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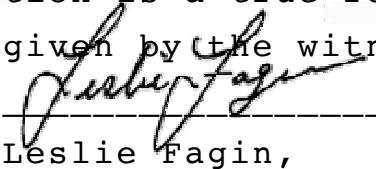
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CERTIFICATE

3

I HEREBY CERTIFY that the witness,
4 NADIA MARCINKO, was duly sworn by me and that
the deposition is a true record of the
5 testimony given by the witness.

6


Leslie Fagin,



7

Registered Professional Reporter

Dated: January 17, 2017

8

9

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(The foregoing certification of
11 this transcript does not apply to any
12 reproduction of the same by any means, unless
13 under the direct control and/or supervision
14 of the certifying reporter.)

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EXHIBIT 11

(Filed Under Seal)

Page 1

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

- - - - - x

VIRGINIA L. GIUFFRE,

Plaintiff,

Case No.:

-against-

15-cv-07433-RWS

GHISLAINE MAXWELL,

Defendants.

- - - - - x

CONFIDENTIAL

Videotaped deposition of GHISLAINE MAXWELL, taken pursuant to subpoena, was held at the law offices of BOIES SCHILLER & FLEXNER, 575 Lexington Avenue, New York, New York, commencing April 22, 2016, 9:04 a.m., on the above date, before Leslie Fagin, a Court Reporter and Notary Public in the State of New York.

- - -

MAGNA LEGAL SERVICES
1200 Avenue of the Americas
New York, New York 10026

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2 Q. I'm not talking about friends. I'm
3 talking about individuals --

4 MR. PAGLIUCA: I'm going to object
5 to you interrupting the witness who was
6 answering your question. The question
7 was, have you ever seen anyone, female
8 under the age of 18 at the house and
9 that's the question she was answering.
10 If you want to strike that question and
11 ask another question, feel free, but let
12 the witness respond, please.

13 MS. McCAWLEY: I will do that.

14 Q. Have you ever observed a female
15 under the age of 18 at Jeffrey Epstein's home
16 that was not a friend, a child -- one of your
17 friend's children?

18 A. Again, I can't testify to that
19 because I have no idea what you are talking
20 about.

21 Q. You have no idea what I'm talking
22 about in the sense you never observed a
23 female under the age of 18 at Jeffrey
24 Epstein's home that was not one of your
25 friend's children, is that correct?

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2 MR. PAGLIUCA: Object to the form
3 and foundation.

4 A. How would I possibly know how
5 someone is when they are at his house. You
6 are asking me to do that. I cannot possibly
7 testify to that. As far as I'm concerned,
8 everyone who came to his house was an adult
9 professional person.

10 Q. Are you familiar with the police
11 report that was issued in respect to the
12 investigation in this matter?

13 MR. PAGLIUCA: Object to the form
14 and foundation.

15 Q. Are you familiar with the police
16 report that was used in this matter, the
17 investigation of Jeffrey Epstein, has been
18 produced as a document in this matter?

19 A. I have seen a police report.

20 (Maxwell Exhibit 1, police report,
21 marked for identification.)

22 Q. The police report that you have in
23 front of you, can you turn to page 28 of that
24 report, the numbers are on the top right-hand
25 corner.

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2 -- just another one of Virginia's many
3 fictitious lies and stories to make this a
4 salacious event to get interest and press.
5 It's absolute rubbish.

6 Q. Were you in charge of hiring
7 individuals to provide massages for Jeffrey
8 Epstein?

9 A. My job included hiring many people.
10 There were six homes. As I sit here, I hired
11 assistants, I hired architects, I hired
12 decorators, I hired cooks, I hired cleaners,
13 I hired gardeners, I hired pool people, I
14 hired pilots, I hired all sorts of people.

15 In the course and a very small part
16 of my job was from from time to time to find
17 adult professional massage therapists for
18 Jeffrey.

19 Q. When you say adult professional
20 massage therapists, where did you find these
21 massage therapists?

22 A. From time to time I would visit
23 professional spas, I would receive a massage
24 and if the massage was good I would ask that
25 man or woman if they did home visits.

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2 Q. Did you hire her?

3 A. First of all, I don't hire girls
4 like that, so let's be clear, I already
5 testified to that, and I have no idea what
6 you are referring to.

7 Q. When you say girls like that, what
8 do you mean?

9 A. I hire people who are professional
10 at the house. You are asking if I hired
11 somebody to do what, I don't know what you
12 are talking about. I hired people to work in
13 the homes.

14 Q. What was Nadia Marcinkova doing?

15 MR. PAGLIUCA: Object to the form
16 and foundation.

17 A. I have no idea what Nadia
18 Marcinkova was doing. I didn't hire her and
19 I don't know what you are referring to.

20 Q. You met Nadia Marcinkova?

21 A. I testified I did.

22 Q. Did she work for Jeffrey Epstein?

23 A. I have no idea what she did.

24 Q. Have you flown on planes with Nadia
25 Marcinkova?

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2 MR. PAGLIUCA: Objection to the
3 form and foundation.

4 A. I don't know what that means,
5 masseuse obligation, I don't know what you
6 are referring to. Would you like to ask the
7 question properly?

8 Q. I think it was proper. I will ask
9 it again.

10 Did you ever assist in getting
11 Virginia Roberts a cell phone to use during
12 the time that she worked for Jeffrey Epstein?

13 A. I have no recollection of doing
14 anything of that nature.

15 Q. Did you ever tell Virginia that you
16 wanted her to have a cell phone so that she
17 could be on call regularly?

18 A. I have no recollection of that
19 conversation.

20 Q. How often would Virginia come over
21 to the house in Palm Beach to give massages?

22 MR. PAGLIUCA: Objection to the
23 form and foundation.

24 A. Ask the question again, please.

25 Q. How often did Virginia Roberts come

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2 over to the house in Palm Beach to give
3 massages?

4 A. It's important to understand that I
5 wasn't with Jeffrey all the time. In fact, I
6 was only in the house less than half the
7 time, so I cannot testify to when I wasn't in
8 the house how often she came when I wasn't
9 there.

10 What I can say is that I barely
11 would remember her, if not for all of this
12 rubbish, I probably wouldn't remember her at
13 all, except she did come from time to time
14 but I don't recollect her coming as often as
15 she portrayed herself.

16 Q. How many times a day on an average
17 day would Jeffrey Epstein get a massage?

18 MR. PAGLIUCA: Objection to the
19 form and foundation.

20 A. When I was at the house and when I
21 was there with him, he received a massage, on
22 average, about once a day.

23 Q. Just once?

24 A. Yes.

25 Q. Were there days when he received

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2 four or five?

3 MR. PAGLIUCA: Objection to the
4 form and foundation.

5 A. When I was present at the house, I
6 never saw something like that.

7 Q. Do you know if Virginia was
8 required to be on call at all times to come
9 to the house if Jeffrey wanted her there?

10 MR. PAGLIUCA: Objection to the
11 form and foundation.

12 A. I have no idea of the arrangements
13 that Virginia made with Jeffrey.

14 Q. When Virginia was in New York,
15 would Virginia sleep at Jeffrey's mansion in
16 New York?

17 MR. PAGLIUCA: Objection to the
18 form and foundation.

19 A. I don't recollect her being in New
20 York and I have no idea where she slept.

21 Q. You don't ever remember seeing
22 Virginia Roberts in New York?

23 MR. PAGLIUCA: Objection to the
24 form and foundation.

25 A. I would barely recollect her at

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2 him at any of those homes?

3 A. Again, Virginia is absolutely
4 totally lying. This is a subject of
5 defamation about Virginia and the lies she
6 has told and one of lies she told was that
7 President Clinton was on the island where I
8 was present. Absolutely 1000 percent that is
9 a flat out total fabrication and lie.

10 Q. You did fly on planes, Jeffrey
11 Epstein's planes with President Clinton, is
12 that correct?

13 A. I have flown, yes.

14 Q. Would it be fair to say that
15 President Clinton and Jeffrey are friends?

16 A. I wouldn't be able to characterize
17 it like that, no.

18 Q. Are they acquaintances?

19 A. I wouldn't categorize it.

20 Q. He just allowed him to use his
21 plane?

22 A. I couldn't categorize Jeffrey's
23 relationship.

24 Q. When you were on the plane with
25 Jeffrey and President Clinton, did you

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2 building that you would have seen when you
3 were on the trip in Europe?

4 MR. PAGLIUCA: Objection to the
5 form and foundation.

6 A. I can't possibly answer that.

7 Q. Do you recall Virginia ever taking
8 pictures?

9 A. I barely recall Virginia, period.

10 Q. Do you recall her ever taking
11 pictures?

12 A. No, I don't.

13 Q. I'm going to direct your attention,
14 still within the flight logs to -- starting
15 on the next page from where you just were
16 which is going to be 000747. And the date at
17 the top says 2001, you will see March and I'm
18 directing your attention down towards the
19 middle to the bottom where you will see the
20 numbers 27, 29 and 31.

21 A. Uh-huh.

22 Q. And we've got actually I'm going to
23 direct your attention to the one that starts
24 with TEB for Teterboro to SAF for Santa Fe
25 and the one below it Santa Fe to Palm Beach

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2 her but you would have to ask Jeffrey what he
3 brought her on the trip for.

4 Q. But she would travel with him when
5 there was a work trip like this?

6 A. I can't -- I'm seeing that she is
7 on this flight but I have no idea what she is
8 doing, he invited her, it would not be my
9 job.

10 Q. What about Nadia BJORLIN, would she
11 regularly travel with Jeffrey on flights?

12 A. I have no idea, you would have to
13 look through the flight logs. I have no
14 idea.

15 Q. Your recollection is -- what is
16 your recollection, do you recollect Nadia
17 traveling often on flights with Jeffrey?

18 A. Absolutely not. No, not at all. I
19 don't recollect her actually on the flight at
20 all.

21 Q. I think you can set that aside for
22 the moment.

23 (Maxwell Exhibit 9, message pad
24 pages, marked for identification.)

25 Q. We will mark as Exhibit 9 these

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2 excerpts from -- we will identify what they
3 are but from the message pads.

4 Did you want to correct anything?

5 A. I want to make an addendum.

6 Would you mind rereading the last
7 question back to me?

8 (Record read.)

9 A. I also just want to say that at
10 this point I cannot recollect flying to
11 parties. Jeffrey went for work so -- was
12 this in Santa Fe, this flight as well.

13 Q. The flight we were looking at, yes
14 but it was to Santa Fe --

15 A. I don't recall going to any parties
16 in Santa Fe at any time but certainly flying
17 to Santa Fe for a party seems highly
18 improbable.

19 Q. So I'm going to direct your
20 attention to the document that I set before
21 you which is Bates number SAO 01456 and it
22 has different Bates numbers because it's a
23 smaller version of the larger production.

24 These are the pages I will be asking about.

25 In the time that you were working

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2 with Jeffrey in Palm Beach, do you recall a
3 process for taking, anybody at the house
4 taking messages when incoming phone calls
5 came in?

6 A. You are supposed to take a message
7 and receive the message and write the message
8 down. Who was the message was for, what time
9 it was taken and who took it and what the
10 message was, obviously.

11 Q. Does what's in front of you look
12 familiar with respect to the message pads
13 that you would have used at the house?

14 A. It is familiar.

15 Q. I'm going to direct your attention
16 to the second page of it?

17 MR. PAGLIUCA: These all have SAO
18 numbers on them or Bates ranges and I
19 don't see any of your Bates ranges on
20 these. I know you have produced message
21 pads but those have your Bates range
22 numbers on them and I'm wondering if
23 these are different documents.

24 MS. McCAWLEY: It's the same, just
25 ours have the Bates underneath them.

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2 believe. Do you believe --

3 A. I can only testify --

4 Q. Let me finish the question so the
5 record is clear.

6 Do you believe Jeffrey Epstein
7 sexually abused minors?

8 MR. PAGLIUCA: Objection to the
9 form and foundation.

10 Q. You can answer.

11 A. I can only testify to what I know.
12 I know that Virginia is a liar and I know
13 what she testified is a lie. So I can only
14 testify to what I know to be a falsehood and
15 half those falsehoods are enormous and so I
16 can only categorically deny everything she
17 has said and that is the only thing I can
18 talk about because I have no knowledge of
19 anything else.

20 Q. I'm not asking about Virginia. I'm
21 asking whether you believe that Jeffrey
22 Epstein sexually abused minors?

23 A. Again, I repeat, I can only go on
24 what I know and what I know is a falsehood
25 based on what Virginia said.

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2 What I'm asking you is whether you
3 believe Jeffrey Epstein abused minors?

4 MR. PAGLIUCA: I object to the form
5 and you made your record, she answered
6 the question. A fair reading of her
7 answer is she doesn't have a belief
8 because she doesn't have any personal
9 knowledge.

10 MS. McCAWLEY: Now you are
11 testifying for the witness. Let her
12 answer the question.

13 MR. PAGLIUCA: It's a fair answer
14 to the question.

15 A. Again, I testified my only personal
16 knowledge concerns Virginia and everything
17 Virginia has said is an absolute lie, which
18 is why we are here in this room. If you are
19 asking me to testify about things I have no
20 knowledge of other than the police report
21 that you showed me, I am not in a position to
22 make a statement based on that because you
23 are asking me to speculate and I cannot
24 speculate.

25 Q. I'm asking you about your belief.

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2 I'm not asking you to speculate at all. I'm
3 asking what you believe.

4 A. You are asking me to speculate and
5 I won't speculate.

6 Q. I'm not asking you to speculate.
7 I'm asking what you believe.

8 MR. PAGLIUCA: She answered the
9 question and we can move on.

10 MS. McCAWLEY: She hasn't answered
11 the question.

12 MR. PAGLIUCA: We are not going to
13 engage in this debate. She answered the
14 question. If you want to mark it and
15 move to compel an answer to the
16 question, have at it. Okay.

17 Q. Ms. Maxwell, is it your belief that
18 Jeffrey Epstein interacted sexually with
19 minors?

20 A. Again, you are asking me the same
21 type of question exactly but with different
22 language. Again, my only knowledge of
23 somebody who claims these things that I have
24 personal knowledge of is Virginia. Virginia
25 is an absolute liar and everything she has

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2 said is a lie. Therefore, based on those
3 lies I cannot speculate on what anybody else
4 did or didn't do because if Virginia is the
5 example of what that story is and everything
6 she said is false, so everything that leads
7 from that is false.

8 Q. So the 30 other minor children in
9 the police report are also telling lies about
10 being sexually abused during massages with
11 Mr. Epstein?

12 MR. PAGLIUCA: Objection to the
13 form and foundation. Counsel, can you
14 show me in these police reports who the
15 30 minors are?

16 MS. McCAWLEY: I'm asking my
17 question.

18 MR. PAGLIUCA: You are making a
19 representation about numbers, you are
20 making a representation on the record
21 about what people said or didn't say.
22 We have no knowledge about that. These
23 are all redacted records so these are
24 bad questions. They don't lead to any
25 admissible evidence. It is only being

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2 A. I'm carrying on.

3 Q. I'm sorry. I thought you were
4 done.

5 A. Please. Her statement also that
6 she was driven by her father to Palm Beach.
7 She was driven by her mother, as a matter of
8 fact. Her whole entire characterization of
9 the first meeting with Jeffrey, as I was
10 outside speaking to her mother.

11 Q. Let me stop you there, so we don't
12 get too far ahead. Let me make sure I
13 understand your testimony.

14 The first, in the first piece when
15 you were talking, I believe you said and
16 correct me if I'm wrong, that her
17 characterization of the first meeting at
18 Mar-a-Lago was an obvious lie.

19 What part of that meeting was an
20 obvious lie?

21 A. By her own testimony, all her
22 various many different descriptions of what
23 she was or wasn't or where she was or wasn't,
24 they have all changed. She was either front
25 of house or bathroom attendant. I don't know

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2 what she was, so just by her own words, one
3 doesn't know what's true and what isn't true.

4 Q. Are you saying what position she
5 said she was working in, is that what you are
6 considering the obvious lie?

7 A. I said inconsistency within her own
8 statement from everything, so in the
9 beginning it starts off with different
10 statements.

11 Q. Then I believe you said the second
12 piece was that she was driven by her father?

13 A. I said she was driven by her
14 mother.

15 Q. That's the obvious lie?

16 A. It's an obvious lie to me.

17 Q. You said why don't you state it in
18 your own words but the characterization of
19 how she was with Jeffrey, what about that is
20 an obvious lie?

21 A. I was standing outside talking to
22 her mother so the entire story is a
23 fabrication.

24 Q. Did she not have sex with Jeffrey
25 Epstein during that first massage?

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2 up to the room and start a massage?

3 A. He would not.

4 Q. So the young girls in the police
5 report who say they came over and were led up
6 to the room on the first day, would they be
7 wrong about that?

8 MR. PAGLIUCA: Objection to form
9 and foundation.

10 A. I can't comment what happened when
11 I was not at the house. I can only comment
12 when I was at the house.

13 Q. Was there ever a time where a woman
14 came to the house for the first time to give
15 a massage and Jeffrey had the massage that
16 day?

17 MR. PAGLIUCA: Objection to the
18 form and foundation.

19 A. Can we talk about adult
20 professional masseuses, please?

21 Q. I'm asking, whether adult or
22 underage?

23 A. I'm not interested in talking about
24 underage. I can only testify to what I know,
25 professional masseuses, adult, I cannot

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2 testify to anything else.

3 Q. Why can't you testify to an
4 underage girl that came over and was led up
5 to the room for a massage?

6 MR. PAGLIUCA: Objection to the
7 form and foundation.

8 A. The police records you are
9 referring to?

10 Q. You are saying that didn't happen.
11 You're saying I can only testify to adults
12 that came for an interview and were led up to
13 the room. Why can't you testify to whether
14 an underage girl was brought in for an
15 interview and led up --

16 MR. PAGLIUCA: Objection to the
17 form and foundation.

18 Q. Go ahead.

19 A. Can you reask the question.

20 Q. Why can't you testify as to an
21 underage girl who came over for an interview
22 and then was then led up to the room for the
23 massage?

24 A. You've mangled your entire
25 question. Can you please reask that in a way

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2 present at the home when a girl under the age
3 of 18 came over for the purposes of giving a
4 massage?

5 MR. PAGLIUCA: Objection to the
6 form and foundation.

7 Q. You can answer.

8 A. You can be a professional masseuse
9 at 17 in Florida, so as far as I am aware, a
10 professional masseuse showed up for a
11 massage. There is nothing inappropriate or
12 incorrect about that and your
13 mischaracterization of it, I think is
14 unfortunate.

15 Q. How many teenagers did he have that
16 were professional masseuses that worked in
17 his home?

18 MR. PAGLIUCA: Objection to the
19 form and foundation.

20 Q. How many?

21 A. First of all, I am not aware of
22 teenagers who worked in his home.

23 Q. You are aware of Virginia Roberts
24 and you've stated she was 17 and she worked
25 for him, correct?

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2 A. No. I did not state that at all,
3 you are mischaracterizing my words and what I
4 said.

5 What I said was that we can all
6 agree and I think at this point there is not
7 one person in this room, however much you
8 would like her to be younger, to say she was
9 not 17 because that has been a very offensive
10 thing that you have all done. So she was 17.
11 At 17 you are allowed to be a professional
12 masseuse and as far as I'm concerned, she was
13 a professional masseuse. There is nothing
14 inappropriate or incorrect about her coming
15 at that time to give a massage. Her entire
16 characterization of her first time at the
17 house was to me an obvious lie, given it was
18 impossible for her entire story to take place
19 given I was speaking to her mother the entire
20 she was at the house.

21 Q. So it was impossible that day, that
22 first day she came and you were speaking to
23 the mother, for Virginia Roberts to have had
24 sex with Jeffrey Epstein during the time that
25 you were outside with her mother?

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2 absolutely 1000 percent that she did not have
3 any type of sexual relations as described by
4 you in your court papers that took place
5 because those allegedly according to her lies
6 involved some aspect of me.

7 As I was standing outside with her
8 mother the entire time, her entire story is a
9 lie. Therefore, to ask me what she did or
10 didn't do during that time, I can only
11 testify to what she said about me, which was
12 1000 percent false.

13 Q. So let's not take the first time,
14 let's take the next time she comes.

15 A. No no, how can do you that, when
16 the basis of this entire horrible story that
17 you have put out is based on this first
18 appalling story that was written, repeated,
19 multiply by the press that lied about her
20 age, lied about the first time she came, lied
21 about and characterized the entire first
22 time. I have been so absolutely appalled by
23 her story and appalled by the entire
24 characterization of it and I apologize
25 sincerely for my banging at the table

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2 earlier, I hope you accept my apology. It's
3 borne out of years of feeling the pressure of
4 this entire lie that she has perpetrated from
5 our first time and whilst I recognize that
6 was -- I hope you forgive me sincerely
7 because it was just the length of time that
8 that terrible story has been told and retold
9 and rehashed when I know it to be 100 percent
10 false.

11 Q. So not the first time she came, but
12 the second time she came or the third time or
13 any time she came, did you ever participate
14 in a massage with her in Jeffrey Epstein's
15 room?

16 A. I have never participated at any
17 time with Virginia in a massage with Jeffrey.

18 Q. Have you ever participated at any
19 time with Virginia in any kind of sexual
20 contact or sexual touching with Jeffrey and
21 Virginia?

22 A. I have not.

23 Q. So we were going through the list
24 of obvious lies and you were talking about
25 the first time which I believe we have

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2 of 18?

3 A. I think we can establish what adult
4 would be.

5 Q. You never interviewed or I know you
6 don't want to use the word hired, whatever
7 your role was, you brought in an exercise
8 instructor that was under the age of 18 to
9 work at the house?

10 MR. PAGLIUCA: Object to the form
11 and foundation.

12 A. I have already testified that what
13 I was responsible for was to find people who
14 had competencies in whatever area I was
15 looking for. The competencies I was looking
16 for were professional and adult.

