

EXHIBIT 3

(File Under Seal)

Page 270

1 UNITED STATES DISTRICT COURT
2 SOUTHERN DISTRICT OF FLORIDA

3 JANE DOE NO. 2, CASE NO: 08-CV-80119

4 Plaintiff,

5 Vs.

6 JEFFREY EPSTEIN,

7 Defendant.
8 _____
9 JANE DOE NO. 3, CASE NO: 08-CV-80232

10 Plaintiff,

11 Vs.

12 JEFFREY EPSTEIN,

13 Defendant.
14 _____
15 JANE DOE NO. 4, CASE NO: 08-CV-80380

16 Plaintiff,

17 Vs.

18 JEFFREY EPSTEIN,

19 Defendant.
20 _____
21 JANE DOE NO. 5, CASE NO: 08-CV-80381

22 Plaintiff,
23 Vs

24 JEFFREY EPSTEIN,
25 Defendant.
26 _____
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CONDENSED

Kress Court Reporting, Inc. 305-866-7688
7115 Rue Notre Dame, Miami Beach, FL 33141

NON PARTY (VR) 000315

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<p style="text-align: right;">Page 299</p> <p>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. EZELL: 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</p>	<p style="text-align: right;">Page 301</p> <p>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. EZELL: 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. EZELL: 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</p>
<p style="text-align: right;">Page 300</p> <p>1 said he didn't even know the video equipment 2 existed until he read the FBI report. 3 MS. EZELL: 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. EZELL: I may be wrong. 8 BY MS. EZELL: 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</p>	<p style="text-align: right;">Page 302</p> <p>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</p>
<p>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. EZELL: 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,</p>	<p>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. EZELL: 25 Q. Do you know that because you saw the</p>

9 (Pages 299 to 302)

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<p>1 names and phone numbers? 2 MR. CRITTON: Form. 3 THE WITNESS: Yes, ma'am. 4 BY MS. EZELL: 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. EZELL: 14 Q. Were they similar to the pictures that 15 Ms. Kellen had on her computer? 16 MR. CRITTON: Form. 17 THE WITNESS: Yes, ma'am. 18 BY MS. EZELL: 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.</p>	<p>Page 303</p> <p>1 computer? 2 MR. CRITTON: Form. 3 THE WITNESS: Yes, ma'am. 4 BY MS. EZELL: 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. EZELL: 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. EZELL: 18 Q. Did she have telephone numbers generally? 19 A. Yes, ma'am. 20 MR. CRITTON: Form. 21 BY MS. EZELL: 22 Q. Were there pictures on her computer of 23 the girls who came to give massages? 24 MR. CRITTON: Form. 25 BY MS. EZELL:</p>
<p>1 THE WITNESS: No, ma'am. 2 BY MS. EZELL: 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.</p>	<p>Page 304</p> <p>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. EZELL: 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</p>
<p>17 MS. EZELL: Okay, thank you. 18 BY MS. EZELL: 19 Q. When I asked you about Ms. Kellen 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. Kellen had a list 25 of the girls that came to give massages on her</p>	<p>Page 305</p> <p>17 they were being photographed. 18 BY MS. EZELL: 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.</p>

10 (Pages 303 to 306)

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<p style="text-align: right;">Page 335</p> <p>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 Sarah, 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</p>	<p style="text-align: right;">Page 337</p> <p>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</p>
<p style="text-align: right;">Page 336</p> <p>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 Joe Recarey, sir. 16 Q. Okay. And the materials that you gave to</p>	<p style="text-align: right;">Page 338</p> <p>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. WILLITS: 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 Recarey. 12 BY MR. WILLITS: 13 Q. Did anyone help you assemble those papers 14 to give to the Detective? 15 A. No, sir. 16 MR. WILLITS: 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.</p>

18 (Pages 335 to 338)

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<p style="text-align: right;">Page 339</p> <p>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. Mermelstein and Mr. Edwards 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?</p> <p>10 A. Yes, I do.</p> <p>11 Q. All right. Now, when Mr. Edwards and -- 12 Mr. Horowitz is here today for Mr. Mermelstein, 13 but you remember a lawyer asked you some questions 14 last time you were here?</p> <p>15 A. Yes.</p> <p>16 Q. That is he started and he went on for a 17 few hours. Do you recall that?</p> <p>18 A. Yes, I remember.</p> <p>19 Q. He asked you do you remember telling the 20 police officer Y, X, or Z.</p> <p>21 Do you remember that? Do you remember 22 that's how he phrased his question?</p> <p>23 A. Yes, yes.</p> <p>24 Q. He never showed you a statement that you 25 made to the police department; did he?</p>	<p style="text-align: right;">Page 341</p> <p>1 marked up, no, you can't. 2 MR. CRITTON: I just want to show him. 3 Thank you, Cathy.</p> <p>4 BY MR. CRITTON:</p> <p>5 Q. This is the first what Ms. Ezell 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?</p> <p>10 A. Yes, I understand that.</p> <p>11 Q. And no one has provided that to you yet 12 today; have they?</p> <p>13 A. No.</p> <p>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?</p> <p>17 A. Yes.</p> <p>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 Recarey and the State Attorney's Office from Palm 24 Beach County was in a taped statement. 25 Is that correct?</p>
<p style="text-align: right;">Page 340</p> <p>1 A. I'm sorry?</p> <p>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 --</p> <p>5 MR. WILLITS: Object to the form of the 6 question.</p> <p>7 MR. CRITTON: You need to let me finish 8 it first.</p> <p>9 MR. WILLITS: I'm sorry, I thought you 10 were.</p> <p>11 BY MR. CRITTON:</p> <p>12 Q. He never showed you a statement of what 13 the question was and the answer that you gave. 14 True?</p> <p>15 MR. WILLITS: Object to the form of the 16 question.</p>	<p style="text-align: right;">Page 342</p> <p>1 A. No.</p> <p>2 Q. Did you talk with them separate and apart 3 from that?</p> <p>4 A. Yes, I did.</p> <p>5 Q. Okay. Did they tape that statement?</p> <p>6 A. No.</p> <p>7 Q. You told us you also spoke with 8 representatives of the FBI?</p> <p>9 A. Yes.</p> <p>10 Q. Okay. And you distinguished between the 11 FBI and between Officer Recarey?</p> <p>12 A. Yes.</p> <p>13 Q. So how many times did Officer Recarey, or 14 Detective Recarey, I think he's from the Palm 15 Beach Police Department speak with you?</p> <p>16 A. Like three or four times.</p>
<p>17 THE WITNESS: I don't exactly understand 18 your question.</p> <p>19 BY MR. CRITTON:</p> <p>20 Q. Do you know what a deposition is?</p> <p>21 A. Yes, I am.</p> <p>22 Q. That's what you're doing here.</p> <p>23 MR. CRITTON: Could I borrow your 24 deposition for just a minute?</p> <p>25 MR. HOROWITZ: The transcript? It's</p>	<p>17 Q. But he only took one statement?</p> <p>18 A. One taped.</p> <p>19 Q. I'm sorry, one taped statement?</p> <p>20 A. Yes.</p> <p>21 Q. All right. So as to whether or not if 22 you said something to Officer Recarey 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</p>

