	Case 1:15-cv-07433-LAP
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UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF FLORIDA CASE No.08-CV-80119-CIV-MARRA/JOHNSON		1 2		TTON, ESQUIRE	
JANE DOE NO. 2,		3		TTON & LUTTIER r Drive, Suite 400	
Plaintiff,			West Palm Beach	ı, Florida 33401	
-vs-		4	Phone: 561.842.2 rcrit@bclclaw.co		
JEFFREY EPSTEIN,		5	mpike@bclclaw.		
Defendant.		6			
Related cases: 08-80232, 08-80380, 98-80381, 08-80994,		8			
08-80993, 08-80811, 08-80893, 09-80469, 09-80591, 09-80656, 09-80802, 09-81092		9			
		11			
VIDEOTAPED DEPOSITION OF JUAN ALESSI VOLUME I		12 13			
Tuesday, September 8, 2009		14			
10:12 a.m 3:45 p.m.		15			
2139 Palm Beach Lakes Boulevard		16 17			
West Palm Beach, Florida 33401		18			
		19 20			
Reported By:		21			
Sandra W. Townsend, FPR Notary Public, State of Florida		22 23			
PROSE COURT REPORTING AGENCY West Palm Beach Office		24			
		25			A
	Page 2	ne deductive de la constanta d			Page 4
1 APPEARANCES: 2 On behalf of the Plaintiffs:		1 2	F X H	IBITS	
3 RICHARD WILLITS, ESQUIRE RICHARD H. WILLITS, P.A.		3		-	
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5 Phone: 561.582.7600 reelrhw@hotmail.com		5	NUMBER	DESCRIPTION	PAGE
7 STUART MERMELSTEIN, ESQUIRE		6	Exhibit number 1	Photographs	45
MERMELSTEIN & HOROWITZ, P.A. 18205 Biscayne Boulevard, Suite 2218		7	Exhibit number 2	Transcript	130
Miami, Florida 33160 Phone: 305.931.2200		8 9	Exhibit number 3 Exhibit number 4	Incident Report Incorporation Papers	137 149
ssm@sexabuseattorney.com 10 ahorowitz@sexabuseattorney.com 11 WILLIAM J. BERGER, ESQUIRE		10	Exhibit number 5	Incorporation Papers	150
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23 24		24 25			
25		<u> </u>			

1 (Pages 1 to 4)

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	Page 5		Page 7
1	PROCEEDINGS	1	Boynton Beach, Florida, 33472.
2		2	Q. All right, sir. Did you ever work for Jeffrey
3	Deposition taken before Sandra W. Townsend, Court	3	Epstein?
4	Reporter and Notary Public in and for the State of	4	A. Yes, I did.
5	Florida at Large, in the above cause.	5	Q. In what capacity?
6		6	A. Everything. I started with Jeffrey Epstein
7	VIDEOGRAPHER: Today is September 8, 2009.	7	around 19 please bear with the dates because I
8	The time is 12 minutes after 10:00 in the morning.	8	trying
9	This is the videotaped deposition of Juan	9	Q. Sure.
10	Alessi in the matter of Jane Doe number two versus	10	A to remember. 1969 as a part-time
11	Jeffrey Epstein. This deposition is being held at	11	maintenance guy.
12	2139 Palm Beach Lakes Boulevard in West Palm Beach	12	And then I become a full-time employee, I
13	Florida.	13	think it was January 1, 2 '91, '92, so '92. Sorry.
14	My name is Stan Sanders. I'm the videographer	14	Q. You said you started in 1969? That would
15	representing Visual Evidence, Incorporated.	15	be
16	Would the attorneys please announce their	16	A. No. No. No. No.
17	appearances for the record.	17	Q. Okay.
18	MR. WILLITS: Richard Willits, representing	18	A. '99.
19	Carolyn Andriano.	19	O. 1999?
20	MR. BERGER: William J. Berger, representing	20	A. Yeah.
21	E.W., L.M. and Jane Doe number two.	21	Q. All right. And how did you happen to get that
22	MR. MERMELSTEIN: Stuart Mermelstein of	22	job? Was it through an employment agency
23	Mermelstein and Horowitz, representing Jane Does	23	A. No.
24	numbers two through eight.	24	Q or an ad in the paper?