17 Q. So there was no exercise instructor
18 that worked at the Palm Beach house or the
19 New York house or the New Mexico house or the
20 USVI under the age of 18?

21 MR. PAGLIUCA: Objection to the
22 form and foundation.

23 A. I can only testify to when I was at
24 the house.

25 Q. Yes.

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2 MR. PAGLIUCA: Objection to the
3 form and foundation.

4 A. That's not how I would characterize
5 that.

6 Q. How would you characterize it?

7 A. I have testified that I'm
8 responsible for finding professional people
9 to work in the homes, age appropriate adult
10 people, so from pool attendants, to
11 gardeners, to chefs, to housekeepers, to
12 butlers, to chauffeurs and one of the
13 functions was to be able to answer the
14 telephones and in the context of finding
15 someone to answer the telephones, I did look
16 to try to find appropriate people to answer
17 the phones.

18 Q. So did you find Johanna for
19 purposes of that role?

20 A. So in the course of looking for
21 somebody to answer phones at the house,
22 Johanna was one of the people who said that
23 she was willing to answer phones.

24 Q. Did you approach her at her school
25 campus?

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2 Q. List all of the girls you met and
3 brought to Jeffrey Epstein's home for the
4 purposes of employment that were under the
5 age of 18?

6 MR. PAGLIUCA: Objection to the
7 form and foundation.

8 A. I've already characterized my job
9 was to find people, adults, professional
10 people to do the jobs I listed before; pool
11 person, secretary, house person, chef, pilot,
12 architect.

13 Q. I'm asking about individuals under
14 the age of 18, not adult persons, people
15 under the age of 18.

16 A. I looked for people or tried to
17 find people to fill professional jobs in
18 professional situations.

19 Q. So Virginia Roberts was under the
20 age of 18, correct?

21 A. I think we've established that
22 Virginia was 17.

23 Q. Is she the -- sorry, go ahead.

24 Is she the only individual that you
25 met for purposes of hiring someone for

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2 MR. PAGLIUCA: Object to the form
3 and foundation.

4 A. If you want to ask Jeffrey
5 questions about me, you would have to ask
6 him.

7 Q. Have you ever been involved in any
8 illegal activity in your lifetime?

9 MR. PAGLIUCA: Objection to the
10 form and foundation.

11 A. I can't think of anything I have
12 done that is illegal.

13 Q. Have you ever been arrested?

14 A. I have a DUI in the U.K. a long
15 time ago.

16 Q. Is that the only arrest you have on
17 your record?

18 A. Yes.

19 Q. I will mark as Maxwell 22 this
20 email?

21 (Maxwell Exhibit 22, email, marked
22 for identification.)

23 Q. This is dated January 21, 2015.
24 It's from Jeffrey Epstein to you, forwarding
25 the Guardian and I would like you to look at

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CERTIFICATE

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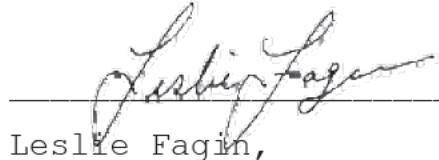
4

5 I HEREBY CERTIFY that the witness,
6 GHISLAINE MAXWELL, was duly sworn by me and
7 that the deposition is a true record of the
8 testimony given by the witness.

9

10

11



Leslie Fagin,



Registered Professional Reporter

12

Dated: April 22, 2016

13

14

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

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Page 1

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK
- - - - -
VIRGINIA L. GIUFFRE,

Plaintiff,
-against-

Case No.:
15-cv-07433-RWS

GHISLAINE MAXWELL,

Defendant.

- - - - -
* * CONFIDENTIAL * *

Continued Videotaped Deposition of
GHISLAINE MAXWELL, the Defendant herein,
taken pursuant to subpoena, was held at
the law offices of Boies, Schiller &
Flexner, LLP, 575 Lexington Avenue, New
York, New York, commencing July 22,
2016, 9:04 a.m., on the above date,
before Leslie Fagin, a Court Reporter
and Notary Public in the State of New
York.

- - -
MAGNA LEGAL SERVICES
1200 Avenue of the Americas
New York, New York 10026
(866) 624-6221

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1 G. Maxwell - Confidential
2 thought. I really don't recall her, so it's
3 hard for me to testify what I thought about
4 her age at the time.

5 Q. Was Virginia, in the period of
6 around 2000, the youngest person that, as you
7 understood it, was giving Mr. Epstein
8 massages?

9 MR. PAGLIUCA: Object to the form
10 and foundation.

11 A. Again, I can't testify to her age,
12 but everybody else that I can recall seemed
13 to be again, like I would say, adults.

14 Q. You didn't think Virginia was an
15 adult, did you?

16 MR. PAGLIUCA: Object to the form
17 and foundation.

18 A. Like I said, I don't recall her. I
19 don't recall thinking about -- my memory is
20 of adults giving Jeffrey massages, and as I
21 don't really remember Virginia around that
22 time, I don't know what I think.

23 Q. You do remember Virginia, about
24 that time back in the 2000s, giving
25 Mr. Epstein massages?

Confidential

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1 G. Maxwell - Confidential

2 MR. PAGLIUCA: Object to the form
3 and foundation.

4 A. I barely remember her at all.

5 Q. Whether you barely remember her or
6 not, you do remember that back in the period
7 around 2000, Virginia was giving Mr. Epstein
8 massages, right?

9 MR. PAGLIUCA: Objection to form
10 and foundation.

11 A. Only in the most general terms. It
12 would be somebody who would give him a
13 massage, and that's it.

14 Q. During the period of time back in
15 the period around 2000, when you knew that
16 Virginia was somebody who would give
17 Mr. Epstein a massage, was she somebody who
18 you considered an adult?

19 MR. PAGLIUCA: Objection to form
20 and foundation.

21 A. I didn't consider her at all
22 because she is not somebody that I really
23 interacted with.

24 Q. It is your testimony that Virginia
25 was not somebody that you interacted with, is

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1 G. Maxwell - Confidential

2 Epstein's home in Palm Beach?

3 MR. PAGLIUCA: Objection to form

4 and foundation.

5 A. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Q. [REDACTED]

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1 G. Maxwell - Confidential

2 Q. [REDACTED]
[REDACTED] [REDACTED]
[REDACTED]
5 A. [REDACTED]
[REDACTED] [REDACTED] [REDACTED]
7 A. [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
11 Q. [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
16 [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
22 [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

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1 G. Maxwell - Confidential

2 MR. PAGLIUCA: Objection to form
3 and foundation.

4 A. [REDACTED]

8 MR. PAGLIUCA: Objection to form
9 and foundation.

10 A. [REDACTED]

14 Q. [REDACTED]

21 [REDACTED]

Confidential

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1 G. Maxwell - Confidential

2 Q.

[redacted]

MR. PAGLIUCA: Objection to form

and foundation.

[redacted]

[redacted]

[redacted]

[redacted]

[redacted]

[redacted]

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1 G. Maxwell - Confidential

2 and foundation.

3 A. No.

4 Q. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

8 MR. PAGLIUCA: Objection to form

9 and foundation.

10 A. I don't know.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

17 MR. PAGLIUCA: Objection to form

18 and foundation. Asked and answered.

19 A. No.

20 Q. Were they ever in the Virgin

21 Islands?

22 MR. PAGLIUCA: Objection to form

23 and foundation.

24 A. No.

25 [REDACTED]

Confidential

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MR. PAGLIUCA: Objection to form

and foundation.

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1 G. Maxwell - Confidential

2 it to something in the case.

3 MR. BOIES: I think it's tied, but
4 if you instruct her not to answer, it
5 goes into the --

6 MR. PAGLIUCA: Meat grinder.

7 BY MR. BOIES:

8 Q. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] .

14 A. Can you repeat the question?

15 Q. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

20 MR. PAGLIUCA: Same objection.

21 A. No.

22 Q. [REDACTED]

[REDACTED]

24 . [REDACTED]

[REDACTED]

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1

2 CERTIFICATE

3

4

5 I HEREBY CERTIFY that GHISLAINE
6 MAXWELL, was duly sworn by me and that the
7 deposition is a true record of the testimony
8 given by the witness.

9

10

11

Leslie Fagin
Leslie Fagin,



Registered Professional Reporter

12

Dated: July 22, 2016

13

14

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16 this transcript does not apply to any
17 reproduction of the same by any means, unless
18 under the direct control and/or supervision
19 of the certifying reporter.)

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EXHIBIT 12

(Filed Under Seal)

GIUFFRE

VS.

MAXWELL

Deposition

LYNN TRUDE MILLER

05/24/2016

Agren Blando Court Reporting & Video, Inc.
216 16th Street, Suite 600
Denver Colorado, 80202
303-296-0017

Agren Blando Court Reporting & Video, Inc.

IN THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

Civil Action No. 15-cv-07433-RWS

CONFIDENTIAL VIDEOTAPED DEPOSITION OF
LYNN TRUDE MILLER May 24, 2016

VIRGINIA L. GIUFFRE,

Plaintiff,

v.

GHISLAINE MAXWELL,

Defendant.

APPEARANCES:

S.J. QUINNEY COLLEGE OF LAW, UNIVERSITY OF UTAH
By Paul G. Cassell, Esq.
383 S. University Street
Salt Lake City, UT 84112
Phone: 801.585.5202
Cassellp@law.utah.edu
Appearing on behalf of the
Plaintiff

HUTCHINSON BLACK AND COOK, LLC
By John Clune, Esq.
921 Walnut Street
Suite 200
Boulder, CO 80302
Phone: 303.442.6514
clune@hbcboulder.com
Appearing on behalf of the
Deponent

Agren Blando Court Reporting & Video, Inc.

1 APPEARANCES: (Continued)
2

3 HADDON, MORGAN AND FORMAN, P.C.
4 By Laura A. Menninger, Esq.
5 Jeffrey S. Pagliuca, Esq.
6 150 East 10th Avenue
7 Denver, CO 80203
8 Phone: 303.831.7364
9 lmenninger@hmflaw.com
jpagliuca@hmflaw.com
Appearing on behalf of the
Defendant

10 Also Present:
11

12 Maryvonne Tompkins, Videographer
13

14

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Agren Blando Court Reporting & Video, Inc.

1 A Because I wasn't told any different.

2 Q Do you know where any -- any source of
3 that information came from? Was it Sky?

4 A It came from Sky.

5 Q Okay. And what do you recall him telling
6 you about when Virginia stopped working at
7 Mar-a-Lago?

8 A She was in a discussion with Mrs. Maxwell
9 to educate her and take her under her wing and be her
10 new momma. That's what I heard.

11 Q Okay. And who told you that?

12 A Sky.

13 Q Okay. And do you remember when Sky told
14 you that?

15 A I don't remember.

16 Q Okay. Did you learn anything else about
17 that, other than what you just said?

18 A No.

19 Q Okay. Do you know where she went to work
20 after Mar-a-Lago?

21 A I think she went with Mrs. Maxwell.

22 Q But do you know where, physically?

23 A Physically, Sky and I dropped her off one
24 day at Mrs. Maxwell's. I did not speak with
25 Mrs. Maxwell. I didn't have anything to say to her.

Agren Blando Court Reporting & Video, Inc.

1 STATE OF COLORADO)

2) ss. REPORTER'S CERTIFICATE

3 COUNTY OF DENVER)

4 I, Kelly A. Mackereth, do hereby certify
5 that I am a Registered Professional Reporter and
6 Notary Public within the State of Colorado; that
7 previous to the commencement of the examination, the
8 deponent was duly sworn to testify to the truth.

9 I further certify that this deposition was
10 taken in shorthand by me at the time and place herein
11 set forth, that it was thereafter reduced to
12 typewritten form, and that the foregoing constitutes
13 a true and correct transcript.

14 I further certify that I am not related to,
15 employed by, nor of counsel for any of the parties or
16 attorneys herein, nor otherwise interested in the
17 result of the within action.

18 In witness whereof, I have affixed my
19 signature this 31st day of May, 2016.

20 My commission expires April 21, 2019.

21
22 Kelly A. Mackereth, CRR, RPR, CSR
23 216 - 16th Street, Suite 600
24 Denver, Colorado 80202
25

EXHIBIT 13

(Filed Under Seal)

Page 1

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

CASE NO. 15-CV-07433-RWS

-----x
VIRGINIA L. GIUFFRE,

Plaintiff,

v.

GHISLAINE MAXWELL,

Defendant.

-----x
June 21, 2016
9:17 a.m.

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

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

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1 JOSEPH RECAREY - CONFIDENTIAL

2 BY MR. EDWARDS:

3 Q. All right.

4 Was SG a licensed massage therapist?

5 MR. PAGLIUCA: Object to form and
6 foundation.

7 THE WITNESS: No.

8 BY MR. EDWARDS:

9 Q. And at 14 years old, are you permitted to
10 be a licensed massage therapist?

11 A. Not to my knowledge.

12 Q. After speaking with SG and understanding
13 her account of what took place at Jeffrey Epstein's
14 home, what -- what happened next in the
15 investigation?

16 A. At some point the investigation was turned
17 over to me for follow-up. I know there was trash
18 pulled that was done prior to -- and surveillance
19 that was done prior to the case being turned over to
20 me; and trash pulls being an investigative technique
21 to acquire intelligence, information and evidence.

22 Q. Okay. If we go to page 17, at the top,
23 and, first of all, I will ask you from memory, do
24 you remember if [REDACTED] identified Jeffrey
25 Epstein in a photo lineup?

Page 27

1 JOSEPH RECAREY - CONFIDENTIAL

2 "a cross-reference"?

3 A. Uh-huh.

4 Q. How is a cross-reference performed? What
5 does that mean?

6 A. When -- when something is
7 cross-referenced, they -- they jot down license
8 plate numbers. They conduct their background into
9 the individuals; photographs, computer research.

10 Q. A cross-reference of Jeffrey Epstein's
11 residence revealed which affiliated names?

12 A. It revealed Nadia Marcinkova, Ghislaine
13 Maxwell, Mark Epstein. Also, the cross-reference,
14 any previous reports from the residence as well.

15 Q. During your investigation, did you learn
16 of any involvement that Nadia Marcinkova had with
17 any of the activities you were investigating?

18 MR. PAGLIUCA: Object to form and
19 foundation.

20 THE WITNESS: Yes.

21 BY MR. EDWARDS:

22 Q. And what involvement did you learn of
23 Nadia Marcinkova?

24 MR. PAGLIUCA: Object to form and
25 foundation.

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1 JOSEPH RECAREY - CONFIDENTIAL

2 THE WITNESS: Nadia was involved sexually
3 with one of the victims at Epstein's request.

4 BY MR. EDWARDS:

5 Q. Okay. Do you remember which victim you're
6 remembering right now?

7 A. AH.

8 Q. Okay. If it indicates in the report that
9 she was also sexually involved with other victims,
10 is that possible as well?

11 A. Yes.

12 MR. PAGLIUCA: Object to form and
13 foundation.

14 BY MR. EDWARDS:

15 Q. Okay. The one that you remember in your
16 mind is AH?

17 MR. PAGLIUCA: Object to form and
18 foundation.

19 THE WITNESS: Correct.

20 BY MR. EDWARDS:

21 Q. The other name that is on here as a
22 cross-reference is Ghislaine Maxwell.

23 Did you speak with Ghislaine Maxwell?

24 A. I did not.

25 Q. Did you ever attempt to speak with

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1 JOSEPH RECAREY - CONFIDENTIAL

2 Ghislane Maxwell?

3 A. I wanted to speak with everyone related to
4 this home, including Ms. Maxwell. My contact was
5 through Gus, Attorney Gus Fronstin, at the time, who
6 initially had told me that he would make everyone
7 available for an interview. And subsequent
8 conversations later, no one was available for
9 interview and everybody had an attorney, and I was
10 not going to be able to speak with them.

11 Q. Okay. During your investigation, what did
12 you learn in terms of Ghislaine Maxwell's
13 involvement, if any?

14 MR. PAGLIUCA: Object to form and
15 foundation.

16 THE WITNESS: Ms. Maxwell, during her
17 research, was found to be Epstein's long-time
18 friend. During the interviews, Ms. Maxwell was
19 involved in seeking girls to perform massages
20 and work at Epstein's home.

21 MR. PAGLIUCA: Object to form and
22 foundation.

23 BY MR. EDWARDS:

24 Q. Did you interview -- how many girls did
25 you interview that were sought to give or that

Page 30

1 JOSEPH RECAREY - CONFIDENTIAL

2 actually gave massages at Epstein's home?

3 MR. PAGLIUCA: Object to form and
4 foundation.

5 BY MR. EDWARDS:

6 Q. Approximately.

7 MR. PAGLIUCA: Same objection.

8 THE WITNESS: I would say approximately
9 30; 30, 33.

10 BY MR. EDWARDS:

11 Q. And of the 30, 33 or so girls, how many
12 had massage experience?

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

15 THE WITNESS: I believe two of them may
16 have been -- two of them.

17 BY MR. EDWARDS:

18 Q. Okay. And as we go through this report,
19 you may remember the names?

20 A. Correct. Let me correct myself. I
21 believe only one had.

22 Q. And was that -- was that one of similar
23 age to the other girls?

24 MR. PAGLIUCA: Object to form and
25 foundation.

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1 JOSEPH RECAREY - CONFIDENTIAL

2 foundation.

3 THE WITNESS: Yes, I did.

4 BY MR. EDWARDS:

5 Q. And were trash pulls done at the property
6 of Jeffrey Epstein?

7 A. Yes.

8 Q. What is the purpose of a trash pull, and
9 what is a trash pull?

10 A. A trash pull is when property is
11 discarded, such as trash, we coordinate with the
12 sanitation department to collect the trash, once it
13 leaves the property, and it's put into an empty well
14 of the trash truck. We acquire the bags, and we
15 sift through the contents of the trash.

16 Q. Did you or another detective from the unit
17 observe each step of the trash pull to make sure
18 that you had a good chain of custody of the
19 evidence?

20 MR. PAGLIUCA: Object to form and
21 foundation.

22 THE WITNESS: Yes. The members of
23 the OCTAN unit at that time did.

24 BY MR. EDWARDS:

25 Q. Okay. And what is that process?

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1 JOSEPH RECAREY - CONFIDENTIAL

2 A. The process --

3 MR. PAGLIUCA: Object to form and
4 foundation.

5 THE WITNESS: The process is when the --
6 once you coordinate a trash pull with the
7 sanitation supervisor, you meet with the
8 sanitation worker and ensure that either the
9 can that he's going to place in the well is
10 completely empty and you physically observe him
11 collect the trash and place it into the empty
12 container. And then you follow him to a
13 disclosed area, and we retrieve the bags and
14 you sift through the trash.

15 BY MR. EDWARDS:

16 Q. Okay. What were you looking for in terms
17 of evidentiary value from these trash pulls?

18 MR. PAGLIUCA: Object to form and
19 foundation.

20 THE WITNESS: We were looking for any --
21 any form of identification. You were looking
22 for -- to gather any kind of intelligence
23 and/or evidence.

24 BY MR. EDWARDS:

25 Q. Okay. If we go to page 20 of the report,

Page 42

1 JOSEPH RECAREY - CONFIDENTIAL

2 I guess I'll start with where it says on 4/4/2005, I
3 just want to ask you, was a voice mail message taken
4 into evidence from HR to SG?

5 A. Yes.

6 Q. Okay. And the purpose of that evidence is
7 to corroborate what?

8 MR. PAGLIUCA: Object to form and
9 foundation.

10 THE WITNESS: It was actually a phone call
11 from HR to SG confirming an appointment to go
12 work at Epstein's residence.

13 BY MR. EDWARDS:

14 Q. The next line down is what I wanted to
15 focus on, April 5th, 2005.

16 This trash pull, what evidence is yielded
17 from this particular trash pull?

18 MR. PAGLIUCA: Object to form and
19 foundation.

20 THE WITNESS: The trash pull indicated
21 that there were several messages with written
22 items on it. There was a message from HR
23 indicating that there would be an 11:00
24 appointment. There were other individuals that
25 had called during that day.

1 JOSEPH RECAREY - CONFIDENTIAL

2 BY MR. EDWARDS:

3 Q. And when you would -- when you would see
4 females' names and telephone numbers, would you take
5 those telephone numbers and match it to -- to a
6 person?

7 MR. PAGLIUCA: Object to form and
8 foundation.

9 THE WITNESS: We would do our best to
10 identify who that person was.

11 BY MR. EDWARDS:

12 Q. And is that one way in which you
13 discovered the identities of some of the other what
14 soon came to be known as victims?

15 MR. PAGLIUCA: Object to form and
16 foundation.

17 THE WITNESS: Correct.

18 BY MR. EDWARDS:

19 Q. Okay. There's the second paragraph from
20 the bottom, it starts, "Detective Leigh provided
21 trash from 4/06, 4/07/2005."

22 Do you see that?

23 A. Yes.

24 Q. And what is the purpose of the indication
25 that "the following information was retrieved: Jet

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1 JOSEPH RECAREY - CONFIDENTIAL

2 BY MR. EDWARDS:

3 Q. And then some of the remaining messages,
4 "Johanna, work Sunday at 4 p.m.; A, Monday after
5 school; left message for Courtney W and NT," are
6 these individuals that you later learned were
7 underaged girls that had been to Jeffrey Epstein's
8 home?

9 MR. PAGLIUCA: Object to form and
10 foundation.

11 THE WITNESS: That's correct.

12 BY MR. EDWARDS:

13 Q. What types of documents do you remember
14 retrieving from the trash pulls from Jeffrey
15 Epstein's home?

16 A. There was numerous items. It was a lot of
17 handwritten notes on different -- different pads of
18 paper. Some of the pads had names on it, whether it
19 was Epstein, whether it was Ghislaine Maxwell,
20 whether it was -- there were phone messages.

