

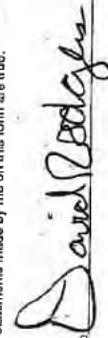
Date	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival		Flight No.	Remarks, Procedures, Maneuvers, Endorsements	Aircraft Category...			SEL	ME
			From	To			AIRPLANE	HELICOPTER			
2010 6	B-727-31H	N908JEC	PBJ	PBJ	491		LV	BA	1	5	
13	G-1159B	N909JEC	PBI	TIST	2086		BH	1/1	2	4	
13	"	"	TIST	PBI	2087		BH	1/1	2	5	
20	"	"	PBI	TCB	2088		LV	1/1	2	5	
21	"	"	TEB	PBI	2089		LV	1/1	2	4	
31	"	"	PBI	TIST	2090		LV	1/1	2	4	
31	"	"	TIST	PBI	2091		LV	1/1	2	7	
10/2	"	"	PBI	TEB	2092		LV	1/1	2	4	
3	"	"	TEB	PBI	2093		LV	1/1	2	7	
9	"	"	PBI	TIST	2094		LV	1/1	2	7	
9	"	"	TIST	PBI	2095		LV	1/1	2	5	
10	"	"	PBI	TEB	2096		LV	1/1	2	5	
11	"	"	TEB	PBI	2097		LV	1/1	2	4	
17	"	"	PBI	TEB	2098		LV	1/1	2	5	
18	"	"	TEB	PBI	2099	LARRY MORSEMAN LARRY MORSEMAN LARRY MORSEMAN	EM	1/1	2	4	
29	B-727-200 SIMULATOR	MIA	MIA				LV	1/1	2	6	
30	G-1159B	N909JEC	PBI	TIST	2100		LV	1/1	2	6	
2	"	"	TIST	PBI	2103		LV	1/1	2	6	
15	"	"	PBI	TIST	2106		LV	1/1	2	5	
							Page Total	10/10	45	5	
							Amount Forward	6413 6504	10595	3	3
							Total to Date	6423 6519	10646	8	3
									173	8	
									173	8	

I certify that the statements made by me on this form are true.

David Rodeger

Date 2010 08/24	Aircraft Model G-1159B	Aircraft Identification Mark N909JE	Points of Departure & Arrival		Flight No.	Wiles Flown	Remarks, Procedures, Maneuvers, Endorsements	Number of Landings		Aircraft Category... Airplane Glider Helicopter		SEL	MGL	Hazardous Category
			From	To				1/1	3/5	LV	LV			
27	B-72-314	N908JE	PBI	TST	2130	492	X	3/3	1/7	LV	LV	35	17	
29	G-1159B	N909JE	TST	EWR	2131			LV	3/6			36	36	
29	"	"	EWR	CPS	2132	EMPTY		LV	2/2			22	22	
NGV	"	"	CPS	TGB	2133	EMPTY		LV	2/0			20	20	
30 08/25	"	"	TGB	ABQ	2134			LV	2/0			40	40	
7	"	"	TGB	TGB	2135			LV	4/0			37	37	
13	"	"	ABQ	TGB	2136			LV	3/7			38	38	
19	"	"	TGB	TST	2137			LV	3/8			40	40	
30 08/26	"	"	TST	TGB	2138			LV	4/0			37	37	
17	"	"	TST	PBI	2139			LV	3/7			37	37	
18	"	"	PBI	TGB	2140	WIND NW		LV	2/1			CONFIDENTIAL	DR_00009929	
Feb	G-1159A	SIMULATOR	DFW	DFW				LV	2/1			24	24	
2	"	"	"	"				LV	2/4			20	20	
3	"	"	"	"			HOLDING	LV	2/0			20	20	
3	"	"	"	"				LV	2/0			20	20	
6	G-1159B	N909JE	TGB	TST	2141			LV	3/5			35	35	
10	G-1159B	NS30G-A	PBI	TGB	2142		JOHN ROBERTS	LV	2/4			24	24	
13	G-1159B	N909JE	TGB	BED	2143			LV	1/1	52/9		9	52/9	
								Page Total	13/10	52/9		9	52/9	
								Amount Forward	6931	6026	33	173	8	89258 S1
								Total to Date	6944	6754	33	173	8	88518 S1
									6235					

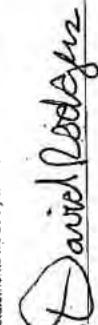
I certify that the statements made on this form are true.



Pilot's Signature

Date	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival		Flight No.	Remarks, Procedures, Maneuvers, Endorsements	Number of Landings	AIRCRAFT GLIDER HIGH CAPAC		SEL	MEL
			From	To				AIRCRAFT	GLIDER		
2011 Feb 13	G-1159B	N909JTE	B6D	PBJ	2144		LV	2	7	27	24
16	"	"	PBT	TTEST	2145		LV	2	4	17	17
18	S-76C++	N722JG	TTEST	LST			LV	2	3	17	17
19	"	"	LST	TFSX			LV	2	3	17	17
19	"	"	TESX	LST			LV	2	3	17	17
19	"	"	LST	TFSX			LV	2	3	17	17
20	"	"	TFSX	LST			LV	2	3	17	17
20	"	"	LST	TFSX			LV	2	3	17	17
20	G-1159B	N909JTE	TTEST	TGB	2146		LV	2	4	42	42
26	"	"	TGB	ABQ	2147		LV	2	5	50	50
Mar 1	"	"	ABQ	LGB	2148		LV	1	1	10	10
4	"	"	LGB	ABQ	2149		LV	1	1	10	10
10	"	"	ABQ	CPS	2150		LV	1	2	2	2
26	"	"	CPS	TEB	2151		LV	1	3	1	1
26	"	"	TEB	TTEST	2152		LV	3	4	3	3
27	"	"	TTEST	MDPC	2153		LV	1	1	3	3
27	"	"	MDPC	TTEST	2154		LV	1	1	3	3
28	"	"	TTEST	MDPC	2155		LV	1	1	3	3
			MDPC	TTEST	2156		LV	6	5	18	18
							Page Total	6944	6944	2176	2176
							Amount Forward	10154	10154	9	9
							Total to Date	10783	10783	5	5
								6540	6540	0	0

I certify that the statements made by me on this form are true.


David Rodger
Pilot's Signature

Date	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival		Flight No.	Remarks, Procedures, Maneuvers, Endorsements	Miles Flown	Number of Landings	Aircraft Category--		SEL	MEL	W
			From	To					A1A PLANE GUARDE	HELICOPTER			
20/11 29	G-1159B	N909JC	TIST	TGB	2157	TWA CONSIGLIO TUNINGO FBI RESTAURANT GENEVA GEORGIE REUSSIA	LV	1/	4	1	41		
30	S-76C++	N1223E	TGB	HN1							3		
30	"	"	4N1	TGB							3		
30	"	"	TGB	P0U							8		
30	B-727-200	SFMUJAR	SFB	SFB							20		
13	"	"	"	"	2161	BELL CHIEF - 20000' CLOUD DAK G-1020-20000' CLOUD GEN HANDBOOK 2000' CLOUD SPARE PARTS - FMA EXHIBITS SANDIC AS A BONE FG CHECK	20	2	2	2	20		
14	"	"	"	"	2162		20	2	2	2	20		
14	"	"	"	"	2163		20	2	2	2	20		
26	B-727-31H	N9083E	PBI	BOOK							12		
30	G-1159B	N909JC	TIST	TGB	2159	TEM POWELL LV	LV	1/	1	2	38		
MP	"	"	TGB	LFB	2160		LV	1/	3	8	CONFIDENTIAL DR 000101	74	
16	"	"	LFB	G00P	2161		LV	1/	7	4		63	
20	"	"	G00Y	GVAC	2162		LV	1/	6	3		12	
20	"	"	GVAC	TIS5	2163		LV	1/	6	4		64	
22	"	"	TIS5	TGB	2164	RANDY RONALD - EXHIBITS	LV	1/	4	1	41		
26	B185-457	N491GM	PBI-F45-PBS	REED SCHAFFER							16		
8	"	"	PBI-LNG-PBS	SHANE AS REPORTS							4		
26	G-1159B	N909JC	TIST	TGB	2164	SELE POMA REPORTS	LV	1/	40	40		40	
30	"	"	TGB	PBF	2167		LV	1/	24	24		24	
							Page Total	5/4	48	44		484	
							Amount Forward	6450	10783	5	33	1750	2176
							Total to Date	6544	10832	4	33	1794	2176

I certify that the statements made by me on this form are true.

David Looker

Pilot's Signature

Date From	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival		Flight No.	Remarks, Procedures, Maneuvers, Endorsements	Number of Landings	Aircraft Category... ...and Class	
			From	To				SEL	MCL
Nov 21 2011	B-727-200	N908SE	MIA	MIA		FLIGHT CHECK, RIDE PAST 125 LV	10		
25 " "	"	"	"	"		CAMP 1921 PC, HAWAIIAN LV	10	10	
Dec 1 2011	B-727-311W	N908TE	PBI	PBI	495	FLY BAL 211B, HAWAIIAN LV	20	20	
3 "	"	PBI	PBI		496	RVM TEST FLIGHTS LV	16	16	
13 " "	PBI	PBI			497	DEMO FLIGHTS FOR GATOR ENTERTAINMENT LV	11	11	
Jan 8 2012	G-1159B	N909JC	TEB	MHT	497	MAINTENANCE LV	9	9	
8 "	"	MHT	LFPB		14	14	9	9	
16 "	LFPB	GMMX	2195		LV	11	61	61	
17 "	"	GMMX	DIAP	2196	LV	11	30	30	
18 "	"	DIAP	GVAC	2197	LV	11	42	42	
18 "	"	GVAC	TIST	2198	LV	11	36	CONFIDENTIAL DR_009168	
23 B14T-467	N491GM	LST			LV	71	71	71	
24 G-1159D	N909JC	TIST	PBT	2199	LV	29	29	29	
Feb 12 G-1159A	SIMULATOR	DFW	DFW		LV	30	30	30	
13 "	"	"	"		HELIOS PILOT'S OPERATIONS DEPARTMENT, RTU, EO LIVERY - GRON	20	20	20	
Mar 8 2012-311H	N908SE	VQA	VQA	498	JFM BOTTIXIER	5	5	5	
6 "	"	VQA	PBJ	498	LV	9	9	9	
16 "	"	PBJ	TSK	499	58	24	24	24	
17 "	"	TSK	LFPB	500	58	24	24	24	
					75	75	75	75	
					Page Total	3/4	50	50	50
					Amount Forward	69641 6552	10872 8	33	88640 845
					Total to Date	6967 6556	10923 5	33	887467 846

I certify that the statements made by me on this form are true.

Daniel Stogre

Pilot's Signature

Flight Log - 2012							Hours Logged	MEL Landed
Date	Aircraft Model and Model	Aircraft Identification Mark	Points of Departure & Arrival	Miles Flown	Flight No.	Remarks, Procedures, Maneuvers, Endorsements	Number of Landings	Aircraft Category
MAR 19	B-717-31H	N908JE	LFB	EGHL	SOL	LASHAM MAFST	1/1	1 0
APR 18	G-1159 B	N909JE	TEB	TIST	2207	WARM UP TO SIGHTING AND LV GATED AT ENCL NEAR HOLDEN V CATERED TO PC HARVEY HARRY BROWN - GUNNISON	3 7	3 7
JUL 30	B-727-200 simulator	MIA	MIA	"	"	"	4 0	4 0
APR 1	"	"	"	"	"	"	4 0	4 0
JUL 3	G-1159 B	N909JE	TIST	PBT	2208	LV	2 7	2 7
JUL 4	"	"	PBT	TEB	2209	LV	1/1	2 5
JUL 5	"	"	TEB	TIST	2212	LV	3 5	3 5
JUL 20	"	"	TIST	TIST	2213	LV	3/3	2
JUL 21	"	"	TIST	TEB	2214	LV	1/1	3 8
JUL 26	"	"	TEB	PBT	2215	LV	2 4	2 4
JUL 30	"	"	PBT	CNW	2216	LV	1/1	2 4
SEP 30	"	"	CNW	ABQ	2217	LV	1/1	CONFIDENTIAL DR_000104
SEP 1	"	"	ABQ	SFO	2218	LV	2 3	1 5
SEP 6	"	"	SFO	ABA	2219	LV	2 1	2 3
SEP 18	"	"	ABA	TEB	2220	LV	3 6	3 6
SEP 22	"	"	TEB	FAD	2221	LV	1/1	3 9
SEP 22	"	"	FAD	PBT	2222	LV	2 3	2 3
SEP 26	"	"	PBT	TIST	2223	LV	2 6	2 6
SEP 26	"	"	TIST	TEB	2224	LV	1/1	3 8
Page Total							49 3	49 3
Amount Forward							6917	8 87467
Total to Date							6565	2176 8 87960

I certify that the statements made by me on this form are true.

David Plogue
Pilot's Signature

Date	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival		Flight No.	Remarks, Procedures, Manufacturers, Endorsements	Miles Flown	Number of Landings	Aircraft Category...	
			From	To					AEROPLANE	GLIDER
2/13 Feb 7	B-727-31H	N908JE	PBI	BQK	S67	RICKY GREGGIES INSTRUMENT ISLANDIC FLIGHTS Same as above	2245	1/1	1	1
13	G-1159 A	SEMIANNE	DFW	DFW	2246	GEORGE W.	2046	1/1	2	0
14	"	"	"	"	2246			3/3	2	0
16	G-1159B	N909JE	TEB	PBI	2246			1/1	3	0
18	"	"	PBI	TEB	2246			1/1	2	0
22	"	"	TEB	ABQ	2247			1/1	4	1
24	"	"	ABQ	LGB	2248			1/1	1	1
26	"	"	LGB	TEB	2249			1/1	4	0
MAR 1	"	"	TEB	PBI	2250	BILL GATES		1/1	2	5
19	"	"	TST	TEB	2251			1/1	4	2
APR 5	"	"	TEB	TST	2252			1/1	3	6
21	"	"	TST	TEB	2253			1/1	CONFIDENTIAL DR_000106	
25	"	"	TEB	ASE	2258			1/1		
25	"	"	ASE	ABQ	2259			1/1		
25	"	"	ABQ	TUL	2260			1/1		
29	"	"	TUL	VNY	2261			1/1		
30	"	"	VNY	TEB	2262			1/1		
MAY 4	"	"	TEB	TST	2263			1/1		
12	"	"	TST	PBI	2264	BELL MURPHY		1/1	2	7
								14/12-	514	
								6984 6583	110286 6581	33 180 6
								6988 6582	110860	33 180 6
								2176 3 2176 2		

I certify that the statements made by me on this form are true.

David Rodriguez
Pilot's Signature

Date 2013 MAY	Aircraft Make G-1159B	Aircraft Identification Mark N909JC	Points of Departure & Arrival		Flight No.	Remarks, Procedures, Maneuvers, Endorsements	Number of Landings	Aircraft Category... Proportion Glider Motorized		SEL : MEL
			From	To				Passenger	Cargo	
15	"	"	PBI	TST	2265	DARREN ROTHFELL	LV	2	3	23
22	"	"	TST	TSP	2266		LV	1	6	34
24	"	"	TSP	TEB	2267		LV	1	8	31
JUN 3	"	"	TST	TST	2268		LV	1	7	33
6	"	"	TSP	LFB	2269		LV	1	9	32
15	"	"	LFB	LPAZ	2270		LV	1	0	31
16	"	"	LPAZ	TST	2271		LV	1	9	33
24	"	"	TST	TEB	2272		LV	1	6	51
JUL 3	"	"	TST	TST	2273	SCHOF DIMARO	LV	3	9	33
19	"	"	TEB	TSP	2274		LV	1	8	33
19	"	"	BED	TST	2275		LV	1	9	33
25	"	"	TST	PBI	2276		LV	1	6	22
26	"	"	PBI	TEB	2277		LV	2	5	22
AUG 1	"	"	TEB	ABQ	2278	BELLY DIVE	LV	4	2	4
3	"	"	ABQ	LDS	2279		BD	1	3	1
4	"	"	LDS	ABQ	2280		BD	1	4	1
7	"	"	ABQ	ASE	2281		BD	1	1	1
7	"	"	ASE	BFI	2282		BD	1	2	2
							Page Total	16	11	58
							Amount Forward	6906 6581 7004	0	33 180 6
							Total to Date	6592	1144	33 180 6

I certify that the statements made by me on this form are true.

Daniel Rodriguez
Pilot's Signature

216 8 898
216 8 896

EXHIBIT CC

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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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Page 2

2

3 A P P E A R A N C E S:

4 BOIES SCHILLER & FLEXNER, LLP
5 Attorneys for Plaintiff
5 401 East Las Olas Boulevard
Fort Lauderdale, Florida 33301
6 BY: BRADLEY EDWARDS, ESQ.

7

8 HADDON MORGAN & FOREMAN, P.C.
9 Attorneys for Defendant
10 150 East 10th Avenue
Denver, Colorado 80203
10 BY: JEFFREY PAGLIUCA, ESQ.

