment.

14 Q. And did she take photographs and pictures
15 by the pool in Jeffrey Epstein's house?

16 A. I think she did some, yes.

17 Q. Did she take pictures of topless girls at
18 the pool?

19 A. I saw pictures of topless girls, yes, I
20 did. Saw it.

21 Q. And were the majority of the pictures that
22 she took of topless or nude girls?

23 MR. PAGLIUSCA: Object to form and
24 foundation.

25 THE WITNESS: I never saw any nude photos.

1 JOHN ALESSI

2 I saw topless pictures of girls. I don't think
3 I can remember seeing nude photos.

4 BY MR. EDWARDS:

5 Q. Okay. I want you to go to your
6 deposition, and --

7 MR. PAGLIUSCA: Which exhibit number?

8 BY MR. EDWARDS:

9 Q. Right. It's going to be Exhibit No. 2,
10 page 40, line 15.

11 A. Okay.

12 Q. Through page 41, line 7.

13 MR. PAGLIUSCA: And, again, I'm going to
14 object to the form of this process.

15 THE WITNESS: Okay.

16 BY MR. EDWARDS:

17 Q. Okay. Did you read that testimony?

18 A. Yes.

19 Q. Okay. So do you remember back in 2009
20 testifying:

21 "QUESTION: Did you ever observe her doing
22 a photo shoot of any of the young women whose names
23 you mentioned?

24 "ANSWER: Young women?

25 "QUESTION: Yes.

1 JOHN ALESSI

2 "ANSWER: No, I can't remember. I know
3 that she went out and took pictures in the pool,
4 because later I would see them at the desk or at the
5 house; and nude, 99.9 percent of the time they were
6 topless. They were European girls."

7 A. Yes.

8 Q. Is that truthful testimony?

9 A. It is truthful.

10 Q. Okay. So it's true that 99.9 percent of
11 the photographs that Ms. Maxwell would take were, in
12 your words, nude, they were topless?

13 A. Topless, not nude. Topless.

14 Q. Do you see where I got the word "nude"
15 from, though, right? That's a word you used?

16 A. Let me tell you something.

17 Q. Sure.

18 A. When these girls came to the house, most
19 of the European -- there were some Americans; they
20 also took their top off -- they would go in the sun,
21 they would go in the pool without the tops. I don't
22 remember seeing nude girls. Nude, with me, means
23 nothing on. They would have the bottoms on and no
24 tops. Some of them. Some will go with a full
25 swimming costume.

1 JOHN ALESSI

2 Q. And did Ms. Maxwell keep these photographs
3 in an album?

4 A. Yes, there was an album, because I knew,
5 when I clean out the desk, I have to put everything
6 in the house back together. Sometimes I saw these
7 albums, and there were pictures of girls at the
8 pool.

9 Q. And there were also nude photographs -- or
10 sorry -- topless photographs -- strike that.

11 Were there photographs of girls topless
12 that were displayed in the Palm Beach house?

13 MR. PAGLIUSCA: Object to form and
14 foundation.

15 THE WITNESS: Not when I was there. Not
16 when I was there.

17 BY MR. EDWARDS:

18 Q. When is the last time that you spoke with
19 Ghislaine Maxwell?

20 A. I did not spoke to her after we left.

21 Q. When was the last time you spoke to
22 Jeffrey Epstein?

23 A. Jeffrey Epstein, I talked to him while I
24 was -- basically, I was attacked by the media at my
25 house.

1 JOHN ALESSI

2 Q. When was that?

3 A. When was that? 2014, after all of this --
4 after the -- the -- Jeffrey got in trouble with the
5 law. After that, the media came to my house trying
6 to get me to talk, trying to get me to basically put
7 him in trouble. And I didn't know anything about
8 it. And I wanted them to be out of my house, out of
9 my life.

10 And I want this thing to get over in my
11 life, too, because I am getting sick and tired of
12 this constant coming back to me, and it's -- I need
13 to be left alone.

14 Q. Okay. I understand.

15 Have you had any communication with anyone
16 who represents the interests of Ghislaine Maxwell in
17 the last --

18 A. Absolutely not.

19 Q. Okay.

20 A. I didn't know there was a case against
21 Ms. Maxwell.

22 Q. Where did Ms. Maxwell keep the album of
23 topless females?

24 MR. PAGLIUSCA: Object to form and
25 characterization.

1 JOHN ALESSI

2 THE WITNESS: I think it was on her desk.

3 BY MR. EDWARDS:

4 Q. Where was Ms. Maxwell's desk within the
5 house?

6 A. It was in the first floor. It was in the
7 opposite end of Mr. Epstein, with a partition wall
8 in the middle. So it was not viewable for him, her
9 desk, and she could not see him and his desk.

10 Q. Okay. And did Ms. Maxwell have her own
11 computer at her desk?

12 A. She had a computer. She had a laptop at
13 her desk.

14 Q. Was one of your job duties to transport
15 any of the girls that would come over to give
16 massages?

17 A. Occasionally.

18 Q. All right.

19 And would there be occasion where
20 Ms. Maxwell would ask you to go pick up a certain
21 girl and bring her over to the house?

22 A. It was basically him. He would ask me.

23 Q. Mr. Epstein?

24 A. Uh-huh.

25 Q. I guess my real question is: Would you