25	MR. LANGINO: Adam Langino, on behalf of B.B.	25	A. I had a company at that time used to take care
4.0	Page 6		Page 8
	nd and a second an	1	of a lot of residents in Palm Beach. And I got to know
1	MS. EZELL: Katherine Ezell from Podhurst	1	Jeffrey through Lesley Wexner. And I used to work in
2	Orseck, on behalf of Jane Does 101 and 102.	2	about 20 different, 20, 25 different homes in Palm Beach
3	MR. CRITTON: Bob Critton, on behalf of	3	
4	Jeffrey Epstein.	4	as a maintenance guy.
5	THEREUPON,	5	Q. Okay.
6	JUAN ALESSI,	6	A. And I have basically my own company and I do
7	having been first duly sworn or affirmed, was examined	7	repairs for them. I did home sit in for them.
8	and testified as follows:	8	Q. And what was did you work for Jeffrey
9	THE WITNESS: I do.	9	Epstein? What was your position when you started?
10	DIRECT EXAMINATION	10	A. When I started, he hire me to he just
11	BY MR. WILLITS:	11	bought the house.
12	Q. Good morning, sir.	12	Q. I'm sorry?
13	A. Good morning.	13	A. He just had bought the house
14	Q. I introduced myself through the videographer.	14	Q. Okay.
	1	15	A where he live on El Brillo. And he hire me
15	My name is Richard Willits.		
	A. Okay.	16	
15	Ţ	16 17	through Mr. Wexner's references to do repair works. And basically what I did the most was taking walls apart,
15 16	A. Okay.	16 17 18	basically what I did the most was taking walls apart, windows and stuff that he didn't want to have it,
15 16 17	A. Okay.     Q. I represent a young lady by the name of     Carolyn Andriano.     A. Okay.	16 17 18 19	basically what I did the most was taking walls apart, windows and stuff that he didn't want to have it, Q. I see.
15 16 17 18	A. Okay. Q. I represent a young lady by the name of Carolyn Andriano.	16 17 18 19 20	basically what I did the most was taking walls apart, windows and stuff that he didn't want to have it, Q. I see. A fix it.
15 16 17 18 19	<ul> <li>A. Okay.</li> <li>Q. I represent a young lady by the name of</li> <li>Carolyn Andriano.</li> <li>A. Okay.</li> <li>Q. Is that name familiar to you at all?</li> <li>A. Whose name?</li> </ul>	16 17 18 19 20 21	basically what I did the most was taking walls apart, windows and stuff that he didn't want to have it, Q. I see. A fix it. Q. And when you started working for Mr. Epstein,
15 16 17 18 19 20	<ul><li>A. Okay.</li><li>Q. I represent a young lady by the name of</li><li>Carolyn Andriano.</li><li>A. Okay.</li><li>Q. Is that name familiar to you at all?</li></ul>	16 17 18 19 20 21 22	basically what I did the most was taking walls apart, windows and stuff that he didn't want to have it, Q. I see. A fix it. Q. And when you started working for Mr. Epstein, were you still working for other people in Palm Beach?
15 16 17 18 19 20 21	<ul> <li>A. Okay.</li> <li>Q. I represent a young lady by the name of</li> <li>Carolyn Andriano.</li> <li>A. Okay.</li> <li>Q. Is that name familiar to you at all?</li> <li>A. Whose name?</li> </ul>	16 17 18 19 20 21 22 23	basically what I did the most was taking walls apart, windows and stuff that he didn't want to have it, Q. I see. A fix it. Q. And when you started working for Mr. Epstein, were you still working for other people in Palm Beach? A. Yes, I did.
15 16 17 18 19 20 21 22	<ul> <li>A. Okay.</li> <li>Q. I represent a young lady by the name of</li> <li>Carolyn Andriano.</li> <li>A. Okay.</li> <li>Q. Is that name familiar to you at all?</li> <li>A. Whose name?</li> <li>Q. Carolyn Andriano. Do you recognize that name?</li> </ul>	16 17 18 19 20 21 22	basically what I did the most was taking walls apart, windows and stuff that he didn't want to have it, Q. I see. A fix it. Q. And when you started working for Mr. Epstein, were you still working for other people in Palm Beach?

2 (Pages 5 to 8)

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	Page 9		Page 11
1	maintenance and taking out walls?	1	about seven months before after I become a full-time
2	A. It was couple months. It was couple months	2	employee.
3	before.	3	Q. Okay. And how did Ms. Maxwell come into the
4	Q. And what was the name of your company?	4	picture?
5	A. Alessi Maintenance.	5	A. It was his girlfriend, his main girlfriend.
6	Q. And how were you paid?	6	Q. Okay. Had you known her before she became
7	A. By him?	7	A. No.
8	Q. Yes.	8	Q your
9	A. Usually by check or cash sometimes.	9	A. Never know her before.
10	Q. Do you know what company actually paid your	10	Q. I'm sorry. I didn't get a chance to finish my
11	company?	11	question.