11

12

13 ALSO PRESENT: Sandy Perkins, Paralegal
Boies Schiller & Flexner
14 Ryan Kick, Videographer
15

16

17

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2

3

I N D E X

4	Examination by Mr. Edwards	5
	Examination by Mr. Pagliuca	209
5	Further Examination by Mr. Edwards	217

6

7

8

E X H I B I T S

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	Equus Global Aviation offering	
22		
23		
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25		

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1 DAVID RODGERS

2 A. Yes.

3 Q. Can you -- can you tell me -- I have been
4 provided by your attorney a -- what has been
5 represented to be a copy, a direct copy of that
6 logbook. And I'm going to mark this as
7 Plaintiff's 1. I just want you to confirm that this
8 is an accurate copy of the original logbook that you
9 brought to your deposition today.

10 A. Yes.

11 MR. REINHART: Let him show it to you.

12 BY MR. EDWARDS:

13 Q. There you go.

14 (The referred-to document was marked by
15 the court reporter for Identification as
16 Deposition Exhibit 1.)

17 MR. REINHART: It is not a copy of the
18 entire book. It is the time period that was
19 covered by the subpoena. I just want to make
20 clear the book covers the time period outside
21 the subpoena.

22 MR. EDWARDS: Okay. I will let him
23 clarify that, of course, too.

24 THE WITNESS: Yes. It is logbook. It is
25 not 40 years, but it is my logbook.

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1 DAVID RODGERS

2 BY MR. EDWARDS:

3 Q. Okay. You can keep this -- that down
4 there --

5 A. Okay.

6 Q. -- so we can keep track of the exhibits.

7 A. Okay.

8 Q. So does the copy that you just went
9 through, is that an exact copy of the original
10 logbook from the November 1995 date through, it
11 looks like, September 2013? That period of time?

12 A. Yes.

13 Q. Okay. And what is this book? What do you
14 call the book?

15 A. It is called the standard pilot master
16 log.

17 Q. All right. And who made the various
18 entries in the book?

19 A. I did.

20 Q. When did you make --

21 MR. PAGLIUCA: Brad, can you hang on for
22 one second.

23 MR. EDWARDS: Sure.

24 MR. PAGLIUCA: You said September 2013, I
25 thought.

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1 DAVID RODGERS

2 MR. EDWARDS: That is what I have on the
3 last page.

4 MR. PAGLIUCA: My last page is 2008 on
5 this copy, 093 Bates label.

6 MR. REINHART: There's 108 pages to the
7 exhibit.

8 MR. PAGLIUCA: I'm missing the last 8
9 pages. That is why.

10 MS. PERKINS: Do you want the last copy?
11 What is your last page?

12 MR. PAGLIUCA: Ninety-three is my last
13 page.

14 That is why I only go through '08.

15 MS. PERKINS: So I will give you my '94 to
16 the end. That should give you a complete. Oh,
17 you're looking -- which one are you looking at,
18 the new one or the old one?

19 MR. EDWARDS: The one through '08.

20 MR. PAGLIUCA: Okay.

21 MR. EDWARDS: Okay. Are you ready, Jeff?

22 MR. PAGLIUCA: Yes.

23 BY MR. EDWARDS:

24 Q. When did you make each individual entry?

25 A. It could have been on that date that it

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1 DAVID RODGERS

2 says. It could have been possibly a later date.

3 Most likely, fairly close to that date.

4 Q. Okay. How did you make sure that the log
5 entries that you were creating were accurate?

6 A. Well, people get on the airplane and I see
7 who the people are, and I put them down there.

8 Q. Okay. So you are making the notation at
9 or around the time that you are making this
10 observation -- the observations?

11 A. Correct.

12 Q. And you are recording the data accurately
13 in your logbook?

14 A. As accurately as I can.

15 Q. Okay.

16 A. Yes.

17 Q. Can we just look at the first page of the
18 exhibit?

19 A. Uh-huh.

20 Q. And if you could walk me through, let's
21 just take the first line.

22 A. Uh-huh.

23 Q. In the top left corner, there is a date.

24 A. Correct.

25 Q. And it says, "NOV '95." Is that you

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1 DAVID RODGERS

2 indicating that this is November 1995?

3 A. Yes.

4 Q. Okay. And the first line under that in
5 the date column says 17. Is that November 17th,
6 1995?

7 A. Yes.

8 Q. Is that a notation that you would have
9 made on November 17th, 1995?

10 A. Yes.

11 Q. And the next column over under "aircraft
12 make and model," there is a number there. What is
13 that number?

14 A. That's the model of aircraft we're flying.
15 It's a G-1159B. It is Gulfstream, II-B aircraft.

16 Q. Okay. And then the next column over,
17 aircraft identification mark?

18 A. It is the registration number of the
19 aircraft.

20 Q. And what is the registration number? What
21 does that mean?

22 A. The number that is on the side of every
23 aircraft to identify what country it is from and
24 what particular airplane it is in that country. The
25 N means United States.

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1 DAVID RODGERS

2 Q. And is that number unique to the aircraft?

3 A. Yes.

4 Q. So there is no other aircraft at the same
5 time bearing the identification number in N908JE?

6 A. That's correct.

7 Q. Who picks the identification number? I
8 understand N means United States.

9 A. Right.

10 Q. Who picks the 908JE?

11 A. It depends -- some aircraft, I mean, when
12 you get them, they already have the number on there,
13 and so that would be one way. Sometimes the
14 manufacturer puts them on there.

15 You can also request a certain number, if
16 you so chose to do so.

17 Q. Okay. The particular air -- these
18 particular logs were produced in a -- as a
19 consequence of a subpoena issued in the case of
20 Virginia Roberts Giuffre versus Ghislaine Maxwell.

21 A. Uh-huh.

22 Q. Is that your understanding?

23 A. Yes.

24 Q. And the period of time that we were
25 produced -- I understand you have flown for 40

Confidential

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1 DAVID RODGERS

2 years. The period of time -- or that is evidenced
3 by this logbook is '95 through 2013.

4 Why was it that period of time that was
5 chosen?

6 A. Because that is what the subpoena
7 requested.

8 Q. Okay. Is that when you started flying for
9 Jeffrey Epstein?

10 A. No.

11 Q. When did you start flying for Jeffrey
12 Epstein?

13 A. July of 1991.

14 Q. Okay. Do you have available today the
15 entries going back as far as July 1991?

16 A. I don't know. I have to look and see.

17 Q. Okay.

18 A. No. Because this is from 7/28 of '94.

19 Q. Okay. So that particular logbook begins
20 July 28th, 1994?

21 A. Yes.

22 Q. And were you privately flying for Jeffrey
23 Epstein on November 17th, 1995?

24 A. Yes.

25 Q. And is that Gulfstream that you described

Confidential

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1 DAVID RODGERS

2 a Jeffrey Epstein owned or controlled airplane?

3 A. It was -- let me think.

4 This was 908 Juliet, Echo -- I believe it
5 was owned by Hyperion Air, Inc., I believe.

6 Q. And is Hyperion Air, to your
7 understanding, a company associated with Jeffrey
8 Epstein?

9 A. As far as I know. I mean, I would assume
10 so, but --

11 Q. Was Jeffrey Epstein your primary
12 passenger --

13 A. Yes.

14 Q. -- on that airplane?

15 A. Yes.

16 Q. And who was the individual that gave you
17 direction as to what passengers to let on and off
18 the airplane and where to fly, et cetera?

19 A. Well, Jeffrey was usually -- I mean,
20 almost always on the airplane, unless we were going
21 to maintenance. And so when he got there, he would
22 have the people with him.

23 Q. Okay. So going back to the aircraft
24 identification mark, 908JE, does the JE signify the
25 initials of Jeffrey Epstein?

Confidential

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1 DAVID RODGERS

2 A. I would assume so.

3 Q. Okay.

4 A. But technically they are actually the
5 phonetic letters that we use. But technically it is
6 Juliet echo; it is not Jeffrey Epstein. As far as
7 radio phraseology, we don't answer Jeffrey Epstein;
8 we answer Juliet.

9 Q. Okay. But the JE doesn't signify some
10 jurisdictional code?

11 A. No.

12 Q. It is -- it is chosen by the owner of the
13 aircraft?

14 A. Right. Right.

15 Q. So as his pilot and as Jeffrey Epstein
16 being the main passenger, you have presumed that JE
17 signifies his initials?

18 A. I would assume so.

19 Q. In fact, we will get to it later down the
20 road, but the -- the other plane also bears the
21 ending initials JE; is that right?

22 A. Yes.

23 And this N number that's on this airplane
24 was eventually switched to another airplane.

25 Q. To the Boeing?

Confidential

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1 DAVID RODGERS

2 A. To the Boeing, correct.

3 Q. Okay.

4 So if we go back to this first entry, the
5 next column says, "From CMH."

6 A. Yes.

7 Q. And what is that?

8 A. Columbus, Ohio.

9 Q. That is an airport code?

10 A. Airport identifier.

11 Q. And, again, that airport code is unique to
12 a particular airport?

13 A. Correct.

14 Q. The next is "To PBI"?

15 A. Yes.

16 Q. Where is that?

17 A. West Palm Beach.

18 Q. And flight number? The next column says
19 "Miles Flown."

20 A. Right.

21 Q. That is not something that you log.

22 A. I don't.

23 Q. You kept pretty meticulous logs.

24 So the next column is flight log -- or
25 flight number?

Confidential

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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?

Confidential

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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?

Confidential

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1 DAVID RODGERS

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.

Confidential

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1 DAVID RODGERS

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

Confidential

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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 DD

**INTENTIONALLY
LEFT BLANK**

EXHIBIT EE

Date: 4/25/16
Time: 8:51:56

ROYAL PALM BEACH POLICE DEPARTMENT
Citation Tracking Report

Page: 1
Program: CMS307L

Case Number . . . : 1-02-009702
Issued By . . . : KLOEPPING, KURT 6/19/02 13:55
Entry Employee : STEPNOWSKI, DOROTHY 6/24/02 13:55
Zone/Division : Zone Two (2) (So of Okee/E thr Wil)
District . . . : PATROL
Street Name . . . : CRESTWOOD BL /SPARROW
Last Name . . . : ROBERTS, VIRGINIA LEE
Street Number : [REDACTED] RD
City : LOXAHATCHEE, FL 33470
Birth Date . . . : [REDACTED]
Race : White Oper Lic No. . . : [REDACTED]
Sex : Female

***** V E H I C L E I N F O R M A T I O N # 1 *****
Case Number . . . : 1-02-009702 License Number : G13BTQ FL
Vehicle Year . . . : 1993 Make : PONTIAC
Style : TWO DOOR Color - Top . . . : White
Color - Bottom : White

***** V I O L A T I O N I N F O R M A T I O N # 1 *****
Case Number . . . : 1-02-009702 Citation Number: 9702BOE5
Statute/Ordin : 316.189 1 ???? : NA

* * * * * * * * * * * * * * * END OF REPORT * * * * * * * * * * * * * * *

CERTIFIED
TO BE A TRUE COPY
RIC L. BRADSHAW, SHERIFF

GM_00776

EXHIBIT FF

| ADMIN | OBTS Number | | PROBABLE CAUSE AFFIDAVIT | | | | 1. A.
2. N.T.A. | 3. Request for Warrant
4. Request for Capias | Juvenile |
|---|---|------------------------------------|--|--------------------------|--------------------|----------------------|--------------------|---|----------|
| | Agency OPI Number | Agency Name | | | | Agency Report Number | | | |
| | FLO_5_0_0_0_0_0 | PALM BEACH COUNTY SHERIFF'S OFFICE | | | | 0_6 | 02-094488 | | |
| DEF | Charge Type:
Check as many
as apply. | 1. Felony
2. Traffic Felony | 3. Misdemeanor
4. Traffic Misdemeanor | 5. Ordinance
6. Other | Special Notes: | | | | |
| CHARGES | Name (Last, First, Middle) | | | | Alias | Race | Sex | | |
| | Higginson, Anthony | | | | | | | | |
| | Charge Description | | | | Charge Description | | | | |
| | Grand Theft 812.014 (2) | | | | | | | | |
| | Charge Description | | | | Charge Description | | | | |
| VICTIM | Victim's Name (Last, First, Middle) | | | | Race | Sex | Date of Birth | | |
| | Hollywood United | (City) | (State) | (Zip) | Phone | | N/A | | |
| | Local Address (Street, Apt. Number) | | | | Address Source | | | | |
| | 12920 Wellington Tr Wellington Fl 33414-6133-1520 (act/compl) | | | | | | | | |
| | Business Address (Name, Street) | (City) | (State) | (Zip) | Phone | Occupation | | | |
| | Jane | | | | () | (None) | | | |
| The undersigned certifies and swears that he/she has just and reasonable grounds to believe, and does believe that the above named Defendant committed the following violation of law. | | | | | | | | | |
| The Person taken into custody ... | | | | | | | | | |
| <input type="checkbox"/> committed the below acts in my presence.
<input type="checkbox"/> confessed to _____
admitting to the below facts. | | | | | | | | | |
| <input checked="" type="checkbox"/> was observed by <u>Sarod D. Smith</u> who told _____
that he/she saw the arrested person commit the below acts.
<input checked="" type="checkbox"/> was found to have committed the below acts, resulting from my (described) investigation. | | | | | | | | | |
| On the _____ day of _____ 20____ at _____ □ A.M. □ P.M. (Specifically include facts constituting cause for arrest.) | | | | | | | | | |
| <p><u>On 8-15-02 a report was written by Deputy Command #2178 of a Grand Theft Case that occurred at Hollywood United Liquor located 12920 Wellington Trace in Wellington fl. On 8-11-02, The Store Manager Philip Powell advised that on 8-11-02 it was found that 18 beers games had been stolen out of their box and the Boxes left on the shelf. It was found that the suspect had come into the store while it was open to the public and had cut the side of the game box with a sharp object and took the game out of the box leaving the Box on the shelf. Mr. Powell advised that the game was captured on the surveillance camera and he made a video. On 8-20-02, the suspect was interviewed and advised he was the one who committed the offense. He further advised he was wearing long shorts and a long shirt. He observed his pants picking the game off the shelf place the tape under his shirt, then uses force placing the game in his pants.</u> </p> | | | | | | | | | |
| <p><u>STATE OF FLORIDA
COUNTY OF PALM BEACH</u></p> <p><u>(Signature of Arresting/Investigative Officer)</u></p> <p><u>Deputy Sarod D. Smith #3083</u></p> <p><u>I declare under penalty of perjury that the information contained in this affidavit is true to the best of my knowledge, information and belief.</u></p> <p><u>(Print Name of Arresting/Investigative Officer), who is personally known to me and/or produced identification. Type 21 Identifications attached.</u></p> <p><u>Sarod D. Smith #3083 12th Sept 2002 Personally Known</u></p> <p><u>Marty Public, Clerk of Court, Officer (F.S.S. 117.10)</u></p> | | | | | | | | | |
| <p>DISTRIBUTION: WHITE - Court Copy GREEN - State Attorney YELLOW - Agency PINK - Agency</p> <p>PAGE GM_01202
OF 1</p> | | | | | | | | | |

| ADMIN. | | PROBABLE CAUSE AFFIDAVIT | | | 1. Arrest
2. N.T.A. | | 3. Request for Warrant
4. Request for Capias | | Juvenile | | |
|--|--|--|--|--|---------------------------|--|---|--|----------|--|--|
| CHARGES DEF. | | Agency ORI Number
FLO-5 0 0 0 0 0 0 | Agency Name
PALM BEACH COUNTY SHERIFF'S OFFICE | Agency Report Number
0, 6-1021-0944-8811 | | | Special Notes: | | | | |
| VICTIM | | Charge Type:
Check as many as apply.
<input checked="" type="checkbox"/> 1. Felony
<input type="checkbox"/> 2. Traffic Felony | | <input type="checkbox"/> 3. Misdemeanor
<input type="checkbox"/> 4. Traffic Misdemeanor | | <input type="checkbox"/> 5. Ordinance
<input type="checkbox"/> 6. Other | | | | | |
| Name (Last, First, Middle) | | | | | Alias | | Race | | Sex | | |
| Charge Description
Grand Theft \$12.00 (281) | | | | | Charge Description | | | | | | |
| Charge Description | | | | | Charge Description | | | | | | |
| Victim's Name (Last, First, Middle) | | | | | | | Race | | Sex | | |
| Local Address (Street, Apt. Number)
12500 Wellington Trl Wellington FL 33411 | | (City)
Wellington | (State)
FL | (Zip)
33411 | Phone
8223-0520 | | Address Source
Next/Compe | | | | |
| Business Address (Name, Street)
Same | | (City)
Same | (State)
Same | (Zip)
Same | Phone | | Occupation | | | | |
| <p>The undersigned certifies and swears that he/she has just and reasonable grounds to believe, and does believe, that the above named Defendant committed the following violation(s) of law. The Person taken into custody ...</p> <p><input type="checkbox"/> committed the below acts in my presence.</p> <p><input type="checkbox"/> confessed to _____ admitting to the below facts.</p> <p><input checked="" type="checkbox"/> was observed by Spanot Angelos who told _____ that he/she saw the arrested person commit the below acts.</p> <p><input checked="" type="checkbox"/> was found to have committed the below acts, resulting from my (described) investigation.</p> | | | | | | | | | | | |
| <p>On the 20 day of 20, at □ A.M. □ P.M. (Specifically include facts constituting cause for arrest.)</p> <p>and placed the game back on the shelf. In some
between hours the subject is forcing the camera
and person on him getting the game tape in plain site.
Also Employee Tarned Angelos also visual the video
Surveillance tape and he gave a written statement the
the suspect is known to him Member #0962516974
this being Anthony Faccio, which he has known for
years. After which I said that you further also
did same crime in Case #03-107617 on 8-24-02
where he was also identified. The value of the stolen
property in this case is \$900.00 due to the damage to
the equipment (not to mention the damage to the victim's
camera equipment). I am not sure if the victim
has actions or not and looks filed for a warrant
not in system yet arrested 10-19-02</p> | | | | | | | | | | | |
| <p>STATE OF FLORIDA - PALM BEACH COUNTY</p> <p>I hereby certify that the foregoing is a true copy of the record in my office, with corrections, if any, as required by law.</p> <p>THIS 8 DAY OF Aug, 20 04</p> <p>SHARON R. BOOK
CLERK & COMPTROLLER</p> <p>Stated</p> <p>By DEPUTY CLERK</p> <p>Debra Smith</p> <p>Signature of Arresting Investigative Officer
Debra Smith</p> <p>My signature is voluntary and is made and acknowledged before me this 10th day of Oct, 2004, by Debra Smith.</p> <p>(Print name of Arresting Investigative Officer), who is personally known to me and/or produced identification, type of identification produced</p> <p>Debra Smith</p> <p>Notary Public, Clerk of Court, Officer (S.S. 117.10)</p> <p>GM_01203 PAGE OF</p> | | | | | | | | | | | |

IN THE CIRCUIT COURT OF THE FIFTEENTH JUDICIAL CIRCUIT
IN AND FOR PALM BEACH COUNTY, STATE OF FLORIDA
CRIMINAL DIVISION "W" (CGS)

STATE OF FLORIDA

vs.

