

THE STATE OF FLORIDA,  
COUNTY OF PALM BEACH.)

IN RE:

PALM BEACH INVESTIGATION.

SWORN STATEMENT OF [REDACTED]

Monday, November 21, 2005

12:25 p.m. - 1:05 p.m.

401 N. Dixie Highway  
West Palm Beach, Florida 33401

ORIGINAL

Reported By:

Susan Shelling, RPR

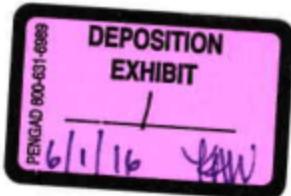
Notary Public, State of Florida

Conson & Associates Reporting and Transcription

Phone - 561.835.9738

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NON PARTY (VR) 000529



EFTA00029390

1 APPEARANCES:

2 On behalf of the State:  
DALIAH H. WEISS, Esquire  
3 ASSISTANT STATE ATTORNEY  
4 401 North Dixie Highway  
West Palm Beach, Florida 33401  
561.355.7100

5 On behalf of the Witness:  
6 DONNIE MURRELL, Esquire  
L.D. MURRELL, P.A.  
7 400 Executive Center Drive  
Suite 201  
8 West Palm Beach, Florida 33409  
561.686.2700

9

10 ALSO PRESENT:

11 DETECTIVE [REDACTED]  
Palm Beach Police Department

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NON PARTY (VR) 000530

[REDACTED]

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1                           I N D E X

2   WITNESS: [REDACTED]

PAGE:

3   EXAMINATION BY DET. [REDACTED]

4

5                           - - -

6                           N O   E X H I B I T S   M A R K E D

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[REDACTED]

EFTA00029392

1                   Sworn statement taken before Susan  
2       Shelling, Registered Professional Reporter and Notary  
3       Public in and for the State of Florida at Large, in the  
4       above cause.

5                   -

6       Thereupon,

7                   [REDACTED]

8       having been first duly sworn or affirmed, was examined  
9       and stated as follows:

10                  MR. MURRELL: I just want to repeat that  
11                  we're here under the State investigative subpoena  
12                  that was served on Mr. [REDACTED] although it was  
13                  dated for, I believe, Wednesday or something.  
14                  This is Monday the 21st, and we are here by  
15                  agreement.

16                   EXAMINATION

17       BY DET. [REDACTED]:

18       Q.      Mr. [REDACTED] I'm Detective [REDACTED] with  
19       the Palm Beach P.D. As I explained to you on the  
20       telephone, I am conducting an investigation on a former  
21       employer of yours.

22                  I just spoke with your wife and she told me  
23       you guys worked for Mr. Epstein for eight years?

24       A.      Yes, she did work for eight years. I  
25       worked longer. I was there before my wife came.

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NON PARTY (VR) 000532

EFTA00029393

1 Q. Before your wife came.

2 A. I started full-time with him on January 1,  
3 1991, and we both left December 31, 2002. So I worked  
4 eleven years exactly. Prior to that, prior to working  
5 full-time for him, I worked part-time for him, on-and-off  
6 basis.

7 Q. What were your responsibilities?

8 A. In the full-time basis, I started as a  
9 houseman, and I became a major domo and butler and  
10 everything else, driver, and did everything. We both did  
11 all the chores in the house, but I was in charge of the  
12 house. I was above my wife and above the cleaning crew,  
13 the gardeners, pool people. So I was house manager, major  
14 domo.

15 Q. You would have been the go-to guy for the  
16 house?

17 A. Yes. And the one who would get the blame.

18 Q. We are talking about Jeffrey Epstein?

19 A. Of course.

20 Q. Do you remember the address of the house?

21 A. 558 E1 Brillo.

22 Q. Was it in the beginning of the street --

23 A. At the end of the street, on the left-hand  
24 side.

25 Q. We're talking about the same house.

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NON PARTY (VR) 000533

EFTA00029394

1 A. Yeah.

2 Q. Your wife said the same number you did.

3 A. 558? 358? 558?

4 Q. It was 358.

5 A. We left three years ago.

6 Q. And I understand it's been some time since

7 then. So the questions I'm going to ask you basically

8 is: During your time, did you deal directly with

9 Mr. Epstein?

10 A. Yes. And her -- and her -- girlfriend,

11 manager. She was the manager of all the households,

12 because he has homes all over the world.