21 When I say "phone messages," I mean, you
22 know, the kind that come in a book. They are carbon
23 copied, so the yellow copy always stays with the
24 book, but the white copy is torn off. So there was
25 always a carbon copy of the actual phone message.

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1 JOSEPH RECAREY - CONFIDENTIAL

2 THE WITNESS: Correct.

3 BY MR. EDWARDS:

4 Q. And let me go back to the beginning six
5 pages of that exhibit, No. 4.

6 MR. PAGLIUCA: Why don't we just make a
7 copy of it now if we're going to ask questions
8 about it? I'm not trying to --

9 MR. EDWARDS: Yes, I know. It's just the
10 first six pages.

11 (A discussion was held off the record,
12 after which the following proceedings were
13 held:)

14 THE VIDEOGRAPHER: On the record at 10:32.

15 BY MR. EDWARDS:

16 Q. And what were some of the items that were
17 found in -- well, are the documents that you're
18 holding, 1 through 6, an accurate reflection of the
19 items that were found in Jeffrey Epstein's home
20 during the search warrant execution?

21 MR. PAGLIUCA: Object to form and
22 foundation.

23 THE WITNESS: Yes.

24 BY MR. EDWARDS:

25 Q. And I believe that you described that some

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1 JOSEPH RECAREY - CONFIDENTIAL

2 of the -- that the house appeared to be -- I don't
3 remember the word you used -- sanitized, for lack of
4 a better word?

5 MR. PAGLIUCA: Object to form and
6 foundation.

7 BY MR. EDWARDS:

8 Q. How did you know that?

9 A. The computers had been removed from the
10 home.

11 Q. How did you know the computers were
12 removed?

13 A. Based on -- based on the dangling wires
14 left behind, the monitors left, but the actual CPU
15 of it was missing.

16 When you went into the bedroom of Jeffrey
17 Epstein, everything was removed from the -- the
18 shelves, from the armoire.

19 Q. Did you find nude photographs of girls?

20 A. Yes.

21 Q. All right.

22 And what did you do with that evidence?

23 A. That was collected and placed into our
24 crime scene unit.

25 Q. And where is that evidence today?

Page 74

1 JOSEPH RECAREY - CONFIDENTIAL

2 A. Any evidence that was not returned to its
3 rightful owner was turned over to the FBI.

4 Q. And evidence which would be nude
5 photographs of girls would be evidence not turned
6 back over to Epstein?

7 A. Correct.

8 MR. PAGLIUCA: Object to form and
9 foundation.

10 THE WITNESS: Some of the items that were
11 collected were later found to be personal items
12 of the houseman, Janush. I recall reviewing
13 his personal photographs on -- on a micro SD
14 card for, like, photos of him and his wife or
15 girlfriend at the time.

16 BY MR. EDWARDS:

17 Q. And the underaged girls that you had
18 spoken with during your investigation, had they
19 described seeing photographs of naked girls in the
20 house?

21 MR. PAGLIUCA: Object to form and
22 foundation.

23 THE WITNESS: Yes, they did.

24 BY MR. EDWARDS:

25 Q. That's something that ran consistent with

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1 JOSEPH RECAREY - CONFIDENTIAL

2 BY MR. EDWARDS:

3 Q. Okay. Also reflected are the property
4 receipts?

5 MR. PAGLIUCA: Object to form and
6 foundation.

7 THE WITNESS: Correct.

8 BY MR. EDWARDS:

9 Q. All right.

10 And where were those taken from, in terms
11 of whose property is that?

12 MR. PAGLIUCA: Object to form and
13 foundation.

14 THE WITNESS: This would have been taken
15 from the home of Jeffrey Epstein.

16 BY MR. EDWARDS:

17 Q. And in reviewing that evidence, were you
18 able to substantiate or corroborate certain victims'
19 accounts of their allegations of having been at the
20 house?

21 MR. PAGLIUCA: Object to form and
22 foundation.

23 THE WITNESS: Correct.

24 BY MR. EDWARDS:

25 Q. Did you find names of other witnesses and

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1 JOSEPH RECAREY - CONFIDENTIAL

2 people that you knew to have been associated with
3 the house in those message pads?

4 MR. PAGLIUCA: Object to form and
5 foundation.

6 THE WITNESS: Yes.

7 BY MR. EDWARDS:

8 Q. And so what was the evidentiary value to
9 you of the message pads collected from Jeffrey
10 Epstein's home in the search warrant?

11 MR. PAGLIUCA: Object to form and
12 foundation.

13 THE WITNESS: It was very important to
14 corroborate what the victims had already told
15 me as to calling in and for work.

16 BY MR. EDWARDS:

17 Q. Okay. And did you learn the identities of
18 some of the other individuals associated with
19 Jeffrey Epstein through the review of that
20 particular evidence?

21 MR. PAGLIUCA: Object to form and
22 foundation.

23 THE WITNESS: Correct.

24 BY MR. EDWARDS:

25 Q. Okay. And what did you do with that

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1 JOSEPH RECAREY - CONFIDENTIAL

2 BY MR. EDWARDS:

3 Q. In these messages, did you see messages
4 that were taken by Ghislane Maxwell or left for
5 Ghislane Maxwell?

6 MR. PAGLIUCA: Object to form and
7 foundation.

8 THE WITNESS: I do recall seeing messages
9 utilizing her pad, her stationery.

10 BY MR. EDWARDS:

11 Q. Okay. Do you remember messages
12 specifically that Ms. Maxwell, she is home, or calls
13 for Ms. Maxwell, or indicating that the person
14 taking the message is GM? Do you remember those?

15 A. Yes.

16 MR. PAGLIUCA: Object to form and
17 foundation.

18 BY MR. EDWARDS:

19 Q. And did that give you further reason to
20 want to speak to Ghislane Maxwell?

21 MR. PAGLIUCA: Object to form and
22 foundation.

23 THE WITNESS: Correct. I wanted to speak
24 with everyone in the home and everyone
25 associated with Jeffrey Epstein.

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1 JOSEPH RECAREY - CONFIDENTIAL
2 anything that's found that has any kind of
3 identifiers, any kind of names, phone numbers,
4 anything that could be used to identify further
5 victims and/or to corroborate what the information
6 we already obtained, that information would be kept.

7 Q. Okay.

8 A. Be followed up on.

9 Q. You testified earlier about certain pieces
10 of paper that had Ghislaine Maxwell's name on it that
11 were obtained.

12 Are the documents that are listed, the
13 first one, two, three, four pages of Exhibit 8, some
14 of the documents that you're referring to?

15 MR. PAGLIUCA: Object to form and
16 foundation.

17 THE WITNESS: That is correct.

18 BY MR. EDWARDS:

19 Q. And if we go through this stack of
20 documents, if you could just review them and tell me
21 if these are some of the items obtained through the
22 trash pulls at Jeffrey Epstein's home?

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

25 THE WITNESS: That is correct. This is --

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1 JOSEPH RECAREY - CONFIDENTIAL

2 these items were collected in the trash pull.

3 BY MR. EDWARDS:

4 Q. Okay. And these are items that you felt
5 had some evidentiary value?

6 MR. PAGLIUCA: Object to form and
7 foundation.

8 THE WITNESS: Yes.

9 BY MR. EDWARDS:

10 Q. Were there other items within the trash
11 that were discarded as not having any apparent
12 evidentiary value?

13 A. Correct. There was stuff like food trash
14 we're not going to keep. You know, an apple core.
15 None of that's going to be kept.

16 Q. Okay. And when you took this stuff into
17 evidence, how was it maintained?

18 A. It was placed in a -- in a sealed
19 container, a sealed Ziploc, and placed into
20 evidence.

21 Q. And then was that file later transferred
22 to the State Attorney's Office or the FBI?

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

25 THE WITNESS: It was collected by the FBI.

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2

C E R T I F I C A T E

4 STATE OF FLORIDA)

: ss

5 COUNTY OF MIAMI-DADE)

I, KELLI ANN WILLIS, a Registered Professional, Certified Realtime Reporter and Notary Public within and for The State of Florida, do hereby certify:

10 That JOSEPH RECAREY, the witness whose
11 deposition is hereinbefore set forth was duly
12 sworn by me and that such Deposition is a true
13 record of the testimony given by the witness.

I further certify that I am not related to any of the parties to this action by blood or marriage, and that I am in no way interested in the outcome of this matter.

18 IN WITNESS WHEREOF, I have hereunto set
19 my hand this 24th day of June, 2016.

20

21

KELLI ANN WILLIS, RPR, CRR

22

23

24

25

EXHIBIT 14

(Filed Under Seal)

Page 1

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK
- - - - -
VIRGINIA L. GIUFFRE,

Plaintiff,
-against-
Case No.:
15-cv-07433-RWS

GHISLAINE MAXWELL,

Defendant.

- - - - -
CONFIDENTIAL

Videotaped deposition of RINALDO RIZZO, taken pursuant to subpoena, was held at the law offices of Boies Schiller & Flexner, 333 Main Street, Armonk, New York, commencing June 10, 2016, 10:06 a.m., on the above date, before Leslie Fagin, a Court Reporter and Notary Public in the State of New York.

- - -
MAGNA LEGAL SERVICES
1200 Avenue of the Americas
New York, New York 10026
(866) 624-6221

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1 R. Rizzo - Confidential
2 even Nadia. And what I found very repulsive,
3 out of the ordinary, was Nadia was wearing a
4 swimsuit that was very revealing and
5 basically, her bottom basically went up her
6 butt, revealing all of her buttocks. So
7 again, in the context not very appropriate
8 for the situation.

9 Q. Could you tell the relationship of
10 age between the three girls that you have
11 described and Nadia, for instance?

12 MR. PAGLIUCA: Object to the form
13 and foundation.

14 A. Nadia seemed to be a bit older, I
15 would say.

16 Q. How does this end, or is there,
17 what do you do next? How does this meeting
18 that you've just described break up?

19 A. I asked to excuse myself and asked
20 where the bathroom was, so I'm pointed inside
21 the house, to go inside the house to the
22 bathroom.

23 I walk in there, and I walk, as I'm
24 walking to the bathroom, what caught my eye,
25 and I had to take a double look, there were

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1 R. Rizzo - Confidential
2 pictures of naked women, half-dressed girls.
3 So I went to the bathroom, again, from
4 someone, myself working in private service, I
5 always know in houses there are cameras, so
6 again, I was very reluctant to stare, because
7 you never know when you are on camera.

8 So I used the bathroom, and I came
9 out, and you know, curiosity got the best of
10 me, and I leaned over and started looking at
11 these pictures for a brief minute, and it was
12 just so coincidental that as I did that, Ms.
13 Maxwell enters, and she immediately says to
14 me that Jeffrey would like for me to rejoin
15 the party immediately.

16 Q. How many pictures of nude females
17 did you see in Jeffrey Epstein's home?

18 MR. PAGLIUCA: Object to the form
19 and foundation.

20 A. I can't recall the exact number.

21 Q. Can you describe the pictures that
22 you saw in terms of what the people, what the
23 people or person within the picture was
24 wearing, what the age range would be of the
25 person that's in the photograph, any poses,

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2 Q. Did you learn whether your
3 perception was correct?

4 MR. PAGLIUCA: Same objection.

5 A. It was younger. Yes, I did.

6 Q. How old was this girl?

7 A. 15 years old.

8 Q. What happens next when Ghislaine
9 Maxwell and Jeffrey Epstein and a 15-year-old
10 girl walk into Eva Anderson's home?

11 MR. PAGLIUCA: Object to the form.
12 Foundation.

13 A. They proceed into the dining room
14 area, which is across from the living room
15 area. I go into the kitchen and I hear a
16 conversation start. Very muffled, I could
17 not hear any particulars about the
18 conversation whatsoever.

19 My wife and I are in the kitchen
20 preparing the evening meal. Eva brings the
21 young girl into the kitchen. In the kitchen,
22 there is an island with three barstools. Eva
23 instructs the young girl to sit to the
24 furthest barstool on the right.

25 Q. Describe for me what the girl

1 R. Rizzo - Confidential

2 looked like, including her demeanor and
3 anything else you remember about her when she
4 walks into the kitchen.

5 A. Very attractive, beautiful young
6 girl. Makeup, very put together, casual
7 dress. But she seemed to be upset, maybe
8 distraught, and she was shaking, and as she
9 sat down, she sat down and sat in the stool
10 exactly the way the girls that I mentioned to
11 you sat at Jeffrey's house, with no
12 expression and with their head down. But we
13 could tell that she was very nervous.

14 Q. What do you mean by distraught and
15 shaking, what do you mean by that?

16 A. Shaking, I mean literally
17 quivering.

18 Q. What happens next?

19 A. We were, again, the absurdity,
20 never introduced. Like you would walk into a
21 room and say this is -- so my wife and I are
22 in the kitchen and this young girl is sitting
23 there. It was a very uncomfortable moment.
24 I look at my wife. And so I want to ease the
25 moment, and so I introduced myself and I

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2 introduced my wife, and she doesn't really
3 respond.

4 And I asked her, are you okay? And
5 she doesn't really respond. Nothing verbal,
6 no cues, her head is still down. I ask her
7 if she would like some water, tissue,
8 anything, and she basically doesn't respond.

9 Q. You ask her for a tissue?

10 A. If she would like a tissue or some
11 water at the time.

12 Q. Was she crying at the time?

13 A. My perception, she was on the verge
14 of crying. And I'm trying to loosen the
15 situation every way I know how, so the only
16 way I knew how, and I thought maybe this will
17 comfort her, I said oh, by the way, do you
18 work for Jeffrey.

19 And she says that, I guess kind of
20 made her feel comfortable, because maybe it
21 was that comment or my persistence, and she
22 said yes. So I said, what do you do? And
23 she says I'm Jeffrey's executive assistant,
24 personal assistant. Which, from looking at
25 her, just didn't seem to suit.

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2 And I blurted out: You're his
3 executive personal assistant? What do you
4 do? And she says I was hired as his
5 executive personal assistant. I schedule his
6 appointments.

7 And I'm shocked, and I blurt out:
8 You seem quite young, how did you get a job?
9 How old are you? And she says to me, point
10 blank: I'm 15 years old.

11 And I said to her: You're 15 years
12 old and you have a position like that? At
13 that point she just breaks down hysterically,
14 so I feel like I just said something wrong,
15 and she will not stop crying. My wife and I
16 were at a loss for words, and I keep on
17 trying to console her, and nothing I was
18 saying, are you all right, do you need a
19 tissue, do you need water, consoles her.

20 And then in a state of shock, she
21 just lets it rip, and what she told me was
22 just unbelievable.

23 Q. What did she say?

24 MR. PAGLIUCA: Object to the form
25 and foundation.

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1 R. Rizzo - Confidential

2 A. She proceeds to tell my wife and I
3 that, and this is not -- this is blurting
4 out, not a conversation like I'm having a
5 casual conversation. That quickly, I was on
6 an island, I was on the island and there was
7 Ghislaine, there was Sarah, she said they
8 asked me for sex, I said no.

9 And she is just rambling, and I'm
10 like what, and she said -- I asked her, I
11 said what? And she says yes, I was on the
12 island, I don't know how I got from the
13 island to here. Last afternoon or in the
14 afternoon I was on the island and now I'm
15 here. And I said do you have a -- this is
16 not making any sense to me, and I said this
17 is nuts, do you have a passport, do you have
18 a phone?

19 And she says no, and she says
20 Ghislaine took my passport. And I said what,
21 and she says Sarah took her passport and her
22 phone and gave it to Ghislaine Maxwell, and
23 at that point she said that she was
24 threatened. And I said threatened, she says
25 yes, I was threatened by Ghislaine not to

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1 R. Rizzo - Confidential

2 discuss this.

3 And I'm just shocked. So the
4 conversation, and she is just rambling on and
5 on, again, like I said, how she got here, she
6 doesn't know how she got here. Again, I
7 asked her, did you contact your parents and
8 she says no.

9 At that point, she says I'm not
10 supposed to talk about this. I said, but I
11 said: How did you get here. I don't
12 understand. We were totally lost for words.

13 And she said that before she got
14 there, she was threatened again by Jeffrey
15 and Ghislaine not to talk about what I had
16 mentioned earlier, about -- again, the word
17 she used was sex.

18 Q. And during this time that you're
19 saying she is rambling, is her demeanor
20 continues to be what you described it?

21 A. Yes.

22 Q. Was she in fear?

23 A. Yes.

24 MR. PAGLIUCA: Object to the form
25 and foundation.

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1 R. Rizzo - Confidential

2 Q. You could tell?

3 A. Yes.

4 MR. PAGLIUCA: Same objection.

5 A. She was shaking uncontrollably.

6 Q. What happens with this 15-year-old
7 girl next?

8 MR. PAGLIUCA: Object to the form
9 and foundation.

10 A. As she is trying to explain, and
11 I'm asking questions because I'm as feared as
12 she is at this point. We hear people
13 approach and she just shuts up.

14 Q. What happens next?

15 A. Eva comes in and tells her that she
16 will be working for Eva in the city.

17 Q. As what?

18 A. As a nanny.

19 Q. Did you see this girl again?

20 A. Yes.

21 Q. And when?

22 A. On a flight maybe a month or so to
23 Sweden.

24 Q. What was the purpose of the flight?

25 A. We were going to Sweden for the

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1 R. Rizzo - Confidential

2 summer.

3 Q. Who was on the flight?

4 A. The Dubin family.

5 Q. As well as this girl?

6 A. Yes.

7 Q. What happens?

8 A. One thing that I forgot to mention
9 is during our initial conversation, I asked
10 her what her name was █ she said her name
11 was █

12 Q. What happened with █?

13 A. We flew to Sweden, we stopped at an
14 airport that we didn't usually stop at and
15 she got off the plane.

16 Q. Just so that I make sure I
17 understand, who it was that she says asked
18 her for sex on the island, who was that?

19 MR. PAGLIUCA: Object to the form.

20 Foundation.

21 A. She didn't specify who asked for
22 sex. She said that they asked for sex.
23 Immediately after that she put Ghislaine and
24 Sarah into the conversation.

25 Q. Taking her passport?

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2 A. Yes.

3 Q. From -- are there any other
4 incidents or occurrences that you observed
5 personally with Jeffrey Epstein and Ghislaine
6 Maxwell?

7 MR. PAGLIUCA: Object to the form
8 and foundation.

9 A. Not that I can recall.

10 Q. This last event that you described,
11 what's the timeframe when that occurred?

12 A. Late 2004, 2005.

13 Q. When did you resign your employment
14 from the Dubin family?

15 A. I think roughly October.

16 Q. Of what year?

17 A. 2005.

18 Q. Why?

19 A. My wife and I had discussed these
20 incidents, and this last one was just, we
21 couldn't deal with it.

22 Q. When you left your employment with
23 the Dubin family, did you have a job?

24 A. When we finally left, I stayed on
25 three months after my resignation, I had a

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1

2 CERTIFICATE

3

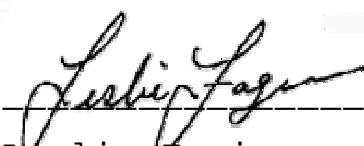
4

5 I HEREBY CERTIFY that RINALDO
6 RIZZO, was duly sworn by me and that the
7 deposition is a true record of the testimony
8 given by the witness.

9

10

11


Leslie Fagin,



Registered Professional Reporter

12

Dated: June 10, 2016

13

14

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

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EXHIBIT 15

(Filed Under Seal)

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Page 1

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

CASE NO. 15-CV-07433-RWS

-----x
VIRGINIA L. GIUFFRE,

Plaintiff,

v.

GHISLAINE MAXWELL,

Defendant.

-----x
June 3, 2016
9:07 a.m.

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

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

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1 DAVID RODGERS

2 flyer person, then you would reduce it to an
3 initial?

4 MR. PAGLIUCA: Object to form and
5 foundation.

6 MR. REINHART: You can answer the
7 question.

8 You can answer the question, if you can
9 answer the question. You are allowed to answer
10 the question, if you understand the question.

11 BY MR. EDWARDS:

12 Q. I'm trying to understand your testimony.

13 Is it, if you came to know that person --

14 A. Uh-huh.

15 Q. -- as a frequent flyer passenger, you
16 would begin to reduce that person's name to an
17 initial at some point?

18 MR. PAGLIUCA: Same objection.

19 THE WITNESS: Well, we don't really have a
20 frequent flyer program that we do, so to speak.
21 A lot of times I would do it because if you
22 would write out everybody's name there is not
23 enough space, you know, to get everybody's name
24 in that little square there.

25

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1 DAVID RODGERS

2 Q. -- is that right?

3 And is that -- is Ghislaine Maxwell
4 somebody that through the years 1995 through 2013
5 was somebody who flew very frequently?

6 A. What were the years again?

7 Q. The years of this book, 1995 --

8 A. I wouldn't say through 2013. But, yes,
9 '95 through 2000 sometime. Probably, I would have
10 to go back and -- well, you can see in there.

11 Q. We will get to it.

12 A. There will be a point where you don't see
13 her much. But to say it went through 2013 would not
14 be accurate.

15 Q. Let's do it this way: The person that you
16 have reflected on numerous notations --

17 A. Yes.

18 Q. -- through here as GM --

19 A. Yes.

20 Q. -- just by the initials, are we able to
21 safely know that that is Ghislaine Maxwell?

22 A. Yes.

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

25 MR. EDWARDS: Court reporter, did you get

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1 DAVID RODGERS

2 the answer?