ANTHONY LUIS ZAC FIGUEROA,
[REDACTED]

CASE NO. 02CF012205A02
BOOKING NO. 2002343589

RECEIVED
CIRCUIT CLERK'S OFFICE
Palm Beach County, Florida
02 SEP 12 2002

INFORMATION FOR

GRAND THEFT

ORIGINAL

In the Name and by Authority of the State of Florida:

BARRY E. KRISCHER, State Attorney for the Fifteenth Judicial Circuit, Palm Beach County, Florida, by and through his undersigned Assistant State Attorney, charges that ANTHONY LUIS ZAC FIGUEROA on or about August 11, 2002, in the County of Palm Beach and State of Florida, did knowingly obtain or use, or endeavor to obtain or use video games of a value of \$300.00 or more, which was the property of HOLLYWOOD VIDEO, or any other person not the defendant(s), with the intent to permanently or temporarily deprive HOLLYWOOD VIDEO or any other person not the defendant(s) of the property or benefit therefrom or to appropriate the property to the use of ANTHONY LUIS ZAC FIGUEROA or to the use of any person not entitled thereto, contrary to Florida Statute 812.014(1) and (2)(c). (3 DEG FEL)

Jill Estey Richstone
JILL ESTEY RICHSTONE
FL. BAR NO. 0928933
Assistant State Attorney

STATE OF FLORIDA
COUNTY OF PALM BEACH

Appeared before me, JILL ESTEY RICHSTONE Assistant State Attorney for Palm Beach County, Florida, personally known to me, who, being first duly sworn, says that the allegations as set forth in the foregoing information are based upon facts that have been sworn to as true, and which, if true, would constitute the offense therein charged, that this prosecution is instituted in good faith, and certifies that testimony under oath has been received from the material witness or witnesses for the offense.

Jill Estey Richstone
Assistant State Attorney

Sworn to and subscribed to before me this 25 day of October, 2002.

STATE OF FLORIDA • PALM BEACH COUNTY

I hereby certify that the foregoing is a
true copy of the record in my office with
revisions, if any as required by law.

Ellen Jordan
NOTARY PUBLIC, State of Florida

JER/sw



THIS 25 DAY OF OCTOBER, 2002
SHARON R. BOCK
CLERK & COMPTROLLER

FCIC REFERENCE NUMBER:
GRAND THEFT 2399 BY [Signature]

DEPUTY CLERK



Ellen Jordan
MY COMMISSION # CC799741 EXPIRES
December 28, 2002
BONDED THRU TROY FAIN INSURANCE, INC.

GM_01204

95nd
IN THE CRIMINAL DIVISION OF THE CIRCUIT COURT OF THE
FIFTEENTH JUDICIAL CIRCUIT OF FLORIDA.
IN AND FOR PALM BEACH COUNTY

CASE NO. 0201220SCF A02 DIV. W

OBTS NUMBER _____

STATE OF FLORIDA []

v.

Anthony Luis Zac Figueroa

DEFENDANT

DATE OF BIRTH :

W
RACE

M
GENDER

FILED

COMMUNITY
CONTROL
VIOLATOR

PROBATION
VIOLATOR

SOCIAL SECURITY NUMBER



01/28/2003 11:36:12 20030047647
OR BK 14720 PG 1936
Palm Beach County, Florida
Dorothy H. Wilken, Clerk
STATE OF FLORIDA - PALM BEACH COUNTY

I hereby certify that the foregoing is a true copy of the record in my office with redactions, if any, as required by law.

THIS 8 Aug, 2003 DAY OF
SHARON R. BOEK
CLERK & COMPTROLLER

Stowers
DEPUTY CLERK

JAN 15 2003

JUDGMENT

DOROTHY H. WILKEN, CLERK
CIRCUIT & COUNTY COURTS

The above Defendant, being personally before this Court represented by

S. Lawrence App

(attorney)

| | | |
|---|--|---|
| [] Having been tried and found guilty of the following crime(s): | X Having entered a plea of guilty to the following crime(s): | [] Having entered a plea of nolo contendere to the following crime(s): |
|---|--|---|

| COUNT | CRIME | OFFENSE STATUTE NUMBER(S) | DEGREE |
|-------|--------------------|------------------------------|-----------|
| 1 | <u>Grand Theft</u> | <u>812.014(1) and (2)(c)</u> | <u>8F</u> |
| | | | |
| | | | |
| | | | |

and no cause having been shown why the Defendant should not be adjudicated guilty. IT IS ORDERED THAT the Defendant is hereby ADJUDICATED GUILTY of the above crime(s).

and having been convicted or found guilty of, or having entered a plea of nolo contendere or guilty regardless of adjudication, to attempts or offenses relating to sexual battery (ch. 794), lewd and lascivious conduct (ch. 800), or murder (s. 782.04), aggravated battery (s. 784.045), burglary (s. 810.02), carjacking (s. 812.133), or home invasion robbery (s. 812.135), or any other offense specified in section 943.325, the defendant shall be required to submit blood specimens.

and good cause being shown, IT IS ORDERED THAT ADJUDICATION OF GUILT BE WITHHELD.

SENTENCE STAYED The Court hereby stays and withholds imposition of sentence as to count(s) and places the Defendant on Probation and/or Community Control under the supervision of the Dept. of Corrections (conditions of probation set forth in separate order).

SENTENCE DEFERRED The Court hereby defers imposition of sentence until _____.

The Defendant in Open Court was advised of his right to appeal from the Judgment by filing notice of appeal with the Clerk of Court within thirty days following the date sentence is imposed or probation is ordered pursuant to this adjudication. The defendant was also advised of his right to the assistance of counsel in taking said appeal at the expense of the State upon showing of indigency.

DONE AND ORDERED in Open Court at Palm Beach County, Florida, this

15 day of January, 2003

John J. Stowers
CIRCUIT COURT JUDGE

GM_01205

15

PLEA IN THE CIRCUIT COURT

THE FOLLOWING IS TO REFLECT ALL TERMS OF THE NEGOTIATED SETTLEMENT

Name: Anthony Luis Zac FigueroaPlea: Guilty Guilty/Bes Interest _____ Nolo Contendere _____

Case No. _____ Charge _____

Count _____

Lesser _____

Degree _____

2012206CFA02 Grand Theft

11

2012205CFA02 Grand Theft

3F
3F

FILED

JAN 15 2003

DOROTHY H. WILKEN, CLERK
CIRCUIT & COUNTY COURT
(ORM. DAY)

State to Nolle Prossse the following at sentencing:

PSI: Waived/Not Required Required/Requested _____ADJUDICATION: Adjudicate Withheld Court's Discretion []

If the Defendant is convicted of possession, sale, trafficking or conspiracy to possess, sell or traffic in any controlled substance, the Court directs the Department of Motor Vehicles and Highway Safety to revoke the Defendant's driver's license for two (2) years. If the Defendant is convicted of grand theft of a motor vehicle; theft of motor vehicle parts; or, any felony in the commission of which a motor vehicle was used, the Court directs the Department of Motor Vehicles and Highway Safety to revoke the Defendant's driver's license as mandated by law. The Clerk is directed to make the proper notifications.

SENTENCE:

| | | | |
|---------------------------|---------------------|----------------------|----------------------------|
| \$ _____ | Fine \$ _____ | Court Costs \$ _____ | Drug Trust Fund _____ |
| \$ _____ | Cost of Prosecution | \$ _____ | Public Defender Fees/Costs |
| Incarceration: _____ Days | Months _____ | Years _____ | |

with credit for time served; which is _____ days.

PROBATION:

ALL CONDITIONS OF PROBATION MUST BE SUCCESSFULLY COMPLETED NO LESS THAN 30 DAYS BEFORE PROBATION IS SCHEDULED TO TERMINATE UNLESS STATED BELOW.

STANDARD CONDITIONS OF PROBATION HAVE BEEN EXPLAINED BY DEFENSE COUNSEL.

SPECIAL CONDITIONS OF PROBATION:

- (A) Restitution as per the accompanying order. [] (check if ordered) \$1900.00
 - (B) Fine: \$ _____ Court Costs: \$ 31 Drug Trust Fund: \$ 50 \$201.00 *Probation, complete all conditions*
 - C) Cost of Prosecution \$ 50 Public Defender Fees/Costs \$ 190 \$601.00 *(check if ordered)*
 - D) Substance abuse evaluation and successful completion of recommended treatment [ordered] (enroll within 30 days) If in custody, release only to _____
 - E) _____ hours of community service at a rate of no less than _____ hours per month
 - F) Incarceration: _____ Days _____ Months _____ Year
- with credit for time served; which is _____ days. *Cost of supervision waived so long as restitution payments current.*

OTHER COMMENTS OR CONDITIONS:

To complete Theft Assessment course, to have no contact w/ Hollywood Video in Palm Beach County. If finds & agrees that they are in possession of S's lawful property they are to return property back

SENTENCING IS DEFERRED UNTIL

THE DEFENDANT UNDERSTANDS IF S/HE FAILS TO APPEAR OR IS ARRESTED ON NEW CHARGES, A CAPIAS WILL BE ISSUED AND THE COURT WILL IMPOSE ANY LAWFUL SENTENCE.

WHEREBY I, the undersigned, certify that the foregoing is a true copy of the record in my office with redactions, if any, as required by law.

THIS DAY OF July, 2003

Assistant State Attorney

SHARON R. BOCK
CLERK & COMPTROLLER

11/15/2003 Powers

IN COURT ROOM Hollywood Video in possession of S's lawful property they are to return property back

Attorney for the Defendant

X Anthony Figueroa GM 01206 that property back

Defendant

Date of Plea

DEPUTY CLERK

In the Circuit Court of the Fifteenth Judicial Circuit
In and For Palm Beach County, Florida

Case No. 02012206 CF A-2

Division: W

STATE OF FLORIDA

VS.

Anthony Luis Zac Figueroa
Defendant

FILED
Circuit Criminal Department

SHARON R. BOOK
Clerk & Comptroller
Palm Beach County, Florida

ORDER MODIFYING PROBATION

THIS cause has come before the Court on the Defendant's Violation of Probation. Upon consideration, it is hereby:

ORDERED AND ADJUDGED that the Defendant's Probation is modified as follows:

Probation extended for a period
of 6 months with which time
defendant will undergo a
drug abuse evaluation + commence
any recommended treatment +

Defendant admits the Violation of Probation.

All Original terms and conditions to remain in effect.

Defendant is sentenced to _____ days/months Palm Beach County Jail with credit for _____ days.

DONE AND ORDERED this 26 day of May, 2005.

STATE OF FLORIDA • PALM BEACH COUNTY



I hereby certify that the foregoing is a true copy of the record in my office with corrections, if any as required by law.

THIS DAY OF May, 2005

SHARON R. BOOK
CLERK & COMPTROLLER

By Maver
DEPUTY CLERK

Sharon R. Book
Circuit Judge

GM_01207

EB MAY 25 2005
38

| | | | | | | | |
|---|--|---|--|----------------|------------------------|---|----------|
| ADMIN. | OBTS Number
FLO 5 0 0 0 0 0 0 | PROBABLE CAUSE AFFIDAVIT | | | 1. Arrest
2. N.T.A. | 3. Request for Warrant
4. Request for Capias | Juvenile |
| DEF. | Agency ORI Number
PALM BEACH COUNTY SHERIFF'S OFFICE | Agency Name | Agency Report Number
0, 6 - 1521-107,6170 | Special Notes: | | | |
| CHARGES | Charge Type:
Check as many as apply.
<input checked="" type="checkbox"/> 1. Felony
<input type="checkbox"/> 2. Traffic Felony | <input type="checkbox"/> 3. Misdemeanor
<input type="checkbox"/> 4. Traffic Misdemeanor | <input type="checkbox"/> 5. Ordinance
<input type="checkbox"/> 6. Other | | | | |
| VICTIM | Name (Last, First, Middle)
Laverson, Anthony D. | Alias | Race | Sex | | | |
| | Charge Description
Grand Theft, FSS 812.04(8)(c) | Charge Description | | | | | |
| | Charge Description | Charge Description | | | | | |
| | Victim's Name (Last, First, Middle)
Anthony D. Laverson | | Race | Sex | Date of Birth | | |
| | Local Address (Street, Apt. Number)
1320 Wellington Park West Fla | (City) | (State) | (Zip) | Phone | Address Source | |
| | Business Address (Name, Street)
Scene | (City) | (State) | (Zip) | Phone | Occupation | |
| <p>The undersigned certifies, and swears that he/she has just and reasonable grounds to believe, and does believe that the above named Defendant committed the following violation of law.</p> <p>The Person taken into custody
 <input type="checkbox"/> committed the below acts in my presence.
 <input type="checkbox"/> confessed to _____ admitting to the below facts.</p> <p><input checked="" type="checkbox"/> was observed by _____ who told _____ that he/she saw the arrested person commit the below acts.</p> <p><input checked="" type="checkbox"/> was found to have committed the below acts, resulting from my (described) investigation.</p> <p>On the _____ day of _____ 20____ at _____ A.M. <input type="checkbox"/> P.M. (Specifically include facts constituting cause for arrest.)</p> | | | | | | | |
| <p>the video. On 8-30-02 this Detective met with Mr. Appali and two of his employees. We viewed the video tape and it was found that on the tape the crime was captured and it showed a man in long shorts wearing a long shirt picking up the video game shop and in some cases putting it under his shirt, then using force and then placing the tape back on the shelf. In some cases he is facing the camera and you can see him lifting the box and putting the video game in his pants. Store Employee, David Angelone also viewed the video tape and made a sworn statement that the suspect is known to him store number #109605-1620. The suspect Anthony Laverson who has known to him since 1998 and that the date of 8-30-02 he also made a sworn statement from store manager Mr. Appali advising his store will remain open until noon late afternoon 8-30-02 that shortly after left the store (interior) that Anthony</p> | | | | | | | |
| ADMINISTRATIVE | STATE OF FLORIDA
COUNTY OF PALM BEACH | <p>Sgt. D.G. O'Conor
Signature of Arresting/Investigative Officer
The foregoing instrument was sworn to or affirmed and subscribed before me this 20th day of August 2002 by <i>D.G. O'Conor</i></p> <p>(Print name of Arresting/Investigative Officer), who is personally known to me and/or produced identification. Type of Identification produced
<i>D.G. O'Conor #3745</i></p> <p>Notary Public, Clerk of Court, Officer #S.S. 117.10
<i>John L. H. 642</i></p> | | | | | |
| | | <p>GM_01209 PAGE 2 OF 3</p> | | | | | |