13 Q. Right.

14 A. So we have -- she was my boss, and I deal

15 directly with her.

16 Q. Who was --

17 A. Elaine Maxwell.

18 Q. Ms. Maxwell, that's his girlfriend,

19 correct?

20 A. Um-hum.

21 Q. During the eleven years, he would come

22 down, she would inform you that they were coming down?

23 A. Right.

24 Q. Make arrangements to have the house ready?

25 A. Right.

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NON PARTY (VR) 000534

EFTA00029395

1           Q.     During the time that he was here, you  
2     prepared the house, did all the chores.

3                 Did you do any of the cleaning?

4           A.     Sometimes. Many times. I did -- last two  
5     or three years the work was so much that we have to  
6     hire -- we hire a clean-up crew that they came twice a  
7     week or once a week, then it was twice a week. Depends  
8     upon his schedule, because he did not allow anybody at  
9     the house except us when he was in town. So when he was  
10    in town, it was just us doing the cleaning and the  
11    cooking, the driving, shopping, everything else.

12          Q.     Did you stay on property in the guest  
13    house?

14          A.     Yes and no. We had an apartment right  
15    across the bridge. We had an apartment in [REDACTED]  
16    [REDACTED] and we had an apartment at the house.

17          Q.     Why would you stay at the house, then?

18          A.     We stay at the house mostly when he was  
19    there. When he was not in town, we went home. We went  
20    to our apartment. When he was there, it was -- the job  
21    was just too much to go home 9 o'clock, 10 o'clock and  
22    come back 5 o'clock in the morning. We would just stay  
23    and sleep and get up and work.

24          Q.     When he was in town, did he receive a lot  
25    of guests at the house?

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NON PARTY (VR) 000535

[REDACTED]

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1           A.    Yes.  Many, many, many guests.  It was  
2 never with no guests.

3           Q.    Did he have assistants with him?

4           A.    Assistants?  At the last year he had an  
5 assistant just for him.  They would travel with him all  
6 the time.  At the last -- in the last two years of my  
7 stay there, he also have a chef, a gourmet chef that he  
8 would travel with him.  That's it.

9           Q.    Do you remember the chef's name?

10          A.    There were quite a few.  The last one I  
11 know is [REDACTED] I think.  And he was from  
12 New York.

13                 And there was another French chef, [REDACTED]  
14 (phonetic); I don't know his last name.

15                 And there was another English chef.  But  
16 they went quickly.

17          Q.    They would come and go, come and go.

18                 What about the assistant that was his  
19 personal assistant that would fly with him?

20          A.    [REDACTED] It was an English girl that  
21 would travel with him a lot, and became the personal  
22 assistant.  But most of the time it was Ms. Maxwell that  
23 traveled with him all the time.

24          Q.    She was basically like his --

25          A.    Girlfriend, whatever it was.  Boss,

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NON PARTY (VR) 000536

EFTA00029397

1       girlfriend. She was our immediate superior.

2           Q.     Did he have girls come over to give  
3       massages?

4           A.     Yes.

5           Q.     How many massages would he have in a day?

6           A.     Sometimes one, sometimes two, three.

7           Q.     Was it the same girl that would come back  
8       to do the massages?

9           A.     Yeah, yeah. Not the same girl -- I mean  
10      during eleven years, I probably saw a hundred, two  
11      hundred different massage therapists.

12          Q.     Did they seem young to you?

13          A.     No, sir. Mostly no. We saw one or two  
14      young ones in the last year. Before that, it was all  
15      adults.

16          Q.     During your last year when you were working  
17      with him, what do you mean that they looked young? Did  
18      they look like they were still in high school?

19          A.     I remember one girl was young. We never  
20      asked how old she was. It was not in my job.

21          Q.     Right. I understand.

22          A.     But I imagine she was 16, 17. In my  
23      judgment, she was 16, 17.

24          Q.     Where would these massages take place?

25          A.     All the time it was in his room. Sometimes

1 it was in the balcony of his quarters. His room has a  
2 wraparound balcony facing the pool. So the massages were  
3 in the balcony outside in the sun, or inside in his  
4 bathroom or her bathroom.