3 THE REPORTER: Yes. The answer came
4 before the objection.

5 BY MR. EDWARDS:

6 Q. So on the next flight, the next day, from
7 Palm Beach to SAF. Is SAF Santa Fe?

8 A. Yes.

9 Q. And it indicates JE and GM.

10 Are we able to then know that those
11 passengers on that flight were Jeffrey Epstein and
12 Ghislaine Maxwell?

13 A. Yes.

14 MR. PAGLIUCA: Object to form and
15 foundation.

16 BY MR. EDWARDS:

17 Q. And where would you land at SAF? Is that
18 an airport?

19 A. It is an airport.

20 Q. Is it a private airport?

21 A. No. It's -- airlines go in there.

22 Q. Did Jeffrey Epstein also have a landing
23 strip at his property in New Mexico?

24 A. He did at one time.

25 Q. What would that -- do you remember what

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1 DAVID RODGERS

2 that code would be?

3 A. I don't believe there was a code.

4 Q. All right. Were there times that you
5 landed either the Gulfstream or the Boeing --

6 A. No.

7 Q. No.

8 MR. REINHART: Let him finish the question
9 before you answer.

10 THE WITNESS: Oh, I'm sorry.

11 BY MR. EDWARDS:

12 Q. Sure. We are doing fine so far. But the
13 court reporter is taking down all of our questions
14 and all of our answers. We are communicating well.

15 A. Okay.

16 Q. But when I go to read this back, we may
17 not get that.

18 A. Okay. Go ahead.

19 Q. So were there times where you landed one
20 of Jeffrey Epstein's planes on his private landing
21 strip at the New Mexico property?

22 A. Yes. But not the Gulfstream and not the
23 Boeing.

24 Q. What plane did you land on his property?

25 A. The Cessna 421. And probably a

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1 DAVID RODGERS

2 9:00, so it is 20 to 11:00 here.

3 BY MR. EDWARDS:

4 Q. So I want to go to page 41, and down to

5 December 9th. Sorry. December 11.

6 A. Okay.

7 Q. Palm Beach to Teterboro.

8 A. Yeah.

9 Q. And who are the passengers?

10 A. Jeffrey Epstein, Ghislaine Maxwell, Emmy
11 Tayler, Virginia.

12 Q. And this appears to be the first time that
13 Virginia's name appears in the log?

14 A. Right.

15 Q. Is there a -- is there a reason why the
16 first time -- I notice that the first time on some
17 of the other passengers, you use a first and last
18 name. Is there any reason why you didn't use her
19 first and last name?

20 A. I probably didn't know her last name.

21 Q. Just didn't catch it.

22 A. Yes.

23 Q. Okay. It was not that somebody told you
24 not to use the last name?

25 A. No. No.

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1 DAVID RODGERS

2 Q. So that flight goes from Palm Beach to
3 Teterboro.

4 Can you remember whether that's the first
5 time that you flew on a plane with Virginia Roberts?

6 MR. PAGLIUCA: Object to --

7 THE WITNESS: I believe it is.

8 MR. PAGLIUCA: Object to form and
9 foundation.

10 BY MR. EDWARDS:

11 Q. Do you remember the flight?

12 A. No.

13 Q. The next flight three days later goes from
14 Teterboro to Virgin Islands with Jeffrey Epstein,
15 Ghislaine Maxwell, Adam Perry Lang, and Virginia; is
16 that right?

17 A. Yes.

18 Q. And below that, it says, "Reposition."

19 What does that mean?

20 A. We were taking the airplane with no
21 passengers to go into maintenance, or an OPS2
22 inspection.

23 Q. Okay. This is -- this is the same
24 Gulfstream, is that right?

25 A. Yes.

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1 DAVID RODGERS

2 Q. How many passengers would that Gulfstream
3 allow?

4 A. Twelve passengers, I believe.

5 Q. And do you know how Jeffrey Epstein,
6 Ghislaine Maxwell, Adam Perry Lang, and Virginia get
7 off of St. Thomas or leave the island?

8 A. No. I do not. Probably a charter, I'm
9 guessing.

10 Q. If -- who would fly the -- well, is there
11 any other plane that Jeffrey Epstein was able to
12 access back then that was a private plane?

13 MR. PAGLIUCA: Object to foundation.

14 THE WITNESS: No. At that point in time
15 we don't have the Boeing yet.

16 BY MR. EDWARDS:

17 Q. So how many airplanes did Jeffrey Epstein
18 back then?

19 A. Well, we -- I don't know if we had the 421
20 then. We may or may not have. But it wouldn't --
21 you know, you wouldn't be flying the 421 down to
22 St. Thomas with Jeffrey. It is too long of a
23 flight.

24 Q. The Cessna?

25 A. The Cessna 421, correct.

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1 DAVID RODGERS

2 Q. Okay.

3 A. But I'm not even sure we still had it at
4 this point in time.

5 Q. Yeah. It shows up on the next page. We
6 will get there.

7 A. Does it? Okay.

8 So then, yes, the answer is, yeah, we
9 still had the airplane. But we wouldn't have used
10 that.

11 Q. So is there any way of telling how Jeffrey
12 Epstein, Ghislaine Maxwell, Adam Perry Lang, and
13 Virginia were in the Virgin Islands on that, from
14 December 14th, 2000 --

15 MR. PAGLIUCA: Object to foundation.

16 BY MR. EDWARDS:

17 Q. -- based on your knowledge or your logs or
18 anything else?

19 A. No, I wouldn't have any way of knowing.

20 Q. Okay.

21 A. Because the next flight that they are on
22 was like this Palm Beach one, January 16th. So I
23 wouldn't have any idea.

24 Q. Okay. To your knowledge, did Jeffrey
25 Epstein ever fly commercially?

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1 DAVID RODGERS

2 A. He probably has. Back then at this time,
3 I'm going to say probably not. But I know that he
4 has flown commercially. But usually that would be
5 like going to Europe, maybe.

6 Q. Okay. January 16th through the 25th,
7 those flights, do you see that block that I'm
8 talking about?

9 A. Yes.

10 Q. Jeffrey Epstein, Ghislaine Maxwell, Emmy
11 Tayler, and then at times Shelly Lewis, do you see
12 that?

13 A. Yes, right.

14 Q. The 25th it lands in Teterboro. And the
15 next day, on the 26th, leaves out of Teterboro with
16 Jeffrey Epstein, Ghislaine Maxwell, Emmy Tayler, and
17 Virginia Roberts. This time you wrote the whole
18 name.

19 A. Right. Right.

20 Q. So when you write the full name, does that
21 signify -- that's when you may have learned her last
22 name?

23 A. Correct.

24 Q. And do you know how she -- how she got up
25 to New Jersey or New York?

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1 DAVID RODGERS

2 A. I do not. I would guess the airlines.

3 Q. At this point in time, did you know what
4 her -- what her relationship was with Jeffrey
5 Epstein or Ghislaine Maxwell?

6 MR. PAGLIUCA: Object to form.

7 THE WITNESS: No.

8 BY MR. EDWARDS:

9 Q. Did you -- was she a masseuse?

10 MR. PAGLIUCA: Object to foundation.

11 THE WITNESS: I -- I'm not sure what she
12 was.

13 BY MR. EDWARDS:

14 Q. Did you form any -- any belief that she
15 was a friend or a business associate or anything?

16 MR. PAGLIUCA: Object to foundation.

17 THE WITNESS: Well, I mean, we had a lot
18 of people on the airplane. And Virginia was
19 just another one of those passengers.

20 BY MR. EDWARDS:

21 Q. Okay. So on the 26th, flies to Palm
22 Beach. And then -- and then I guess the 27th --

23 A. Right.

24 Q. -- leaves from Palm Beach to the Virgin
25 Islands --

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2 A. Yes.

3 Q. -- with Jeffrey Epstein, Ghislaine
4 Maxwell, Emmy Tayler, and Virginia Roberts, right?

5 A. Yes.

6 Q. And on the 30th, you fly it back. That's
7 still the Gulfstream, right?

8 A. Yes.

9 Q. From the Virgin Islands to Palm Beach with
10 the same four passengers, correct?

11 A. Yes.

12 Q. And that's Jeffrey Epstein, Ghislaine
13 Maxwell, Emmy Tayler, and Virginia Roberts?

14 A. Correct.

15 Q. And then what happens to that plane, the
16 Gulfstream, for the next month, from February 1st
17 through March 5th?

18 A. Well, I don't know what happened to it,
19 but I'm -- from, looks like February 17th, I'm going
20 to school to get a type rating on the Boeing. And
21 I'm gone for about three weeks.

22 Q. So this is when you're doing a simulator
23 on the Boeing?

24 A. Correct.

25 Q. And getting your certification to fly the

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2 Boeing?

3 A. Yes.

4 Q. The Boeing, was that previously owned by
5 The Limited or Les Wexner?

6 A. I'm not sure of the company name,
7 officially. But probably, yes.

8 Q. Some association with him?

9 A. Some association, yes.

10 Q. Do you know who flew the Gulfstream while
11 you were doing the simulator?

12 A. Well, it would have been Larry Visoski,
13 I'm not sure who the first officer was.

14 Q. Do you know if any logs were kept of the
15 passengers' names?

16 A. While I was at school?

17 Q. Right, while you were at school.

18 A. There probably were logs, but I don't know
19 where they are.

20 Q. Have you ever spoken with Larry about
21 whether he kept names of passengers?

22 A. I don't think he does.

23 Q. Do you know where Larry Visoski flew the
24 Gulfstream for the month that you were --

25 A. No.

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2 Q. Sorry. Just let me finish my question. I
3 know I was getting it out slow.

4 -- but for the month that you were
5 training on the Boeing?

6 A. No.

7 Q. All right. So the last flight that you
8 took in the Gulfstream before you began, before you
9 flew the Cessna for a day, I guess, right, from
10 Santa Fe to DFW --

11 A. Right.

12 Q. -- February 3rd --

13 A. Yes.

14 Q. And that's the Cessna with 908GM tail
15 number?

16 A. Yes.

17 Q. The last flight that you flew on the
18 Gulfstream was the flight back from St. Thomas with
19 Jeffrey Epstein, Ghislaine Maxwell, Emmy Tayler, and
20 Virginia Roberts, right?

21 A. Uh-huh.

22 Q. And then the next time that you're on the
23 plane is -- on the Gulfstream is when?

24 A. It looks like March the 5th.

25 Q. And who are the passengers on that flight?

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2 Where is it going to?

3 A. Jeffrey Epstein, Ghislaine Maxwell, Emmy
4 Tayler, Virginia Roberts.

5 Q. And then there's notation of Gary
6 Roxborough?

7 A. Yes.

8 Q. Do you know why that is?

9 A. Yeah. He was the first officer.

10 Q. Why did he become the first officer?

11 A. Because Larry was probably in training for
12 the Boeing.

13 Q. Okay. You took -- you alternated?

14 A. Right. We didn't go at the same time.

15 Q. All right. Then the Gulfstream has the
16 same aircraft make and model. That's the same
17 Gulfstream airplane, right?

18 A. Yes.

19 Q. But the aircraft identification mark
20 changes --

21 A. Correct.

22 Q. -- on March 5th, 2001.

23 A. Correct.

24 Q. And it changes to N -- it changes from
25 N908JE to N909JE.

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2 A. Yes.

3 Q. Why was that?

4 A. Because the N908JE went to the Boeing.

5 That was going to be on the Boeing now.

6 Q. And the new number for N909JE was
7 transferred to the Gulfstream?

8 A. Correct.

9 Q. And where does that first flight on the
10 5th go?

11 A. From Palm Beach to Stephenville up in
12 Newfoundland for a fuel stop.

13 Q. Okay. And then how do you know it is a
14 fuel stop?

15 A. Because we are going to Paris, and so we
16 have to stop there for fuel.

17 Q. Okay. I know how -- I know how you would
18 know that. But is there any indication on any of
19 the numbers that go off to the right that would tell
20 me that it's a fuel stop as opposed to --

21 A. No.

22 Q. No? Okay. All right. So there's no way
23 after today's deposition I can look at any of the
24 numbers; it's not going to tell me what it was for?

25 A. No. No. And it's -- obviously it looks

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2 different, because one day is the 5th; one day is
3 the 6th. But we landed there like at 11:50 at
4 night. And then when we took off, it was, you know,
5 the next day.

6 Q. Okay. Got it.

7 And then where do you go the next day?

8 A. We went from Stephenville to
9 Paris-Le Bourget.

10 Q. And who were the passengers going to
11 Paris?

12 A. Jeffrey Epstein, Ghislaine Maxwell, Emmy
13 Tayler, and Virginia Roberts.

14 Q. And then what's the next flight?

15 A. On the 8th, from Paris to -- I believe
16 that is in Spain.

17 Q. Granada, Spain?

18 A. Granada, Spain. Correct.

19 Q. Okay. And who are the passengers on that
20 trip?

21 A. Jeffrey Epstein, Ghislaine Maxwell, Emmy
22 Tayler, Virginia Roberts, Alberto and Linda Pinto,
23 one female, and Ricardo, it looks like Orieta.

24 Q. And then what's the next flight?

25 A. From there to Tangiers. From Granada to

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2 Tangiers.

3 Q. When you landed -- sorry to go back --

4 when you landed in -- what did we say LEGR was?

5 A. Granada, Spain.

6 Q. Where did -- where did you stay? Where do
7 you stay on those trips?

8 A. We didn't stay. We left the same day, I
9 believe.

10 Q. Okay. What if we go back to one flight to
11 LFPB?

12 A. Uh-huh. LFPB.

13 Q. That's Paris?

14 A. Yeah. We stayed in Paris.

15 Q. And do --

16 A. We stayed there.

17 Q. Do you know -- do you stay at the same
18 location where Jeffrey Epstein, Ghislaine Maxwell,
19 Emmy Tayler, and Virginia Roberts stay?

20 A. No.

21 Q. Where do you stay while you are in Paris?

22 A. Hotel.

23 Q. Where do they say?

24 MR. PAGLIUCA: Object to foundation.

25 THE WITNESS: He has a place there, in

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2 Paris.

3 BY MR. EDWARDS:

4 Q. Okay. Jeffrey Epstein has a home or a
5 house in Paris?

6 A. Right.

7 Q. Okay. Have you been to it?

8 A. Yes, I believe I have.

9 Q. Have you ever stayed there?

10 A. No.

11 Q. And getting to and from the airport, were
12 you ever in the car riding to or from the airport in
13 Paris with Jeffrey Epstein?

14 A. No.

15 Q. So going down to the 9th, then, where is
16 that flight?

17 A. That is from Tangiers to London Luton
18 Airport.

19 Q. And is Luton Airport, is that a major
20 airport?

21 A. For general aviation it is. There is
22 airline service in there, but it is not a huge one,
23 for sure.

24 Q. Who were the passengers?

25 A. Jeffrey Epstein, Ghislaine Maxwell, Emmy

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2 Tayler, and Virginia Roberts.

3 Q. And am I reading this correctly that the
4 next flight is two days later, on the 11th?

5 A. Yes.

6 Q. And where does the flight on the 11th go?

7 A. From Luton to Bangor, Maine.

8 Q. All right. While in London, do you know
9 what Jeffrey Epstein, Ghislaine Maxwell, Emmy
10 Tayler, and Virginia Roberts did?

11 A. No, I do not.

12 Q. Do you know who they saw?

13 A. No, I do not.

14 Q. After the flight to Maine, where is the
15 next flight?

16 A. Maine is from Bangor to Teterboro the same
17 day.

18 Q. Okay.

19 A. So that was a fuel stop.

20 MR. EDWARDS: All right. We are at a good
21 time to stop. The videographer has to change
22 tapes.

23 THE WITNESS: Okay.

24 MR. EDWARDS: So we why don't we take a
25 five-minute break.

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2 THE WITNESS: Okay.

3 THE VIDEOGRAPHER: Off the record at
4 10:57.

5 (Thereupon, a recess was taken, after
6 which the following proceedings were held:)

7 THE VIDEOGRAPHER: This is the beginning
8 of Disk 2. On the record at 11:12.

9 BY MR. EDWARDS:

10 Q. Sure. If we go back to page 41,
11 December 7th, 2000.

12 MR. PAGLIUCA: Give us a Bates page,
13 please.

14 MR. EDWARDS: Right, 41. For the
15 remainder, when I say "page," I'm really just
16 referring to the Bates number.

17 BY MR. EDWARDS:

18 Q. So page 41, December 7th, 2000.

19 A. Okay.

20 Q. Do you see that?

21 Where was that flight going from and to?

22 A. Luton to -- Luton -- that's going into
23 Marham Air Force Base.

24 Q. Do you remember why you would have flown
25 into the Air Force base?

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2 A. We flew in there to drop the passengers
3 off. And then these passengers that were on there,
4 we dropped them off. And then -- let's see. We
5 repositioned.

6 I don't remember. We dropped passengers
7 off, and we had to leave, I believe.

8 Q. Okay. That was --

9 A. We weren't allowed to stay there.

10 Q. That was Tom Pritzker?

11 A. Yes.

12 Q. And then did you also drop off Jeffrey
13 Epstein, Ghislaine Maxwell, Kelly Spamm?

14 A. Yes.

15 Q. Okay.

16 A. I believe everyone got off the airplane
17 there.

18 Q. And where did you reposition to?

19 A. It says, "Positioned in Norwich, England."
20 I guess it's Norwich.

21 Q. Sandringham, that is what it says right
22 above that. What is that?

23 A. Sandringham. I believe Sandringham is the
24 estate that the queen has --

25 Q. Okay.

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2 A. -- near there.

3 Q. All right. And the flight on
4 December 9th --

5 A. Uh-huh.

6 Q. That's Jeffrey Epstein, Ghislaine Maxwell,
7 Emmy Tayler, Kelly Spamm?

8 A. Right.

9 Q. And then what did you write in the
10 parenthesis under that?

11 A. "Blowing snow on runway." It was a great
12 weird phenomenon that happened that night.

13 Q. And then you're leaving out of that
14 Sandringham Airport; is that right?

15 A. We are -- which one are you on?

16 Q. On the 9th.

17 A. On the 9th --

18 Q. The first entry on the 9th.

19 A. The 9th, we're leaving, looks like
20 Norwich, England, I believe, EGSH, and we go to
21 Gander, Newfoundland --

22 Q. Okay?

23 A. -- for a fuel stop.

24 Q. I think before we took a break that we
25 were on page 43.

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2 A. Uh-huh.

3 Q. And the flight that began in Palm Beach,
4 before going to Paris and Belgium, Tangier, I think
5 you told me, it ended up in Maine --

6 A. Correct.

7 Q. -- on March 11th, 2001.

8 A. Right.

9 Q. Or, sorry, it ended up in Teterboro.

10 A. Teterboro.

11 Q. Okay. And then on the 15th, you fly
12 from -- on the Gulfstream out of Teterboro to ISP.
13 Do you know where that is?

14 A. Islip, New York.

15 Q. Okay. And Virginia Roberts was on the
16 flight that landed in Teterboro on the 11th,
17 correct?

18 MR. PAGLIUCA: Object to form and
19 foundation.

20 THE WITNESS: Yes.

21 BY MR. EDWARDS:

22 Q. But leaving out of Teterboro, she's not
23 one of the passengers on the flight.

24 A. No.

25 Q. Any idea where she went?

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2 A. No.

3 Q. Okay.

4 MR. PAGLIUCA: Are you referring to
5 Bates 0041, the 11th through 14th? Is that
6 what you're talking about?

7 MR. EDWARDS: Forty-three.

8 MR. PAGLIUCA: Forty-three.

9 MR. EDWARDS: March 11th and March 15th,
10 2001.

11 MR. REINHART: If it will help there, the
12 flight numbers column, like the fifth or sixth
13 column over, are sequentially numbered and
14 unique numbers. So if you want to just say
15 "flight 1468" --

16 MR. EDWARDS: Okay.

17 MR. REINHART: -- that might help
18 everybody --

19 MR. EDWARDS: Right.

20 MR. REINHART: -- follow along.

21 MR. EDWARDS: Okay. Thanks, Bruce.

22 MR. REINHART: Uh-huh.

23 BY MR. EDWARDS:

24 Q. So the flight now that I'm talking about
25 that leaves out of Teterboro on the 15th, flight

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2 No. 1471 --

3 A. Right.

4 Q. -- the passengers appear to be Jeffrey
5 Epstein, Ghislaine Maxwell, Adam Perry Lang, Alexia
6 Wallert and Banu Cukuglu?

7 A. I think so.

8 Q. Do you remember Banu?

9 A. I definitely remember that. It was a hard
10 name to spell.

11 Yeah. Sort of, I guess. I mean, if she
12 walked in right now, I probably wouldn't recognize
13 her.

14 Q. Well, it has been since 2001, so --

15 A. Yeah, I know.

16 Q. Okay. So then the next flight is 1472.

17 Where is that? Where is that going?

18 A. From Islip to Lake City, Florida.

19 Q. All right. And the passengers, again, are
20 who?

21 A. Jeffrey Epstein, Ghislaine Maxwell, Adam
22 Perry Lang, Alexia Wallert and Banu Cukuglu,
23 whatever her name is.

24 Q. Did you know what relationship she had, if
25 at all, with Jeffrey Epstein?

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2 A. No. No.

3 Q. Do you remember an Ed Tuttle?

4 A. Yes.

5 Q. And who was he?

6 A. I believe Ed was a, probably in
7 construction. I think he may have been around
8 before the Jeffrey -- well, let me think.

9 Q. If we skip down to March 16th, I see his
10 name. So I don't know if that's going to help you.

11 A. I believe -- I believe Ed Tuttle was like
12 maybe an architect, or somewhere in the
13 construction, real estate side, I believe.

14 Q. Okay. So flight No. 1477 --

15 A. Uh-huh.

16 Q. -- from LaGuardia to Palm Beach, is that
17 Jeffrey Epstein, Ghislaine Maxwell, Emmy Tayler, Joe
18 Pagano, Eva Dubin?

19 A. Yes.

20 Q. Celina Dubin?

21 A. Yes.

22 Q. Jordan Dubin?

23 A. Right.

24 Q. Maya Dubin and two nannies?

25 A. Yes.

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2 Q. And Alexia Wallert? Is that what that is?