12	A. It was Jeffrey Epstein and Company.	12	Would you have referred to her as your
13	Q. So you said you had that position for a couple	13	supervisor or your superior or what would you have
14	of months.	14	called Mrs. Maxwell?
15	What happened next?	15	A. I used to call her Ghislaine.
16	A. Then Mr. Epstein asked me to, if I wanted to	16	Q. Okay. And how was it explained to you that
17	be his employee, because I was going from one house to	17	you were now to deal with Ms. Maxwell, as opposed to
18	another house to another house, one hour here. I was	18	Jeffrey Epstein?
19	just running around Palm Beach all day.	19	A. She would tell me, I am going to take care of
20	So he asked me if I would just work for him,	20	the house.
21	exclusively for him.	21	Q. Okay. That was explained to you by
22	Q. Okay.	22	Ms. Maxwell?
23	A. And we agreed with the terms and I become a	23	A. Uh-huh.
24	full-time employee as a maintenance guy. And I was	24	Q. Is that a yes?
25	taking care of everything, as far as maintenance.	25	A. Yes.
	Page 10		Page 12
	the state of the s	-	•
1	Then my job changed little by little to house	1	Q. And when Ms. Maxwell started assuming
2	man, estate manager, and then to a majordomo.	2	responsibility for the house, did your duties change at
3	Q. Okay. When you first agreed to terms with	3	that time?
4	Mr. Epstein and you first started working for him full	4	A. Not much.
5	time, what were those terms, do you remember?	5	Q. Okay.
6	A. The terms is basically was how much he	6	<ul><li>A. Not much.</li><li>Q. And at that time when Ms. Maxwell started</li></ul>
7	asked me how much I was making in all the properties.	7	1) And at that time when Ms. Maxwell started
8			•
· ·	And I says, well, I make this this amount	8	taking responsibility for the house, what were your
9	of money.	9	taking responsibility for the house, what were your duties?
9 10	of money.  And he says, fine.	9	taking responsibility for the house, what were your duties?  A. Basically I was still doing the maintenance
9 10 11	of money.  And he says, fine.  Q. And how much was that, did he pay you?	9 10 11	taking responsibility for the house, what were your duties?  A. Basically I was still doing the maintenance work.
9 10 11 12	of money.  And he says, fine.  Q. And how much was that, did he pay you?  A. Around \$45,000. I think I started with 45.	9 10 11 12	taking responsibility for the house, what were your duties?  A. Basically I was still doing the maintenance work.  Q. Okay.
9 10 11 12 13	of money.  And he says, fine.  Q. And how much was that, did he pay you?  A. Around \$45,000. I think I started with 45.  Q. Okay. And when you started to work for him as	9 10 11 12 13	taking responsibility for the house, what were your duties?  A. Basically I was still doing the maintenance work.  Q. Okay.  A. Was doing they were trying to remodel the
9 10 11 12 13 14	of money.  And he says, fine.  Q. And how much was that, did he pay you?  A. Around \$45,000. I think I started with 45.  Q. Okay. And when you started to work for him as a full-time employee, did you have anybody that you	9 10 11 12 13 14	taking responsibility for the house, what were your duties?  A. Basically I was still doing the maintenance work.  Q. Okay.  A. Was doing they were trying to remodel the home and they would told me, okay, tear down this wall.
9 10 11 12 13	of money.  And he says, fine.  Q. And how much was that, did he pay you?  A. Around \$45,000. I think I started with 45.  Q. Okay. And when you started to work for him as a full-time employee, did you have anybody that you reported to or did you deal directly with Mr. Epstein?	9 10 11 12 13 14	taking responsibility for the house, what were your duties?  A. Basically I was still doing the maintenance work.  Q. Okay.  A. Was doing they were trying to remodel the home and they would told me, okay, tear down this wall. We want to see how it's going to look. Or put this
9 10 11 12 13 14	of money.  And he says, fine.  Q. And how much was that, did he pay you?  A. Around \$45,000. I think I started with 45.  Q. Okay. And when you started to work for him as a full-time employee, did you have anybody that you	9 10 11 12 13 14 15	taking responsibility for the house, what were your duties?  A. Basically I was still doing the maintenance work.  Q. Okay.  A. Was doing they were trying to remodel the home and they would told me, okay, tear down this wall. We want to see how it's going to look. Or put this windows and tear down we had a fishing tank. We took
9 10 11 12 13 14	of money.  And he says, fine.  Q. And how much was that, did he pay you?  A. Around \$45,000. I think I started with 45.  Q. Okay. And when you started to work for him as a full-time employee, did you have anybody that you reported to or did you deal directly with Mr. Epstein?	9 10 11 12 13 14 15 16	taking responsibility for the house, what were your duties?  A. Basically I was still doing the maintenance work.  Q. Okay.  A. Was doing they were trying to remodel the home and they would told me, okay, tear down this wall. We want to see how it's going to look. Or put this windows and tear down we had a fishing tank. We took it out I took it out. A kitchen on the second floor.