19 (Pages 339 to 342)

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<p>1 with you.</p> <p>2 MR. EDWARDS: Form.</p> <p>3 MR. HOROWITZ: Form.</p> <p>4 BY MR. CRITTON:</p> <p>5 Q. Is that correct?</p> <p>6 A. Yes, correct.</p> <p>7 MR. WILLITS: Object to the form.</p> <p>8 MR. HOROWITZ: Join.</p> <p>9 BY MR. CRITTON:</p> <p>10 Q. And when we were here, I think it was last week or the last ten days anyway -- I could tell you. On July 29th of this year, and Mr. Mermelstein started with your deposition and then others asked questions, when Mr. Mermelstein and I think Mr. Edwards asked questions about did you tell Officer Recarey X, Y, or Z, they didn't show you a statement, they didn't give you like a transcript like this and say see what the question and see what the answer is?</p> <p>20 A. No.</p> <p>21 MR. EDWARDS: Form.</p> <p>22 MR. WILLITS: Object to the form of the question.</p> <p>24 BY MR. CRITTON:</p> <p>25 Q. And you haven't had an opportunity to see</p>	<p>Page 343</p> <p>1 Q. When Officer Recarey took -- spoke with you on those approximately two times when he did not take a taped statement, did he ever present anything for you, anything in writing that he had written to say, Mr. Rodriguez, I would like you to review this to make certain that I took down correctly what you said?</p> <p>8 A. No, sir.</p> <p>9 Q. If he had offered to do that would you have read what he wrote down to determine whether or not he took down that which you had said or told him?</p> <p>13 MR. EDWARDS: Object to the form.</p> <p>14 THE WITNESS: Probably I will read it first.</p> <p>16 BY MR. CRITTON:</p> <p>17 Q. All right. And if in fact he had recorded something incorrectly or recorded in a particular way that he wanted it phrased and it was not accurate, would you have told him that?</p> <p>21 MR. EDWARDS: Object to the form.</p> <p>22 THE WITNESS: No, I never told him that.</p> <p>23 BY MR. CRITTON:</p> <p>24 Q. Listen to my question. If he, Officer Recarey, had taken down</p>
<p>Page 344</p> <p>1 your taped statement since you gave it many years ago?</p> <p>3 A. No, sir.</p> <p>4 Q. Would you agree that your taped statement would probably be a little more accurate than your testimony today because of the time period that has transpired?</p> <p>8 A. That's correct.</p> <p>9 MR. HOROWITZ: Object to the form.</p> <p>10 MR. WILLITS: Object to the form of the question.</p> <p>12 BY MR. CRITTON:</p> <p>13 Q. When you spoke with the FBI over at Greens -- I think it was Greens Pharmacy?</p> <p>15 A. Yes.</p> <p>16 Q. Did they take a statement from you, that</p>	<p>Page 346</p> <p>1 what you said and it was not accurate, that is, he put his interpretation of what you said, would you have told him that's not accurate, Officer Recarey?</p> <p>5 MR. HOROWITZ: Form.</p> <p>6 MR. EDWARDS: Object to the form.</p> <p>7 THE WITNESS: I will tell him.</p> <p>8 MR. CRITTON: Go ahead and change. We're going to change the tape. We do have time.</p> <p>10 Cathy, could I borrow back the photographs, please?</p> <p>12 While you're giving me those back, would it be correct that you're going to keep -- you took as you did with photograph number four you took back five, six, seven, and eight, and you're going to keep those</p>
<p>17 is, did they have a tape recorder or did they just make notes?</p> <p>19 A. They took notes.</p> <p>20 Q. All right. Did you sign anything?</p> <p>21 A. No, sir.</p> <p>22 Q. That is like did they take notes of what you said and then you signed it to say yep, that accurately reflects what I said?</p> <p>25 A. No, I didn't sign anything.</p>	<p>17 and not allow me or anyone else to have a copy of them?</p> <p>19 MS. EZZELL: Yes.</p> <p>20 MR. CRITTON: You're going to be equally restrictive; right?</p> <p>22 MS. EZZELL: Right.</p> <p>23 MR. CRITTON: All right. Thank you.</p> <p>24 BY MR. CRITTON:</p> <p>25 Q. You were shown photograph five of a lady,</p>

20 (Pages 343 to 346)

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<p style="text-align: right;">Page 347</p> <p>1 F.E., 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 F.E.'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</p>	<p style="text-align: right;">Page 349</p> <p>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. WILLITS: Object to the form of the 23 question. 24 BY MR. CRITTON: 25 Q. On Exhibit 6 there is a person who's</p>
<p style="text-align: right;">Page 348</p> <p>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</p>	<p style="text-align: right;">Page 350</p> <p>1 covered, the lady that Ms. Ezell 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 [REDACTED] 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.</p>
<p>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:</p>	<p>17 Q. And did you ever tell anyone that you had 18 seen her naked in the sauna? 19 A. I told Louella. 20 Q. Okay. And what did Louella 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</p>