5 Q. Would you set up the room for the massages?

6 A. Many times. Yes, he will tell me, Set up  
7 the room inside my bathroom or in the bedroom or in  
8 Elaine's bathroom, or outside on the balcony. And I  
9 would go and set up or my wife would go and set up the  
10 table.

11 We had a table in every room of the house,  
12 the massage tables, for the different guests. Because  
13 not only he got massages, all the other guests got  
14 massages too. So we have a table -- massage table in  
15 basically every room, guest room.

16 Q. The girls that would come over to do  
17 massages, they would massage him first or massage guests?

18 A. Different times. There were -- mostly they  
19 was his massage. Mostly he would get massages.

20 Q. Would Ms. Maxwell be in the room with him  
21 while he was getting the massage?

22 A. We don't know. Apparently we saw her going  
23 upstairs, because it was -- when they went upstairs, they  
24 closed -- his quarters, it had a double door, so it was a  
25 door on top of the stairs -- I don't know if you've been

1 in the house -- and then there's another door going into  
2 his room. So it was a long corridor. So everything was  
3 closed and nobody saw anything.

4 Q. Would you clean up after?

5 A. Once in a while, yes, I did. Most of the  
6 times I did. I did the cleanup.

7 Q. Did it appear as if there was going to be  
8 more than one massage going on in the room?

9 A. More than one massage? I don't know. It  
10 was massages. There was massages, because it was a hot  
11 oil, and it was -- you know this vibrator, the neck  
12 vibrators with the long handles. And towels, a lot of  
13 towels. We used a lot of towels in the house. Used like  
14 maybe 40, 50 towels a day, because every time he go in  
15 into the pool, it was two or three towels. Everything  
16 had to be cleaned up. I went most of the time to pick up  
17 the room and get it ready.

18 Q. Did it ever appear to you that more went on  
19 in the room other than a massage?

20 A. I just imagine. I never saw anything. But  
21 I imagine there was more than -- I never saw anything  
22 because it was closed doors. It was never done outside.

23 Q. Based on the cleanup?

24 A. Based on the cleanup -- at the end, I  
25 cannot say there was. At the end, it was a few times

1 that the bed was undone. You know, we make the beds  
2 three or four times a day. And sometimes we went to  
3 clean up the massage to put it back, the massage table,  
4 to pick up the towels, but the bed was undone again. So  
5 either he took a nap or he went for a nap, I don't know.

6 Q. Or something else occurred?

7 A. Or something else. I cannot.

8 Q. Did the girls, would they bring their own  
9 stuff or they would use his stuff?

10 A. No. We had everything. We had gallons of  
11 stuff, different stuff.

12 Q. Different massage oils?

13 A. Different, all kinds.

14 Q. Different massagers?

15 A. Different stuff.

16 They would buy all over the world different  
17 types of -- for different --

18 Q. Did any of these massagers look like sex  
19 toys?

20 A. At the end, at the last year that we were  
21 there they had like sex toys, some of them. I can say

22 maybe three or four occasions that I saw in the sink,  
23 they were left out on the sink, and just --

24 Q. Where would he keep these massagers?

25 A. When I was there, we keep all the stuff in

1 a basket inside Ms. Maxwell's closet. It was a big  
2 basket, about this round (indicating), with a cover on  
3 it. And we used to pick up from the towel and just dump  
4 it in there. That's it. That's the standard we went  
5 through.

6 Q. What sink would you find those massagers  
7 in?

8 A. Mostly in his sink, in his bathroom sink.

9 Q. His bathroom sink?

10 Was Ms. Maxwell still his girlfriend at  
11 that time?

12 A. Oh, yeah.

13 Q. Still his girlfriend that you know of right  
14 now?

15 A. Yeah. We left, she was still his  
16 girlfriend. I don't know now, but she was still there.

17 Q. Why did you leave at the end?

18 A. It was a hard job. It was an incredible  
19 hard job. So demanding. Hours were terrible, from  
20 5 o'clock in the morning to 10 o'clock at night.