9 10 11 12 13 14 15 16	of money.  And he says, fine.  Q. And how much was that, did he pay you?  A. Around \$45,000. I think I started with 45.  Q. Okay. And when you started to work for him as a full-time employee, did you have anybody that you reported to or did you deal directly with Mr. Epstein?  A. At the beginning with Mr. Epstein, directly to	9 10 11 12 13 14 15 16 17	taking responsibility for the house, what were your duties?  A. Basically I was still doing the maintenance work.  Q. Okay.  A. Was doing they were trying to remodel the home and they would told me, okay, tear down this wall. We want to see how it's going to look. Or put this windows and tear down we had a fishing tank. We took it out I took it out. A kitchen on the second floor. I took it out. So it was basically dismantling the
9 10 11 12 13 14 15 16 17	of money.  And he says, fine.  Q. And how much was that, did he pay you?  A. Around \$45,000. I think I started with 45.  Q. Okay. And when you started to work for him as a full-time employee, did you have anybody that you reported to or did you deal directly with Mr. Epstein?  A. At the beginning with Mr. Epstein, directly to him.  Q. Did that change?  A. Later on, yes.	9 10 11 12 13 14 15 16 17 18	taking responsibility for the house, what were your duties?  A. Basically I was still doing the maintenance work.  Q. Okay.  A. Was doing they were trying to remodel the home and they would told me, okay, tear down this wall. We want to see how it's going to look. Or put this windows and tear down we had a fishing tank. We took it out I took it out. A kitchen on the second floor. I took it out. So it was basically dismantling the house.
9 10 11 12 13 14 15 16 17	of money.  And he says, fine.  Q. And how much was that, did he pay you?  A. Around \$45,000. I think I started with 45.  Q. Okay. And when you started to work for him as a full-time employee, did you have anybody that you reported to or did you deal directly with Mr. Epstein?  A. At the beginning with Mr. Epstein, directly to him.  Q. Did that change?	9 10 11 12 13 14 15 16 17 18 19 20	taking responsibility for the house, what were your duties?  A. Basically I was still doing the maintenance work.  Q. Okay.  A. Was doing they were trying to remodel the home and they would told me, okay, tear down this wall. We want to see how it's going to look. Or put this windows and tear down we had a fishing tank. We took it out I took it out. A kitchen on the second floor. I took it out. So it was basically dismantling the house.  Q. Okay. And about how long a period of time did
9 10 11 12 13 14 15 16 17 18	of money.  And he says, fine.  Q. And how much was that, did he pay you?  A. Around \$45,000. I think I started with 45.  Q. Okay. And when you started to work for him as a full-time employee, did you have anybody that you reported to or did you deal directly with Mr. Epstein?  A. At the beginning with Mr. Epstein, directly to him.  Q. Did that change?  A. Later on, yes.	9 10 11 12 13 14 15 16 17 18 19 20 21	taking responsibility for the house, what were your duties?  A. Basically I was still doing the maintenance work.  Q. Okay.  A. Was doing they were trying to remodel the home and they would told me, okay, tear down this wall. We want to see how it's going to look. Or put this windows and tear down we had a fishing tank. We took it out I took it out. A kitchen on the second floor. I took it out. So it was basically dismantling the house.  Q. Okay. And about how long a period of time did that project last?
9 10 11 12 13 14 15 16 17 18 19 20	of money.  And he says, fine.  Q. And how much was that, did he pay you?  A. Around \$45,000. I think I started with 45.  Q. Okay. And when you started to work for him as a full-time employee, did you have anybody that you reported to or did you deal directly with Mr. Epstein?  A. At the beginning with Mr. Epstein, directly to him.  Q. Did that change?  A. Later on, yes.  Q. And how did that change?  A. When Ms. Maxwell, Ghislaine Maxwell came to the picture.	9 10 11 12 13 14 15 16 17 18 19 20 21 22	taking responsibility for the house, what were your duties?  A. Basically I was still doing the maintenance work.  Q. Okay.  A. Was doing they were trying to remodel the home and they would told me, okay, tear down this wall. We want to see how it's going to look. Or put this windows and tear down we had a fishing tank. We took it out I took it out. A kitchen on the second floor. I took it out. So it was basically dismantling the house.  Q. Okay. And about how long a period of time did that project last?  A. I would says, six to seven months.