| | | | | | | | |
|--|--|--|--|--|--------------------|------------------------|----------|
| ADMIN | OBTS Number | PROBABLE CAUSE AFFIDAVIT | | | 1. Arrest | 3. Request for Warrant | Juvenile |
| | Agency ORI Number | Agency Name | 2. N.T.A. | 4. Request for Capias | | | |
| | FLO_5_0_0_0_0_0 | PALM BEACH COUNTY SHERIFF'S OFFICE | | | 0_6_1-1021-1076170 | | |
| CHARGES DEF | Charge Type:
Check as many as apply: | 1. Felony
<input checked="" type="checkbox"/> | 3. Misdemeanor
<input type="checkbox"/> | 5. Ordinance
<input type="checkbox"/> | Special Notes: | | |
| | | 2. Traffic Felony
<input type="checkbox"/> | 4. Traffic Misdemeanor
<input type="checkbox"/> | 6. Other
<input type="checkbox"/> | | | |
| VICTIM | Name (Last, First, Middle) | | | Alias | Race | Sex | |
| | <i>Luis Angelino Figueroa Anthony</i> | | | | | | |
| | Charge Description | | | Charge Description | | | |
| | <i>Grand Theft FSS 812.04(2)(b)</i> | | | | | | |
| | Charge Description | | | Charge Description | | | |
| | Victim's Name (Last, First, Middle) | | | Race | Sex | Date of Birth | |
| | <i>Luis Angelino Figueroa</i> | | | | | | |
| | Local Address (Street, Apt. Number) | (City) | (State) | (Zip) | Phone | Address Source | |
| | <i>26201 11th Street, Wellington, FL</i> | | | | | | |
| | Business Address (Name, Street) | (City) | (State) | (Zip) | Phone | Occupation | |
| | <i>Same</i> | | | | | <i>Sane</i> | |
| The undersigned certifies and swears that he/she has just and reasonable grounds to believe, and does believe that the above named Defendant committed the following violation of law. The Person taken into custody ... | | | | | | | |
| <input type="checkbox"/> committed the below acts in my presence.
<input type="checkbox"/> confessed to _____
admitting to the below facts.
<i>X was observed by Luis Angelino Figueroa who told Det. S. Smith that he saw the arrested person commit the below acts.</i>
<input type="checkbox"/> was found to have committed the below acts, resulting from my (described) investigation. | | | | | | | |
| On the _____ day of _____ 20____ at _____ □ A.M. □ P.M. (Specifically include facts constituting cause for arrest.) | | | | | | | |
| <p><i>Figuereroa came into the store with his had hanging this due to the possible cut received while committing the crime on Woodlawn, same on one of the video tapes you from him (he left the store), before police caught him).</i></p> <p><i>Due to my findings as stated herein and with nothing in kind of the account I find that he is Provable cause for the arrest of my Figuereroa for the crime of Grand theft as his actions are contrary to FSS.</i></p> <p><i>The above affidavit is submitted at the request of the Sheriff's Office.</i></p> | | | | | | | |
| PROBABLE CAUSE STATEMENT | <p>STATE OF FLORIDA - PALM BEACH COUNTY</p> <p>I hereby certify that the foregoing is a true copy of the record in my office within the elections, it has been so certified.</p> <p>THIS 8 DAY OF AUGUST 2002</p> <p>SHARON R. BOCK
CLERK & COMPTROLLER</p> | | | | | | |
| ADMINISTRATIVE | <p>STATE OF FLORIDA
COUNTRY OF PALM BEACH</p> <p>STATE OF FLORIDA
COURT OF APPEALS</p> <p>(Signature of Arresting/Investigative Officer)</p> <p>I, the undersigned law enforcement officer, affirm and subscribe before me this 30th day of August 2002, by <i>Det. S. Smith</i>, personally known to me and/or produced identification, place of identification produced <i>#3745</i>.</p> <p>(Print name of Arresting/Investigative Officer), who is personally known to me and/or produced identification, place of identification produced <i>Det. S. Smith</i>, personally known to me and/or produced identification, place of identification produced <i>#3745</i>.</p> <p>Notary Public, Clerk of Court, Officer (F.S.S. 117.10)</p> | | | | | | |
| | <p>By <i>Shaw</i>
DEPUTY CLERK</p> <p>GM_01210 PAGE 3 of 3</p> | | | | | | |

IN THE CIRCUIT COURT OF THE FIFTEENTH JUDICIAL CIRCUIT
IN AND FOR PALM BEACH COUNTY, STATE OF FLORIDA
CRIMINAL DIVISION "W" (CGS)

STATE OF FLORIDA

vs.

ANTHONY LUIS ZAC FIGUEROA,
W/M, [REDACTED]

CASE NO. 02CF012206A02
BOOKING NO. 2002343590

ORIGINAL

RECEIVED
2002 OCT 29 PM 11:15
Palm Beach County
Circuit Court Clerk

INFORMATION FOR:

GRAND THEFT

In the Name and by Authority of the State of Florida:

BARRY E. KRISCHER, State Attorney for the Fifteenth Judicial Circuit, Palm Beach County, Florida, by and through his undersigned Assistant State Attorney, charges that ANTHONY LUIS ZAC FIGUEROA on or about October 24, 2002, in the County of Palm Beach and State of Florida, did knowingly obtain or use, or endeavor to obtain or use video games of a value of \$300.00 or more, which was the property of HOLLYWOOD VIDEO, or any other person not the defendant(s), with the intent to permanently or temporarily deprive HOLLYWOOD VIDEO or any other person not the defendant(s) of the property or benefit therefrom or to appropriate the property to the use of ANTHONY LUIS ZAC FIGUEROA or to the use of any person not entitled thereto, contrary to Florida Statute 812.014(1) and (2)(c). (3 DEG FEL)

Jill Estey Richstone
JILL ESTEY RICHSTONE
FL. BAR NO. 0928933

Assistant State Attorney

STATE OF FLORIDA
COUNTY OF PALM BEACH

Appeared before me, JILL ESTEY RICHSTONE Assistant State Attorney for Palm Beach County, Florida, personally known to me, who, being first duly sworn, says that the allegations as set forth in the foregoing information are based upon facts that have been sworn to as true, and which, if true, would constitute the offense therein charged, that this prosecution is instituted in good faith, and certifies that testimony under oath has been received from the material witness or witnesses for the offense.

Jill Estey Richstone
Assistant State Attorney

Sworn to and subscribed to before me this 29 day of October, 2002.

Ellen Jordan
NOTARY PUBLIC, State of Florida

JER/sw

STATE OF FLORIDA • PALM BEACH COUNTY

FCIC REFERENCE NUMBERS
GRAND THEFT 21001



I hereby certify that the foregoing is a true copy of the record in my office with corrections, if any as required by law.
THIS DAY OF AUGUST, 2002
CLERK & COMPTROLLER
SHARON R. BOCK
CLERK & COMPTROLLER

Ellen Jordan
MY COMMISSION # CC799741 EXPIRES
December 28, 2002
BONDED THRU TROY FAIN INSURANCE, INC.

By *Sharon R. Bock*
DEPUTY CLERK

GM_01216



- (1) Not later than the fifth day of each month or as directed, you will make a full and truthful report to your Probation Officer on the form provided for that purpose.
- (2) You will pay to the State of Florida the amount of \$ **50.00 FIFTY DOLLARS** per month, plus a 4% surcharge, toward the cost of your supervision, unless otherwise exempted in compliance with Florida Statutes.
- (3) You will not change your residence or employment or leave the county of your residence without first procuring the consent of your Probation Officer.
- (4) You will neither possess, carry or own any weapons or firearm without first securing the consent of your Probation Officer.
- It is further ordered that you shall comply with the following conditions of probation:

Now, therefore, it is ordered and adjudged that the imposition of sentence are hereby withheld, and that you are hereby placed on probation for a period of **EIGHTEEN (18) MONTHS CONCURRENT WITH 02-12205CF-A02**, under the supervision of the Department of Corrections and its Officers, such supervision to be subject to the provisions of the laws of this State.

It appearing to the satisfaction of the Court that you are not likely again to engage in a criminal course of conduct, and that the ends of justice and the welfare of society do not require that you should suffer the penalty authorized by law;

The offense of **COUNT 1. GRAND THEFT** the court hereby adjudges you to be guilty of said offense; and

This cause coming on this day to be heard before me, and you, the defendant **ANTHONY LUIS ZACIGUEROA**, being now present before me, and you having:

PLED GUILTY TO

ANTHONY LUIS ZACIGUEROA

Defendant
-vs- Plaintiff

STATE OF FLORIDA
In The Circuit Court
of Palm Beach County, Florida
Case No. 02-12206CF-A02

ANTHONY LUIS ZACIGUEROA
Defendant
Luis ZACIGUEROA, being now present before me, and you having:

FILED
203 JAN 23 PM12:34
DOROTHY H. WILKINSON
CIRCUIT COURT
PALM BEACH, FL

JUDGMENT OF GUILTY
AND PLACING DEFENDANT ON PROBATION

Officer: 15-3
DC# W14116

HOY
"W"

ZacFigueroa, Anthony
Case # 02-12206CFA02

- (5) You will live and remain at liberty without violating any law. A conviction in a court of law shall not be necessary in order for such a violation to constitute a violation of your probation.
- (6) You will submit to Urinalysis, Breathalyzer or Blood tests, as directed by your Probation Officer or the Professional Staff of any treatment center where you may be receiving treatment, to determine the possible use of alcohol, drugs or controlled substances.
- (7) You will make a good faith effort to obtain lawful employment and support any dependents to the best of your ability as directed by your Probation Officer.
- (8) You will promptly and truthfully answer all inquiries directed to you by the Court or the Probation Officer, and allow the Officer to visit in your home, at your employment site, or elsewhere, and you will comply with all instructions he may give you.
- (9) RESTITUTION TO: HOLLYWOOD VIDEO IN THE AMOUNT OF \$1000.00 MINIMUM PAYMENT OF \$55.56 PER MONTH – CRO FILED
- (10) NO CONTACT WITH HOLLY VIDEO IN PALM BEACH CO.
- (11) ENTER AND COMPLETE: THEFT ABATEMENT PROGRAM
- (12) AUTOMATIC EARLY TERMINATION AFTER 12 MONTHS PROVIDED ALL CONDITIONS ARE SATISFIED

You are hereby placed on notice that the Court may at any time rescind or modify any of the conditions of your probation, or may extend the period of probation as authorized by law, or may discharge you from further supervision; and that if you violate any of the conditions of your probation, you may be arrested and the Court may revoke your probation and impose any sentence which it might have imposed before placing you on probation.

It is further ordered that when you have reported to the Probation Officer and have been instructed as to the conditions of probation you shall be released from custody if you are in custody and if you are at liberty on bond, the sureties thereon shall stand discharged from liability.

ZacFigueroa, Anthony
Case # 02-12206CFA02

It is further ordered that the Clerk of this Court file this order in his office, record the same in the Minutes of the Court, and forthwith provide certified copies of same to the Probation Officer for his use in compliance with the requirements of law.

DONE AND ORDERED IN OPEN COURT THIS 15TH DAY OF JANUARY, 2003.

Signed this 22 day of January, 2003. John J. H.
JUDGE

I acknowledge receipt of a certified copy of this order and that the conditions have been explained to me.

Date: _____ Probationer _____

Instructed by: _____

Original: Court
Copies: Probationer/File

DC4-900A

JF 1/16/03



STATE OF FLORIDA • PALM BEACH COUNTY

I hereby certify that the foregoing is a true copy of the record in my office with corrections, if any as required by law.

THIS 8 DAY OF Aug, 2003

SHARON R. BOCK

CLERK & COMPTROLLER

By Sharon
DEPUTY CLERK

In the Circuit Court of the Fifteenth Judicial Circuit
In and For Palm Beach County, Florida

02012205CF A-2

Case No. [REDACTED]

Division: [REDACTED]

STATE OF FLORIDA

VS.

Anthony Luis Zac Figueroa
Defendant

FILED

Circuit Criminal Department

SHARON R. BOCK
Clerk & Comptroller
Palm Beach County

ORDER MODIFYING PROBATION

THIS cause has come before the Court on the Defendant's Violation of Probation. Upon consideration, it is hereby:

ORDERED AND ADJUDGED that the Defendant's Probation is modified as follows:

Probation extended for a period
of 6 months with which time
defendant will undergo a
drug abuse evaluation + commence
any recommended treatment +

Defendant admits the Violation of Probation.

All Original terms and conditions to remain in effect.

Defendant is sentenced to _____ days/months Palm Beach County Jail with credit for _____ days.

DONE AND ORDERED this 20 day of May, 2005.



I hereby certify that the foregoing is a true copy of the record in my office with redactions, if any, as required by law.

THIS 8 Aug 16 DAY OF

SHARON R. BOCK
CLERK & COMPTROLLER

By Silver Salazar DEPUTY CLERK

Circuit Judge

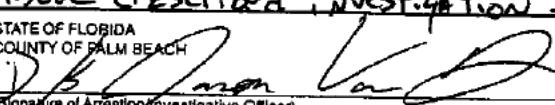
GM_01216

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MAY 24 2005

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| | | | | | | | | | | | | | | | |
|---|--|---|--|--|--|-----------------------------|--|---|--|---|--|--|--|---------------|--|
| OBTS Number | | ARREST / NOTICE TO APPEAR
Juvenile Referral Report | | | | | | 1. Stat 2. N.T.A. | | 3. Request for Warrant
4. Request for Capias | | Juvenile | | | |
| Agency ORI Number | | Agency Name | | | | | | | | Agency Report Number | | | | | |
| FLO 5 0 0 0 0 0 | | PALM BEACH COUNTY SHERIFF'S OFFICE | | | | | | | | 0 6 1 0 2 1 1 2 8 8 2 1 | | | | | |
| Charge Type:
Check as many as apply. | | <input checked="" type="checkbox"/> 1. Felony <input type="checkbox"/> 3. Misdemeanor
<input type="checkbox"/> 2. Traffic Felony <input type="checkbox"/> 4. Traffic Misdemeanor | | <input type="checkbox"/> 5. Ordinance
<input type="checkbox"/> 6. Other _____ | | | | | | If Weapon Seized
Enter Type | | Multiple Clearance Indicator | | | |
| Location of Arrest (Including Name of Business) | | | | | | | | | | | | Location of Offense (Business Name, Address) | | | |
| 13920 Wellington Trace Hollywood Video SAME | | | | | | | | | | | | | | | |
| Date of arrest | | Time of Arrest | | Booking Date | | Booking Time | | Jail Date | | Jail Time | | Location of Vehicle | | | |
| 10/19/2018 | | 10:19 | | | | | | | | | | | | | |
| Name (Last, First, Middle)
Fionsoa, Anthony Luis, Zac | | | | | | | | | | | | | | | |
| Alias (Name, DOB, Soc. Sec. #, Etc.) | | | | | | | | | | | | | | | |
| Race
W - White
B - Black | | Sex
I - American Indian
O - Oriental/Asian | | Height
5'9 | | Weight
145 | | Eye Color
Brn | | Hair Color
Brn | | Complexion
Med | | Build
Slim | |
| Scars, Marks, Tattoos, Unique Physical Features (Locs)
Scar on Left Arm | | | | | | | | | | | | | | | |
| Local Address (Street, Apt. Number) | | | | | | | | | | | | | | | |
| Physical Address (Street, Apt. Number) (City) (State) (Zip) Phone () | | | | | | | | | | | | | | | |
| Business Address (Name, Street) (City) (State) (Zip) Phone () | | | | | | | | | | | | | | | |
| D/L Number, State
Date of Birth
Place of Birth (City, State) Citizenship | | | | | | | | | | | | | | | |
| Social Security Number
Date of Birth
Place of Birth (City, State) Citizenship | | | | | | | | | | | | | | | |
| Co-Defendant Name (Last, First, Middle)
Relationship | | | | | | | | | | | | | | | |
| Parent Legal Custodian Name (Last) (First) (Middle)
Other | | | | | | | | | | | | | | | |
| Address (Street, Apt. Number) (City) (State) (Zip) Residence Phone ()
Business Phone () | | | | | | | | | | | | | | | |
| Notified by: (Name) (1) 31009 Date Time Juvenile Disposition
1. Handled/Processed within Dept. and Released.
2. TOT HRS/DYS
3. Incarcerated | | | | | | | | | | | | | | | |
| Released To: (Name) Relationship Date Time | | | | | | | | | | | | | | | |
| The above address was provided by <input type="checkbox"/> defendant and / or <input type="checkbox"/> defendant's parents. The child and / or parent was told
<input type="checkbox"/> Yes, by: (Name) <input type="checkbox"/> No: (Reason) School Attended Grade | | | | | | | | | | | | | | | |
| Property Crime? <input type="checkbox"/> Yes <input type="checkbox"/> No Description of Property Value of Property | | | | | | | | | | | | | | | |
| Drug Activity S. Sell R. Smuggle K. Dispense/ Distribute M. Manufacture/ Produce/ Cultivate Z. Other Drug Type B. Barbiturate H. Hallucinogen P. Paraphernalia/ Equipment U. Unknown N. N/A D. Deliver E. Use A. Amphetamine C. Cocaine M. Marijuana O. Opium/Deriv. S. Synthetic T. Traffic | | | | | | | | | | | | | | | |
| Charge Description Grand Theft Counts Domestic Violence Statute Violation Number 8 1 2 1 0 1 4 1 1 2 1 1 1 Violation of ORD # | | | | | | | | | | | | | | | |
| Drug Activity Drug Type Amount / Unit Offense # 02-128821 Warrant / Capias Number Bond | | | | | | | | | | | | | | | |
| Charge Description F.T.A. Counts Domestic Violence Statute Violation Number 8 4 3 1 1 5 1 1 1 1 Violation of ORD # | | | | | | | | | | | | | | | |
| Drug Activity Drug Type Amount / Unit Offense # 02-128821 Warrant / Capias Number Bond | | | | | | | | | | | | | | | |
| Charge Description Counts Domestic Violence Statute Violation Number 1 1 1 1 1 1 1 1 Violation of ORD # | | | | | | | | | | | | | | | |
| Drug Activity Drug Type Amount / Unit Offense # Warrant / Capias Number Bond | | | | | | | | | | | | | | | |
| Charge Description Counts Domestic Violence Statute Violation Number 1 1 1 1 1 1 1 1 Violation of ORD # | | | | | | | | | | | | | | | |
| Drug Activity Drug Type Amount / Unit Offense # Warrant / Capias Number Bond | | | | | | | | | | | | | | | |
| Location (Court, Room Number, Address) | | | | | | | | | | | | | | | |
| Court Date and Time
Month Day Year Time A.M. P.M. | | | | | | | | | | | | | | | |
| I AGREE TO APPEAR AT THE TIME AND PLACE DESIGNATED TO ANSWER THE OFFENSE CHARGED OR TO PAY THE FINE SUBSCRIBED. I UNDERSTAND THAT SHOULD I WILLFULLY FAIL TO APPEAR BEFORE THE COURT AS REQUIRED BY THIS NOTICE TO APPEAR, THAT I MAY BE HELD IN CONTEMPT OF COURT AND A WARRANT FOR MY ARREST SHALL BE ISSUED. | | | | | | | | | | | | | | | |
| Signature of Defendant (or Juvenile and Parent/ Custodian) Date Signed | | | | | | | | | | | | | | | |
| HOLD for other Agency
Name: | | | | Signature of Arresting Officer
X/S Jason K.D. | | | | Name Verification (Printed by Arrestee) | | | | | | | |
| <input type="checkbox"/> Dangerous <input type="checkbox"/> Resisted Arrest
<input type="checkbox"/> Suicidal <input type="checkbox"/> Other: _____ | | | | Name of Arresting Officer (Print)
VAN DUSEN 6142 | | | | (PRINT) | | | | | | | |
| Inmate Deputy
X/S Jason K.D. | | I.D. # 3334 | | Pouch # | | Transporting Officer I.D. # | | Agency PBSO | | Witness here if subject signed with an "X" GM-01217 | | CAA | | | |
| DISTRIBUTION: WHITE - COURT COPY GREEN - STATE ATTORNEY YELLOW - AGENCY PINK - AGENCY GOLD - DEFENDANT (N.T.A.'s ONLY) | | | | | | | | | | | | | | | |