21 (Pages 347 to 350)

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<p style="text-align: right;">Page 351</p> <p>1 was at that time?</p> <p>2 A. No, I didn't know.</p> <p>3 Q. If I was to tell you she was born in</p> <p>4 December of '86 which would have made her 18 at</p> <p>5 the time, and you would say, not surprised?</p> <p>6 MS. EZELL: Objection, form.</p> <p>7 MR. WILLITS: Object to the form of the</p> <p>8 question.</p> <p>9 MR. HOROWITZ: Join.</p> <p>10 THE WITNESS: I would say I wouldn't</p> <p>11 know.</p> <p>12 BY MR. CRITTON:</p> <p>13 Q. Other than telling Louella did you say</p> <p>14 anything to anyone else when you saw [REDACTED], the</p> <p>15 lady you believe was [REDACTED] naked in the sauna?</p> <p>16 A. I believe I mentioned that to my wife.</p> <p>17 Q. All right. Anyone else?</p> <p>18 A. No.</p> <p>19 Q. And did [REDACTED] continue -- assuming it was</p> <p>20 [REDACTED], did she continue to sleep in the sauna, that</p> <p>21 is, she didn't know you were there?</p> <p>22 A. She never knew that I was there.</p> <p>23 Q. She didn't at least acknowledge that she</p> <p>24 knew. Correct?</p> <p>25 A. Yes, correct.</p>	<p style="text-align: right;">Page 353</p> <p>1 correct?</p> <p>2 A. I think so, sir.</p> <p>3 Q. All right. I assume that in over the</p> <p>4 course of your life separate and apart from your</p> <p>5 wife you've seen a naked woman before.</p> <p>6 A. Yes,</p> <p>7 Q. And I assume that in your 50 some odd</p> <p>8 years -- how old are you, sir?</p> <p>9 A. 55.</p> <p>10 Q. In your 55 years you've seen pictures of</p> <p>11 naked women both photographs, paintings, statutes.</p> <p>12 Would that be a fair statement?</p> <p>13 A. Yes.</p> <p>14 Q. And in terms of at least in this</p> <p>15 particular case there is all sorts of -- as you</p> <p>16 know there is testimony, and you've been asked a</p> <p>17 number of questions about sex related issues, that</p> <p>18 is whether you saw in photographs or whether you</p> <p>19 saw anyone engaged in any type of sexual activity.</p> <p>20 Correct?</p> <p>21 A. Correct.</p> <p>22 Q. And I assume that you understand that men</p> <p>23 and women -- we'll start there first, that men and</p> <p>24 women actually do have sex in this world?</p> <p>25 A. Yes.</p>
<p style="text-align: right;">Page 352</p> <p>1 Q. You were asked by Ms. Ezell -- I'm just</p> <p>2 going to cover a couple of things as long as I'm</p> <p>3 staying with Cathy here -- whether Louella, you</p> <p>4 had told us something about the picture of the</p> <p>5 Pope near a picture of a naked person, naked</p> <p>6 woman. That's what Louella told you, you never</p> <p>7 saw those photos. Correct?</p> <p>8 A. I did saw the pictures.</p> <p>9 Q. You did see the pictures?</p> <p>10 A. Yes.</p> <p>11 Q. And the photos that you saw of the naked</p> <p>12 woman that was near the Pope's photograph, was</p> <p>13 that someone that you knew or just a picture of a</p> <p>14 naked woman?</p> <p>15 A. It was somebody -- somebody that was a</p> <p>16 visitor in the house, but I don't know her name.</p> <p>17 Q. And the visitors, that would have been</p> <p>18 one of the plane women, you described the women</p> <p>19 who came in on planes, or that they came with Mr.</p> <p>20 Epstein from time to time?</p> <p>21 A. They came with Mr. Epstein from time to</p> <p>22 time.</p> <p>23 Q. All right. And those are women that I</p> <p>24 think you testified at your last deposition all</p> <p>25 appeared to be in their 20's or older. Is that</p>	<p style="text-align: right;">Page 354</p> <p>1 Q. That comes as no grand surprise to you?</p> <p>2 A. No.</p> <p>3 Q. And you understand that people actually</p> <p>4 enjoy sex from time to time?</p> <p>5 A. Yes.</p> <p>6 Q. Are you familiar with that concept at</p> <p>7 least?</p> <p>8 A. Yes.</p> <p>9 Q. All right. And what may be typical</p> <p>10 sexual activity for one man and woman, or whatever</p> <p>11 the permutation might be, another couple, or</p> <p>12 another man and woman, or another man or woman may</p> <p>13 consider to be unusual or overly aggressive.</p> <p>14 MS. EZELL: Objection to form.</p> <p>15 BY MR. CRITTON:</p> <p>16 Q. True?</p> <p>17 A. It depends on your point of view.</p> <p>18 Q. That's what I mean. Everyone has a</p> <p>19 different point of view about sex and what may be</p> <p>20 considered typical sexual activity for someone,</p> <p>21 someone else may consider that's a bit</p> <p>22 adventurous?</p> <p>23 MR. EDWARDS: Objection to the form.</p> <p>24 THE WITNESS: Yes.</p> <p>25 BY MR. CRITTON:</p>

22 (Pages 351 to 354)

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<p style="text-align: right;">Page 355</p> <p>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</p>	<p style="text-align: right;">Page 357</p> <p>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</p>
<p style="text-align: right;">Page 356</p> <p>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</p>	<p style="text-align: right;">Page 358</p> <p>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?</p>
<p>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</p>	<p>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</p>

23 (Pages 355 to 358)

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<p style="text-align: right;">Page 359</p> <p>1 didn't recognize who those people were. Is that 2 correct? 3 MR. EDWARDS: 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. LANGINO: 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.</p>	<p style="text-align: right;">Page 361</p> <p>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?</p>
<p style="text-align: right;">Page 360</p> <p>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</p>	<p style="text-align: right;">Page 362</p> <p>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. Ezell 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</p>