9 10 11 12 13 14 15 16 17 18 19 20 21	of money.  And he says, fine.  Q. And how much was that, did he pay you?  A. Around \$45,000. I think I started with 45.  Q. Okay. And when you started to work for him as a full-time employee, did you have anybody that you reported to or did you deal directly with Mr. Epstein?  A. At the beginning with Mr. Epstein, directly to him.  Q. Did that change?  A. Later on, yes.  Q. And how did that change?  A. When Ms. Maxwell, Ghislaine Maxwell came to	9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	taking responsibility for the house, what were your duties?  A. Basically I was still doing the maintenance work.  Q. Okay.  A. Was doing they were trying to remodel the home and they would told me, okay, tear down this wall. We want to see how it's going to look. Or put this windows and tear down we had a fishing tank. We took it out I took it out. A kitchen on the second floor. I took it out. So it was basically dismantling the house.  Q. Okay. And about how long a period of time did that project last?  A. I would says, six to seven months.  Q. Okay. And after the remodeling slacked off or
9 10 11 12 13 14 15 16 17 18 19 20 21 22	of money.  And he says, fine.  Q. And how much was that, did he pay you?  A. Around \$45,000. I think I started with 45.  Q. Okay. And when you started to work for him as a full-time employee, did you have anybody that you reported to or did you deal directly with Mr. Epstein?  A. At the beginning with Mr. Epstein, directly to him.  Q. Did that change?  A. Later on, yes.  Q. And how did that change?  A. When Ms. Maxwell, Ghislaine Maxwell came to the picture.	9 10 11 12 13 14 15 16 17 18 19 20 21 22	taking responsibility for the house, what were your duties?  A. Basically I was still doing the maintenance work.  Q. Okay.  A. Was doing they were trying to remodel the home and they would told me, okay, tear down this wall. We want to see how it's going to look. Or put this windows and tear down we had a fishing tank. We took it out I took it out. A kitchen on the second floor. I took it out. So it was basically dismantling the house.  Q. Okay. And about how long a period of time did that project last?  A. I would says, six to seven months.

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	Page 13		Page 15
1	Q. Okay. Who	1	living on the property, but outside the house?
2	A. Periodically. It didn't change from one day	2	A. I was living in the property. No. No. No.
3	to another.	3	I was working outside the property.
4	Q. And who would tell you that your duties were	4	Q. Yes.
5	increasing?	5	A. And because it was multiple jobs that I had to
6	A. Either Mr. Epstein or Ms. Maxwell.	6	do.
7	Q. Okay. And how did your duties increase?	7	Q. Okay.
8	A. In I become more more involved in the	8	A. Had to do with the pool, the service, the
9	daily running operation of this home. This home was run	9	landscaping, taking care of that. I didn't do it
10	like a hotel basically.	10	myself, but I have people working for me.
11	Q. Okay. Were you given any manuals or rules or	11	Q. Okay. Approximately when was it in
12	procedures that you had to follow?	12	relationship to Ms. Maxwell taking over the
13	A. At the end of my stay, yes, I was.	13	responsibility of the house did you then move inside the
14	Q. Okay. At the end. And I'm going to jump to	1.4	house?
15	the end now and then come back.	15	A. I will says, after it was done, a big
16	What was it that you were given at the end of	16	renovation, when architects and engineers. And that was
17	your stay; what kind of papers or manuals?	17	after I did the breaking down of this renovation, they
18	A. It was a manual. I can't remember how many	18	hire architects, they hire decorators and engineers, and
19	pages, but it was quite thick manual that was that	19	did the they did the work. It was a big renovation,
20	was done by estate manager, that she will manage all	20	one of the renovations.
21	all the properties. And that was also to be in force in	21	And then they make our quarters. They even
22	Palm Beach.	22	built our my quarters in there.
23	Q. I see. Do you still have a copy of that	23	Q. When you said "our," was there someone else
24	manual?	24	who had quarters there, too?
25	A. No, I don't.	25	A. About three years later, after I start
	Page 14	ana manadorna mrellisida dibendele lesi bebbe	Page 16
1		1	working, my wife came to help me.
1	Q. Do you have any papers whatsoever that were	2	Q. I see. And are you able to describe for me
2	prepared while you were working	3	where the quarters were, like, what floor?