| | | | | | | | |
|--|---|--|--|------------------|--|---|----------|
| ADMIN. | OBTS Number: | PROBABLE CAUSE AFFIDAVIT | | | 1. Arrest
2. N.T.A. | 3. Request for Warrant
4. Request for Capias | Juvenile |
| | Agency ORI Number:
FLO 5 0 0 0 0 0 0 | Agency Name:
PALM BEACH COUNTY SHERIFF'S OFFICE | | | Agency Report Number:
0 6 10 21 12 8 8 2 1 | Special Notes: | |
| DEF | Charge Type:
Check as many as apply.
<input type="checkbox"/> Felony
<input type="checkbox"/> Traffic Felony | <input type="checkbox"/> 3. Misdemeanor
<input type="checkbox"/> 4. Traffic Misdemeanor | <input type="checkbox"/> 5. Ordinance
<input type="checkbox"/> 6. Other | | | | |
| CHARGES | Name (Last, First, Middle):
Figueroa, Anthony | Alias | | Race
W | Sex
M | | |
| | Charge Description:
Grand Theft | Charge Description | | | | | |
| VICTIM | Charge Description | Charge Description | | | | | |
| | Victim's Name (Last, First, Middle):
Hollywood Video | | | Race
/ | Sex
/ | Date of Birth | |
| | Local Address (Street, Apt. Number):
13920 Wellington Trace Wellington FL 33414 | (City) | (State) | (Zip) | Phone
(| Address Source | |
| | Business Address (Name, Street):
13920 Wellington Trace Wellington FL 33414 | (City) | (State) | (Zip) | Phone | Occupation | |
| <p>The undersigned certifies and swears that he/she has just and reasonable grounds to believe, and does believe that the above named Defendant committed the following violation of law. The Person taken into custody ...</p> <p><input checked="" type="checkbox"/> committed the below acts in my presence.
 <input type="checkbox"/> confessed to _____ admitting to the below facts.</p> <p><input checked="" type="checkbox"/> was observed by Philip Napoli who told D/S Van Dusen that he/she saw the arrested person commit the below acts.
 <input checked="" type="checkbox"/> was found to have committed the below acts, resulting from my (described) investigation.</p> <p>On the 19 day of October 2002 at 600 <input type="checkbox"/> A.M. <input checked="" type="checkbox"/> P.M. (Specifically include facts constituting cause for arrest.)</p> | | | | | | | |
| <p>I responded to Hollywood Video located at 13920 Wellington Trace in Palm Beach County in response to a shoplifting call. PBSO dispatch was advised by store Manager Philip Napoli that two white males were stuffing the pockets of their shorts with video games. These w/m later identified as Anthony Figueroa and [REDACTED] were caught on video surveillance which has been entered into PBSO evidence. These 2 subjects were apprehended by myself and D/S Conley leaving the store. The subjects had 7 video games in the pockets of their shorts. (3 playstation 2, 3 X Box and 1 Gamecube). These games totaled \$350.00. Also these 2 subjects were identified by Napoli as they were leaving the store. It should be noted that Anthony Figueroa was apprehended attempting to enter his vehicle. He did have the driver side door open and was getting in. Upon search of his vehicle which was taken for forfeiture 6 other video games were found without receipts. These were placed into evidence. Store manager told me that [REDACTED] came to the counter and asked a clerk questions in an attempt to distract him while Figueroa left the store. [REDACTED] then also left. Neither subject made any attempt to pay for the games. Based upon the above described investigation I believe [REDACTED] was at the scene of the offense at the time of the arrest.</p> | | | | | | | |
| PROBABLE CAUSE STATEMENT | <p>STATE OF FLORIDA
COUNTY OF PALM BEACH

(Signature of Arresting/Investigative Officer)</p> <p>PROBABLE CAUSE STATEMENT
I hereby certify that the foregoing is a true copy of the record in my office with corrections, if any as required by law.</p> <p>THIS 18 DAY OF October, 2002, at 10:00 AM, at the office of CLERK & COMPTROLLER, BY SHARON R. ROCK, DEPUTY CLERK.</p> <p>The foregoing instrument was sworn to or affirmed and subscribed before me this 18 day of October, 2002, at 10:00 AM.
(Print name of Arresting/Investigative Officer), who is personally known to me and/or produced identification. Type of identification produced: Notary Public, Clerk of Court Officer (F.S.S. 117.10)
By: SHARON R. ROCK, DEPUTY CLERK</p> | | | | | | |
| ADMINISTRATIVE | <p>GM_0121 PAGE 1 OF 2</p> | | | | | | |
| <p>DISTRIBUTION: WHITE - Court Copy GREEN - State Attorney YELLOW - Agency</p> | | | | | | | |

IN THE CIRCUIT COURT OF THE FIFTEENTH JUDICIAL CIRCUIT
IN AND FOR PALM BEACH COUNTY, FLORIDA
CRIMINAL DIVISION

DS JASON VANDUSEN, 6142
PALM BEACH COUNTY SHERIFFS OFFICE
Agency case number 02-128821

CASE NO. 02CF012204A99
Booking No. 2002343586

STATE OF FLORIDA

vs.

ANTHONY LUIS ZAC FIGUEROA, W/M,



02 OCT 29
P.D.
53
E

NO FILE FOR:

GRAND THEFT

The State enters a no-file because the elements of the crime cannot be proven beyond a reasonable doubt.

BARRY E. KRISCHER, STATE ATTORNEY

DATE: October 28, 2002

By: J. Richstone

JILL ESTEY RICHSTONE
Assistant State Attorney
FL. BAR NO. 0928933

JER/sw

CLERK AND SHERIFF TO RESCIND NO CONTACT ORDER



STATE OF FLORIDA • PALM BEACH COUNTY

I hereby certify that the foregoing is a true copy of the record in my office with corrections, if any, as required by law.

THIS 8 DAY OF Aug 16, 2002
SHARON R. BOCK
CLERK & COMPTROLLER

By S. Bock
DEPUTY CLERK

GM_01219

PROBABLE CAUSE AFFIDAVIT

| | | | | | | |
|--|---|--|--|------------------------|-----------------------|------------|
| ADMIN IN | OBTS Number | 1. [REDACTED] | | 3. Request for Warrant | 1 | Juvenile |
| | Agency ORI Number
FLO 5 0 2 8 0 0 | Agency Name
ROYAL PALM BEACH POLICE DEPARTMENT | Agency Report Number
8 6 - 0 0 3 8 1 2 | 2. [REDACTED] | 4. Request for Capias | |
| DEF. | Charge Type:
Check as many
as apply.
<input checked="" type="checkbox"/> 1. Felony
<input type="checkbox"/> 2. Traffic Felony | <input type="checkbox"/> 3. Misdemeanor
<input type="checkbox"/> 4. Traffic Misdemeanor | <input type="checkbox"/> 5. Ordinance
<input type="checkbox"/> 6. Other | Special Notes: | | |
| CHARGES | Name (Last, First, Middle)
Figueroa, Anthony Luis Zac | Alias | | Race
W | Sex
M | |
| | Charge Description
Grand Theft Auto | Charge Description | | | | |
| VICTIM | Charge Description | Charge Description | | | | |
| | Victim's Name (Last, First, Middle)
Figueroa, Richard Jr. | | | Race
W | Sex
M | |
| | [REDACTED] | (zip) | Phone | Address | | |
| | Business Address (Name, Street) | (City) | (State) | (zip) | Phone | Occupation |
| The undersigned certifies and swears that he/she has just and reasonable grounds to believe, and does believe that the above named Defendant committed the following violation of law.
The Person taken into custody ...
<input checked="" type="checkbox"/> committed the below acts in my presence.
<input type="checkbox"/> confessed to _____ admitting to the below facts.
<input type="checkbox"/> was observed by _____ who told _____ that he/she saw the arrested person commit the below acts.
<input checked="" type="checkbox"/> was found to have committed the below acts, resulting from my (described) investigation. | | | | | | |
| On the <u>22nd</u> day of <u>October</u> <u>00</u> at <u>12:27</u> <input checked="" type="checkbox"/> A.M. <input type="checkbox"/> P.M. (Specifically include facts constituting cause for arrest.) | | | | | | |
| I met with victim Richard Figueroa, Jr., who told me that he allowed his brother, Anthony, to use his 1986 Mazda pick-up truck to drive a friend home to Okeechobee Blvd. and Cherry Road at about 8pm, on 10/21/00. Richard told me that he has always been very specific about the times and use he allows his brother to use the truck, to the extent that he has told Anthony that if the truck were not brought back in the allotted time, he would call the police and report the truck stolen. For this trip, Anthony told Richard he would be back in 30 minutes. At about 10:15pm, Anthony called Richard to say that the truck had a flat tire, and that he would be right home. Richard asked Anthony where he was and Anthony would not say. At about 12:22am, on 10/22/00, Richard called the police department to report the truck stolen. | | | | | | |
| I explained the seriousness about reporting a vehicle stolen, to the extent that is covered on the stolen vehicle affidavit. Richard filled-out this form and signed the same without any hesitation. Richard further stated that he had to be at work in the morning and was concerned since he needed the vehicle to get there. | | | | | | |
| At about 01:55am, Officer T.E. Murphy located and stopped this vehicle, near Huntington Woods and Royal Palm Beach Boulevard. Driving was a [REDACTED] and Anthony was in the passenger's seat. I responded to this location where the two were still inside the vehicle. Both subjects were placed under arrest for Grand Theft Auto. Anthony Figueroa, since he first had possession of the vehicle, depriving the victim of the same, and Luckett, for being in actual physical control of the vehicle, also depriving the victim use of his vehicle. | | | | | | |
| When the victim arrived to reclaim his vehicle, he inspected the tires and believed that they were the original tires and could not detect any evidence of a flat tire or use of a spare tire. He further wrote me another written statement, indicating to me that Luckett never had permission to drive his truck. | | | | | | |
| Figueroa went to the County Jail and [REDACTED] went to the Juvenile Assessment Center. | | | | | | |
| <p>FILED AM 6:52 CLERK F.
23 OCT 2000 CLERK & COMPTROLLER OF FLORIDA
FILED 23 OCT 2000 CLERK & COMPTROLLER OF FLORIDA
00 OCT 2000 CLERK & COMPTROLLER OF FLORIDA</p> <p>STATE OF FLORIDA - PALM BEACH COUNTY
I hereby certify that the foregoing is a true copy of the record in my office with all necessary signatures, initials, and other markings, if any, as required by law.
THIS DAY OF <u>8</u> AUGUST <u>2000</u>
SHARON R. BOCH
CLERK & COMPTROLLER
By <u>Sharon Boch</u>
DEPUTY CLERK</p> | | | | | | |
| ADMINISTRATIVE | SWORN AND SUBSCRIBED BEFORE ME

Sgt. Eli Shavit #70
NOTARY PUBLIC /CLERK OF COURT / POLICE OFFICER
10-22-00
DATE | | | | | |
| | SIGNATURE OF ARRESTING / INVESTIGATING OFFICER

Eli Shavit #70
NAME OF OFFICER (PLEASE PRINT) | | | | | |
| | 10-22-00
DATE | | | | | |
| | PAGE 1 OF 1 | | | | | |

| | | | | | | | | | | | | |
|--|---|---|--|---|---|--|---|--|--|--|--|---------------|
| ADMIN. | OBTS Number | PROBABLE CAUSE AFFIDAVIT | | | | | | | | | | Juvenile
1 |
| | Agency ORI Number
FLO 5 0 2 8 0 0 | Agency Name
ROYAL PALM BEACH POLICE DEPARTMENT | Charge Type:
Check as many as apply: | <input checked="" type="checkbox"/> 1. Felony | <input type="checkbox"/> 3. Misdemeanor | <input type="checkbox"/> 5. Ordinance | <input type="checkbox"/> 7. Request for Warrant | | | | | |
| CHARGES DEF. | Name (Last, First, Middle)
Figueroa, Anthony Luis Zac | Agency Report Number
8 6 - 0 0 3 8 1 2 | <input type="checkbox"/> 2. Traffic Felony | <input type="checkbox"/> 4. Traffic Misdemeanor | <input type="checkbox"/> 6. Other | <input type="checkbox"/> 8. Request for Capias | Special Notes: | | | | | |
| DEMOGRAPHICS | Alias | Race
W | Sex
M | | | | | | | | | |
| Charge Description
Grand Theft (Auto) | Charge Description | | | | | | | | | | | |
| Charge Description | Charge Description | | | | | | | | | | | |
| Victim's Name (Last, First, Middle)
Figueroa, Richard Jr | Race
W | Sex
M | | | | | | | | | | |
| (Name)
[REDACTED] | (State)
[REDACTED] | (zip)
[REDACTED] | Phone
[REDACTED] | Address
[REDACTED] verbal | | | | | | | | |
| (Name)
[REDACTED] | (State)
[REDACTED] | (zip)
[REDACTED] | Phone
[REDACTED] | Occupation | | | | | | | | |
| <p>The undersigned certifies and swears that he/she has just and reasonable grounds to believe, and does believe that the above named Defendant committed the following violation of law.
 The Person taken into custody ...</p> <p><input checked="" type="checkbox"/> committed the below acts in my presence.
 <input type="checkbox"/> confessed to _____ admitting to the below facts.</p> <p><input type="checkbox"/> was observed by _____ who told _____ that he/she saw the arrested person commit the below acts.
 <input checked="" type="checkbox"/> was found to have committed the below acts, resulting from my (described) investigation.</p> <p>On the <u>22nd</u> day of <u>October</u> <u>00</u> at <u>1:55</u> <input checked="" type="checkbox"/> A.M. <input type="checkbox"/> P.M. (Specifically include facts constituting cause for arrest.)</p> | | | | | | | | | | | | |
| <p>ADDITIONAL PROBABLE CAUSE:</p> <p>At above date and time, I was southbound in the 1300 block of Royal Palm Beach Blvd. when I observed a white and maroon Mazda pickup truck driving north on Royal Palm Beach Blvd. Ofc. Eli Shaivitz had earlier taken a stolen vehicle report on a truck which matched this description. I caught up to the truck and saw that it had Florida tag number D61XWE. This was the tag number of the stolen truck. I stopped the truck in the 100 block of Sherwood Dr. I found [REDACTED] V/M [REDACTED] to be the driver and Anthony Luis Zac Figueroa W/M [REDACTED] to be the passenger. Anthony Figueroa is the brother of the owner and was the original suspect in the stolen car case. Both subjects were taken into custody, secured, and placed in my patrol unit. I transported the to the police station where they were turned over to Ofc. Eli Shaivitz.</p> | | | | | | | | | | | | |
| <p>PROBABLE CAUSE STATEMENT</p> <p>[REDACTED LINES]</p> | | | | | | | | | | | | |
| <p>STATE OF FLORIDA - PALM BEACH COUNTY</p> <p>I hereby certify that the foregoing is a true copy of the record in my office with corrections if any as required by law.</p> <p>THIS <u>8 Aug 2000</u> DAY OF <u>August</u>, <u>2000</u>
 <u>SHARON R. BOCK</u>
 <u>CLERK & COMPTROLLER</u>
 <u>Sharon Bock</u>
 By <u>DEPUTY CLERK</u></p> | | | | | | | | | | | | |
| <p>ADMINISTRATIVE</p> <p>SWORN AND SUBSCRIBED BEFORE ME</p> <p><u>John E. Murphy #100</u></p> <p>NOTARY PUBLIC / CLERK OF COURT / POLICE OFFICER</p> <p><u>10-22-00</u></p> <p>DATE</p> | | | | | | | | | | | | |
| <p>SIGNATURE OF ARRESTING / INVESTIGATING OFFICER</p> <p><u>T. E. Murphy #100</u></p> <p>NAME OF OFFICER (PLEASE PRINT)</p> <p><u>10-22-00</u></p> <p>DATE</p> <p>PAGE <u>OF</u> <u>1</u></p> | | | | | | | | | | | | |