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<p>1 I don't know which room, sir.</p> <p>2 Q. Okay. Did you recognize both the girls</p> <p>3 or just one of the girls?</p> <p>4 A. The two girls.</p> <p>5 Q. Then there were -- there was one or two</p> <p>6 other photographs of girls that you recognized?</p> <p>7 A. Yes.</p> <p>8 Q. Okay. And were they fully unclothed or</p> <p>9 did they have some degree of clothes on and/or</p> <p>10 off?</p> <p>11 A. They were naked.</p> <p>12 Q. All right. And all of the remaining</p> <p>13 pictures at least within that mosaic were of</p> <p>14 individuals that you did not know?</p> <p>15 A. No, sir.</p> <p>16 Q. And that you did not recognize as having</p> <p>17 been at the house. Is that correct?</p> <p>18 A. Yes, that's correct.</p> <p>19 Q. You were also asked about some -- let me</p> <p>20 switch for just a minute.</p> <p>21 You were asked about a vibrator that you</p> <p>22 saw, and I think you described it as a back</p> <p>23 massager that was approximately 18 inches long</p> <p>24 that had a couple of rotating heads on it.</p> <p>25 A. Yes.</p>	<p>Page 363</p> <p>1 pilots, masseuses, chefs, so she have a copy of</p> <p>2 the black book with herself and as well as the</p> <p>3 computer.</p> <p>4 Q. Did you ever go on Ms. Maxwell's computer</p> <p>5 to see what she had in it?</p> <p>6 A. Yes.</p> <p>7 Q. And was that something you were allowed</p> <p>8 to do?</p> <p>9 A. No.</p> <p>10 Q. Okay. You actually went in her office?</p> <p>11 A. Yes.</p> <p>12 Q. And was her computer on so that you</p> <p>13 didn't need to access the password?</p> <p>14 A. It was off.</p> <p>15 Q. Okay. So you just turned it on?</p> <p>16 A. Yes, sir.</p> <p>17 Q. And then you were able to access her</p> <p>18 computer?</p> <p>19 A. Exactly.</p> <p>20 Q. And what possessed you to go in and to</p> <p>21 access her personal computer?</p> <p>22 A. I needed to send some documents to the</p> <p>23 New York office and it was the only computer</p> <p>24 working in the house.</p> <p>25 Q. Okay. And how many occasions did you use</p>
<p>1 Q. And I think you ultimately came up with</p> <p>2 the idea as it was something you had seen at like</p> <p>3 a Sharper Image store.</p> <p>4 A. Yes, sir.</p> <p>5 Q. Have you ever seen one of those types of</p> <p>6 devices, that is a back massager with the rotating</p> <p>7 heads also sold -- well, let me ask you this.</p> <p>8 Strike that last question.</p> <p>9 Have you ever been to Brookstone?</p> <p>10 A. Yes.</p> <p>11 Q. Okay. Have you ever seen a massager like</p> <p>12 that at Brookstone?</p> <p>13 A. Yes.</p> <p>14 Q. Okay. You were asked whether Ms. Maxwell</p> <p>15 kept the names of any of the girls who came to</p> <p>16 give massages on -- let me ask it this way.</p>	<p>Page 364</p> <p>1 her computer?</p> <p>2 A. Several times.</p> <p>3 Q. Was she ever aware that you used her</p> <p>4 computer?</p> <p>5 MR. LANGINO: Form.</p> <p>6 THE WITNESS: I don't think so.</p> <p>7 BY MR. CRITTEN:</p> <p>8 Q. Did you ever ask Ms. Maxwell for</p> <p>9 permission to use her computer?</p> <p>10 A. I was the house manager, I believe I was</p> <p>11 supposed to use everything in the house to</p> <p>12 accomplish my duties, in that case sending</p> <p>13 financial reports or e-mails.</p> <p>14 Q. So would you have been -- did you ever</p> <p>15 use Mr. Epstein's computer?</p> <p>16 A. No.</p>
<p>17 I think you were asked whether</p> <p>18 Ms. Maxwell ever kept the names of any of the</p> <p>19 girls who came to give massages and I think your</p> <p>20 response was yes.</p> <p>21 A. Yes.</p> <p>22 Q. Okay. Did she keep them on a pad of</p> <p>23 paper, did she keep them in a notebook, did she</p> <p>24 keep them in a computer?</p> <p>25 A. We used to have internal books for</p>	<p>17 Q. Okay. But you used Ms. Maxwell's</p> <p>18 computer?</p> <p>19 A. Yes.</p> <p>20 Q. Did you ever use Ms. Kellen's computer?</p> <p>21 A. Yes.</p> <p>22 Q. In looking at Ms. Maxwell still, you went</p> <p>23 into Ms. Maxwell's computer with at least the idea</p> <p>24 of sending some documents?</p> <p>25 A. Yes.</p>

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<p style="text-align: right;">Page 367</p> <p>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. EZELL: 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</p>	<p style="text-align: right;">Page 369</p> <p>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</p>
<p style="text-align: right;">Page 368</p> <p>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 Sarah, Mrs. Maxwell, and the staff 15 house. 16 Q. Staff house being yours?</p>	<p style="text-align: right;">Page 370</p> <p>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. EZELL: Objection, form. 16 BY MR. CRITTON:</p>
<p>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</p>	<p>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</p>

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<p style="text-align: right;">Page 371</p> <p>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?</p>	<p style="text-align: right;">Page 373</p> <p>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</p>
<p style="text-align: right;">Page 372</p> <p>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?</p>	<p style="text-align: right;">Page 374</p> <p>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?</p>
<p>17 A. That's correct. 18 MS. EZELL: 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.</p>	<p>17 A. That's true. 18 MR. WILLITS: 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 Nadia? 23 A. Yes. 24 Q. And you knew Nadia was someone who was in 25 her 20's?</p>