3 A. I would assume so, yes, AW.

4 Q. That is sort of what we talked about in
5 the beginning, where Alexia Wallert appears in full
6 name at the top --

7 A. Right.

8 Q. -- and it's AW, AW, AW.

9 A. And there's no room to write her name out
10 there --

11 Q. Right.

12 A. -- so she's AW.

13 Q. Okay. And then the next flight, the 27th,
14 leaves out of Palm Beach. Who are our passengers on
15 that flight and where's it going? 1478 is the
16 flight.

17 A. Yeah. Jeffrey Epstein, Ghislaine Maxwell,
18 Emmy Tayler, Virginia Roberts, two females, Banu,
19 and that's it.

20 Q. And do you know, in New York, when that
21 plane lands in Teterboro, where do you stay when the
22 plane is up there?

23 A. It is 2001. At an apartment there.

24 Q. Did you have your own apartment?

25 A. Yes.

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2 Q. Or did you stay at one of Jeffrey
3 Epstein's apartments?

4 A. No. It was his apartment, Jeffrey's
5 apartment.

6 Q. Was that one of the apartments at 301 East
7 66th Street?

8 A. Yes.

9 Q. And did any of the other passengers from
10 that flight, that 1478, did any of them stay at any
11 of those apartments?

12 A. Yeah. Emmy would have. Virginia probably
13 did.

14 Q. Did you see Virginia stay at the
15 apartment?

16 A. I don't know.

17 Q. When you were in New York and you left
18 from the airport, did you ride in the same car with
19 Virginia?

20 A. Not usually. I mean, I don't know if we
21 ever did. It's possible we did.

22 Q. Do you know whether Virginia Roberts
23 stayed at Jeffrey Epstein's townhouse or whether
24 Virginia Roberts stayed at the apartments?

25 MR. PAGLIUCA: Object to form.

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2 THE WITNESS: I don't know for sure.

3

4 BY MR. EDWARDS

5 Q. Can you recollect riding in a car with
6 her, or can you recollect whether she got in a car
7 with anyone else?

8 MR. PAGLIUCA: Object to form.

9 THE WITNESS: I can't.

10 MR. EDWARDS: Okay.

11 MR. REINHART: I'm sorry. Are you asking
12 about that specific trip or --

13 MR. EDWARDS: Sorry.

14 BY MR. EDWARDS:

15 Q. I mean that specific trip.

16 A. No. I can't.

17 Q. How about in general at any time?

18 A. No. I don't recall. I mean, I can
19 recall, I would ride sometimes with Emmy, with Adam
20 I remember them being in the car. But, again, that
21 was unusual. Usually it would just be Larry and
22 myself. But on occasion, you know, somebody might
23 ride with us.

24 Q. When you would stay at the apartment in
25 New York on East 66th Street, would it always be in

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2 the same apartment?

3 A. Yes.

4 Q. All right. There are multiple apartments
5 owned by Jeffrey Epstein?

6 A. At that time, it was the same apartment.

7 Q. Okay. Have you stayed in other apartments
8 since that time?

9 A. Yes.

10 Q. All at that East 66th Street location?

11 A. Yes. I really don't -- I don't have an
12 apartment there now. We haven't gone there since
13 probably 2008.

14 Q. How about Banu? Would she have stayed at
15 301 East 66th Street?

16 MR. PAGLIUCA: Object to foundation.

17 THE WITNESS: Most likely.

18 BY MR. EDWARDS

19 Q. Why do you say that?

20 A. Well, if she's on the plane with us on
21 multiple trips, then most likely she probably stayed
22 there.

23 Q. Have you been to Jeffrey Epstein's
24 townhouse as 9 East 71st Street?

25 A. Yes.

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2 Q. And it's a pretty big place, right?

3 A. Pretty big.

4 Q. And it has numerous bedrooms?

5 A. Yes.

6 Q. Any reason why Banu would not have been
7 staying there?

8 MR. PAGLIUCA: Object to foundation.

9 THE WITNESS: I don't know.

10 BY MR. EDWARDS

11 Q. I'm just trying to get to, is there a
12 reason why you believe that Banu would have, I think
13 you said, probably have stayed at the apartment
14 versus the townhouse?

15 A. Well, I only say that because Emmy, you
16 know, stayed there.

17 Q. Stayed where?

18 A. At the -- at our apartments.

19 Q. Okay.

20 A. I'm pretty sure Adam, yeah, Adam stayed
21 there at the time. So most of the people that were
22 regulars on the flight, they would stay there in the
23 apartments.

24 Q. Okay. But do you remember Virginia or
25 Banu staying in the apartments?

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2 A. I do not specifically.

3 Q. Okay. The next flight on the next day,
4 1479, is flying from Teterboro to Santa Fe; is that
5 right?

6 A. Yes.

7 Q. And who are those passengers?

8 A. Jeffrey Epstein, Ghislaine Maxwell, Adam
9 Perry Lang, Virginia Roberts, Banu, Marvin Minsky,
10 Henry Jarecki.

11 Q. Do you remember Marvin and Henry?

12 A. I remember Henry. I don't really remember
13 Marvin.

14 Q. Okay. And then two days later -- again,
15 where would you have stayed if you landed in
16 Santa Fe on March 29th, 2001?

17 A. Probably would have stayed at the ranch.

18 Q. At the Zorro Ranch?

19 A. Yes.

20 Q. All right. Did the other passengers that
21 were on the plane, Jeffrey Epstein, Ghislaine
22 Maxwell, Adam Perry Lang, Virginia Roberts, Banu --
23 I'm not evenning going to try her last name --

24 A. Right.

25 Q. -- Marvin Minsky and Henry Jarecki also

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2 have stayed at the ranch?

3 MR. PAGLIUCA: Object to foundation.

4 THE WITNESS: I'm going to say most likely
5 they did.

6 BY MR. EDWARDS

7 Q. Was there any other location in Santa Fe
8 where you are aware passengers would have stayed?

9 A. Not that I'm aware of.

10 Q. If you were all going to the same place,
11 is that an occasion where you would all ride in the
12 same vehicle from the airport to the ranch?

13 MR. PAGLIUCA: Object to foundation.

14 THE WITNESS: I don't know.

15 BY MR. EDWARDS

16 Q. You would still right in separate
17 vehicles?

18 A. Right. Because it takes us about an hour
19 to finish up at the airport.

20 Q. And then the 31st, so two days?

21 A. Let me go back to that one --

22 Q. Sure.

23 A. -- and say, it is possible. I think Adam
24 has ridden with us before. So I couldn't swear that
25 one way or the other. But he has probably ridden

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2 with us before to the airport; to or from the
3 airport.

4 Q. Two days later, flight No. 1408 out of
5 Santa Fe to Palm Beach, who were the passengers
6 there?

7 A. Jeffrey Epstein, Ghislaine Maxwell, Prince
8 Andrew, Virginia Roberts, Nadia BJORLIN, Henry
9 Jarecki, Marvin Minsky.

10 Q. Do you remember when you were at the ranch
11 Nadia BJORLIN arriving?

12 A. I would assume that she airlined in there.

13 Q. Do you remember her at the ranch? Did she
14 perform for you or anything?

15 A. No.

16 I don't remember her at the ranch. I
17 mean, I'm sure she was there. I just don't
18 remember.

19 Q. Okay. Do you remember a person named
20 Heather Mann? She's found on flight 1438 next to
21 Lydia.

22 A. Heather Mann, not really.

23 Q. Okay. The next flight, on page 45, is
24 1488. The flight number. April 9th, 2001.

25 A. Right.

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2 Q. Where does that flight take off from and
3 where does it go?

4 A. Palm Beach to Atlantic City.

5 Q. Who is on that flight?

6 A. Jeffrey Epstein, Emmy Tayler, Virginia
7 Roberts, Banu and Johanna.

8 Q. Do you remember Johanna Sjoberg?

9 A. I don't.

10 Q. On that same day, you take a flight to
11 Teterboro?

12 A. Right.

13 Q. Did you go to the casinos at all that day?

14 A. I don't think so.

15 Q. Would that be something that you would do
16 with them? Or you would stay back?

17 A. No. We would stay at the airport.

18 Q. All right.

19 And then two days later, on the 11th,
20 flight 1490, the plane flies out of Teterboro.

21 For that two-day period of time, the night
22 of the 9th and the night of the 10th, would you have
23 stayed at the apartment?

24 MR. PAGLIUCA: Object to foundation.

25 MR. EDWARDS: In New York.

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2 THE WITNESS: I would say, yes.

3 BY MR. EDWARDS:

4 Q. All right. Do you know where Virginia and
5 Banu and Johanna stayed?

6 A. No idea.

7 Q. You can't recollect whether they were --
8 you can't recollect seeing them at the apartments?

9 MR. PAGLIUCA: Object to foundation.

10 THE WITNESS: No.

11 BY MR. EDWARDS:

12 Q. All right.

13 Then on the 11th, you leave from Teterboro
14 and go to where?

15 A. St. Thomas.

16 Q. That is flight 1490. And on that flight,
17 Jeffrey Epstein, Ghislaine Maxwell, Prince Andrew,
18 Banu, Virginia Roberts and Johanna?

19 A. Yes.

20 Q. And that is -- that is a flight -- how
21 does -- how did those passengers get from -- does
22 Jeffrey Epstein have a place in St. Thomas?

23 MR. PAGLIUCA: Object to form.

24 THE WITNESS: Well, yes.

25

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2 BY MR. EDWARDS:

3 Q. Where is that?

4 A. In St. Thomas, he has an office. In St.
5 Thomas.

6 Q. Where does he stay in the Virgin Islands?

7 A. On Little St. James.

8 Q. And how do the passengers get from
9 St. Thomas to Little St. James?

10 A. Most likely, helicopter.

11 Q. How many people does the helicopter fit?

12 A. We didn't own a helicopter then.

13 Probably -- probably 5. It depends,
14 because they had different helicopters. I'm not
15 sure which one they used that day.

16 Q. What is the duration of the flight from
17 St. Thomas to Little St. James?

18 A. About six minutes.

19 Q. What is the duration of a boat trip from
20 Little St. James to St. Thomas?

21 A. Probably about, let's say, 15 to 20
22 minutes. But you are on the east side of the island
23 and the airport is almost to the west side of the
24 island.

25 Q. So you have to almost circle the island?

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2 A. To get from the island by boat, to get
3 to -- there's land there and take a car, it is
4 probably -- it is probably close to an hour, 45
5 minutes for sure.

6 Q. Are there passenger manifests that are
7 kept for the helicopters?

8 MR. PAGLIUCA: Object to foundation.

9 THE WITNESS: I'm not sure. I'm not sure.

10 BY MR. EDWARDS:

11 Q. Back in this time, in around April of
12 2001, did Jeffrey Epstein have a helicopter yet?

13 A. No, he did not have a helicopter.

14 Q. At that time?

15 A. Correct.

16 Q. And so do you remember the name of the
17 company or corporation that they rented or
18 transported?

19 A. I don't. It was the only -- helicopter
20 service there in St. Thomas is no longer there.

21 Q. Okay.

22 A. Air Center Helicopter.

23 Q. Was there a particular person at Air
24 Center Helicopter that you ever coordinated with?

25 A. We would, like, call a dispatcher. Or you

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2 know, whoever picked up the phone, we would call
3 them.

4 Q. All right. So 1491 is a flight from
5 St. Thomas to Palm Beach; is that right?

6 A. Yes.

7 Q. And Gwendolyn Beck is now on that flight?

8 A. Yes.

9 Q. Do you remember that flight at all, 1491?

10 A. Not really.

11 Q. Anything about it stick out in your mind?

12 A. No.

13 Q. All right. The next flight that -- do you
14 remember a female name Kelly Bovina?

15 A. I remember the name, but I don't remember
16 her.

17 Q. Was she an actress as well, do you
18 remember that?

19 A. I don't recall.

20 Q. The next flight I want to direct your
21 attention is 1501, May 3rd, 2001.

22 A. Okay.

23 Q. What is that airport, ADS?

24 A. Addison, Texas. San Antonio, Texas.

25 Q. And who are the passengers on that?

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2 A. Jeffrey Epstein, Virginia Roberts.

3 Q. Do you know how Virginia Roberts got to
4 Addison, Texas?

5 A. No.

6 Q. Was that flight -- was the purpose of that
7 flight only to pick up Virginia Roberts?

8 MR. PAGLIUCA: Object to form and
9 foundation.

10 BY MR. EDWARDS:

11 Q. Can you tell by your logs?

12 A. Not really. Let's see. We -- no, I don't
13 know.

14 Q. The flight previous on the 3rd flies in
15 from where? Where is that?

16 A. Little Rock.

17 Q. Arkansas?

18 A. Correct.

19 Q. So the only passenger on that flight from
20 Little Rock, Arkansas, to Addison, Texas, flight
21 1500, is Jeffrey Epstein, right?

22 A. Right.

23 Q. And then you land in Addison before going
24 to Santa Fe?

25 A. That is actually San Antonio, I believe.

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2 Yes. That is San Antonio, SAT.

3 Q. How long is the flight from Addison to San
4 Antonio?

5 A. I would be guessing, probably an hour.

6 Q. Do you know what the purpose was for
7 landing --

8 A. Well, you know, I can tell you. It is
9 9/10s. Fifty-four minutes.

10 Q. Do you know what the purpose was to be to
11 land in Addison, Texas, before arriving in San
12 Antonio?

13 A. I do not. But it appears that we spent
14 the night in San -- oh, I see what you are saying.
15 No, I don't know. That I went to Addison probably
16 the same day.

17 Q. Went to Addison and picked up Virginia
18 Roberts?

19 A. It looks like it.

20 Q. And then in San Antonio, two days later,
21 who are your passengers on that flight, 1502?

22 A. Jeffrey Epstein, Virginia Roberts.

23 Q. Where do you fly?

24 A. From San Antonio to Palm Beach.

25 Q. And in May, on May 14th, 2001, flight

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2 1506, where is that flight leaving from?

3 A. St. Thomas.

4 Q. And going where?

5 A. Teterboro.

6 Q. And who are your passengers?

7 A. Jeffrey Epstein, Ghislaine Maxwell, Emmy
8 Tayler, Banu, Virginia Roberts and one female.

9 Q. And, again, do you remember who the one
10 female would have been with Virginia Roberts?

11 A. No.

12 Q. Can you tell by this how any of those
13 individuals that were on that flight leaving from
14 the Virgin Islands to Teterboro got to the Virgin
15 Islands?

16 A. No.

17 Q. What were the other possible avenues back
18 in those days for Jeffrey Epstein, Ghislaine Maxwell
19 to travel to the Virgin Islands?

20 A. They could have done a charter, possibly.

21 Q. Okay. Was there ever a time when, it
22 looks like that is the -- that is the Gulfstream
23 that you fly out of the Virgin Islands to Teterboro,
24 correct?

25 A. Correct.

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2 Q. Was there ever a time you were flying the
3 Gulfstream and -- well, let's go back a little bit.

4 A. Okay.

5 Q. On May 7th, at the top.

6 A. Right.

7 Q. Flight 1503, that is the Gulfstream
8 traveling from Palm Beach to CHO?

9 A. That is Charlottesville, I believe,
10 Virginia.

11 Q. And then on that same day from
12 Charlottesville to Teterboro?

13 A. Correct.

14 Q. So when does the Gulfstream get from
15 Teterboro to St. Thomas?

16 A. Hmm, I don't know. Because it appears
17 that I'm on vacation at that time. So I don't know.

18 Q. How did you get to St. Thomas for the 14th
19 to fly?

20 A. Airline.

21 Q. All right. So at some point in time,
22 between May 7th and May 14th --

23 A. Uh-huh.

24 Q. -- somebody flies the Gulfstream to the
25 Virgin Islands.

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2 A. Correct.

3 Q. And who would that be?

4 MR. PAGLIUCA: Object to foundation.

5 THE WITNESS: Larry Visoski and I don't
6 know who the other person would have been.

7 BY MR. EDWARDS:

8 Q. When you pick up passengers in the Virgin
9 Islands and you are taking them to Teterboro, do you
10 speak with Larry Visoski about when he arrived in
11 the Virgin Islands?

12 A. Yeah. Yeah. We would coordinate that. I
13 mean, usually we would go down there together. We
14 would ride in the same airline down.

15 Q. In this particular case, you were on
16 vacation?

17 A. Well, that is true. However, most likely
18 he airlined home once he got to St. Thomas. And
19 then most likely, we drove in a car to Miami and
20 road the same airline down there.

21 Q. That was something that you customarily
22 did?

23 A. Yes.

24 Q. Okay. So then you have -- we have no way
25 of knowing then who the passengers that flew to the

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2 Virgin Islands would have been, if there were any in
3 addition to those that left?

4 A. No.

5 Q. All right. You fly into Teterboro on
6 flight 1506 on May 14th, 2001, and fly out in the
7 Gulfstream on the 24th, 10 days later; is that
8 right?

9 A. Yes.

10 Q. And your passengers, 10 days later flying
11 to Palm Beach are Jeffrey Epstein, Ghislaine
12 Maxwell, Emmy Tayler, Adam Perry Lang and a female.

13 A. Right.

14 Q. Do you know where Virginia Roberts went
15 during that time after she landed in Teterboro on
16 the 14th?

17 A. I do not.

18 Q. Page 47, I'm going to go to flight
19 No. 1510. June 3rd, 2001.

20 Who is on that flight?

21 A. Jeffrey Epstein, Virginia Roberts, Banu.

22 Q. And you are flying from Palm Beach to
23 St. Thomas again?

24 A. St. Thomas, yes.

25 Q. And then from St. Thomas to Teterboro two

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2 days later, on June 5th?

3 A. Jeffrey Epstein, Virginia Roberts, and
4 Banu.

5 Q. All right. And then where is the next
6 flight on the 8th?

7 A. On the 8th, from Teterboro to Montreal.

8 Q. Do you know what -- so Virginia Roberts
9 and Banu were not on the flight on the 8th, right?

10 A. That's correct.

11 Q. Okay. Do you remember the flight on the
12 8th with Naomi Campbell, Rebecca White, Ana Malova?

13 A. Sort of. But not really.

14 Q. Okay. Do you remember who Rebecca White
15 is?

16 A. No.

17 Q. Do you remember how old Rebecca White was?

18 A. No.

19 Q. The next flight I want to direct your
20 attention to is on the 15th of June, flight 1516.

21 A. Uh-huh.

22 Q. Passengers: Jeffrey Epstein, Ghislaine
23 Maxwell, and then does that say Sheridan?

24 A. Yes.

25 Q. Do you remember a passenger named Sheridan

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2 Gibson?

3 A. Possibly.

4 Q. And then it says, Caroline. Do you know
5 who Caroline is?

6 A. I do not.

7 Q. And then one female?

8 A. Yeah, I don't know who the female is.

9 Q. Okay. On the 28th, there is a flight
10 1523.

11 A. Uh-huh.

12 Q. From -- is that Portugal to St. Thomas?

13 A. No. It is the Azores.

14 Q. LPAZ?

15 A. Yes. It was a fuel stop.

16 Q. To St. Thomas?

17 A. Right.

18 Q. And then on that flight is Jeffrey
19 Epstein, Ghislaine Maxwell, Emmy Tayler and Ed
20 Tuttle, right?

21 A. Yes.

22 Q. Six days later, leaving on July 4th from
23 St. Thomas, who are your passengers?

24 A. Jeffrey Epstein, Prince Andrew, Virginia
25 Roberts, one female.

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2 Q. And do you know how Virginia Roberts got
3 to the Virgin Islands?

4 A. No.

5 Q. Is there any -- is it possible that the
6 Cessna took her or the Boeing took her? Or any
7 other aircraft that is owned by Jeffrey?

8 MR. PAGLIUCA: Object to foundation.

9 THE WITNESS: No, I would -- if I had to
10 guess, I would guess the airlines.

11 BY MR. EDWARDS:

12 Q. Okay.

13 A. Well, I know it wasn't the Boeing, because
14 the Boeing is not in operation at that point in
15 time. We hadn't flown it. I mean, it hadn't had
16 any passengers on board yet. That is like in August
17 of 2001.

18 Q. Okay. And the Cessna, did you take that
19 from Florida to the Virgin Islands?

20 A. It has been to the Virgin Islands, but I
21 don't think we ever took any passengers down there.

22 Q. Okay. All right. The next flight is
23 1525.

24 A. Okay.

25 Q. On July 8th, 2001.

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2 A. Okay.

3 Q. That leaves out of Palm Beach?

4 A. Okay.

5 Q. Where do you go on that?

6 A. Teterboro.

7 Q. And who are your passengers?

8 A. Jeffrey Epstein, Ghislaine Maxwell, Emmy
9 Tayler, Prince Andrew, Virginia Roberts, Sheridan
10 Gibson, maybe Sheridan Gibson-Beaute, I guess, and
11 one female.

12 Q. And then three days later, you leave out
13 of Teterboro to CPS?

14 A. Yes.

15 Q. Where is that?

16 A. That is St. Louis, actually it is Cahokia,
17 Illinois, across the river from St. Louis.

18 Q. Who are your passengers?

19 A. Jeffrey Epstein, Ghislaine Maxwell, Emmy
20 Tayler, Virginia Roberts. We were actually en route
21 to Santa Fe. We had a mechanical problem. We had
22 to go into there for maintenance.

23 Q. Do you remember having a mechanical
24 problem or is the log just refreshing your memory?

25 A. No, I remember because that was the only

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2 time we landed at Cahokia with passengers on board.

3 Q. What was the problem?

4 A. We had a -- we had a static line that had
5 cracked and it was causing our altimeters to not
6 agree. And then we went to the alternate system,
7 things got really worse because it was stopped up
8 with a mud dauber somewhere in the system. That is
9 why I remember that flight.