JB

Case No.: 00-11425CF A02 "T" ST of FL vs. ANTHONY LUIS ZAC FIGUEROA
 Charges: GRAND THEFT (MOTOR VEHICLE)

| | | | | | | | |
|---|------------|----------|--------------|-----------|------------------|----------|-----|
| Arrest# | 2000346620 | Bond# | P07-00274775 | Type | SB-PN | \$ 3,000 | A/C |
| Date | 6-7-00 | Judge | Lindsey | Crt. Rep. | I. Sancilio | | |
| ASA | Lock | DC | | Int | | | |
| Deft--Pres / Not Pres. | Not Pres. | Def. Co. | D. Vogel | Esq / PD | Pres / Not Pres. | | |
| Before the Court for: | | | | | | | |
| <input type="checkbox"/> Granted <input type="checkbox"/> Denied <input type="checkbox"/> With / Without Prejudice <input type="checkbox"/> Withdrawn <input type="checkbox"/> Court Reserves Ruling <input type="checkbox"/> Written Order to Follow | | | | | | | |
| <input type="checkbox"/> Warrant <input type="checkbox"/> Ordered <input type="checkbox"/> Recalled <input type="checkbox"/> Bond Set at \$ _____ <input type="checkbox"/> See Below <input type="checkbox"/> Also Covers <input type="checkbox"/> Sp Cond | | | | | | | |
| <input type="checkbox"/> Bond Forf <input type="checkbox"/> OR: Disch / Revoked / Reinstated <input checked="" type="checkbox"/> Bond: Disch / Revoked / Reinstated <input type="checkbox"/> SOR: Disch / Revoked / Reinstated | | | | | | | |
| <input type="checkbox"/> Bond Forf Vacated <input type="checkbox"/> Previous Bond Reinstated, if Bondsman agrees <input type="checkbox"/> State failed to file charges <input type="checkbox"/> Released O.R. | | | | | | | |
| <input type="checkbox"/> Deft <input type="checkbox"/> Indigent <input type="checkbox"/> PD Appt <input type="checkbox"/> Hrg only <input type="checkbox"/> PD Pres <input type="checkbox"/> Court Appts | | | | | | | |
| Evaluation for: <input type="checkbox"/> Drug Farm <input type="checkbox"/> DOC Non-Secure Bed by _____ | | | | | | | |
| <input type="checkbox"/> Pre-Plea <input type="checkbox"/> PSI ordered by/within _____ days <input type="checkbox"/> w/input from DJJ / Staffing | | | | | | | |
| DEFT ENTERED A PLEA OF: <input type="checkbox"/> NOT GUILTY <input type="checkbox"/> GUILTY <input type="checkbox"/> NO CONTEST <input type="checkbox"/> BEST INTEREST <input type="checkbox"/> TO THE COURT | | | | | | | |
| As Charged-Cts _____ Lesser Cts _____ Lesser Charge _____
<input type="checkbox"/> Sw & Test <input type="checkbox"/> Adv of Rts <input type="checkbox"/> Waived PSI Lesser Cts _____ Lesser Charge _____ | | | | | | | |
| <input type="checkbox"/> ADJ GUILTY as Charged as to Cts _____ Lesser Cts _____
<input type="checkbox"/> FOUND GUILTY as Charged as to Cts _____ Lesser Cts _____
<input type="checkbox"/> ADJ W/Held as to Cts _____ <input type="checkbox"/> SENT W/Held as to Cts _____ | | | | | | | |
| <input type="checkbox"/> FOUND AND ADJUDICATED DELINQUENT as to Cts _____ <input type="checkbox"/> Dispo Order to follow / Filed
<input type="checkbox"/> FOUND & ADJ NOT GUILTY as to Cts _____ <input type="checkbox"/> Dismiss <input checked="" type="checkbox"/> Nolle Prossse Cts _____ | | | | | | | |
| Prob / Comm Control: <input type="checkbox"/> Revoked <input type="checkbox"/> Reinstated <input type="checkbox"/> Modified <input type="checkbox"/> Term. Successfully / Unsuccessfully | | | | | | | |
| <input type="checkbox"/> SEE ORDER ASSESSING COSTS <input type="checkbox"/> SEE REVERSE SIDE FOR INSTRUCTIONS REGARDING FURTHER HEARING | | | | | | | |
| <input type="checkbox"/> Stip/Found: (violent) Habitual Off. 775.084 <input type="checkbox"/> Stip/Found: Sexual Offender / Sexual Predator <input type="checkbox"/> Stip/Found: P.R.R.
SENTENCE: PBCJ: _____ Cts: _____ / DOC: _____ Cts: _____
PBCJ: _____ Cts: _____ / DOC: _____ Cts: _____ | | | | | | | |
| <input type="checkbox"/> W/Credit for _____ Days / Mos. / Yrs. <input type="checkbox"/> Deft Remanded <input type="checkbox"/> Deft to remain on same rel. status pending sent.
Conc / Consec / Co-Term w/cases / cts: _____ | | | | | | | |
| <input type="checkbox"/> Execution of Sentence Stayed <input type="checkbox"/> Sentence Suspended <input type="checkbox"/> Time served as to Cts _____
<input type="checkbox"/> Youthful Off <input type="checkbox"/> Habitual Off <input type="checkbox"/> Min / Mand: _____ as to Cts _____
<input type="checkbox"/> ABOVE SENTENCE TO BE FOLLOWED By: <input type="checkbox"/> Probation <input type="checkbox"/> Drug Off Prob <input type="checkbox"/> Comm. Control <input type="checkbox"/> I <input type="checkbox"/> II - See Page 2 | | | | | | | |

STATE OF FLORIDA • PALM BEACH COUNTY

I hereby certify that the foregoing is a true copy of the record in my office with corrections, if any, as required by law.

Set / Remains Set / Remains THIS DAY OF JUNE 2000 Rm _____ at _____ AM/PM

Set / Remains Set / Remains SHARON R. BOCK Rm _____ at _____ AM/PM
CLERK & COMPTROLLER

Deft sign _____

Def Co _____ ASA _____ By DEPUTY CLERK Bondsman _____

Prob Jail DJJ GAL Notified by mail by: _____ on _____ / _____ / _____

County Courthouse
205 N. Dixie, West Palm Beach Courtroom, Criminal Justice Bldg. 38844 State Road 80, Belle Glade Courtroom, Criminal Justice Complex 3228 Gun Club Rd., West Palm Beach

IF YOU ARE A PERSON WITH A DISABILITY WHO NEEDS ANY ACCOMMODATION IN ORDER TO PARTICIPATE IN THIS PROCEEDING, YOU ARE ENTITLED, AT NO COST TO YOU, TO THE PROVISION OF CERTAIN ASSISTANCE. PLEASE CONTACT THE ADMINISTRATIVE OFFICE OF THE COURT - 205 NORTH DIXIE HIGHWAY, ROOM 52500, WEST PALM BEACH, FL 33401, TELEPHONE (561) 355-2431, WITHIN 2 WORKING DAYS OF YOUR RECEIPT OF THIS NOTICE. IF YOU ARE HEARING IMPAIRED, CALL 1-800-855-8771; IF VOICE IMPAIRED, 1-800-855-8770

EXHIBIT GG

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.

Page 2

2 A P P E A R A N C E S:

3

4 BOIES SCHILLER & FLEXNER, LLP

5 Attorneys for Plaintiff

401 East Las Olas Boulevard

6 Fort Lauderdale, Florida 33301

BY: BRADLEY EDWARDS, ESQ.

7

8 HADDON MORGAN & FOREMAN, P.C.

Attorneys for Defendant

9

150 East 10th Avenue

Denver, Colorado 80203

10 BY: JEFFREY PAGLIUCA, ESQ.

11

12 JONES FOSTER JOHNSTON & STUBBS, P.A.

Attorneys for Deponent

13 505 South Flagler Drive

Suite 1100

14 West Palm Beach, Florida 33401

BY: JOANNE O'CONNOR, ESQ.

15

16 ALSO PRESENT: Sandy Perkins, Paralegal

Boies Schiller & Flexner

17

Ryan Kick, Videographer

18

19

20

21

22

23

24

25

Page 3

2

3

I N D E X

| | | |
|---|---|-----|
| 4 | Examination by Mr. Edwards | 9 |
| | Examination by Ms. Schultz | 123 |
| 5 | Examination by Mr. Pagliuca | 165 |
| | Further Examination by Ms. Schultz | 329 |
| 6 | Further Examination by Mr. Pagliuca | 355 |
| 7 | | |

8

E X H I B I T S

| | | |
|----|-----------------------------------|-----|
| 9 | Deposition Exhibit 1 | 11 |
| | Palm Beach Police Department | |
| 10 | Incident Report | |
| 11 | Deposition Exhibit 2 | 59 |
| | AH statement | |
| 12 | Deposition Exhibit 3 | 66 |
| 13 | CD with video (retained by Boies) | |
| 14 | Deposition Exhibit 4 | 69 |
| | Search warrant return | |
| 15 | Deposition Exhibit 5 | 76 |
| 16 | Property receipts | |
| 17 | Deposition Exhibit 6 | 77 |
| | Additional search warrant returns | |
| 18 | Deposition Exhibit 7 | 84 |
| 19 | Probably cause affidavit | |
| 20 | Deposition Exhibit 8 | 96 |
| | Trash pull return | |
| 21 | Deposition Exhibit 9 | 102 |
| 22 | Folder with evidence | |
| 23 | | |
| 24 | | |
| 25 | | |

Page 4

| | | |
|----|--|-----|
| 2 | Deposition Exhibit 10 | 119 |
| | Investigative report | |
| 3 | Deposition Exhibit 11 | 165 |
| 4 | CD with audio recording (retained by Boies) | |
| 5 | Deposition Exhibit 11 | 178 |
| | Supplement to incident report | |
| 6 | Deposition Exhibit 12 | 259 |
| 7 | Rule 26 disclosure | |
| 8 | Deposition Exhibit 13 | 282 |
| | Vol. 2 of prior Recarey transcript | |
| 9 | Deposition Exhibit 14 | 292 |
| 10 | Vol. 1 of prior Recarey transcript | |
| 11 | | |
| 12 | | |
| 13 | *** Exhibit 11 was used on two different exhibits. | |
| 14 | | |
| 15 | | |
| 16 | | |
| 17 | | |
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| 20 | | |
| 21 | | |
| 22 | | |
| 23 | | |
| 24 | | |
| 25 | | |

1 JOSEPH RECAREY - CONFIDENTIAL

2 Q. Most of the events that we are going to
3 discuss today occurred, at least the investigation
4 that we're going to discuss today, occurred in 2005
5 and 2006.

6 So can you just tell us what your position
7 was with the Palm Beach Police Department at that
8 time?

9 A. I was a police detective.

10 Q. And did you investigate a person by the
11 name of Jeffrey Epstein?

12 A. I did.

13 Q. All right.

14 What was your role in the investigation of
15 Jeffrey Epstein?

16 A. I was the lead detective once the case was
17 turned over to me by Michelle Pagan.

18 Q. Okay. And as the lead detective, did you
19 review all of the history of the investigation up to
20 the point it was turned over to you?

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

23 THE WITNESS: Correct.

24 BY MR. EDWARDS:

25 Q. And was that one of your jobs as the lead

1 JOSEPH RECAREY - CONFIDENTIAL
2 investigator over a case, is to acclimate yourself
3 to the history of the case?

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

6 THE WITNESS: Yes.

7 BY MR. EDWARDS:

8 Q. Just so that the record is clear, will you
9 just give a brief pause in case Mr. Pagliuca has an
10 objection?

11 A. All right.

12 Q. So they can also capture your answer.

13 A. Okay.

14 Q. In reviewing the history of the case, did
15 you review prior police reports, police reports
16 prior to you becoming involved personally?

17 A. I did.

18 Q. Okay. And I've handed you what is marked
19 as Plaintiff's Exhibit 1.

20 (The referred-to document was marked by
21 the court reporter for Identification as
22 Deposition Exhibit 1.)

23 BY MR. EDWARDS:

24 Q. Do you recognize that?

25 A. Yes.

1 JOSEPH RECAREY - CONFIDENTIAL

2 Police Department incident report as suspects?

3 MS. SCHULTZ: Object to form and
4 foundation.

5 BY MR. PAGLIUCA:

6 Q. These people, right?

7 A. At that time, yes.

8 Q. Well, and then are you aware -- were there
9 any suspects added in any subsequent reports, to
10 your knowledge?

11 A. Not that I'm aware of.

12 Q. In fact, you did not seek a probable cause
13 warrant for any other suspects in this case,
14 correct?

15 MS. SCHULTZ: Object to form and
16 foundation.

17 THE WITNESS: That's correct.

18 BY MR. PAGLIUCA:

19 Q. And Ms. Ghislaine Maxwell is not listed in
20 any of your Palm Beach Police Department incident
21 reports as a suspect in this case, correct?

22 MS. SCHULTZ: Object to form and
23 foundation.

24 THE WITNESS: Not -- no, not as a suspect
25 in this case, no.

1 JOSEPH RECAREY - CONFIDENTIAL

2 Exhibit 1. Are you with me?

3 A. Uh-huh.

4 Q. Okay. Again, this was information that
5 was obtained by Detective Pagan, correct?

6 A. Correct.

7 Q. And it's true, is it not, that this
8 alleged victim never claimed to have been recruited
9 by Ghislaine Maxwell; true?

10 MS. SCHULTZ: Object to form and
11 foundation.

12 THE WITNESS: Correct.

13 BY MR. PAGLIUCA:

14 Q. And this individual, alleged victim No. 1,
15 never identified Ghislaine Maxwell as being at
16 Mr. Epstein's house when she was there, correct?

17 MS. SCHULTZ: Object to form and
18 foundation.

19 THE WITNESS: I don't believe so.

20 BY MR. PAGLIUCA:

21 Q. You don't believe so --

22 A. I don't believe so.

23 Q. That she ever identified Ghislaine Maxwell
24 as being in the house?

25 A. Right.

1 JOSEPH RECAREY - CONFIDENTIAL

2 Q. Okay. She never -- this individual,
3 victim No. 1, never claimed that Ghislaine Maxwell
4 paid her any money, correct?

5 A. Correct.

6 Q. And this individual No. 1 never claimed
7 that Ms. Maxwell instructed her what to wear,
8 correct?

9 A. Right.

10 Q. This individual never claimed that
11 Ghislaine Maxwell told her how to act, correct?

12 A. Correct.

13 Q. This individual never claimed to have met
14 Ghislaine Maxwell ever, correct?

15 A. I don't believe so, no.

16 Q. This individual never claimed to even have
17 spoken to Ghislaine Maxwell ever, correct?

18 A. I don't believe so, no.

19 Q. And when you say "I don't believe so, no,"
20 that means my statement to you is correct; is that
21 right?

22 MS. SCHULTZ: Object to form, foundation.

23 THE WITNESS: Well, you're saying "ever."
24 I don't know if she's ever, ever spoken to --
25

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2 BY MR. PAGLIUCA:

3 Q. To Detective Pagan.

4 A. Right. To my knowledge, I don't know,
5 because Detective Pagan is the one who actually
6 interviewed her. So I don't know to the answer of
7 "ever." So not to my knowledge.