21 Constantly on your feet.

22 I got very sick. My health went down the  
23 drain. I was diagnosed with cancer, polycythemia, a kind  
24 of blood cancer, and we had to leave. It was just too  
25 much for me.

1 Q. Sounds like a lot.

2 A. Yeah. For me and my wife, we both left.

3 Q. It was very demanding when he was here in  
4 town?

5 A. It was terrible. Bad job. Pay was good,  
6 but we had enough.

7 Q. I know you guys had a falling out a couple  
8 of years ago; I guess you weren't working with him  
9 anymore. This would have been in 2003. You guys had a  
10 falling out, remember?

11 A. Yeah, we settled that.

12 Q. That was settled?

13 A. That was settled with him between us.

14 Q. Was that --

15 A. It was an amicable -- it was an agreement,  
16 mutual agreement. It was a mistake on my part.

17 Q. Are there any questions you have of me?

18 A. No. I told you the truth.

19 We just imagined things that could have  
20 happened. I used to talk to my wife all day, working and  
21 under that environment. But we didn't know for sure what  
22 was going on.

23 We never heard anything. We never heard a  
24 complaint, or a girl crying.

25 Q. Would these massage girls, especially

1 towards the end, would they come alone or would they come  
2 with other people?

3 A. Mostly they would come alone. It was one  
4 girl, one of the young girls, the one I can't think of  
5 it, she would bring somebody else. She'd bring other  
6 girls. But I didn't even know the names.

7 Q. All of them would go downstairs?

8 A. Yes.

9 Q. Or would one stay downstairs?

10 A. Most of the times when that girl came, it  
11 was at night. So after dinner -- after dinner, they went  
12 to the movies. And by the time they went to the movies,  
13 we clean up right away and tried to get out of there.

14 And that was about 8, 9 o'clock at night.

15 After, when they come back, I don't know  
16 what happened. Our quarters were a different -- I don't  
17 know if you've been in the house, but our quarters were  
18 separate.

19 Q. It's separate.

20 A. Separate. Before -- that building is new.

21 ~~They build the building in 2001.~~

22 Q. The guest quarters?

23 A. Yeah, the guest quarters.

24 Before, we had an apartment upstairs.

25 Q. They have the laundry and a little office

1 and the bedroom?

2 A. Yes. That was 2001. Before that, we had  
3 an apartment upstairs in their house, in the main house.

4 Q. In the little rooms upstairs across from  
5 his master bedroom?

6 A. Right.

7 Q. Was there ever any photographs that you can  
8 recall around the house?

9 A. Girls, girls' photographs and guests'  
10 photographs, yes.

11 Q. Were they dressed or were they naked?

12 A. Most of them were dressed. It was a lot of  
13 entertainment in the pool, around the pool area. But  
14 most of them were dressed.

15 Q. When was the last time you spoke with  
16 Mr. Epstein?

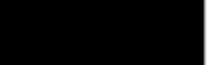
17 A. The last time I spoke with Mr. Epstein was  
18 about a week ago, when you left me the card. I got  
19 scared because of that fallout that we had, and I thought  
20 it was a consequence of that. And I called and says,  
21 ~~Jeffrey, what's going on, what's happening? Because I~~  
22 thought it was an investigation against me on his part.

23 Q. I'm sorry if I gave you that impression.

24 A. That's why I called him. That's the only  
25 reason that I called.

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1                   Before I even spoke to you.

2                 Q.     Just when you found the card?

3                 A.     When I find the card, I get scared. I  
4     said, What's going on now? Why are you bothering me now  
5     in my house?

6                   That's why I called him.

7                 He said, [REDACTED], there is an investigation  
8     going on. I have nothing to talk to you. That's it.

9                   I said, Okay.

10                Q.     He didn't give you any information as to --

11                A.     No, not a word.

12                Q.     Has anybody else contacted you from  
13     Mr. Epstein or his organization, his assistants, his  
14     attorney?