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<p style="text-align: right;">Page 375</p> <p>1 A. Yes.</p> <p>2 Q. All right. And then you saw another</p> <p>3 picture of a Brazilian woman who had traveled or</p> <p>4 flown on the plane before?</p> <p>5 A. Yes.</p> <p>6 Q. All right. And she also appeared to be a</p> <p>7 woman to you not only in the photograph but from</p> <p>8 your having seen her who appeared to be in her</p> <p>9 20's?</p> <p>10 A. Yes.</p> <p>11 Q. Excuse me. Thank you. You talked about</p> <p>12 Sarah Kellen's computer. Was she hooked into your</p> <p>13 main system?</p> <p>14 A. Not to my office in the staff house but</p> <p>15 she was hooked into the main house.</p> <p>16 Q. Okay. The same Citrix system?</p> <p>17 A. Yes.</p> <p>18 Q. And you said that Sarah had pictures of</p> <p>19 women on her computer that you saw. Is that</p> <p>20 correct?</p> <p>21 A. Yes.</p> <p>22 Q. Okay. And were those the same types of</p> <p>23 pictures that Ms. Maxwell had, that is, females,</p> <p>24 pictures of females who had traveled in with Mr.</p> <p>25 Epstein from his plane?</p>	<p style="text-align: right;">Page 377</p> <p>1 names and addresses of -- let me start over.</p> <p>2 Strike that.</p> <p>3 If I understood your testimony, you said</p> <p>4 that Sarah had pictures -- start again.</p> <p>5 You said that Sarah had the names and</p> <p>6 phone numbers of some of the massage girls.</p> <p>7 A. Yes.</p> <p>8 Q. Or at least of the people that you</p> <p>9 thought may have been called to give massages.</p> <p>10 A. Yes.</p> <p>11 MS. EZELL: Form.</p> <p>12 MR. EDWARDS: Form.</p> <p>13 BY MR. CRITTON:</p> <p>14 Q. And was that in the same format that you</p> <p>15 saw on Ms. Maxwell's computer?</p> <p>16 A. No.</p> <p>17 Q. Okay. What occasion would you have been</p> <p>18 -- have had to use Sarah Kellen's computer?</p> <p>19 A. She will instruct me to get some</p> <p>20 information from her desk or telephone numbers, so</p> <p>21 I will.</p> <p>22 Q. And that's where you would have seen it?</p> <p>23 A. Yes.</p> <p>24 Q. I think you testified at your last</p> <p>25 deposition, or the start of your deposition that</p>
<p style="text-align: right;">Page 376</p> <p>1 A. This were different pictures.</p> <p>2 Q. Okay. Were any of hers of any of the</p> <p>3 girls who came in on the plane, or the ladies or</p> <p>4 women?</p> <p>5 A. No.</p> <p>6 Q. What were her pictures of?</p> <p>7 A. They were young women modeling, you know.</p> <p>8 I don't remember seeing nudity on Sarah's</p> <p>9 computer.</p> <p>10 Q. All right. Hers, when I say hers, the</p> <p>11 photographs that Sarah Kellen had on her computer</p> <p>12 were all of individuals who appeared -- or not</p> <p>13 appeared, but were dressed and appeared to be</p> <p>14 modeling?</p> <p>15 A. Yes.</p> <p>16 Q. Would it be a correct statement that none</p> <p>17 of the women that you saw, that is the pictures of</p> <p>18 the women that you saw on Sarah's computer were</p> <p>19 any of the girls, women, whoever came to give</p> <p>20 massages? Is that correct?</p> <p>21 MR. EDWARDS: Object to the form.</p> <p>22 MS. EZELL: Form.</p> <p>23 THE WITNESS: That's correct.</p> <p>24 BY MR. CRITTON:</p> <p>25 Q. You said that Sarah you thought also had</p>	<p style="text-align: right;">Page 378</p> <p>1 the number of women that you remember came over to</p> <p>2 give massages was something eight to ten, twelve,</p> <p>3 I don't remember, what's your best recollection?</p> <p>4 A. Can you repeat that, please?</p> <p>5 Q. Of the women, of different women that you</p> <p>6 knew came over to give massages during the time</p> <p>7 that you worked for Mr. Epstein, '04 to '05,</p> <p>8 during that time period, approximately how many</p> <p>9 women were there?</p> <p>10 MR. EDWARDS: Object to the form.</p> <p>11 THE WITNESS: To give massages?</p> <p>12 BY MR. CRITTON:</p> <p>13 Q. Yes, sir.</p> <p>14 A. Fifteen, yeah.</p> <p>15 Q. So something between one and fifteen of</p> <p>16 the names you would have seen on Ms. Kellen's</p> <p>17 computer along with a phone number?</p> <p>18 MR. EDWARDS: Form.</p> <p>19 THE WITNESS: Yes.</p> <p>20 BY MR. CRITTON:</p> <p>21 Q. Do you remember how many you would have</p> <p>22 seen?</p> <p>23 A. Fifteen.</p> <p>24 Q. Okay. You also told us earlier today</p> <p>25 that you saw Sarah Kellen from time to time taking</p>

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<p style="text-align: right;">Page 379</p> <p>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</p>	<p style="text-align: right;">Page 381</p> <p>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. LANGINO: Form. 7 THE WITNESS: Yes, I was called to pay 8 them. 9 BY MR. CRITTEN: 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</p>
<p style="text-align: right;">Page 380</p> <p>1 statement? 2 A. Yes. 3 Q. All right. You left the kitchen, you 4 understood Sarah Kellen came down, and what 5 happened thereafter you don't have any personal 6 knowledge whatsoever? 7 A. That's correct. 8 MR. EDWARDS: Form. 9 BY MR. CRITTEN: 10 Q. At some point in time Ms. Kellen 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</p>	<p style="text-align: right;">Page 382</p> <p>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. EDWARDS: Objection. 7 MS. EZELL: 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 A., or 12 others, C., whatever, I remember driving in 13 the Suburban, but I cannot say this was -- 14 BY MR. CRITTEN: 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. Ezell's questions today she asked</p>
<p>17 18 19 20 21 22 23 24 25</p>	<p>17 18 19 20 21 22 23 24 25</p>