8 Q. Certainly, nothing in Exhibit 1, Narrative
9 1 reflects that this individual ever met or talked
10 to or spoke to Ghislaine Maxwell, right?

11 A. Right. Not to my knowledge.

12 Q. And, indeed, you would agree with me that
13 if this individual claimed that Ms. Maxwell had
14 something to do with the events listed in Narrative
15 1, you would have folded up on it, as the
16 investigating detective, right?

17 MS. SCHULTZ: Object to the form.

18 THE WITNESS: Either myself or Detective
19 Pagan would have.

20 BY MR. PAGLIUCA:

21 Q. Sure. And when you got the case six
22 months later, if there hadn't been follow-up, you
23 would have followed up on it, right?

24 MS. SCHULTZ: Object to form.

25 THE WITNESS: Correct.

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2 Q. Okay. The person alleged to have brought
3 the alleged victim No. 1 to Mr. Epstein's house is
4 this Hayley Robson individual, correct?

5 A. Yes.

6 Q. Okay. Then with regard to alleged victim
7 No. 2, then this individual did not claim to have
8 been recruited by Ms. Maxwell, correct?

9 MS. SCHULTZ: Object.

10 THE WITNESS: Who would be victim No. 2?

11 BY MR. PAGLIUCA:

12 Q. Well, you can either go to the second page
13 of Exhibit 1 and we can just follow down the victim
14 information, or you can go to the body of the
15 report, whichever is easier for you.

16 MS. SCHULTZ: Can you use the initials?

17 MR. PAGLIUCA: Sure. I can call them 1 or
18 AH or whatever you want to call them. That's
19 fine with me.

20 BY MR. PAGLIUCA:

21 Q. So I'll just say alleged victim AH never
22 claimed to have been recruited by Ms. Maxwell,
23 correct?

24 A. Correct.

25 Q. And alleged victim AH did not claim to

1 JOSEPH RECAREY - CONFIDENTIAL

2 have spoken to Ms. Maxwell ever, correct?

3 MS. SCHULTZ: Object to form.

4 THE WITNESS: It's been a while since I
5 read this report.

6 BY MR. PAGLIUCA:

7 Q. Sure. Is it fair to say, Detective, that
8 this investigation occurred some 12 years ago,
9 right?

10 A. Yeah. Well, yeah.

11 Q. And is it fair to say that you've
12 conducted quite a few investigations over your
13 career?

14 A. Yes.

15 Q. All right.

16 And it's fair to say that it would be
17 impossible for you to remember all the details of
18 this investigation as you sit here today, correct?

19 A. Correct.

20 Q. And you've been referring to Exhibit 1
21 frequently throughout this deposition, correct?

22 A. Yes.

23 Q. And that's because you don't have any
24 present memory of these details, correct?

25 MS. SCHULTZ: Object to form, foundation.

1 JOSEPH RECAREY - CONFIDENTIAL

2 THE WITNESS: I have some recollection,
3 but I'm not going to have exact dates and times
4 off the top of my head.

5 BY MR. PAGLIUCA:

6 Q. Sure.

7 A. You know, I spoke to over 33 girls
8 regarding this case. So when you say an initial, it
9 takes me a little while to go through the entire
10 list. But to have specifics, I'm not going to be
11 able to remember the exact specifics of -- of the
12 report.

13 Q. I appreciate that.

14 So we can take our time, but do you
15 recall, did AH ever identify Ms. Maxwell has someone
16 she spoke to?

17 A. I don't recall.

18 Q. You don't recall at all?

19 A. I don't recall that she had mentioned
20 Ms. Maxwell.

21 Q. And if she had, you would have put that in
22 your report, correct?

23 A. I believe so, yes, I would have.

24 Q. All right.

25 And so the absence of alleged victim AH

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2 referring to Ms. Maxwell means that she didn't,
3 right?

4 MS. SCHULTZ: Object to form.

5 THE WITNESS: Say the question one more
6 time.

7 BY MR. PAGLIUCA:

8 Q. When we go through this report, and I've
9 gone through it, if any of the alleged victims had
10 identified Ms. Maxwell as someone that they spoke to
11 at Mr. Epstein's house, you would have listed that
12 in your report, right?

13 MS. SCHULTZ: Object to form.

14 THE WITNESS: I believe I would have, yes.

15 BY MR. PAGLIUCA:

16 Q. Yeah.

17 You tried to be thorough and accurate when
18 you were writing your reports, right?

19 A. Yes.

20 Q. And, certainly, you've indicated on direct
21 examination that the identity of people who were at
22 the house was something that was important to your
23 investigation, correct?

24 A. Yes.

25 Q. And that's why you did trash pulls, right?

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2 A. Yes.

3 Q. And then you asked various individuals who
4 was there when you went to Mr. Epstein's house,
5 right?

6 A. Correct.

7 Q. And you then, to the best of your ability,
8 recorded those answers, I take it, as to who was
9 there, right?

10 A. Yes.

11 Q. And with regard to AH, she never said
12 anything about Ghislaine Maxwell being at
13 Mr. Epstein's house, did she?

14 MS. SCHULTZ: Object to form and
15 foundation.

16 BY MR. PAGLIUCA:

17 Q. To you?

18 A. I don't believe she did.

19 Q. Okay. And if she did, it's likely that
20 you would have recorded it, correct?

21 A. Correct, and it would be on the -- it
22 would be on the tape.

23 Q. Right.

24 She never claimed, AH, that Ms. Maxwell
25 paid her, right?

1 JOSEPH RECAREY - CONFIDENTIAL

2 MS. SCHULTZ: Object to form and
3 foundation.

4 THE WITNESS: Correct.

5 BY MR. PAGLIUCA:

6 Q. She never claimed that -- AH never claimed
7 that Ms. Maxwell instructed her about what to wear,
8 correct?

9 MS. SCHULTZ: Object to the form.

10 THE WITNESS: Correct.

11 BY MR. PAGLIUCA:

12 Q. AH never claimed that Ms. Maxwell told her
13 how to act at Mr. Epstein's house, correct?

14 MS. SCHULTZ: Object to form.

15 THE WITNESS: Correct.

16 BY MR. PAGLIUCA:

17 Q. AH never claimed to have met Ghislaine
18 Maxwell anywhere, correct?

19 MS. SCHULTZ: Object to form.

20 THE WITNESS: I don't believe so, no.

21 BY MR. PAGLIUCA:

22 Q. Okay. If we go on to individual alleged
23 victim No. 3, AY, the same question: AY never
24 identified Ms. Maxwell as someone she knew or
25 interacted with in any fashion, correct?

1 JOSEPH RECAREY - CONFIDENTIAL

2 MS. SCHULTZ: Object to form.

3 THE WITNESS: No.

4 BY MR. PAGLIUCA:

5 Q. No, she did not?

6 A. No, she did not.

7 Q. Okay. The same with individual No. 4,
8 alleged victim FP: Again, FP never claimed to have
9 met with Ms. Maxwell, correct?

10 MS. SCHULTZ: Object to form and
11 foundation.

12 THE WITNESS: I don't believe so, no.

13 BY MR. PAGLIUCA:

14 Q. Okay. And FP never identified Ms. Maxwell
15 as someone being at Mr. Epstein's house, correct?

16 MS. SCHULTZ: Object to form and
17 foundation.

18 BY MR. PAGLIUCA:

19 Q. And if you need to look at your report --

20 A. No, I don't -- I don't believe so. The
21 only people that recalled Ghislaine at the house
22 was --

23 Q. Sjoberg?

24 A. Johanna Sjoberg.

25 Q. Who was over the age of 18, correct?

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2 MS. SCHULTZ: Object to form and
3 foundation.

4 THE WITNESS: And Venero, Christina
5 Venero.

6 BY MR. PAGLIUCA:

7 Q. Who is an adult as well?

8 MS. O'CONNOR: Object to form.

9 THE WITNESS: Yes.

10 BY MR. PAGLIUCA:

11 Q. So out of your entire report, the only two
12 people who ever said anything about Ms. Maxwell were
13 Ms. Sjoberg, who I believe was 23 when you
14 interviewed her?

15 A. Right, but she was --

16 MS. SCHULTZ: Object to form and
17 foundation.

18 THE WITNESS: She was -- she had worked
19 there for quite some time, so you would have to
20 back up, I think, a year or two.

21 BY MR. PAGLIUCA:

22 Q. She was an adult when she worked there?

23 A. Right. She was over the age of 18, right,
24 let's put it that way.

25 Q. And she was not listed by you as a victim

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2 as part of this case, right?

3 A. Correct, because it was between two
4 consenting adults.

5 Q. Exactly.

6 And so that's Ms. Sjoberg, and then the
7 other individual, I think you said Bolero; is that
8 right?

9 A. Venero, Christina Venero. She's a --

10 Q. Adult masseuse, correct?

11 A. Yes. I remember she had lots of tattoos.

12 Q. Tatts, right.

13 But the 17 individuals that you listed in
14 Exhibit 1, none of those individuals ever said the
15 word -- the words "Ghislaine Maxwell" during the
16 course of this investigation to you, correct?

17 MS. SCHULTZ: Object to form and
18 foundation.

19 THE WITNESS: I don't believe so. It
20 would be on the tapes if they did.

21 BY MR. PAGLIUCA:

22 Q. Well, or it would be in your report,
23 right?

24 MS. SCHULTZ: Object to form and
25 foundation.

1 JOSEPH RECAREY - CONFIDENTIAL

2 THE WITNESS: Either in the report or on
3 the tapes.

4 BY MR. PAGLIUCA:

5 Q. That's an interesting point, so let's talk
6 about that for a moment.

7 This report, this Palm Beach Police
8 Department incident report, Exhibit 1, is a summary
9 of your investigation, correct?

10 A. Correct.

11 Q. And these recitations of your interviews
12 are abbreviated summaries, correct?

13 A. Correct.

14 Q. And so you're typing into this report
15 parts of it but not every word verbatim into the
16 report, correct?

17 A. Right.

18 Q. And, again, the originals of these tapes
19 are somewhere with the FBI at this point, correct?

20 MS. SCHULTZ: Object to form and
21 foundation.

22 THE WITNESS: Correct. Or at the State
23 Attorney's Office.

24 BY MR. PAGLIUCA:

25 Q. Are you aware of any of these originals

1 JOSEPH RECAREY - CONFIDENTIAL

2 That would be one. Probably victim JB would be
3 another. I believe there was a victim ML, as well.

4 Q. Let me ask this question: As you sit here
5 today, do you know who the subjects of the four
6 counts that are referenced on the first page of
7 Exhibit 7 are?

8 A. If I went through the entire PC affidavit,
9 I could -- I could tell you who. But I just named
10 three.

11 Q. Okay.

12 A. So, like I said, I can go through it and
13 tell you who exactly those four counts were for.

14 Q. Okay. We are limited to four, though,
15 right?

16 A. Four instances.

17 MS. SCHULTZ: Object to form.

18 BY MR. PAGLIUCA:

19 Q. Right.

20 And then throughout this entire 22-page,
21 Palm Beach Police Department affidavit,
22 Ms. Maxwell's name does not appear in here once,
23 does it?

24 MS. SCHULTZ: Object to form.

25 THE WITNESS: I don't believe so, no.

1 JOSEPH RECAREY - CONFIDENTIAL

2 A. Correct.

3 Q. And then Mr. Epstein is arrested and ends
4 up pleading guilty and all of that, right?

5 MS. SCHULTZ: Object to form.

6 THE WITNESS: I think there was a
7 non-prosecution agreement prepared between the
8 Feds and some kind of agreement was made. But,
9 yes, he did end up pleading guilty.

10 BY MR. PAGLIUCA:

11 Q. All right.

12 Now, based on the questions that were
13 asked of you in the grand jury, it's fair to say
14 that Ms. Maxwell was not a target of the grand
15 jury's investigation, correct?

16 MS. SCHULTZ: Object to form and
17 foundation.

18 THE WITNESS: Not based on the questions
19 that the state was asking me, no, the state
20 wasn't...

21 BY MR. PAGLIUCA:

22 Q. In fact, it's fair to say that you never
23 said Ms. Maxwell's name in the grand jury, right?

24 MS. SCHULTZ: Object to form and
25 foundation.

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2 THE WITNESS: No. Based on the questions
3 that the state was asking, no.

4 BY MR. PAGLIUCA:

5 Q. Were you aware of who was being issued
6 subpoenas by the grand jury?

7 A. No. But it wasn't the actual subpoena
8 from the grand jury; it came from the State
9 Attorney's Office.

10 Q. At the direction of the grand jury,
11 though, right?

12 MS. SCHULTZ: Object to form and
13 foundation.

14 THE WITNESS: I don't know. Again, I
15 don't know.

16 BY MR. PAGLIUCA:

17 Q. I would like to talk a little bit about
18 the surveillance that you initiated at Mr. Epstein's
19 house, okay?

20 Can you tell me when the surveillance
21 began?

22 A. It would have started under Detective
23 Pagan and gone through --

24 Q. The entire investigation?

25 A. Pretty much trash pulls. We stopped the

1 JOSEPH RECAREY - CONFIDENTIAL

2 actual physical surveillance sometime during the
3 investigation. But it would have started under
4 Pagan.

5 Q. Okay. Do you recall in what -- well, how
6 was surveillance conducted, if you recall?

7 A. I didn't conduct it personally, no. That
8 would have been under plainclothes unit team. They
9 would have sent out a vehicle and recorded vehicles
10 coming and going and actual physical surveillance.

11 Q. So physical surveillance means eyes on the
12 property, correct?

13 A. Right.

14 Q. And eyes on the property by a police
15 officer, correct?

16 A. Correct.

17 Q. And that police officer would be charged
18 with the obligation of recording the incomings and
19 outgoings of people to the property, correct?

20 A. Correct.

21 Q. Is there a log that's maintained during
22 surveillance?

23 A. I'm not sure who -- if there was a log or
24 not. I know that they set up a vehicle with cameras
25 facing -- facing Epstein's residence.

1 JOSEPH RECAREY - CONFIDENTIAL

2 Q. And so these were video cameras?

3 A. Correct.

4 Q. And so whoever was coming and going,
5 whenever -- an officer saw somebody coming or going,
6 they would videotape that person; is that correct?

7 A. Or they would just leave the video
8 rolling, time lapse.

9 Q. And did you have the opportunity to
10 observe any of that video?

11 A. I did observe a couple, but the person who
12 actually set it up would review it and then submit a
13 supplement to the report.

14 Q. Okay. It's true that none of the video of
15 the surveillance led to the identification of
16 Ghislaine Maxwell as coming or leaving the house
17 during the time of surveillance, correct?

18 MS. SCHULTZ: Object to form and
19 foundation.

20 THE WITNESS: I don't know. I didn't see
21 all of the video, so I can't -- I can't attest
22 to that.

23 BY MR. PAGLIUCA:

24 Q. Okay. Did anybody report to you that
25 Ms. Maxwell was seen coming or going?

1 JOSEPH RECAREY - CONFIDENTIAL

2 MS. SCHULTZ: Object to form, foundation.

3 THE WITNESS: I don't recall.

4 BY MR. PAGLIUCA:

5 Q. If someone had reported to you that
6 Ms. Maxwell was seen coming or going, you would have
7 recorded it in your Palm Beach Police Department
8 incident report, Exhibit No. 1, correct?

9 MS. SCHULTZ: Object to form and
10 foundation.

11 THE WITNESS: I would have told the
12 officer who was conducting the surveillance or
13 reviewing the video to document it in the
14 supplements.

15 BY MR. PAGLIUCA:

16 Q. And there is no documentation in the
17 supplement of Ms. Maxwell either coming or going
18 from Mr. Epstein's house during this time frame,
19 correct?

20 MS. SCHULTZ: Object to the form.

21 THE WITNESS: I don't believe so. I
22 don't -- I don't -- I don't believe so.

23 BY MR. PAGLIUCA:

24 Q. And, again, so we're on the same page,
25 when you say "I don't believe so," I interpret that

1 JOSEPH RECAREY - CONFIDENTIAL

2 THE WITNESS: Correct.

3 BY MR. PAGLIUCA:

4 Q. And none of these individuals was employed
5 as a massage therapist at the time of their alleged
6 involvement with Mr. Epstein, correct?

7 A. Correct.

8 Q. Each of these individuals, as I recall,
9 claimed to have been paid directly by Mr. Epstein or
10 Ms. Kellen, correct?