15                A.     No, no, no.

16                Q.     Anyone that works for his attorney?

17                A.     For his attorney? Yes. For his attorney,  
18     the present attorney? Yes. That was an investigator  
19     that it was investigated on his side, I can't remember  
20     his name, but I understand it was from Roy Black's  
21     office. That was his attorney. And he [REDACTED] this  
22     investigator basically asked me the same questions,  
23     exactly the same questions: What did I know, what did I  
24     know.

25                Q.     When did this happen?

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[REDACTED]

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1           A.     This happened about ten days ago -- about a  
2 week ago, ten days ago. I'm not sure what date.

3           Q.     Was his investigator's name --

4           A.     It's the date after I contacted you.

5           Q.     -- Paul, first name Paul?

6           A.     Paul, Paul, yes.

7                 You have the last name?

8           Q.     No.

9           A.     He asked me exactly the same questions.

10          Q.     Did he offer you any money?

11          A.     Absolutely not. I would not take it.

12          Q.     Did he tell you not to speak to me?

13          A.     No. He says -- no, he told me not to speak  
14 to you. He didn't say that to me. He says, It's your  
15 choice. You make that decision.

16                 And he says, If you hire a lawyer, you make  
17 that decision.

18                 And we feel that was important for us. I  
19 don't want to be involved with this thing. I'm out of  
20 the job three years ago, and that's why we hired  
21 Mr. Murrell. He suggested that.

22          Q.     Did he ask you if anybody else has been  
23 contacted?

24          A.     No.

25          Q.     Did he tell you that to call him back after

1 our meeting?

2 A. No, no.

3 Q. Were you to have any contact with him at  
4 any time after our meeting?

5 A. If I will have a contact? I have no reason  
6 for it. I have no reason to call Jeffrey or anybody  
7 else. This is over, I hope.

8 Q. Well, Mr. [REDACTED], this is basically an  
9 ongoing investigation, so obviously anything that we  
10 discuss hopefully will stay between us. Because it is  
11 still ongoing, I wouldn't want this out until the  
12 investigation is complete.

13 A. It's not going anywhere. Even my kids  
14 don't know it.

15 Q. He contacted you after you called  
16 Mr. Epstein?

17 A. Yes.

18 When I call him and I said, Jeffrey, what's  
19 going on?

20 He said, [REDACTED], I don't know what's going  
21 on. There's an investigation against me.

22 So then I said, Whew, thank God. I don't  
23 know what's happening.

24 And then he says, I have an investigator  
25 that is investigating, the same thing the police

1 department is doing. He's going to contact you.

2 And that was the end of it.

3 I think his name was Paul. I only met him  
4 for about fifteen minutes, ten minutes.

5 Q. You met at your house?

6 A. No, no. I don't want him at my house. We  
7 met at Carrabas restaurant, but it was not open, so we  
8 met outside Carrabas. It took about ten minutes.

9 Q. Going back to the items that were found in  
10 the sink, can you describe any of those massagers?

11 A. I only saw two things: It was a big,  
12 big -- I think a vibrator. Big (indicating). And it was  
13 a long -- I hate to -- I'm sorry. It was a long dick, I  
14 think. Rubber thing. And there was a thing you used it  
15 in the back, the vibrator in the back.

16 Q. What color?

17 A. We always had those. Not those toys.

18 Vibrators, we have different types, one for the neck, one  
19 for the back. You know the one that has a battery and  
20 they move, with balls on it, vibrator. That's it.

21 ~~That's what I find there. I never find anything else.~~

22 Those two things.

23 Q. Do you remember any names of the girls that  
24 might have come over for massages?

25 A. Yes. I remember some of them. From the

1 beginning? From the end?

2 Q. As many as you can remember.

3 A. As many as I can remember.

4 Q. I know it's been a while.

5 A. It was [REDACTED]. It was [REDACTED]. And it was --

6 it was [REDACTED] It was -- how many? [REDACTED] [REDACTED]

7 It was also a young girl, but she was not a  
8 massage therapist. She came to the house as a friend, I  
9 think. I don't think she was a massage therapist. Her  
10 name was -- as a matter of fact, she's in a soap opera  
11 now, she's a star. Just give me a minute.

12 [REDACTED]

13 There also were men masseuses.

14 Q. There were men too?

15 A. There were men. A few. Not that many. A  
16 few. I can't remember.

17 [REDACTED] There was an [REDACTED] There was  
18 a [REDACTED] I think every name -- girls' names. In  
19 eleven years, I cannot remember.