10 Q. When you landed in St. Louis did the
11 passengers get off the plane?

12 A. Yes. And then they airlined -- I believe
13 they airlined. They could have taken a charter, I
14 don't recall. But I know they didn't leave with us.

15 Q. All right. And the passengers that got
16 off the plane would have been Jeffrey Epstein,
17 Ghislaine Maxwell, Emmy Tayler and Virginia Roberts?

18 A. Yes.

19 Q. And then on the 16th, those five days
20 later, those same passengers leave Santa Fe?

21 A. Right.

22 Q. And go back to Teterboro?

23 A. Correct.

24 Q. When Jeffrey Epstein would go to his
25 townhouse in New York, would you always fly into

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2 Teterboro?

3 A. Most of the time. It would depend on the
4 airplane, too. Like the Boeing, you are not allowed
5 to take it into Teterboro.

6 Q. So while you had the Gulfstream, it seemed
7 like Teterboro?

8 A. Yeah, it is -- I mean, occasionally there
9 would be a LaGuardia in there, but not really often.

10 Q. So on the 16th, you fly in to Teterboro.
11 And then six days later, it looks like, flight
12 No. 15 -- oh, wait. All right.

13 So flight No. 1528, you fly into
14 Teterboro, Jeffrey Epstein, Emmy Tayler, Ghislaine
15 Maxwell and Virginia Roberts. Do you see that?

16 A. Yes.

17 Q. Then the next flight I have listed is
18 1530.

19 Do you know where 1529 is?

20 A. No, other than I'm gone for some reason.
21 I wasn't on that flight.

22 Let's see. July, approximately. I see I
23 went on vacation.

24 Q. Okay. And the 23rd, there is a flight
25 from Palm Beach to St. Thomas with Jeffrey Epstein,

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2 Shelly Lewis. Do you see that?

3 A. Yes.

4 Q. Five days later, the flight that leaves
5 St. Thomas does not have Shelly Lewis; is that
6 right?

7 A. Correct.

8 Q. And then you fly to Palm Beach?

9 A. Yes.

10 Q. And who are your passengers at that time?

11 A. Jeffrey Epstein, Virginia Roberts, yes.

12 Q. When you had the mechanical problem, do
13 you remember any of the passengers being scared or
14 frightened?

15 A. No. Not really. I mean, they didn't
16 really know that we had a problem. We just informed
17 them that we couldn't continue on to Santa Fe.

18 Q. Okay. And August 7th, 2001, flight 2?

19 A. Uh-huh.

20 Q. Is that the first flight that the Boeing
21 makes with passengers?

22 A. Correct.

23 Q. And that is Jeffrey Epstein, Ghislaine
24 Maxwell, Emmy Tayler, Prince Andrew and two females.
25 Do you remember who the two females were on the

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2 first passenger flight of the Boeing?

3 A. I do not.

4 Q. And then on the 7th -- at that flight flew
5 from Los Angeles to Albuquerque, correct?

6 A. Uh-huh.

7 Q. On the 14th, you were flying the Cessna
8 that has the 908GM tag.

9 A. Correct. Right.

10 Q. And then the next entry with passengers is
11 on the 16th. And you are flying the Boeing again,
12 right?

13 A. Yes.

14 Q. All right. Do you know who flew the
15 Boeing for flight 3, 4 and 5?

16 A. For 3, 4 and 5, no. Oh, yes. I know it
17 wasn't me. I do remember that now.

18 I went on vacation. And it was a contract
19 guy that flew for us while I was gone.

20 Q. Do you remember a passenger named
21 Alexander Dixon?

22 A. Alexander Dixon, no.

23 Q. Flight No. 11 on the Boeing?

24 A. Uh-huh.

25 Q. Now, the Boeing has the tag 908JE?

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2 A. Correct.

3 Q. That is what you were explaining in the
4 beginning, correct?

5 A. Correct.

6 Q. So September 3rd, the Boeing flies from
7 St. Thomas to HPN?

8 A. Yes, White Plains, New York.

9 Q. And your passengers?

10 A. Jeffrey Epstein, Ghislaine Maxwell, Emmy
11 Tayler, Adam Perry Lane, Banu, Sarah Kellen,
12 Alexander Dixon.

13 Q. Do you remember Sarah Kellen?

14 A. Yes.

15 Q. And do you remember what -- is that your
16 first time meeting Sarah Kellen, when she appears?

17 A. I don't think so. I thought she was on an
18 earlier flight. Let's see. But it could be. It
19 could be, I'm not sure.

20 Q. Do you know how Sarah Kellen got to
21 St. Thomas to be leaving St. Thomas with you?

22 A. No.

23 Q. Do you know what her relationship was, if
24 any, with Jeffrey Epstein?

25 A. She was -- Sarah was sort of taking over

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2 Emmy's position. Like an assistant to Ghislaine.

3 Q. All right. Page 53. January 15th, 2002.

4 A. Okay.

5 Q. There is a flight from Bedford,
6 Massachusetts; is that right?

7 A. Yes.

8 Q. To where is that going?

9 A. White Plains.

10 Q. And it's Jeffrey Epstein and Jessica.

11 A. Yes.

12 Q. Do you remember who Jessica is?

13 A. I do not.

14 Q. From White Plains, who are the passengers
15 going to St. Thomas?

16 A. Jeffrey Epstein, Ghislaine Maxwell, Sarah
17 Kellen, Prince Andrew, Cindy Lopez, Johanna and one
18 female.

19 Q. Do you remember Cindy Lopez?

20 A. Yes.

21 Q. And what did she do?

22 A. I don't know what she did, but I do
23 remember Cindy Lopez.

24 Q. Was she somebody that you believed to be a
25 masseuse?

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2 A. I'm not sure what her position was. It is
3 possible.

4 Q. All right. February 9th, 2002, flight 57
5 on the Boeing.

6 A. Okay.

7 Q. From Miami to White Plains.

8 A. Yes.

9 Q. Your passengers include Bill Clinton, four
10 Secret Service.

11 Did the Secret Service ask that you not
12 identify them by name?

13 A. No.

14 Q. Any reason that you didn't identify them
15 by name?

16 A. Didn't know their name.

17 Q. Two males, one female.

18 A. Right.

19 Q. Jeffrey Epstein, Ghislaine Maxwell, Sarah
20 Kellen and Prince Andrew.

21 A. Correct.

22 Q. Was that your first time meeting Bill
23 Clinton?

24 A. Yes.

25 Q. At that point, did you have any

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2 understanding of what was the relationship between
3 Jeffrey Epstein and Bill Clinton or Ghislaine
4 Maxwell and Bill Clinton?

5 A. No, I didn't have any idea.

6 Q. Had you seen any pictures, prior to that
7 time, of Bill Clinton in any of Jeffrey Epstein's
8 planes or homes?

9 A. Not him I'm aware of.

10 Q. Have you ever seen a picture of Bill
11 Clinton in Jeffrey Epstein's plane?

12 A. In his plane? I don't think so.

13 Q. Have you ever seen one in his homes?

14 A. Not that I can recall.

15 Q. Okay.

16 A. Oh, wait, wait. Back up. A picture of
17 Bill Clinton in the plane? Do you mean the picture
18 is on the wall in the airplane or a picture taken of
19 Bill Clinton on the plane?

20 Q. A picture of Bill Clinton on the wall of
21 the airplane.

22 A. I have a picture of me and actually the
23 crew with Bill Clinton on the plane, but it is not
24 on the wall of the airplane.

25 Q. And when was the picture of you with Bill

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2 Clinton taken?

3 A. I think it was the first flight.

4 Q. The flight that we just looked at?

5 A. Yes.

6 Q. To the best of your knowledge, is that the
7 first time that Bill Clinton flew with Jeffrey
8 Epstein or Ghislaine Maxwell?

9 A. To the best of my knowledge. It was the
10 first time that we had flown him.

11 Q. Okay. On flight No. 72, which is page 54,
12 March 10th.

13 A. Okay.

14 Q. The Boeing flies from St. Thomas to JFK;
15 is that right?

16 A. Yes.

17 Q. Is there any way of knowing when the
18 Boeing got to St. Thomas by these logs?

19 A. Yes, it got there on the 28th. Because it
20 is trip No. 71 above it. Oh, wait. Oh. Wait.
21 State the question again.

22 Q. Yes, exactly.

23 Do we know how or when the Boeing got to
24 St. Thomas? It is leaving out of St. Thomas on
25 flight 72, but flight 71 seems to me to land in Palm

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2 Beach.

3 A. Correct.

4 Q. So I'm just missing the kind of connection
5 there.

6 A. Yes. Me, too.

7 Q. Okay.

8 A. Yeah, I don't have an answer for that.

9 Q. Okay. Would somebody else have flown the
10 Boeing, while you were doing this simulator, the 6th
11 and 7th and 8th?

12 A. It is possible.

13 Q. That is one possible conclusion, based
14 upon what we have here?

15 A. That is probably what happened.

16 Q. Okay.

17 So then March 10th -- sorry. March 10th,
18 you fly to JFK, right?

19 A. Yes.

20 Q. March 4th, from JFK to Palm Beach. March
21 the 17th, from Palm Beach back to JFK. And then
22 March 19th, 2002, you fly from JFK to -- where is
23 that?

24 A. Luton, London.

25 Q. And who are your passengers?

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2 A. Bill Clinton. Doug Band. Three Secret
3 Service, Jeffrey Epstein, Ghislaine Maxwell, Sarah
4 Kellen.

5 Q. And the next day -- or, sorry, two days
6 later.

7 Do you know where those passengers stayed
8 in London?

9 A. I have to think about this one second.
10 No, in fact, I don't think they did. Because we
11 didn't spend the night there. We went there. I got
12 to the hotel. As soon as I got to the hotel, I got
13 word from Secret Service that President Clinton
14 wanted to leave that night, so we left that night.

15 So we made it to the hotel, the crew did,
16 but we were there not that long. Two or three
17 hours, four hours, maybe.

18 Q. Do you remember why he wanted to leave
19 that night?

20 A. No. No, because when we went there, we
21 thought we were going to be there for like probably
22 at least a couple of nights. But it didn't turn
23 out -- we didn't even spend one night there.

24 Q. Okay. So does this probably mean that you
25 got there late at night on the 19th, the early

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2 morning on the 21st?

3 A. We took off the 19th. So when we land
4 there, it is really the 20th. And probably when we
5 took off there, it is like after midnight or
6 thereabouts.

7 Q. And that is when you fly back to JFK?

8 A. Back to JFK, yes.

9 Q. And you went there with three Secret
10 Service and came back with 10?

11 A. Yes.

12 Q. How did that happen?

13 A. Well, there was an advance party waiting
14 for us when we got there and then when we came back,
15 they just flew back with us.

16 Q. What was the events that you were
17 traveling to London for?

18 A. I'm not sure. I would imagine, he was
19 probably giving a speech.

20 Q. Okay. And you came back with Bill
21 Clinton, Doug Band?

22 A. Yes.

23 Q. Who was Doug Band?

24 A. Doug was Bill Clinton's, he's an attorney,
25 and he was like his right-hand guy, really, as far

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2 as doing anything.

3 Q. Okay. And you also flew back with Jeffrey
4 Epstein, Ghislaine Maxwell, Sarah Kellen and Naomi
5 Campbell?

6 A. Yes.

7 Q. How did it happen that Naomi Campbell
8 joined the plane to come home?

9 A. I don't know. The same way she joined it
10 before I guess in Montreal. I don't know how she
11 was there. And one male, too. It looks like.

12 Q. All right. The next page is page 56,
13 flight 96.

14 A. Okay.

15 Q. Sorry. Let's back up to 94.

16 When the Boeing takes off from JFK, do you
17 know sometime during that trip that you are going to
18 be picking up President Clinton?

19 A. I think so. Let me see. We went to
20 Paris.

21 Yes, oh, yes. We knew that was going to
22 be a long trip.

23 Q. Okay.

24 A. So we knew at that point in time. I'm
25 almost certain that we knew.

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2 Q. What did you know about that trip?

3 A. We knew that was going to be a long trip
4 because we were going to go around the world.

5 So when we departed, it was about a week
6 later, as I recall, that we picked up Clinton. We
7 left JFK on the 11th, a little less than a week.
8 Half a week later, we picked up Clinton and from
9 there, we went to -- Hong Kong.

10 Q. So you fly in to -- on the 20th, flight
11 99, Jeffrey Epstein, Ghislaine Maxwell, and Sarah
12 Kellen.

13 A. Right.

14 Q. You fly in to a Naval air base in Japan?

15 A. Correct.

16 Q. How were you given access to stay in the
17 Naval air base?

18 MR. PAGLIUCA: Object to foundation.

19 THE WITNESS: The airplane, you mean?

20 BY MR. EDWARDS:

21 Q. Yes. It looks like it is there two days.
22 That is why --

23 A. I guess because we were picking up
24 President Clinton.

25 Q. And do you know where Jeffrey Epstein,

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2 Ghislaine Maxwell and Sarah Kellen stayed?

3 A. I do not.

4 Q. Was there a room for them on the Naval air
5 base?

6 A. No, I don't think -- nobody stayed at the
7 Naval air base.

8 Q. All right. And then on the 22nd, you
9 leave the Naval air base with -- who is that on that
10 flight?

11 A. Jeffrey Epstein, Ghislaine Maxwell, Sarah
12 Kellen, President Bill Clinton, Mike, Doug Band,
13 Janis and Jessica.

14 Q. You flew into the Naval air base with
15 Jeffrey Epstein?

16 A. Plus six other passengers.

17 Q. Okay. Are those secret service?

18 A. Most likely.

19 Q. You flew in to the Naval air base with
20 Jeffrey Epstein, Ghislaine Maxwell and Sarah Kellen
21 only, right?

22 A. Right.

23 Q. And nobody stayed on the Naval air base?

24 A. No.

25 Q. And you are there to pick up Bill Clinton?

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2 A. Yes.

3 Q. And you pick up Bill Clinton and six
4 passengers plus Mike?

5 A. Correct.

6 Q. Doug Band, who you have already explained
7 who that is with relation to Bill Clinton, and Janis
8 and Jessica.

9 A. Yes.

10 Q. Do you know who they are?

11 A. Yes.

12 Q. Who are Janis and Jessica?

13 A. Secret Service.

14 Q. How do you remember that?

15 A. Well, there is probably 8, 8 or 9 Secret
16 Service people there, two of them were women. The
17 other 7 -- and it was just easier to remember the
18 two women's names than the 7 other guys' names.

19 Q. This entry on January 22nd, 2002, Jessica,
20 is that the same or a different Jessica from --

21 A. On which one?

22 Q. Sure. Sorry. May 22nd. I think I
23 butchered the date before.

24 A. Right.

25 Q. May 22nd, 2002. Is that the same Jessica

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1 DAVID RODGERS

2 as January 15th, 2002, flying with Jeffrey Epstein?

3 A. January 15th.

4 MR. REINHART: Flight 48.

5 BY MR. EDWARDS:

6 Q. Right. It is flight 48.

7 A. I'm don't think -- no, I they wouldn't be
8 the same Jessica, no.

9 Q. Okay. After you pick up President Bill
10 Clinton, where did you fly?

11 A. We went to Hong Kong.

12 Q. Do you know what the purpose was?

13 A. I believe he was giving a speech.

14 Q. All right. And then from there, where did
15 you fly?

16 A. That would be Shenzhen, Japan -- or China.

17 Q. Okay. And do you remember the purpose
18 there?

19 A. Speech.

20 Q. And then where did you fly?

21 A. Singapore.

22 Q. Again, another speech?

23 A. Another speech.

24 Q. During the course of these days, where did
25 President Bill Clinton sleep?

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1 DAVID RODGERS

2 A. I guess at a hotel somewhere. I'm not
3 sure.

4 Q. Did he stay at the same place as Jeffrey
5 Epstein, Ghislaine Maxwell and Sarah Kellen?

6 MR. PAGLIUCA: Foundation.

7 THE WITNESS: I don't know.

8 BY MR. EDWARDS:

9 Q. All right. Were meals served on the
10 plane?

11 A. Something was served, but I don't know if
12 you would call it a meal. Probably. I'm sure we
13 had catering and stuff. I just don't recall.

14 Q. That was just typical back then to have
15 meals, especially for the President, right?

16 A. Normally we do not. And we probably did
17 have catering back then, but I don't recall.

18 Q. Okay. Where did you fly from Singapore?

19 A. Singapore, VTBD, I don't know. You have
20 your cheat sheet over there?

21 Q. VTBD, mine says Thailand.

22 A. I was going to guess Thailand.

23 Then from Thailand, I think we went to --

24 Q. My cheat sheet says Brunei?

25 A. Exactly. You don't want to go there.

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2 Q. You don't?

3 A. No.

4 Q. Okay. Was the purpose a speech at each
5 location to the best of your knowledge?

6 A. To the best of my knowledge, it was.

7 Q. All right. Do you know why it was that
8 Jeffrey Epstein and Ghislaine Maxwell and Sarah
9 Kellen accompanied him?

10 A. No.

11 Q. And then did you leave?

12 MR. REINHART: Did you answer that
13 question?

14 THE REPORTER: He said no.

15 MR. REINHART: I didn't hear it.

16 BY MR. EDWARDS:

17 Q. Did you leave President Bill Clinton and
18 Doug Band and the Secret Service in Brunei?

19 A. Hmm. It is possible.

20 What is WRR?

21 Q. Not found. Sorry.

22 A. Not good.

23 Q. That is the only entry in here that is not
24 found.

25 But the next one, VCBI says Sri Lanka?

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1 DAVID RODGERS

2 A. Okay. Then if that says Sri Lanka, then,
3 yes, we probably did leave Clinton in Brunei, I
4 think. And I think we went from there down to Bali.
5 We went to Bali without --

6 Q. Without Bill Clinton?

7 A. Yes.

8 Q. What was the purpose of the trip to Bali?

9 A. Just to get away.

10 Q. And then to Sri Lanka?

11 A. Sri Lanka was just a fuel stop on the way
12 to Paris. Two fuel stops.

13 Q. That's in Dubai?

14 A. Yes.

15 Q. And then you get to Paris?

16 A. Correct.

17 Q. And then you fly back to London?

18 A. Yes. Yes.

19 Q. All right. Do you remember the purpose of
20 the trip to London?

21 A. Yes.

22 Q. What was that?

23 A. We had to have our APU changed on the
24 airplane. It quit working in Paris. And we landed
25 there.

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1 DAVID RODGERS

2 Q. All right. The next page, page 57,
3 June 21st. Flight 1570. Where is that flight
4 leaving from?

5 A. Palm Beach to the Bahamas.

6 Q. And who is on the flight from Palm Beach
7 to the Bahamas?

8 A. Jeffrey Epstein, Ghislaine Maxwell, Sarah
9 Kellen, Cindy Lopez, Jean-Luc Brunel, Virginia
10 Roberts.

11 Q. All right. And that is on June 21st?

12 A. Yes.

13 Q. All right. And then there is a couple of
14 entries that say "reposition."

15 A. Right.

16 Q. That is flying back to Palm Beach and then
17 back down to the Bahamas?

18 A. Correct. Yeah, we left them there. And
19 we flew the airplane home.

20 Q. And then did you leave out of the Bahamas
21 on the 23rd.

22 A. Yes.

23 Q. Up to Teterboro.

24 A. And who are your passengers on flight
25 1573?

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1 DAVID RODGERS

2 A. Jeffrey Epstein, Ghislaine Maxwell, Sarah
3 Kellen, Cindy Lopez, Juliana Borres, I guess,
4 Jean-Luc Brunel, Melissa Stahl.

5 Q. A Virginia Roberts was taken to the
6 Bahamas. Do you know where she went from there?

7 A. I do not.

8 Q. Do you remember a Frederic Fekkai?

9 A. What is the name again?

10 Q. Fekkai, F-E-K-K-A-I. Frederic Fekkai?

11 A. First name?

12 Q. Fred.

13 A. Fred.

14 Q. Hairdresser?

15 A. The last name sounds familiar.

16 Q. All right. He's on a flight No. 116 on
17 the Boeing.

18 A. Uh-huh.

19 Q. June 27th?

20 A. Okay. I see.

21 Q. And there are -- it looks like a bunch of
22 passengers. Do you remember Daralyn Priest?

23 A. No. Where is she?

24 Q. Middle column.

25 A. Daralyn. Oh, yes, I see her. Right. I

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2 don't remember her.

3 Q. Do you remember that flight?

4 A. To Paris. Not really. It was a big
5 flight. We had a lot of people on it, which was
6 unusual, going to Paris. No, I don't.

7 Q. You don't remember it.

8 A. No.

9 Q. So you don't remember the purpose of the
10 flight?

11 A. No.

12 Q. July 2002, it is page 58. Go to flight
13 120.

14 A. Okay.

15 Q. LF?

16 A. That is Nice.

17 Q. And where do you go?

18 A. Tangiers.

19 Q. And then from Tangiers to?

20 A. To another place in Morocco. Marrakesh.
21 I think it is Marrakesh. I could be wrong on that
22 one. It is definitely Morocco.

23 Q. From there, is that where you pick up Bill
24 Clinton?

25 A. Let's see. GMME would be Rabat, the

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1 DAVID RODGERS

2 capital of Morocco, I believe.

3 Q. Did you know before this flight that you
4 at some point would be picking up Bill Clinton?

5 A. I think we did, yes.

6 Q. Who was on the flight with Bill Clinton?

7 A. Jeffrey Epstein, Ghislaine Maxwell, Sarah
8 Kellen, Prince Andrew, Cindy Lopez, President
9 Clinton, Doug Band, Mike, with Secret Service and 8
10 Secret Service people. So probably 9 Secret Service
11 people.