3	A. No.	4	A. Yes. It was in the second floor and the
4	Q for Mr. Epstein?	5	let me trying to remember northeast corner of the
5	<ul><li>A. I left everything in there.</li><li>Q. Did you make any diary notes yourself or any</li></ul>	6	property. Northeast corner, yes.
7	notes for your own private use while you worked for	7	Q. Did anyone else work for Mr. Epstein while you
8		8	were working for him there at the house?
	Mr. Epstein?  A. No, sir. The only thing I have is my	9	A. During the whole time?
9 10	separation agreement. That's it.	10	Q. Yes, sir.
11	Q. Okay. Did you bring that with you today?	11	A. Yes.
12		12	Q. All right. When you first started there,
13	A. No, I didn't. Q. Okay. Did your duties ever include taking	13	there was no one else?
1	telephone messages?	14	A. When I started there, was a it was a
14 15	A. Yes, sometimes.	15	Jamaican girl that she was doing the cooking.
	Q. And when did that start approximately?	16	Q. Okay. Do you happen to remember her name?
16	A. When I move from the outside to the inside of	17	A. No.
17	the house.	18	Q. All right.
18 19	Q. All right.	19	A. She worked for couple months.
1 12	A. I when I start the position, I never had an	20	Q. I see. All right. When did any other
20		21	employees begin to work for Mr. Epstein while you were
20	apartment in the house. And when I definite they want. I	4	
21	apartment in the house. And when I definite they want	22	there?
21 22	me inside to run the house, I had an apartment. I have	22 23	there?  A. They hire chefs. There was mostly European
21 22 23	me inside to run the house, I had an apartment. I have a small service quarters in the house, inside the house.	23	A. They hire chefs. There was mostly European
21 22	me inside to run the house, I had an apartment. I have	23 24	

4 (Pages 13 to 16)

	Page 17		Page 19
1	Didier. A kid from New York who was a chef, also. But	1	Q. Were there any photographs of nude females in
2	they were one after another one. They were hiring chefs	2	the house while you were there?
3	when I doing sometimes I did most of the cooking.	3	MR. CRITTON: Form.
4	When they wanted to bring their chef, they bring their	4	MR. WILLITS: What's the matter with that
5	chef in their plane. And the chef will stay, will work	5	form?
6	there and then will travel with them.	6	MR. CRITTON: Overly broad. Nude? You mean.
7	Q. Were there any other employees that worked for	7	completely naked?
. 8	Mr. Epstein while you were worked for him, that you know	8	MR. WILLITS: However you want to interpret
9	of?	9	it.
10	A. No, except my wife.	10	THE WITNESS: Excuse me. Can you repeat that
11	Q. Did you know a lady by the name of Sarah	11	again?
12	Kellen?	12	MR. CRITTON: Form.
13	A. Sarah, yes, I do. Sarah Kellen came at the	13	BY MR. WILLITS:
14	end of my stay there, probably two or three months	14	Q. Yes. Were there any photographs of nude
15	before I left.	15	females in the house while you worked for Mr. Epstein?
16	Q. Okay. Did she do any work for Mr. Epstein,	16	A. Yes. Sometimes I saw nude photographs.
17	that you know of?	17	Q. Are you able to describe where you saw those,
18	A. Yes. She was a I don't know her deterrent,	18	where in the house?
19	but she was an assistant to him or to her. I don't	19	A. Most of the times those photographs were taken
20	know.	20	by Ms. Maxwell. And they usually are her desk. And she
21	Q. All right. There is a I've seen a	21	kept a big album.
22	reference in and the spelling has changed in my	22	Q. Do you remember any pictures of nude or
23	various references is there a N. or N.? Do you	23	partially unclothed females on the walls at
l	recognize that name?	24	Mr. Epstein's house?
24 25	A. N.	25	MR. CRITTON: Form.
23			Page 20
	Page 18		_
1	Q. N.	1	BY MR. WILLITS:
2	A. N. Yes, I know N.B.	2	Q. He's just making objections for the record
3	Q. Want to take a chance at spelling that last	3	that he can take he will take it up with the Judge
4	name?	4	later on.
5	A. I think it was B. But she was not an	5	A. Okay.
6	employee. She was a guest.	6	Q. You don't need to worry about
7	Q. Was she a full-time guest?	7	A. Yes, it was. It was pictures of partially
8	A. No.	8	nude.
9	Q. When would she visit?	9	Q. And where were they?
	A. She was a girl that was very, very talented.	10	A. Most of the times they were in the pool.
10			
10 11	Mr. Epstein help her become an actress. Now she's a	11	Q. How about on the stairway?
l	Mr. Epstein help her become an actress. Now she's a movie actress and she's in a soap opera. She came with	12	A. No. On the stairway there were no pictures
11	Mr. Epstein help her become an actress. Now she's a	12 13	A. No. On the stairway there were no pictures when I was there.