20 Q. That's fine.

21 A. ~~There were girls coming and going. There~~  
22 were girls traveling with him as massage therapists.  
23 They would travel with him all over the world, because he  
24 was in the plane, he got massages on the plane,  
25 because -- I know because I used to supply the oils and

1 the towels for the plane.

2 Q. Would you clean his plane too?

3 A. No, no.

4 Q. Did you ever travel with him anywhere?

5 A. No, no.

6 Q. When he went to New York or Arizona or his  
7 private island?

8 A. I've been on his island. I've been as a  
9 guest, as a vacation. We just took vacations, and I went  
10 to his island in the Caribbean. And I've been in New  
11 Mexico. I've been at his house in London. But not as a  
12 worker, just vacation.

13 Q. As a vacation?

14 A. Uh-huh.

15 We went to New Mexico for -- it was kind of  
16 a symposium about how to clean homes. It was this lady  
17 who make -- teach all the house people, housemen, and  
18 they invited us to Santa Fe, New Mexico, to teach us how  
19 to clean homes. That was kind of stupid.

20 Q. How he wanted it to be cleaned?

21 A. Yes. We didn't get that much.

22 Q. Can you think of anything that I haven't  
23 asked you that might be relevant to this?

24 A. I can't think of anything. Basically it's  
25 the same questions that the other investigator asked me.

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1 Exactly the same.

2 I wish I could give you more names.

3 Allison --

4 Q. I'm not going to ask you to do that because  
5 I know it's been a long time. I can't think of stuff I  
6 did last week.

7 A. It's been a long time.

8 Q. If by any chance you are contacted again by  
9 his investigator again for any more questions or anything  
10 or any packages that he may deliver to you --

11 A. They have to go to Mr. Murrell.

12 Q. I was going to say, have him contact your  
13 attorney.

14 MR. MURRELL: Packages? Are we expecting a  
15 delivery of something?

16 DET. [REDACTED]: No. I'm just saying --

17 MR. MURRELL: Okay. Just making sure there  
18 wasn't something I didn't know about.

19 DET. [REDACTED]: I.e., gifts, et cetera.

20 That kind of thing.

21 THE WITNESS: No.

22 DET. [REDACTED]: I would appreciate a phone  
23 call just to give me a heads up.

24 THE WITNESS: I do not intend to contact  
25 him at all.

1 DET. [REDACTED]: Okay. I appreciate it.

2 And that's it.

3 (Thereupon, the sworn statement was  
4 concluded at 1:05 p.m.)

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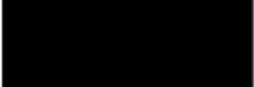
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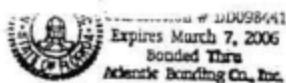


1 THE STATE OF FLORIDA, )  
2 COUNTY OF PALM BEACH. )  
3  
4

5 I, the undersigned authority, certify that [REDACTED]  
6 [REDACTED] personally appeared before me and was duly  
7 sworn.

8  
9 WITNESS my hand and official seal this 5th day  
10 of December, 2005.

11  
12  
13  
14 Susan Shelling, RPR  
15 Notary Public - State of Florida  
16 My Commission No. DD 098441  
My Commission expires 3/7/2006



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[REDACTED]  
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C E R T I F I C A T E

2 The State Of Florida,  
3 County Of Palm Beach.

5 I, Susan Shelling, Registered Professional  
6 Reporter and Notary Public in and for the State of  
7 Florida at Large, do hereby certify that [REDACTED]  
8 was by me first duly sworn to testify the whole truth;  
9 that I was authorized to and did report said sworn  
statement in stenotype; and that the foregoing pages,  
numbered from 1 to 24, inclusive, are a true and correct  
transcription of my shorthand notes of said sworn  
statement.

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

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

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

18 IN WITNESS WHEREOF, I have hereunto set my hand  
and seal this 5th day of December, 2005.

Susan Shilling, Notary Public  
In and for the State of Florida  
My Commission No. DD 098441  
My Commission Expires 3/7/2006

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