12 Q. So Mike is a person that is also -- that
13 is?

14 A. He's Secret Service, yes. That is just
15 what I recall. He was the lead guy of the Secret
16 Service.

17 Q. Where do you take Bill Clinton?

18 A. We went to the Azores for a fuel stop and
19 then we went to JFK. Kennedy, New York.

20 Q. Then on August 5th, in the Gulfstream, on
21 flight 1586, you leave from Teterboro and go to
22 Santa Fe; is that correct?

23 A. Correct.

24 Q. On that flight, you have Jeffrey
25 Epstein -- sorry, Jeffrey Epstein, Sarah Kellen and

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1 DAVID RODGERS

2 two females?

3 A. Yes.

4 Q. Do you know who those two females were?

5 A. No.

6 Q. How long does the plane, the Gulfstream,
7 stay in Santa Fe?

8 A. Let's see. 1586, Gulfstream. I don't
9 really know, because apparently, we had 1586 and the
10 next one I see is 1589. So it flew three places,
11 but I wasn't on that trip.

12 Q. 1587 and 1588 are missing, right?

13 A. That is what I'm saying.

14 Q. Because you are not on it?

15 A. I'm not on the trip.

16 Q. And 1589?

17 A. Uh-huh.

18 Q. Leaving out of Santa Fe, who are the
19 passengers?

20 A. Jeffrey Epstein, Ghislaine Maxwell, Sarah
21 Kellen, Cindy Lopez, Virginia Roberts, Dan Moran,
22 Eduardo, Alfred, Margarita and Nick Simmons.

23 Q. Do you know how Virginia Roberts got to
24 Santa Fe?

25 A. No.

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2 Q. Is there any way to get to Santa Fe from,
3 say, Florida -- well, strike that.

4 MR. PAGLIUCA: Bus, train, car.

5 BY MR. EDWARDS:

6 Q. Did you ever know Virginia Roberts to take
7 a train?

8 A. Not that I'm aware.

9 Q. Did you ever know her to take a bus?

10 MR. REINHART: To go to New Mexico?

11 THE WITNESS: Not that I'm aware. Maybe
12 she has, but I don't know about it.

13 BY MR. EDWARDS:

14 Q. Okay. I have a picture of her on
15 horseback at the ranch, so who knows.

16 Let's see. August 17th, sorry,
17 August 18th.

18 A. Okay.

19 Q. From Teterboro to Palm Beach?

20 A. Right.

21 Q. Who are your passengers?

22 A. Jeffrey Epstein, Virginia Roberts, one
23 female.

24 Q. All right. Do you remember who that
25 female was?

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1 DAVID RODGERS

2 CERTIFICATE OF OATH

3 STATE OF FLORIDA)

4 COUNTY OF MIAMI-DADE)

5

I, the undersigned authority, certify
that DAVID RODGERS personally appeared before
me and was duly sworn.

WITNESS my hand and official seal
this 8th day of June, 2016.

8

9

Kelli Ann Willis, RPR, CRR
Notary Public, State of Florida
Commission FF928291, Expires 2-16-20
+ + + + + + + + + + + + + + + + + + + +

12 CERTIFICATE

13 STATE OF FLORIDA)

14 COUNTY OF MIAMI-DADE)

I, Kelli Ann Willis, Registered
Professional Reporter and Certified Realtime
Reporter do hereby certify that I was
authorized to and did stenographically report the
foregoing deposition of DAVID RODGERS; that a
review of the transcript was not requested; and
that the transcript is a true record of my
stenographic notes.

I FURTHER CERTIFY that I am not a
relative, employee, attorney, or counsel of any
of the parties, nor am I a relative or employee of
any of the parties' attorney or counsel connected
with the action, nor am I financially interested
in the action.

Dated this 8th day of June, 2016.

23

24 KELLI ANN WILLIS, RPR, CRR

25

EXHIBIT 16

(Filed Under Seal)

Page 1

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

CASE NO. 15-CV-07433-RWS

-----x

VIRGINIA L. GIUFFRE,

Plaintiff,

v.

GHISLAINE MAXWELL,

Defendant.

-----x

May 18, 2016

9:04 a.m.

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

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

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1 Q. Okay. Great.

2 All right. Do you know a female by the
3 name of Ghislaine Maxwell?

4 A. Yes.

5 Q. And when did you first meet Ms. Maxwell?

6 A. 2001. March probably. End of
7 February/beginning of March.

8 Q. And how did you meet her?

9 A. She approached me while I was on campus at
10 Palm Beach Atlantic College.

11 Q. And what happened when she approached you?

12 A. She asked me if I could tell her how to
13 find someone that would come and work at her house.
14 She wanted to know if there was, like, a bulletin
15 board or something that she could post, that she was
16 looking for someone to hire.

17 Q. And what did you discuss with her?

18 A. I told her where she could go to -- you
19 know, to put up a listing. And then she asked me if
20 I knew anyone that would be interested in working
21 for her.

22 Q. Did she describe what that work was going
23 to be?

24 A. She explained that she lived in Palm Beach
25 and didn't want butlers because they're too stuffy.

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1 And so she just liked to hire girls to work at the
2 house, answer phones, get drinks, do the job a
3 butler would do.

4 Q. And did she tell you what she would pay
5 for that kind of a job?

6 A. At that moment, no, but later in the day,
7 yes.

8 Q. And what did she say?

9 A. Twenty dollars an hour.

10 Q. Was there anybody else with Ms. Maxwell
11 when you met her?

12 A. There was another woman with her. I don't
13 recall her or what she looks like or how old she
14 was.

15 Q. And what happened next?

16 A. And then she asked me if I would be
17 interested in working for her. And she told me that
18 she was -- I could trust her and that I could jump
19 in her car and go check out the house at that moment
20 if I wanted.

21 And so I said, Sure, let's do it, and went
22 to her home with her.

23 Q. And where was that home?

24 A. In Palm Beach.

25 Q. And did she describe that home as being

Page 12

1 magazines.

2 She and I went -- she wanted to take me
3 shopping to Worth Avenue, but it was a Sunday and
4 Nieman Marcus was closed, so we went back to, like,
5 a little book store. And I remember she bought, I
6 think, five pairs of reading glasses because she
7 thought Jeffrey would like them. He had them all
8 over the house. On every table there was reading
9 glasses.

10 And that's about it. It was a pretty
11 simple day.

12 Q. Were you paid that day for that work?

13 A. Yes.

14 Q. And how much were you paid? Do you
15 remember?

16 A. I don't remember how many hours I was
17 there -- I was there. She paid me cash.

18 Q. So Maxwell paid you?

19 A. Yes.

20 Q. And then was she the one who trained you
21 with what -- with respect to what you were supposed
22 to do during the day, directed you to, like you
23 said, go to --

24 A. I believe she was the one that was kind of
25 showing me around.

Page 13

1 Q. And how long did you work in that position
2 answering phones and doing --

3 A. Just that one day.

4 Q. Just that one day.

5 And did your duties change?

6 A. Well, the next time she called me, she
7 asked me if I wanted to come over and make \$100 an
8 hour rubbing feet.

9 Q. And what did you think of that offer?

10 A. I thought it was fantastic.

11 Q. And did you come over to the house for
12 that purpose?

13 A. Yes.

14 Q. And when you came over to the house, was
15 Maxwell present?

16 A. I don't recall.

17 Q. And what happened that second time you
18 came to the house?

19 A. At that point, I met Emmy Taylor, and she
20 took me up to Jeffrey's bathroom and he was present.
21 And her and I both massaged Jeffrey. She was
22 showing me how to massage.

23 And then she -- he took -- he got off the
24 table, she got on the table. She took off her
25 clothes, got on the table, and then he was showing

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1 me moves that he liked. And then I took my clothes
2 off. They asked me to get on the table so I could
3 feel it. Then they both massaged me.

4 Q. So it was more than a foot massage at that
5 point?

6 A. Yeah, it was mostly, like, legs and back.

7 Q. Was everybody in the room without clothes
8 on?

9 A. When they were on the massage table, yes.

10 Q. Did they -- when they got off the massage
11 table to perform the massage, did they dress or
12 did --

13 A. Yes.

14 Q. They dressed.

15 And do you recall who paid you for that
16 first day that you did the massages?

17 A. I don't recall.

18 Q. Do you recall whether Maxwell was at the
19 house during that first day when you were doing the
20 massage with Emmy and Jeffrey?

21 MS. MENNINGER: Objection, asked and
22 answered.

23 BY MS. McCAWLEY:

24 Q. You can answer.

25 A. I don't recall.

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1 Q. Who did Emmy work for?

2 A. Ghislaine.

3 Q. Did Maxwell ever refer to Emmy by any
4 particular term?

5 A. She called her her slave.

6 Q. You said your job duties changed. Did you
7 start to travel as part of your job with Jeffrey and
8 Ghislaine?

9 A. Yes. The next time they called me, they
10 asked me to go to New York.

11 Q. And did you -- do you recall when that was
12 approximately?

13 A. That was Easter of 2001.

14 Q. And do you recall who was on the plane
15 with you for that trip?

16 MS. MENNINGER: Objection, leading, form.

17 MS. McCAWLEY: Actually, I'm going to stop
18 really quickly and I'm going to ask for the
19 next exhibit, please.

20 MS. MENNINGER: This is 3?

21 MS. McCAWLEY: Yes. I'm going to mark
22 this as Exhibit 3 for purposes of the
23 deposition.

24

25

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1 leading.

2 THE WITNESS: Jeffrey Epstein; Ghislaine
3 Maxwell; AP and PK are the two women I do not
4 recall; Virginia Roberts; and myself.

5 BY MS. McCAWLEY:

6 Q. Do you recall how you flew back from the
7 location in the US Virgin Islands?

8 A. They put me on a commercial flight. I
9 wanted to be home in time for Easter.

10 Q. When you say "they," do you recall who
11 made those arrangements for you?

12 A. It could have been Ghislaine.

13 Q. Did you -- do you recall performing
14 massages while you were in the US Virgin Islands?

15 A. Yes.

16 Q. Who was involved in -- was there more than
17 one?

18 A. Yes. I massaged Ghislaine at one point.

19 And I massaged Jeffrey, Virginia and I, both, on the
20 beach.

21 Q. Were you dressed during the massage that
22 was on the beach?

23 A. Yes. Bikinis probably, most likely.

24 Q. Do you recall what Virginia was wearing?

25 A. I believe she was wearing a bathing suit,

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1 to object and then you can still answer. No
2 one is going to stop you from answering. I
3 just need to get the objection on the record,
4 in the same way she needs to be able to talk
5 before you. My apologies. I'm not trying to
6 cut you off, but I am supposed to get it in
7 before you answer.

8 BY MS. McCAWLEY:

9 Q. Did Jeffrey ever tell you why he received
10 so many massages from so many different girls?

11 MS. MENNINGER: Objection, hearsay.

12 BY MS. McCAWLEY:

13 Q. You can answer.

14 A. He explained to me that, in his opinion,
15 he needed to have three orgasms a day. It was
16 biological, like eating.

17 Q. And what was your reaction to that
18 statement?

19 A. I thought it was a little crazy.

20 Q. And what did -- do you recall what -- when
21 you observed the other females giving massages, do
22 you recall what they would dress like? Did they
23 wear scrubs or did they typically wear normal
24 clothes?

25 A. Normal clothes.

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1 MS. MENNINGER: Objection, leading.

2 BY MS. McCAWLEY:

3 Q. Do you believe that from your
4 observations, Maxwell and Epstein were boyfriend and
5 girlfriend?

6 A. Initially, yes.

7 Q. Did Maxwell ever share with you whether it
8 bothered her that Jeffrey had so many girls around?

9 MS. MENNINGER: Objection, leading,
10 hearsay.

11 THE WITNESS: No. Actually, the opposite.

12 BY MS. McCAWLEY:

13 Q. What did she say?

14 A. She let me know that she was -- she would
15 not be able to please him as much as he needed and
16 that is why there were other girls around.

17 Q. Did there ever come a time -- did you ever
18 take a photography class in school?

19 A. Yes.

20 Q. And did there ever come a time when
21 Maxwell offered to buy you a camera?

22 A. Yes.

23 MS. MENNINGER: Objection, leading.

24 BY MS. McCAWLEY:

25 Q. Did Maxwell ever offer to buy you a

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1 camera?

2 MS. MENNINGER: Objection, leading.

3 THE WITNESS: Yes.

4 BY MS. McCAWLEY:

5 Q. Was there anything you were supposed to do
6 in order to get the camera?

7 MS. MENNINGER: Objection, leading.

8 THE WITNESS: I did not know that there
9 were expectations of me to get the camera until
10 after. She had purchased the camera for me,
11 and I was over there giving Jeffrey a massage.
12 I did not know that she was in possession of
13 the camera until later.

14 She told me -- called me after I had left
15 and said, I have the camera for you, but you
16 cannot receive it yet because you came here and
17 didn't finish your job and I had to finish it
18 for you.

19 BY MS. McCAWLEY:

20 Q. And did you -- what did you understand her
21 to mean?

22 A. She was implying that I did not get
23 Jeffrey off, and so she had to do it.

24 Q. And when you say "get Jeffrey off," do you
25 mean bring him to orgasm?

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1 A. Yes.

2 Q. Did Ghislaine ever describe to you what
3 types of girls Jeffrey liked?

4 A. Model types.

5 Q. Did Ghislaine ever talk to you about how
6 you should act around Jeffrey?

7 A. She just had a conversation with me that I
8 should always act grateful.

9 Q. Did Jeffrey ever tell you that he took a
10 girl's virginity?

11 A. He did not tell me. He told a friend of
12 mine.

13 Q. And what do you recall about that?

14 MS. MENNINGER: Objection, hearsay,
15 foundation.

16 THE WITNESS: He wanted to have a friend
17 of mine come out who was cardio-kickboxer
18 instructor. She was a physical trainer.

19 And so I brought her over to the house,
20 and he told my friend Rachel that -- he said,
21 You see that girl over there laying by the
22 pool? She was 19. And he said, I just took
23 her virginity. And my friend Rachel was
24 mortified.

25

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1 BY MS. McCAWLEY:

2 Q. Based on what you knew, did Maxwell know
3 that the type of massages Jeffrey was getting
4 typically involved sexual acts?

5 MS. MENNINGER: Objection, foundation,
6 leading.

7 THE WITNESS: Yes.

8 BY MS. McCAWLEY:

9 Q. What was Maxwell's main job with respect
10 to Jeffrey?

11 MS. MENNINGER: Objection, foundation.

12 THE WITNESS: Well, beyond companionship,
13 her job, as it related to me, was to find other
14 girls that would perform massages for him and
15 herself.

16 BY MS. McCAWLEY:

17 Q. Did Maxwell ever refer to the girls in a
18 particular way?

19 A. At one point when we were in the islands,
20 we were all watching a movie and she called us her
21 children.

22 Q. Did anybody respond to that?

23 A. I don't recall.

24 Q. Did she ever refer to herself as a mother?

25 A. Yes, like a mother hen.

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1 Q. Do you remember anything notable about the
2 phone calls?

3 A. I just remember I always had to say, He's
4 unavailable, can I take a message?

5 Q. And where did you take a message?

6 A. On a little notepad next to the phone.

7 Q. Do you recall any small children calling
8 the house that day?

9 A. No.

10 Q. Were you speaking to anyone about their
11 school experience or anything like that?

12 A. No.

13 Q. Did you take any messages for famous
14 people?

15 A. They could have been famous and I would
16 have been clueless.

17 Q. Did you take messages at any other point
18 during the time that you worked with Jeffrey?

19 A. No.

20 Q. And you said you remember at the end of
21 that day being paid by Ghislaine?

22 A. Yes.

23 Q. And you were paid for doing the errands
24 and answering phones and whatever else you did?

25 A. Yes.

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1 Q. When you came upstairs, where was Virginia
2 sitting?

3 A. I don't remember.

4 Q. Do you remember what she was wearing?

5 A. No.

6 Q. She was already there when you got back
7 from sightseeing?

8 A. Yes.

9 Q. Tell me what happened with the caricature.

10 A. Ghislaine asked me to come to a closet.
11 She just said, Come with me. We went to a closet
12 and grabbed the puppet, the puppet of Prince Andrew.
13 And I knew it was Prince Andrew because I had
14 recognized him as a person. I didn't know who he
15 was.

16 And so when I saw the tag that said Prince
17 Andrew, then it clicked. I'm like, that's who it
18 is.

19 And we went down -- back down to the
20 living room, and she brought it in. It was just
21 funny because -- he thought it was funny because it
22 was him.

23 Q. Tell me how it came to be that there was a
24 picture taken.

25 MS. McCAWLEY: Objection.

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1 THE WITNESS: I just remember someone
2 suggesting a photo, and they told us to go get
3 on the couch. And so Andrew and Virginia sat
4 on the couch, and they put the puppet, the
5 puppet on her lap.

6 And so then I sat on Andrew's lap, and I
7 believe on my own volition, and they took the
8 puppet's hands and put it on Virginia's breast,
9 and so Andrew put his on mine.

10 BY MS. MENNINGER:

11 Q. And this was done in a joking manner?

12 MS. McCAWLEY: Objection.

13 THE WITNESS: Yes.

14 BY MS. MENNINGER:

15 Q. Do you recall a photo being taken of that
16 event?

17 A. Yes.

18 Q. You've never seen the photo?

19 A. No.

20 Q. You don't know whose camera it was?

21 A. No.

22 Q. Virginia was sitting on the couch next to
23 Andrew, not in a big leather armchair?

24 A. Maybe. I'm just trying to remember how I
25 remember it.

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1 exposed her bra, and she grabbed it and pulled it
2 down.

3 Q. Anything else?

4 A. That was the conversation that he had told
5 her that he had taken this girl's virginity, the
6 girl by the pool.

7 Q. Okay. Did Maxwell ever say to you that it
8 takes the pressure off of her to have other girls
9 around?

10 A. She implied that, yes.

11 Q. In what way?

12 A. Sexually.

13 Q. And earlier Laura asked you, I believe, if
14 Maxwell ever asked you to perform any sexual acts,
15 and I believe your testimony was no, but then you
16 also previously stated that during the camera
17 incident that Maxwell had talked to you about not
18 finishing the job.

19 Did you understand "not finishing the job"
20 meaning bringing Jeffrey to orgasm?

21 MS. MENNINGER: Objection, leading, form.

22 BY MS. McCAWLEY:

23 Q. I'm sorry, Johanna, let me correct that
24 question.

25 What did you understand Maxwell to mean

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1 when she said you hadn't finished the job, with
2 respect to the camera?

3 MS. MENNINGER: Objection, leading, form.

4 THE WITNESS: She implied that I had not
5 brought him to orgasm.

6 BY MS. McCAWLEY:

7 Q. So is it fair to say that Maxwell expected
8 you to perform sexual acts when you were massaging
9 Jeffrey?

10 MS. MENNINGER: Objection, leading, form,
11 foundation.

12 THE WITNESS: I can answer?

13 Yes, I took that conversation to mean that
14 is what was expected of me.

15 BY MS. McCAWLEY:

16 Q. And then you mentioned, I believe, when
17 you were testifying earlier that Jeffrey told you a
18 story about sex on the plane. What was that about?

19 MS. MENNINGER: Objection, hearsay.

20 THE WITNESS: He told me one time Emmy was
21 sleeping on the plane, and they were getting
22 ready to land. And he went and woke her up,
23 and she thought that meant he wanted a blow
24 job, so she started to unzip his pants, and he
25 said, No, no, no, you just have to be awake for

Page 150

1 A. No.

2 Q. Was it in the context of anything?

3 A. About the camera that she had bought for
4 me.

5 Q. What did she say in relationship to the
6 camera that she bought for you and taking
7 photographs of you?

8 A. Just that Jeffrey would like to have some
9 photos of me, and she asked me to take photos of
10 myself.

11 Q. What did you say?

12 A. I don't remember saying no, but I never
13 ended up following through. I think I tried once.

14 Q. This was the pre-selfie era, correct?

15 A. Exactly.

16 Q. I want to go back to this: You testified
17 to two things just now with Sigrid that you said
18 were implied to you.

19 A. Okay.

20 Q. The first one was it would take pressure
21 off of Maxwell to have more girls around?

22 A. Right.

23 Q. What exactly did Maxwell say to you that
24 led you to believe that was her implication?

25 A. She said she doesn't have the time or

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1

2 C E R T I F I C A T E

3 STATE OF FLORIDA)

 : ss

4 COUNTY OF MIAMI-DADE)

5 I, KELLI ANN WILLIS, a Registered
6 Professional, Certified Realtime Reporter and
7 Notary Public within and for The State of
8 Florida, do hereby certify:

9 That JOHANNA SJOBERG, the witness whose
10 deposition is hereinbefore set forth was duly
11 sworn by me and that such Deposition is a true
12 record of the testimony given by the witness.

13 I further certify that I am not related
14 to any of the parties to this action by blood
15 or marriage, and that I am in no way interested
16 in the outcome of this matter.

17 IN WITNESS WHEREOF, I have hereunto set
18 my hand this 18th day of May, 2016.

19

20

KELLI ANN WILLIS, RPR, CRR

21

22

23

24

25

EXHIBIT 17

(Filed Under Seal)

UNITED STATES DISTRICT COURT
for the
Southern District of New York

Civil Action No. 15-cv-07433-RWS

VIRGINIA GIUFFRE,

Plaintiff,

vs.

GHISLAINE MAXWELL,

Defendant.

10 VIDEO-DEPOSITION Sky Roberts
OF:

TAKEN BY: Defendant.

13 REPORTED BY: Karla Layfield, RMR
Stenographic Court Reporter
Notary Public
14 State of Florida at Large

15 DATE AND TIME: May 20, 2016, 8:33 a.m.

18 APPEARANCES: Laura A. Menninger, Esquire
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Denver, Colorado 80203
Attorney for Defendant

21 Brad Edwards, Esquire
22 Farmer, Jaffe, Weissing, Edwards,
FISTOS & LEHRMAN, PL
23 425 Andrews Avenue, Suite 2
Fort Lauderdale, Florida 33301
Attorney for Plaintiff

ALSO PRESENT: Kenneth Sarcony, Videographer

Owen & Associates Court Reporters
P.O. Box 157, Ocala, Florida
352.624.2258 * owenassocs@aol.com

1 Q Do you remember there being a job posting that
2 you felt like was appropriate for Virginia or did you just
3 go out and talk to the woman who ran the spa area on your
4 own?