11 12	Mr. Epstein help her become an actress. Now she's a movie actress and she's in a soap opera. She came with her mother to the house. And she he help her come up with her career.	12 13 14	<ul><li>A. No. On the stairway there were no pictures when I was there.</li><li>Q. How many stairways were there?</li></ul>
11 12 13	Mr. Epstein help her become an actress. Now she's a movie actress and she's in a soap opera. She came with her mother to the house. And she he help her come up with her career.  Q. Okay. Do you are you familiar with any	12 13 14 15	<ul><li>A. No. On the stairway there were no pictures when I was there.</li><li>Q. How many stairways were there?</li><li>A. It was the service stairway that is very</li></ul>
11 12 13 14	Mr. Epstein help her become an actress. Now she's a movie actress and she's in a soap opera. She came with her mother to the house. And she he help her come up with her career.  Q. Okay. Do you are you familiar with any other individuals by the name of N. or N. who worked for	12 13 14 15 · 16	<ul> <li>A. No. On the stairway there were no pictures when I was there.</li> <li>Q. How many stairways were there?</li> <li>A. It was the service stairway that is very narrow coming from the service quarters to the kitchen</li> </ul>
11 12 13 14 15	Mr. Epstein help her become an actress. Now she's a movie actress and she's in a soap opera. She came with her mother to the house. And she he help her come up with her career.  Q. Okay. Do you are you familiar with any	12 13 14 15 16 17	<ul> <li>A. No. On the stairway there were no pictures when I was there.</li> <li>Q. How many stairways were there?</li> <li>A. It was the service stairway that is very narrow coming from the service quarters to the kitchen And the main stairway, that it was quite wide</li> </ul>
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11 12 13 14 15 16 17 18 19 20 21	Mr. Epstein help her become an actress. Now she's a movie actress and she's in a soap opera. She came with her mother to the house. And she he help her come up with her career.  Q. Okay. Do you are you familiar with any other individuals by the name of N. or N. who worked for Mr. Epstein?  A. No.  Q. After the renovations were complete, did you have access to the entire house while you worked for Mr. Epstein?  A. Absolutely, yeah.  Q. Was there any particular portion of the house	12 13 14 15 16 17 18 19 20 21 22 22	A. No. On the stairway there were no pictures when I was there.  Q. How many stairways were there?  A. It was the service stairway that is very narrow coming from the service quarters to the kitchen And the main stairway, that it was quite wide and to the second floor.  Just those two.  And also there was a stairway outside through the pool to the balcony upstairs.  Q. And do you have a recollection of pictures of any females whatsoever on either of the inside
11 12 13 14 15 16 17 18 19 20 21 22	Mr. Epstein help her become an actress. Now she's a movie actress and she's in a soap opera. She came with her mother to the house. And she he help her come up with her career.  Q. Okay. Do you are you familiar with any other individuals by the name of N. or N. who worked for Mr. Epstein?  A. No.  Q. After the renovations were complete, did you have access to the entire house while you worked for Mr. Epstein?  A. Absolutely, yeah.	12 13 14 15 16 17 18 19 20 21 22	A. No. On the stairway there were no pictures when I was there.  Q. How many stairways were there?  A. It was the service stairway that is very narrow coming from the service quarters to the kitchen And the main stairway, that it was quite wide and to the second floor.  Just those two.  And also there was a stairway outside through the pool to the balcony upstairs.  Q. And do you have a recollection of pictures of

5 (Pages 17 to 20)

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	Page 21		Page 23
1	Q. What is your understanding, sir, of the a	1	Q. Okay. Do you remember any other females being
2	reference to a girl, as opposed to a woman? Are you	2	present at the house, other than the females that you've
3	familiar with the term, girl?	3	mentioned, which were N., her mother, Sarah Kellen, V.
4	A. Of course.	4	Were there any others that you
5	Q. Are you familiar with the term, woman?	5	A. Many, many, many, many.
6	A. I interpret most a woman, a married woman, a	6	Q. When did you first
7	married person.	7	MR. CRITTON: Can I just have the last
8	Q. Are you how would you describe a 14 year	8	question read back?
9	old, a woman or a girl?	9	MR. WILLITS: Of course you can.