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<p style="text-align: right;">Page 383</p> <p>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. EDWARDS: 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</p>	<p style="text-align: right;">Page 385</p> <p>1 Q. All right. Ms. Ezell 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. EDWARDS: 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. EZELL: Form.</p>
<p style="text-align: right;">Page 384</p> <p>1 dining room or the library. Would that be a fair 2 statement? 3 A. That's correct. 4 MR. EDWARDS: Form. 5 BY MR. CRITTON: 6 Q. All right. So, therefore, the pictures 7 that you saw Sarah Kellen 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. EZELL: Form. 12 MR. EDWARDS: 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. EDWARDS: Form. 24 THE WITNESS: I don't know, 25 BY MR. CRITTON:</p>	<p style="text-align: right;">Page 386</p> <p>1 BY MR. CRITTON: 2 Q. Okay. Were you in any way attempting in 3 your response to Ms. Ezell 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. EDWARDS: 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. Ezell's 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?</p>

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<p style="text-align: right;">Page 387</p> <p>1 A. To place a phone call?</p> <p>2 Q. Yeah. Did you ever see him place a phone 3 call?</p> <p>4 A. Yes.</p> <p>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?</p> <p>8 A. That's correct.</p> <p>9 Q. I think you said that Ms. Kellen told you 10 that Mr. Epstein would take photographs. Did I 11 understand you correctly?</p> <p>12 A. I'm sorry, can you repeat that?</p> <p>13 Q. Did Ms. Kellen ever tell you that Mr. 14 Epstein took a photograph of anyone?</p> <p>15 A. No, she said to me Mr. Epstein is like 16 he's an amateur photographer.</p> <p>17 Q. Okay. I may have misunderstood you then. 18 Let me clarify that testimony.</p> <p>19 It's your testimony that Ms. Kellen told 20 you that Mr. Epstein is an amateur photographer?</p> <p>21 A. Yes.</p> <p>22 Q. She never told you that -- or let me 23 strike that.</p> <p>24 Is it correct that she never told you 25 that Mr. Epstein took photographs of any of the</p>	<p style="text-align: right;">Page 389</p> <p>1 Q. Of the time that you've done that 2 approximately how many years does that include in 3 your working life?</p> <p>4 A. Eight years, ten years.</p> <p>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?</p> <p>12 A. Yes.</p> <p>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?</p> <p>17 A. Yes.</p> <p>18 Q. And do you assist each other from time to 19 time if someone needs help?</p> <p>20 A. That's correct.</p> <p>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?</p> <p>24 A. Yes.</p> <p>25 Q. As part of during your working career did</p>
<p style="text-align: right;">Page 388</p> <p>1 girls, women, who came over to give him a massage?</p> <p>2 A. That's correct.</p> <p>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?</p> <p>6 A. Yes.</p> <p>7 Q. And you had worked for a gentleman --</p> <p>8 A. Sidney Bowman.</p> <p>9 Q. Is he the gentleman from Fisher Island?</p> <p>10 A. No, Arturo Torres.</p> <p>11 Q. All right. In addition to Ms. Hammond up 12 in Palm Beach you worked for other individuals as 13 well?</p> <p>14 A. I did it part-time but I don't have her 15 name right now, sir.</p> <p>16 Q. During your career as a -- let me strike 17 that.</p> <p>18 Had you worked other than those places, 19 Mr. Arturo --</p> <p>20 A. Arturo Torres, yes.</p> <p>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?</p> <p>25 A. No, sir.</p>	<p style="text-align: right;">Page 390</p> <p>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?</p> <p>5 A. I did.</p> <p>6 Q. Give us a little of your background if 7 you could then, Mr. Rodriguez.</p> <p>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, Richard 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.</p> <p>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.</p> <p>22 A. That's correct.</p> <p>23 Q. When you would -- I think you described 24 her as a demanding person?</p> <p>25 A. Yes.</p>

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<p style="text-align: right;">Page 391</p> <p>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?</p> <p>7 MR. HOROWITZ: Object to form.</p> <p>8 THE WITNESS: They have a common ground, 9 yes.</p> <p>10 BY MR. CRITTON:</p> <p>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.</p> <p>15 A. House manual, yes.</p> <p>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?</p> <p>20 MR. EDWARDS: Form.</p> <p>21 THE WITNESS: I know a lot of houses do 22 but that was the only estate that we have a 23 house manual.</p> <p>24 BY MR. CRITTON:</p> <p>25 Q. And other individuals like where you've</p>	<p style="text-align: right;">Page 393</p> <p>1 about what they do? 2 MR. HOROWITZ: 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. HOROWITZ: Form. 25 THE WITNESS: No.</p>
<p style="text-align: right;">Page 392</p> <p>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?</p> <p>8 MR. EDWARDS: Object to the form.</p> <p>9 THE WITNESS: No, sir.</p> <p>10 BY MR. CRITTON:</p> <p>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 --</p> <p>15 A. Montauk Lake Club and Marina.</p> <p>16 Q. Right. You ran into separate and apart 17 from Richard Nixon were there a lot of people, 18 corporate people, business people?</p> <p>19 A. Yes.</p> <p>20 Q. People of substantial resources and 21 wealth?</p> <p>22 A. Yes.</p> <p>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</p>	<p style="text-align: right;">Page 394</p> <p>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.</p>