5 A I just talked to Angela.

6 Q Okay. Do you recall whether this was intended
7 to be a full-time job?

8 A I don't remember if it was full time or just
9 summer jobs or, you know, during season. It was probably
10 for a season because Mar-a-Lago is seasonal.

11 I mean, I was there year round but a lot of
12 people are seasonal, you know, because it's like
13 snowbirds, you know, summertime comes and nobody wants to
14 be down in south Florida.

15 Q What would you call the season, the seasonal
16 aspect of Mar-a-Lago? What's the season?

17 A Probably from September or October to, you know,
18 maybe May, I guess.

19 Q Is that the coolest time?

20 A Times of the year, yes.

21 Q And it's more guests that come during that
22 period of time?

23 A Yes.

24 Q And is there more staff brought on during that
25 period of time?

1 we'll call her Angela.

2 A We've got to call her something, but, you know,
3 I didn't really know what her job title was, but I was
4 glad that they would give her a job.

5 Q Right.

6 A You know, and that, you know, I was hoping she
7 would be happy; that way she could, you know, go back and
8 forth to work with me. She didn't have to drive or
9 nothing.

10 Q Did you drive to and from work with her?

11 A Yes. Pretty sure I did, yeah.

12 Q Do you remember her hours being relatively the
13 same as yours?

14 A I'm pretty sure they were. Yes.

15 Q Do you recall her being in school at the same
16 time?

17 A No, I don't recall. I don't remember if she was
18 in school or not.

19 Q Is it possible it was over, say, winter break
20 or --

21 A I don't remember. I'm sorry. This is so long
22 ago. I mean, some things stick in my mind but some things
23 I just don't remember.

24 Q Do you remember whether Virginia wore a uniform?

25 A Yes, I think she did. Yeah. I think everybody

1 Q So you don't know if it was a couple days or a
2 couple weeks or a couple months or a couple years?

3 Anything in that --

4 A Well, it wasn't a couple years. It might have
5 been two weeks to two months. I don't know. It wasn't a
6 whole long time, you know.

7 Q Where were you when Virginia told you she might
8 be going to try to get this other job?

9 A Probably at work. She might have told me, like,
10 at lunch or whatever. I don't remember. That was so many
11 years ago. I just remember she said Ms. Maxwell was going
12 to, you know, get her a job with Jeffrey Epstein and learn
13 massage therapy. And I thought, well, that's great, you
14 know, because learning new jobs is all about life, you
15 know.

16 You've got to learn each -- you know, I've
17 learned a lot of different things over my lifetime so it's
18 good to learn every new job you can because that can help
19 you later in life and that's what I think I told her.

20 Q Okay. So the best you can recall today is you
21 had a conversation with her sometime at lunch perhaps at
22 Mar-a-Lago where she told you she was going to try to get
23 another job?

24 A Yes. And I thought that was a good thing.

25 Q Do you know now that you recall that, what

1 A No.

2 Q Did she ever call you from that home?

3 A Not that I know of.

4 Q Was this when she was still living at home with
5 you on Rackley Road?

6 A Yes. Yes.

7 Q Not Rackley Drive.

8 A Rackley Road.

9 Q Do you know whether Michael was living with you
10 at Rackley Road at the time or not?

11 A I don't think so. I don't remember. I didn't
12 care for Michael. Of course, what parent cares for your
13 daughter's boyfriend.

14 Q Why didn't you care for Michael?

15 A I didn't think anybody was good enough for my
16 daughter but that's just me.

17 Q I suspect you're right about all fathers.

18 Do you remember her telling you anything about
19 what her job with Mr. Epstein was going to be or was?

20 A She said it was going to be massage therapy.

21 Q Okay. Did she tell you she was getting some
22 training?

23 A Yes.

24 Q Did she tell you about the training?

25 A No. She just said she was being trained in
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1 massage therapy.

2 Q All right. When she came home at night from
3 working with Mr. Epstein, did she look distressed to you
4 in any way?

5 A Not that I remember.

6 Q Okay. Did she report any complaints about her
7 job with Mr. Epstein?

8 A Not to me.

9 Q Okay. Did she report them to anyone else who
10 then reported them to you?

11 A No.

12 Q Your wife, for example?

13 A I have no idea. Like I said, if she did tell my
14 wife, I never heard about it.

15 Q Okay. Have you ever met Ms. Maxwell?

16 A Not that I remember ever meeting her.

17 Q Do you know what she looks like?

18 A No.

19 Q Did you ever meet anyone else who worked with
20 Mr. Epstein?

21 A No.

22 Q Do you remember anyone else who worked for
23 Mr. Epstein bringing your daughter home, for example?

24 A No.

25 Q Did your daughter ever move into the home where
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1 Q Okay. But your hours, if I understood you
2 right, were approximately 7:00 a.m. to 3:00 p.m.?

3 A Yes.

4 Q And Tuesday through Saturday?

5 A Yes.

6 Q Those hours would be the same time as somebody
7 her age would have been in high school?

8 A Yes.

9 Q Okay. So does that -- does that give an
10 indication to you that the short period of time she was
11 working was during the summer when there was not school?

12 A It seems to be that way.

13 Q Okay.

14 A I mean, to me, yeah.

15 Q It could have been a summer job?

16 A Yes, it could have been.

17 Q Okay. You would not have, as a father, had her
18 working somewhere instead of going to school?

19 A No, I wouldn't.

20 Q And the day that Virginia came and spoke to you
21 about meeting someone named Ms. Maxwell who was offering
22 her another job, do you remember the conversation that you
23 had with Virginia on that day?

24 A No, not really. I just remember Virginia saying
25 that, you know, she met Ms. Maxwell at the spa and that

1 Q And there it describes her job at Mar-a-Lago as
2 lasting from August 2000 to September of 2001. Do you see
3 that?

4 A Yes.

5 Q Does that refresh your memory about how long she
6 was working there?

7 MR. EDWARDS: Form.

8 THE WITNESS: She didn't work that long.

9 MS. MENNINGER: Okay.

10 THE WITNESS: Like I say, it was more, like,
11 a couple of weeks. It wasn't --

12 BY MS. MENNINGER:

13 Q Well, earlier you testified it, might have been
14 a couple of months?

15 A Well, you know, for me, two weeks, two months, I
16 mean, I don't even remember how long I worked at
17 Mar-a-Lago. I told you I worked there six years and
18 according to them, it was, like, three years. Seemed like
19 six.

20 Q Well, earlier you testified that Mar-a-Lago was
21 more of a seasonal place, correct?

22 A Yes, well, it is seasonal. But I mean, they
23 could be open up the spa area during the summer too
24 because I'm sure a lot of people in Palm Beach come to get
25 massages and things like that. I mean, you know, the only

1 part they close off is where the chefs and all that, where
2 they didn't do any more big events and stuff.

3 Q Okay.

4 A But I think the kitchen was still open. I mean,
5 they had a dining room.

6 Q So if she didn't work there that long
7 August 2000 -- even though August is in the summer -- it
8 would not be unusual in your mind?

9 A No.

10 Q Okay. So she could have started working in
11 August of 2000, correct?

12 A She could have, yeah.

13 Q And while you don't think she worked all the way
14 until September of 2001 --

15 A No.

16 Q -- that would be consistent with your
17 recollection of it being more seasonal in the fall,
18 September --

19 MR. EDWARDS: Object to the form.

20 THE WITNESS: Yes.

21 BY MS. MENNINGER:

22 Q So if she worked in the fall, September,
23 October, something like that, that seems like that
24 accords with your memory, correct?

25 MR. EDWARDS: Object to the form.

1 C E R T I F I C A T E

2 STATE OF FLORIDA

3 COUNTY OF MARION

4 I, Karla Layfield, RMR, Stenographic Court
5 Reporter, do hereby certify that I was authorized to and
6 did stenographically report the foregoing deposition of
7 Sky Roberts; that said witness was duly sworn to testify
8 truthfully; and that the foregoing pages, numbered 1
9 through 142, inclusive, constitute a true and correct
10 record of the testimony given by said witness to the best
11 of my ability.

12 I FURTHER CERTIFY that I am not a relative or
13 employee or attorney or counsel of any of the parties
14 hereto, nor a relative or employee of such attorney or
15 counsel, nor am I financially interested in the action.

16 WITNESS MY HAND this _____ day of May, 2016, at
17 Ocala, Marion County, Florida.

18
19 _____
20 Karla Layfield, RMR
Stenographic Court Reporter
21
22
23
24
25

EXHIBIT 18

(Filed Under Seal)

Page 1

Page 3

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

JANE DOE NO. 2,
 Plaintiff,
 -vs-
 JEFFREY EPSTEIN,
 Defendant.

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

VIDEOTAPED DEPOSITION OF JUAN ALESSI
 VOLUME I

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

2139 Palm Beach Lakes Boulevard
 West Palm Beach, Florida 33401

Reported By:
 Sandra W. Townsend, FPR
 Notary Public, State of Florida
 PROSE COURT REPORTING AGENCY
 West Palm Beach Office

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Page 4

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E X H I B I T S
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1 (Pages 1 to 4)

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1 MS. EZELL: I'm going to ask -- I don't know
 2 whether you've still been serially designating
 3 Exhibits or whether we're doing them separately for
 4 deposition.

5 MR. CRITTON: I think we cannot trust that
 6 people will do them serially. I'd do them with
 7 each one.

8 MS. EZELL: Then would you mark this, please,
 9 as Exhibit 1 to this deposition.

10 And I'm just going to state on the record that
 11 I will keep that original. We will not attach it
 12 to the deposition.

13 (Exhibit number 1 was marked for
 14 identification purposes and retained by Counsel for the
 15 Plaintiffs.)

16 THE WITNESS: Yes, that's --

17 BY MS. EZELL:

18 Q. Can you identify that -- the young woman in
 19 those pictures?

20 A. Yes.

21 Q. Who is it?

22 A. That's V. -- V. Now that you says R., that
 23 is V.R. definite, a hundred percent.

24 MR. CRITTON: Let me just note my objection,
 25 as I did in A. Rod's deposition or Mr. Rodriguez's

1 THE WITNESS: Could have been. But, you know
 2 I am not -- I don't think I am a very good judge of
 3 ages. If you ask me how old you are, I really
 4 couldn't tell you.

5 MR. CRITTON: Kathy thinks she's 25.

6 MS. EZELL: In my dreams.

7 THE WITNESS: Now, again, I must tell you, I
 8 was never told to check any i.d.s on any of the
 9 people who work at the house.

10 BY MS. EZELL:

11 Q. I understand that. And, so, I think I'm just
 12 trying to establish that you didn't consider it part of
 13 your job description to worry about or consider the
 14 ages --

15 A. No.

16 Q. -- of the young women that came there?

17 A. Absolutely not. Absolutely not.

18 Q. And, so, you never really focused on that or
 19 particularly thought about it if they seemed young?

20 MR. CRITTON: Form.

21 THE WITNESS: I don't -- I didn't see that
 22 many young girls, you know, young, underage girls
 23 at the house. I never saw except the two girls
 24 that I mentioned that I think it was underage was
 25 N. for sure because she was still in high school.

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1 deposition, that I know you're going to confiscate
 2 Exhibit number 1. I think it's inappropriate. I
 3 think I should be allowed to have a copy of
 4 Exhibits that are being used in deposition. But
 5 I'll file a motion with the Court so we don't get
 6 into a pulling match over your Exhibits.

7 MR. BERGER: I would ask that the court
 8 reporter initial that.

9 MS. EZELL: Sure.

10 Oh, you did?

11 MR. WILLITS: She marked it.

12 MR. BERGER: Did she put her initials or did
 13 she just put a number or a letter?

14 MR. CRITTON: She's nodding that she did
 15 everything that she usually does, which means,
 16 initials, date and number.

17 MR. MERMELSTEIN: You can talk.

18 MR. WILLITS: But when you talk, use your
 19 initials.

20 BY MS. EZELL:

21 Q. How old did you think V.R. was at the time she
 22 began coming to Mr. Epstein's home?

23 A. She could have been 17, 18, 19.

24 Q. Could she have also been 15?

25 MR. CRITTON: Form.

1 And she -- she had dinner with her mother, a couple
 2 times with her mother. And she became an actress.
 3 She's an actress and she has done movies. And he
 4 help her in her career.

5 That's the only girl that I knew she was young
 6 because she was going to high school and I pick her
 7 up from high school sometimes. But she was not a
 8 massage therapist. She will go for dinner. And
 9 they will go for the movies and she sang sometimes
 10 because she was a singer. So she sung at the
 11 house. Beautiful girl. Very talented.

12 That's the only girl that I know that it
 13 was -- I would say, underage.

14 BY MS. EZELL:

15 Q. Okay. Did -- who told you that V.R. was a
 16 massage therapist?

17 A. Nobody.

18 Q. Did you assume that she was a massage
 19 therapist because you were told she was coming to give
 20 a massage?

21 A. No. I assumed she was a massage therapist
 22 because I was -- I drove Ms. Maxwell to Mar-a-lago,
 23 Donald Trump's residence. And I wait in the car while
 24 Ms. Maxwell got a -- I think it was a facial or massage.
 25 I don't know. But that day I remember this girl, V.,

12 (Pages 45 to 48)

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1 walking down from the main lobby towards the spa of
 2 Mar-a-lago. And I was driving Ms. Maxwell up, up the
 3 ramp. It's a little ramp there.

4 And Ms. Maxwell says, stop. And she went and
 5 talked to -- she went inside.

6 And that afternoon around 5:00 I saw V. came.
 7 She came to the house already, so she was there already.
 8 That was the first day I knew. And then she would come
 9 regularly.

10 Q. Did you ever meet any of V.'s family?

11 A. No. I think she was -- one time I think her
 12 father drove her there. And I met -- I don't know if it
 13 was the boyfriend or husband or -- but he had to wait,
 14 make him wait outside while she was at the house.

15 Q. Do you know the name or recognize the name
 16 Tony Santiago?

17 A. I think it was him.

18 Q. That was her --

19 A. I know he had an old beat-up car, Camaro or
 20 Mustang. I know it was very old car that I make him
 21 wait on the street one time. I make him come out of the
 22 driveway because we have to move some cars around.

23 Q. Did there ever come a time when Tony Santiago
 24 was welcome in the kitchen?

25 A. I think he came once in the kitchen, but

Page 50

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1 Ms. Maxwell told me to get him out.

2 Q. Did she tell you why?

3 A. No. She didn't -- I guess she didn't want to
 4 become, you know, everybody -- because some of these
 5 people came with their husbands and they wait outside.
 6 And I guess she didn't want this to become a norm for
 7 everybody to bring their companions while they have --
 8 they will do a massage for her.

9 Q. During the time you were there, did you ever
 10 know of Tony Santiago bringing any other girls to
 11 Mr. Epstein?

12 A. No. I knew that sometimes I saw V. bring
 13 other girls with her, not Tony Santiago.

14 Q. Do you remember the names of any of those
 15 girls --

16 A. No, I don't.

17 Q. -- that V. brought?

18 A. That was at the end of my stay there. No.
 19 That was a very -- at the very end of the last month of
 20 my stay.

21 Q. Did you give -- I don't believe I asked you,
 22 but if I did, forgive me. Did you give us an
 23 approximate year in which you were taking Ms. Maxwell to
 24 Mar-a-lago and saw V.R. for the first time?

25 A. That was at the -- at the end of my stay

1 there. So I would say, between three months maybe
 2 before I left. And I think I left at the end of the
 3 year, so it could have been -- I remember it was a very
 4 hard day because I had to wait in the sun outside in a
 5 convertible and I was dying, waiting for an hour for
 6 Ms. Maxwell. I think it was in the summer of 2002.

7 Q. And if I remember correctly, you left in
 8 November or December of 2002?

9 A. Yes.

10 Q. So that might have been perhaps July or August
 11 of 2002?

12 A. Uh-huh.

13 Q. And, so, as I understand it, you only saw V.R.
 14 come to that house during the last three months of your
 15 time at Mr. Epstein's?

16 A. Yes.

17 Q. Do you have any -- any sense or can you
 18 approximate how many times she came?

19 A. I cannot give you a number, but I would say,
 20 two, three times a week.

21 Q. You mentioned that sometimes you would have to
 22 call these massage therapists in the middle of the
 23 night. Did you ever have to call V. for Mr. Epstein in
 24 the middle of the night?

25 MR. CRITTON: Form.

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1 THE WITNESS: No. No.

2 BY MS. EZELL:

3 Q. Did there come a time while you were there
 4 that V.R. stayed in the house?

5 MR. CRITTON: Form.

6 THE WITNESS: I don't think so. I cannot
 7 remember. No.

8 BY MS. EZELL:

9 Q. How many bedrooms were there upstairs?

10 A. One, two, three -- one, two, three, four --
 11 four -- so that would be five, five bedrooms.

12 Q. Five. And, so, would one have been
 13 Mr. Epstein's bedroom?

14 A. Yes. His quarters was big, huge quarters.

15 Q. Sort of a suite?

16 A. Yeah. And he has -- this is the room. His
 17 bathroom was here and her bathroom was here. The main
 18 room was here. And we have -- it was two sets of doors
 19 before -- two sets of double doors before you can go
 20 into the suite. There was one on top of the stairway
 21 and one in the middle of the hallway. And then you walk
 22 into the -- into the suite.

23 Q. Okay. And you -- you just put a red eight by
 24 11 folder in front of you?

25 A. Yeah.

13 (Pages 49 to 52)

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1 A. Yes. Before she was married, yeah. They
2 split up and she went her own way.

3 Q. Did she marry a Glen Dubin (phonetics)?

4 A. That's correct. And Mr. Dubin used to come to
5 the house, too.

6 Q. Do you know, was Sarah Kellen ever one of the
7 massage therapists before she became an assistant?

8 A. I don't know if she was a massage therapist.

9 I don't remember setting up a massage table for her. I
10 think she was an assistant. And she would call -- at
11 the end of my stay, I was -- tried to pull aside from my
12 obligations and Sarah was doing all the phone calls and
13 all the arrangement and all the looking out for these
14 girls for the -- for massage therapists. They were
15 constantly.

16 Q. When did that role get transferred from you to
17 Ms. Maxwell, the role of looking after girls and calling
18 the girls?

19 A. I didn't look after -- out for girls.
20 Ms. Maxwell was the one that recruit -- I remember one
21 occasion or two occasions she would says to me, John,
22 give me a list of all the spas in Palm Beach County.
23 And I will drive her from one to the other one to PGA
24 and Boca. And she will go in, drop credit cards -- not
25 credit cards, but business cards, and she come out. And

1 Q. And they called him uncle, you said?

2 A. They called him uncle.

3 Q. Did you ever learn what Tony Santiago did for
4 a living?

5 A. No.

6 Q. Have you had any occasion to see him since the
7 time you left Mr. Epstein's employ?

8 A. No.

9 Q. And you don't -- do you have any idea where he
10 is?

11 A. I have no idea. I remember an incident, one
12 time the -- I went to pick her up at Royal Palm Beach
13 and she was crying and I went and knock at the door and
14 she was crying. And she says, well, -- I think it was
15 Tony or -- because she used to live with these other
16 guys, too. There were two guys and her or two couples.
17 I don't know the arrangements there. But I remember
18 that she told me the -- Tony or her boyfriend had got
19 mad and ripped the furniture, he cut the furniture in
20 pieces and he even broke the screens. Because I was --
21 when I went into to knock the door, the screen was all
22 ripped up like it was cut.

23 And she told me that he got mad at -- I don't
24 know what happened. I never saw him in there.

25 Q. Did she tell you he had hit her or beaten her

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1 then we go to -- she will recruit the girls. Was
2 never -- never done by me or Mr. Epstein or anybody
3 else, that I know.

4 I don't know about Sarah because Sarah was
5 there at the last, last -- probably last weeks of my
6 stay there. So I cannot say anything about Sarah.

7 Q. Was there any point in time -- well, let me
8 ask you this way: Did -- you said sometimes you would
9 call the girls to come --

10 A. Uh-huh.

11 Q. -- to give them massage. And sometimes
12 Ms. Maxwell would?

13 A. Yeah.

14 Q. Did there come a time when she took that over
15 entirely from you --

16 A. No.

17 Q. -- or that continued --

18 A. That's continued.

19 Q. -- until you left?

20 A. Yeah.

21 Q. Do you remember, is Jeffrey Epstein godfather
22 to one of the Dubin children?

23 A. I don't know if he godfather. I don't
24 remember that. But he was very fond to these children,
25 the children.

1 at all?

2 MR. CRITTON: Is the she, V., V.R.?

3 MS. EZELL: Yes. Thank you.

4 BY MS. EZELL:

5 Q. Did you ever see during the time you were
6 there photographs of V. in the house, the Epstein house?
7 V.R. in the Epstein house?

8 A. I don't think so. I don't think so.

9 Q. Did you ever see photographs of V.R. in
10 Ms. Maxwell's albums?

11 A. No.

12 Q. At the time you were employed by Mr. Epstein,
13 were there any hidden cameras?

14 A. No.

15 Q. You do know that he installed some after you
16 left, correct?

17 MR. CRITTON: Correct.

18 THE WITNESS: I don't know.

19 BY MS. EZELL:

20 Q. Wasn't there a camera involved in the incident
21 that -- the incident in which you took money from
22 Mr. Epstein?

23 A. Yeah. Yes. But I don't know if he install it
24 or not. That's what he told me.

25 Q. Okay.

15 (Pages 57 to 60)