10	A. A girl, of course.	10	MR. CRITTON: Please.
11	Q. How would you describe a 16 year old, a woman	11	MR. WILLITS: But only once.
12	or a girl?	12	MR. CRITTON: That's all I need.
13	A. Again, I don't know. I am not I don't	13	MR. WILLITS: You sure.
14	think I can tell you exactly she is 14 or 16.	14	Go ahead.
15	Q. But if you knew	15	(Previous question was read.)
16	A. Sixteen, I would think is a girl, of course.	16	MR. CRITTON: And can I just ask for a
17	Q. Were there ever any visitors to the Epstein	17	clarification from you? Are you going to use if
18	house that you considered to be girls, as opposed to	18	you use the word woman, are you
19	women?	19	MR. WILLITS: I said, females.
20	A. Yes. Yes. I think I would says, I never	20	MR. CRITTON: No, no, I understand. But in
21	check her i.d.	21	the future if you use woman, does that mean, at
22	O. Right.	22	least to Mr. Alessi, that that's married, and if
23	A. Or I was not told to check i.d.s	23	it's a girl she has to be 14 or 16? Because that's
24	Q. Of course.	24	how you asked the question.
25	A on these girls. But one, I would says,	25	MR. WILLITS: All I'm going to talk about is
40			
	Page 22		Page 24
	Page 22	-	Page 24
1	N.B. was very young because she was in high school. And		females.
2	N.B. was very young because she was in high school. And sometimes either I pick her mother and herself from her	2	females.  MR. CRITTON: Okay.
2	N.B. was very young because she was in high school. And sometimes either I pick her mother and herself from her house or I pick her from The School of the Arts or the	2	females.  MR. CRITTON: Okay.  MR. WILLITS: And ask
2 3 4	N.B. was very young because she was in high school. And sometimes either I pick her mother and herself from her house or I pick her from The School of the Arts or the ballet place, ballet in West Palm Beach. I can't	2 3 4	females.  MR. CRITTON: Okay.  MR. WILLITS: And ask  MR. CRITTON: I'll be alert to the questions
2 3 4 5	N.B. was very young because she was in high school. And sometimes either I pick her mother and herself from her house or I pick her from The School of the Arts or the ballet place, ballet in West Palm Beach. I can't remember exactly what that place is, the name of the	2 3 4 5	females.  MR. CRITTON: Okay.  MR. WILLITS: And ask  MR. CRITTON: I'll be alert to the questions then.
2 3 4 5 6	N.B. was very young because she was in high school. And sometimes either I pick her mother and herself from her house or I pick her from The School of the Arts or the ballet place, ballet in West Palm Beach. I can't remember exactly what that place is, the name of the place.	2 3 4 5 6	females.  MR. CRITTON: Okay.  MR. WILLITS: And ask  MR. CRITTON: I'll be alert to the questions then.  MR. WILLITS: All right. So you don't need to
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2 3 4 5 6 7 8	N.B. was very young because she was in high school. And sometimes either I pick her mother and herself from her house or I pick her from The School of the Arts or the ballet place, ballet in West Palm Beach. I can't remember exactly what that place is, the name of the place.  Q. Did you give provide transportation for any other females while you worked for Mr. Epstein?	2 3 4 5 6 7 8	females.  MR. CRITTON: Okay.  MR. WILLITS: And ask  MR. CRITTON: I'll be alert to the questions then.  MR. WILLITS: All right. So you don't need to sleep through the next few questions.  MR. CRITTON: I don't sleep at all.
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2 3 4 5 6 7 8 9 10 11 12 13 14 15 16	N.B. was very young because she was in high school. And sometimes either I pick her mother and herself from her house or I pick her from The School of the Arts or the ballet place, ballet in West Palm Beach. I can't remember exactly what that place is, the name of the place.  Q. Did you give provide transportation for any other females while you worked for Mr. Epstein?  A. Occasionally, yes, I did.  Q. Do you happen to remember the names of any of those females?  A. I remember one, specifically one. It was V. Her name was V. I can't remember her last name, but I think it was P. I'm not sure. I can be wrong on that.  Q. And how many times did you provide transportation services for this female?  A. Whenever I had I been told. Whenever I was	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16	females.  MR. CRITTON: Okay.  MR. WILLITS: And ask  MR. CRITTON: I'll be alert to the questions then.  MR. WILLITS: All right. So you don't need to sleep through the next few questions.  MR. CRITTON: I don't sleep at all.  MR. WILLITS: All right. Now I'm totally confused.  BY MR. WILLITS:  Q. When did you first become aware of females visiting the Epstein house?  A. Since I know him.  Q. During the renovations?  A. Yeah.  Q. Were there
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