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<p style="text-align: right;">Page 395</p> <p>1 Q. All right. And you might find drugs?</p> <p>2 A. Yes.</p> <p>3 Q. And some pretty wild parties?</p> <p>4 A. Yes.</p> <p>5 Q. Now, with regard to the women who came to give massages, of those women, of those approximately fifteen that you described, how many of them came more than one -- more than one occasion?</p> <p>10 MR. HOROWITZ: Form.</p> <p>11 THE WITNESS: I'd say more than half.</p> <p>12 BY MR. CRITTON:</p> <p>13 Q. So maybe seven, eight, nine, ten?</p> <p>14 A. Yes.</p> <p>15 Q. Of those people that came on -- of those seven to ten that came on more than one occasion, did those individuals come on many occasions?</p> <p>18 A. Yes.</p> <p>19 Q. And as to the women who were -- who you understood were coming to give the massages --</p> <p>21 MR. EDWARDS: Form.</p> <p>22 MR. CRITTON: I'm not done yet.</p> <p>23 THE VIDEOGRAPHER: I need to go off the record for a second.</p> <p>25 (Thereupon, an interruption was had.)</p>	<p style="text-align: right;">Page 397</p> <p>1 MR. EDWARDS: Object to the form.</p> <p>2 BY MR. CRITTON:</p> <p>3 Q. And I don't know whether he asked, do you remember a person named T.M.?</p> <p>5 A. Yes.</p> <p>6 Q. And would she call from time to time asking if she could come to give a massage just like C.W.?</p> <p>9 MR. EDWARDS: Object to the form.</p> <p>10 THE WITNESS: Yes.</p> <p>11 BY MR. CRITTON:</p> <p>12 Q. So at least those two individuals, they were overtly, that is, they were asking whether they could come to give Mr. Epstein a massage. Correct?</p> <p>16 A. They will call and they will say I need to talk to Sarah, and Sarah fifteen minutes later will tell, Alfredo, we're going to have a massage with so and so.</p> <p>20 Q. So either C.W. or T.M. would call to ask if they could come and then a massage would be set then they would show up?</p> <p>23 A. That's correct, sir.</p> <p>24 Q. Okay. And from time to time they would bring other people as well?</p>
<p style="text-align: right;">Page 396</p> <p>1 THE VIDEOGRAPHER: We're back on the record.</p> <p>3 BY MR. CRITTON:</p> <p>4 Q. Mr. Rodriguez, I want to turn to the -- stay with the women who came to give or at least were called to give the massages.</p> <p>7 You were shown a number of message pads, I think Mr. Mermelstein who represents a number of -- or at least certainly Jane Doe 2 and some others, you were identified or shown a bunch of message pads that had I think in most instances your initials, A.R. Do you recall that?</p> <p>13 A. Yes, I do.</p> <p>14 Q. I think one of the individuals that you identified that called often was C.W.?</p> <p>16 A. Yes.</p> <p>17 Q. Which is one of Mr. Edwards' clients.</p> <p>18 This lady called on a regular basis, or at least from looking at your pad she would call on a pretty regular basis. Is that true?</p> <p>21 A. Yes.</p> <p>22 Q. And she and others who are reflected on those message pads, they were calling to come to give massages. Correct?</p> <p>25 A. Yes.</p>	<p style="text-align: right;">Page 398</p> <p>1 A. That's correct.</p> <p>2 Q. Both C.W. and T.M.?</p> <p>3 A. Yes.</p> <p>4 Q. Of the females that -- the women that came to the house, did you ever see anyone force any of these women onto the property?</p> <p>7 A. No, sir.</p> <p>8 Q. Did you ever see anyone force them into the house?</p> <p>10 A. No.</p> <p>11 Q. Did you ever see anyone force them into the kitchen?</p> <p>13 A. No, sir.</p> <p>14 Q. Did you ever use any force, any type of intimidation or coercion to bring them into the house and get them into the kitchen?</p> <p>17 A. No, sir.</p> <p>18 Q. Did you ever observe Ms. Kellen using any force or intimidation or coercion --</p> <p>20 A. No, I did not.</p> <p>21 Q. -- with any of these individuals?</p> <p>22 A. I did not.</p> <p>23 MR. EDWARDS: Object to the form.</p> <p>24 BY MR. EDWARDS:</p> <p>25 Q. Did Ms. M. -- let me use the initials</p>

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<p style="text-align: right;">Page 399</p> <p>1 that way it will show up correctly. 2 Did T.M. 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. HOROWITZ: Form. 7 MR. EDWARDS: 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 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. EDWARDS: Form. 21 MR. HOROWITZ: Form. 22 MS. EZELL: Objection, form. 23 BY MR. CRITTON: 24 Q. When C.W. brought individuals to the 25 house, did you ever see her use any force or</p>	<p style="text-align: right;">Page 401</p> <p>1 Q. Did any of them ever appear to be 2 frightened? 3 MR. HOROWITZ: 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. EDWARDS: 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?</p>
<p style="text-align: right;">Page 400</p> <p>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. EDWARDS: Form. 6 MR. HOROWITZ: Form. 7 MS. EZELL: 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.</p>	<p style="text-align: right;">Page 402</p> <p>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. EDWARDS: Object to the form. 19 MR. HOROWITZ: 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?</p>

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<p style="text-align: right;">Page 403</p> <p>1 A. No. 2 MR. EDWARDS: 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. Edwards asked you 13 some questions -- I think it was Mr. Edwards, 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 Edwards, 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.</p>	<p style="text-align: right;">Page 405</p> <p>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 Sarah 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. EDWARDS: Form.</p>
<p style="text-align: right;">Page 404</p> <p>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. HOROWITZ: 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</p>	<p style="text-align: right;">Page 406</p> <p>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. HOROWITZ: 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</p>
<p>35 (Pages 403 to 406)</p>	

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<p style="text-align: right;">Page 407</p> <p>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. HOROWITZ: 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. HOROWITZ: 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.</p>	<p style="text-align: right;">Page 409</p> <p>1 MR. EDWARDS: 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. HOROWITZ: 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?</p>
<p style="text-align: right;">Page 408</p> <p>1 MR. HOROWITZ: 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. EDWARDS: Form. 14 MR. HOROWITZ: 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?</p>	<p style="text-align: right;">Page 410</p> <p>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. HOROWITZ: Object to the form. 10 MR. EDWARDS: 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?</p>

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<p>1 A. Yes.</p> <p>2 MR. EDWARDS: Form.</p> <p>3 MR. HOROWITZ: Form.</p> <p>4 BY MR. CRITTON:</p> <p>5 Q. All right. Were you aware of the backgrounds of any of these women who came over to give massages?</p> <p>6 MR. HOROWITZ: Form.</p> <p>7 THE WITNESS: No, sir.</p> <p>8 BY MR. CRITTON:</p> <p>9 Q. Well, have you -- did any one of the females who ever came to give massages, did they ever tell you that they were prostitutes?</p> <p>10 A. No, sir.</p> <p>11 Q. Did they ever tell you that they had been lead into a life of prostitution?</p> <p>12 MR. HOROWITZ: Form.</p> <p>13 THE WITNESS: No.</p> <p>14 BY MR. CRITTON:</p> <p>15 Q. Did they ever tell you about their family life, whether it involved prostitution, abuse, prior posttraumatic stress syndrome, drugs, alcohol, abuse by individuals, physical abuse as well as verbal abuse?</p> <p>16 A. No, they didn't tell me.</p>	<p>Page 411</p> <p>1 the property in your car?</p> <p>2 A. I was pulling over from Publix so I turned around and I went to the police and say --</p> <p>3 Q. Okay. You were coming back to the home when you saw that car there?</p> <p>4 A. Exactly.</p> <p>5 Q. And they sent -- they, the police, sent a police car with you to come there?</p> <p>6 A. Yes.</p> <p>7 Q. Did you and the police officer walk up to the car?</p> <p>8 A. The police went first.</p> <p>9 Q. All right. And if I understand that, that was in January of '05?</p> <p>10 A. Yes.</p> <p>11 Q. And when you did that then did you follow behind the police officer to see who was in the car?</p> <p>12 A. Yes.</p> <p>13 Q. And then you recognized that as [REDACTED]?</p> <p>14 A. Yes.</p> <p>15 Q. And [REDACTED] said she had come back or was there to get some money?</p> <p>16 A. Yes.</p> <p>17 Q. And did you in fact give her money?</p>
<p>1 Q. And, obviously, you have no personal knowledge one way or the other --</p> <p>2 A. No, sir.</p> <p>3 Q. -- with regard to what their backgrounds were before they ever met or came in contact with Mr. Epstein?</p> <p>4 A. No, sir.</p> <p>5 Q. Did any person, female, who came to give a massage at the Epstein home, did anyone ever come downstairs and say, Mr. Rodriguez, or sir, call the police?</p> <p>6 MR. EDWARDS: Form.</p> <p>7 MR. HOROWITZ: Form.</p> <p>8 THE WITNESS: No, sir.</p> <p>9 BY MR. CRITTON:</p> <p>10 Q. I think you said on one occasion you saw someone parked in a vehicle inside the gate that you didn't recognize.</p> <p>11 A. Exactly.</p> <p>12 Q. You called the police?</p> <p>13 A. Yes, I did.</p> <p>14 Q. Did you go to the police or you called the police and they came?</p> <p>15 A. I went to the police department.</p> <p>16 Q. So how did you -- did you actually leave</p>	<p>Page 412</p> <p>1 A. Yes, I did.</p> <p>2 Q. And I think you said you told the police officer you recognized her?</p> <p>3 A. Yes.</p> <p>4 Q. Did you have to get permission to pay her or did you just pay her?</p> <p>5 A. No, because Sarah told me already but I forgot she was going to be that late, so that was my concern in calling the police.</p> <p>6 Q. Okay. And that person who came, do you have any idea what her age was at that time?</p> <p>7 A. That night?</p> <p>8 Q. Right, January of '08.</p> <p>9 A. No, no.</p> <p>10 Q. I'm sorry, January of '05.</p> <p>11 A. No.</p> <p>12 Q. You mentioned some conversations that you had had with Louella who was I think she was one of the house -- the main housekeeper.</p> <p>13 A. Yes.</p> <p>14 Q. And Louella told you a number of thoughts that she had. Is that correct?</p> <p>15 A. Yes.</p> <p>16 Q. And as to Louella what she told you about -- let me strike that.</p>

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<p style="text-align: right;">Page 415</p> <p>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 Louella 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. HOROWITZ: Form. 24 MS. EZELL: Objection, form. 25 THE WITNESS: I consider -- well, if it's</p>	<p style="text-align: right;">Page 417</p> <p>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 C.W.</p>
<p style="text-align: right;">Page 416</p> <p>1 a frontal picture it's pornography, I will 2 look at my way. 3 BY MR. CRITTEN: 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. EZELL: Objection, form. 19 MR. EDWARDS: Form. 20 MR. HOROWITZ: Form. 21 BY MR. CRITTEN: 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.</p>	<p style="text-align: right;">Page 418</p> <p>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 C.W. on the many times she came 10 to your house? 11 MR. EDWARDS: Form. 12 THE WITNESS: I didn't see any. 13 BY MR. CRITTEN: 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. EDWARDS: Form. 19 MR. HOROWITZ: Form. 20 MR. WILLITS: Object to the form of the 21 question. 22 THE WITNESS: I'm not a psychologist. 23 MR. EDWARDS: Can you state your answer, 24 I didn't hear it? 25 THE WITNESS: Yeah, I'm not a</p>

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<p>1 psychologist, I don't know. 2 MR. CRITTON: I have no further 3 questions. 4 REDIRECT EXAMINATION 5 BY MR. EDWARDS: 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. EDWARDS:</p>	<p>Page 419</p> <p>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. EDWARDS: 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</p>
<p>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: Balsone was the house 24 manager of Paris, 22 Foch Avenue. 25 BY MR. EDWARDS:</p>	<p>Page 420</p> <p>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. EDWARDS: 6 Q. Did he indicate whether or not -- or how 7 old these girls were? 8 A. No, he didn't tell 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. EDWARDS: Form. 13 THE WITNESS: Yes. 14 BY MR. EDWARDS: 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</p>

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