11 MS. SCHULTZ: Object to form and
12 foundation.

13 THE WITNESS: Correct.

14 BY MR. PAGLIUCA:

15 Q. Most often, these individuals, these 17
16 individuals, were paid directly by Mr. Epstein,
17 correct?

18 MS. SCHULTZ: Object to form and
19 foundation.

20 THE WITNESS: Mr. Epstein or Sarah Kellen.

21 BY MR. PAGLIUCA:

22 Q. Okay. None of these individuals identify
23 Ms. Maxwell as someone who was paying them money,
24 correct?

25 MS. SCHULTZ: Object to form and

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1 JOSEPH RECAREY - CONFIDENTIAL

2 foundation.

3 THE WITNESS: I don't believe so, no.

4 BY MR. PAGLIUCA:

5 Q. And each of these individuals identified
6 receiving cash, correct?

7 MS. SCHULTZ: Object to the form.

8 THE WITNESS: Correct.

9 BY MR. PAGLIUCA:

10 Q. Each of these individuals claimed varying
11 amounts, generally between \$200 and up to \$1,000,
12 correct?

13 MS. SCHULTZ: Object to form.

14 THE WITNESS: Correct.

15 BY MR. PAGLIUCA:

16 Q. According to each of these individuals,
17 Mr. Epstein, when the massage was over, would either
18 hand them the money -- that happened according to
19 these individuals, right?

20 MS. SCHULTZ: Object to form.

21 THE WITNESS: At times, yes.

22 BY MR. PAGLIUCA:

23 Q. Or Mr. Epstein had laid out the money
24 somewhere and directed them to where to go get it,
25 correct?

1 JOSEPH RECAREY - CONFIDENTIAL

2 A. I don't believe clothing was seized.

3 Q. To your knowledge, did you seize any
4 property belonging to Ghislaine Maxwell from the
5 home?

6 MS. SCHULTZ: Object to form and
7 foundation.

8 THE WITNESS: I'm not sure. Not to my
9 knowledge.

10 BY MS. SCHULTZ:

11 Q. Okay. No one ever came to you and said,
12 Could you please return these items to Ms. Maxwell,
13 correct?

14 MS. SCHULTZ: Object to form.

15 THE WITNESS: No.

16 BY MS. SCHULTZ:

17 Q. All right.

18 You did that with Janush?

19 A. Yes, he had photos and --

20 Q. But nothing like that ever happened with
21 Ms. Maxwell, correct?

22 MS. SCHULTZ: Object to form.

23 THE WITNESS: No.

24 BY MS. SCHULTZ:

25 Q. Ms. Maxwell was not present when you

1 JOSEPH RECAREY - CONFIDENTIAL

2 Q. Any way that you get contacted by a police
3 officer, if they put it into your database, it will
4 come up when you do the CAD search, correct?

5 A. Right.

6 Q. And that's all that came up with regard to
7 Ms. Maxwell, was her name was somewhere in the
8 system. Do you know or not know?

9 MS. SCHULTZ: Object to form and
10 foundation.

11 THE WITNESS: I don't know.

12 MR. PAGLIUCA: Okay.

13 (The referred-to document was marked by
14 the court reporter for Identification as
15 Deposition Exhibit 12.)

16 BY MR. PAGLIUCA:

17 Q. I have handed you what has been marked as
18 Deposition Exhibit 12, which I will represent to you
19 are the Plaintiff in this case, Ms. Giuffre's Rule
20 26 disclosure.

21 I want to just go through very quickly and
22 ask you if you know any of these individuals.

23 So, let's start with No. 1, Virginia
24 Giuffre. Have you ever met Virginia Giuffre?

25 A. No.

1 JOSEPH RECAREY - CONFIDENTIAL

2 Q. Have you ever talked to her?

3 A. I don't recall.

4 Q. Do you know what information that she may
5 have that's referenced below? Conducted is the
6 subject of this action. Do you have any knowledge
7 of that?

8 MS. O'CONNOR: Object to form.

9 THE WITNESS: No.

10 BY MR. PAGLIUCA:

11 Q. Number 2, Ghislaine Maxwell, I'm going to
12 come back to her.

13 Number 3, Juan Alessi, you did interview
14 Mr. Alessi, correct?

15 A. Yes.

16 Q. I have seen a transcript of that
17 interview, and I have seen Exhibit 2, which is a
18 transcript of the interview with Ms. █. I want
19 to ask you a couple of questions about the
20 transcription process.

21 As I understand your testimony previously,
22 the electronic recordings are sent somewhere, you
23 don't know where, for transcription; is that right?

24 MS. SCHULTZ: Object to form.

25 THE WITNESS: I didn't request a

1 JOSEPH RECAREY - CONFIDENTIAL

2 different investigators Mr. Black uses in a
3 particular calendar year, do you?

4 MS. SCHULTZ: Object to form.

5 THE WITNESS: No.

6 BY MR. PAGLIUCA:

7 Q. And so you don't know whether Mr. Black's
8 association with this law firm was in connection
9 with Mr. Epstein's case or some other case, do you?

10 MS. SCHULTZ: Object to form.

11 THE WITNESS: I worked this case,
12 nothing -- nothing but this case for an entire
13 year. This was my only case for a year.

14 BY MR. PAGLIUCA:

15 Q. Okay. That's it?

16 A. If it walks like a duck.

17 MS. SCHULTZ: Objection.

18 BY MR. PAGLIUCA:

19 Q. Okay. So we're finished with Dershowitz.
20 Keep on going.

21 A. Number 28, obviously, [REDACTED].

22 Q. Okay. And you've talked about her?

23 A. Right.

24 Q. And, again, she never discussed Ghislaine
25 Maxwell with you, correct?

1 JOSEPH RECAREY - CONFIDENTIAL

2 Q. Right. So you're 75. So I want you -- I
3 want to take a moment and read what's under 75:

4 "Detective Recarey was the chief investigator of the
5 crimes committed at Jeffrey Epstein's Palm Beach
6 mansion." Is that true?

7 MS. SCHULTZ: Object to form.

8 THE WITNESS: Yes.

9 BY MR. PAGLIUCA:

10 Q. "And has information about Ghislaine
11 Maxwell and Jeffrey Epstein's sexual trafficking
12 conduct and interaction with underaged minors."

13 Tell me everything that you believe you
14 know about Ghislaine Maxwell's sexual trafficking
15 conduct.

16 MS. SCHULTZ: Object to form.

17 THE WITNESS: I don't.

18 BY MR. PAGLIUCA:

19 Q. So that's inaccurate, then? I mean, you
20 have no knowledge about Ghislaine Maxwell sexually
21 trafficking anybody, do you?

22 MS. SCHULTZ: Object to form.

23 THE WITNESS: Not with -- not with the
24 girls that I spoke with, no.

25

1 JOSEPH RECAREY - CONFIDENTIAL

2 BY MR. PAGLIUCA:

3 Q. But that's your investigation, right?

4 A. Right.

5 Q. Okay.

6 A. Right.

7 Let's see. Seventy-six.

8 Q. Okay. And you've talked about her.

9 Whatever happened to her, do you know?

10 MS. SCHULTZ: Object to form.

11 BY MR. PAGLIUCA:

12 Q. Haley Robson?

13 A. No.

14 Q. She was never charged, as I understand it,
15 correct?

16 A. Correct.

17 Q. And after you spoke to her in connection
18 with your investigation, did you ever speak to her
19 again?

20 A. No.

21 Q. Okay.

22 A. David Rogers, 77.

23 Q. And you know him because he was identified
24 as one of the pilots for Mr. Epstein, right?

25 A. Right.

1 JOSEPH RECAREY - CONFIDENTIAL

2 in your mind, right? Correct?

3 MS. SCHULTZ: Object to the form.

4 THE WITNESS: Yes.

5 BY MR. PAGLIUCA:

6 Q. And you're a peace officer, obligated to
7 arrest when a felony is committed in your presence,
8 correct?

9 A. Correct.

10 Q. And the possession of child pornography is
11 a felony, correct?

12 A. Correct.

13 Q. And had you seen any child pornography in
14 Mr. Epstein's house when you were there installing
15 these cameras, you would have done something about
16 it, correct?

17 MS. SCHULTZ: Object for form.

18 THE WITNESS: Right.

19 BY MR. PAGLIUCA:

20 Q. You wouldn't have just walked out and
21 said, Nice pics, have a nice day, correct?

22 A. Correct.

23 Q. So is it fair to say the entire time you
24 were in Epstein's house, whether it's 2002, 2003,
25 you did not observe any child pornography, right?

1 JOSEPH RECAREY - CONFIDENTIAL

2 MS. SCHULTZ: Object to the form.

3 THE WITNESS: Not in the areas I was in.

4 BY MR. PAGLIUCA:

5 Q. You don't recall seeing any pictures of
6 naked women, do you?

7 MS. SCHULTZ: Object to form.

8 THE WITNESS: Again, I was only confined
9 to where that desk was. That's where I set up
10 the camera, and then after it was set up, I
11 left.

12 BY MR. PAGLIUCA:

13 Q. Okay. But, again, all I'm asking you is
14 wherever you were, you didn't see any pictures of
15 naked women?

16 A. Right. No, I didn't see any.

17 Q. And at the time you recall that he had
18 these surveillance cameras already installed; is
19 that true? Other cameras, the clock cameras?

20 MS. SCHULTZ: Object to form.

21 THE WITNESS: I'm not sure if he had the
22 cameras installed or not. I can't recall.

23 BY MR. PAGLIUCA:

24 Q. Why would he need your cameras if he
25 already had cameras?

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1 JOSEPH RECAREY - CONFIDENTIAL

2 None of these alleged victims claimed to
3 have ever traveled with Mr. Epstein, correct?

4 MS. SCHULTZ: Object to form.

5 THE WITNESS: No.

6 BY MR. PAGLIUCA:

7 Q. No, they did not? They did not travel
8 with Mr. Epstein, right?

9 MS. SCHULTZ: Object to form.

10 THE WITNESS: I don't believe so, no.

11 BY MR. PAGLIUCA:

12 Q. None of them reported that to you?

13 A. Not reported, correct.

14 Q. None of them reported to you that they
15 ever spent the night with Mr. Epstein, did they?

16 MS. SCHULTZ: Object to form.

17 THE WITNESS: I don't believe so.

18 BY MR. PAGLIUCA:

19 Q. None of them ever reported being
20 trafficked by Mr. Epstein to other men, correct?

21 MS. SCHULTZ: Object to form, foundation.

22 THE WITNESS: I don't believe so.

23 BY MR. PAGLIUCA:

24 Q. The only other men that any of these
25 alleged victims -- the only man that any of these

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1 JOSEPH RECAREY - CONFIDENTIAL
2 alleged victims ever claimed to have any contact
3 with that was sexual in nature was Mr. Epstein,
4 correct?

5 MS. SCHULTZ: Object to form and
6 foundation.

7 THE WITNESS: Yes.

8 BY MR. PAGLIUCA:

9 Q. Okay. None of these alleged victims ever
10 claimed to have been sent to another location to
11 have sex with another man, correct?

12 MS. SCHULTZ: Object to form and
13 foundation.

14 THE WITNESS: I don't believe so.

15 BY MR. PAGLIUCA:

16 Q. Meaning my statement is correct; is that
17 right?

18 MS. SCHULTZ: Object to form.

19 BY MR. PAGLIUCA:

20 Q. I'm just trying to --

21 A. Meaning I don't believe they've ever said
22 that. I don't recall any of them ever saying...

23 Q. Had they claimed that they were sent
24 somewhere else to have sex with another man, you
25 would have followed up on that, correct?

1 JOSEPH RECAREY - CONFIDENTIAL

2 MS. SCHULTZ: Object to form.

3 THE WITNESS: Correct.

4 BY MR. PAGLIUCA:

5 Q. And none of them ever claimed to have been
6 sent to another location to give another man a
7 massage, correct?

8 MS. SCHULTZ: Object to form.

9 THE WITNESS: No, not the victims.

10 BY MR. PAGLIUCA:

11 Q. Right. That's who I'm talking about.

12 A. I believe [REDACTED] did.

13 Q. Who is an adult, right?

14 MS. SCHULTZ: Object to form.

15 THE WITNESS: Right.

16 BY MR. PAGLIUCA:

17 Q. We covered this, I believe: None of them
18 ever was on Mr. Epstein's airplane, correct?

19 MS. SCHULTZ: Object to form.

20 THE WITNESS: I believe one of the victims
21 were, but not to a private island. I think
22 they went -- they didn't go to a private
23 island; they went to some other trip.

24 BY MR. PAGLIUCA:

25 Q. I think maybe you're referring to AH, who

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1 JOSEPH RECAREY - CONFIDENTIAL

2 went to New York but on a commercial flight. Does
3 that jog your memory?

4 MS. SCHULTZ: Object to form.

5 THE WITNESS: No.

6 BY MR. PAGLIUCA:

7 Q. Okay. Do you recall who it is?

8 A. It would have been FP.

9 Q. Okay. Was on Mr. Epstein's airplane?

10 MS. SCHULTZ: Object to form.

11 THE WITNESS: I believe so.

12 BY MR. PAGLIUCA:

13 Q. Would that be reflected in Exhibit 1?

14 MS. SCHULTZ: Object to form.

15 THE WITNESS: But she flew alone. It
16 wasn't like Epstein was there. She went
17 someplace else, not to his private island,
18 nothing to do with Epstein. It was something
19 she wanted to do. And I think she flew on his
20 plane, but it was, like, her by herself.

21 BY MR. PAGLIUCA:

22 Q. Alone.

23 A. Right.

24 Q. With a pilot?

25 A. Right.

1 JOSEPH RECAREY - CONFIDENTIAL

2 MS. SCHULTZ: Object to form.

3 BY MR. PAGLIUCA:

4 Q. None of the alleged victims in your
5 investigation claimed to have gone to the Caribbean
6 island of Little St. James, correct?

7 MS. SCHULTZ: Object to form.

8 THE WITNESS: No.

9 BY MR. PAGLIUCA:

10 Q. "No" meaning they never went there,
11 correct?

12 MS. SCHULTZ: Object to form.

13 THE WITNESS: Not that I'm aware of.

14 BY MR. PAGLIUCA:

15 Q. None of the alleged victims ever went to
16 Mr. Epstein's New York residence, to your knowledge,
17 correct?

18 MS. SCHULTZ: Object to form.

19 THE WITNESS: Not that I'm aware of.

20 BY MR. PAGLIUCA:

21 Q. None of them ever reported that to you?

22 MS. SCHULTZ: Object to form.

23 THE WITNESS: No.

24 BY MR. PAGLIUCA:

25 Q. Okay. And none of them ever claimed to

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1 JOSEPH RECAREY - CONFIDENTIAL

2 have been outside of the country with Mr. Epstein,
3 ever, correct?

4 MS. SCHULTZ: Object to the form.

5 THE WITNESS: Not that I'm aware of.

6 MR. PAGLIUCA: Can we go off for a second?

7 Time check.

8 THE VIDEOGRAPHER: Off the record at 4:13.

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

11 THE VIDEOGRAPHER: On the record at 4:14.

12 BY MR. PAGLIUCA:

13 Q. Can you take a look at Exhibit 4, please?

14 A. Which one is 4?

15 Q. Four is the True Copy. That's what it
16 says at the top. Exhibit 4. Six pages.

17 A. Yes.

18 Q. Do you have that?

19 A. Yes, sir.

20 Q. There's yellow highlighting on the exhibit
21 that's in front of you.

22 Do you know how that got there?

23 A. No.

24 Q. And there's a -- there are numbers, item
25 numbers. Do you see that in the left column?

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2

3 CERTIFICATE OF OATH

4 STATE OF FLORIDA)

5 COUNTY OF MIAMI-DADE)

6

7 I, the undersigned authority, certify
8 that JOSEPH RECAREY personally appeared before me
9 and was duly sworn.

10 WITNESS my hand and official seal this
11 24th day of June, 2016.

12

13

KELLI ANN WILLIS, RPR, CRR

14 Notary Public, State of Florida

My Commission No. EE911443

15 Expires: 2/16/16

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3 C E R T I F I C A T E

4 STATE OF FLORIDA)

: ss

5 COUNTY OF MIAMI-DADE)

6 I, KELLI ANN WILLIS, a Registered
7 Professional, Certified Realtime Reporter and
8 Notary Public within and for The State of
9 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.

14 I further certify that I am not related
15 to any of the parties to this action by blood
16 or marriage, and that I am in no way interested
17 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 HH

IN THE CIRCUIT COURT OF THE
SEVENTEENTH JUDICIAL CIRCUIT
IN AND FOR BROWARD COUNTY,
FLORIDA

CASE NO.: CACE 15-000072

EDWARDS, *et al.*,

Plaintiffs / Counterclaim Defendants,

v.

DERSHOWITZ,

Defendant / Counterclaim Plaintiff.

**AFFIDAVIT OF JUAN P. ALESSI
REGARDING KNOWLEDGE OF ALAN M. DERSHOWITZ**

A. Introduction

1. My name is Juan P. Alessi. I make this declaration voluntarily and without compensation on personal knowledge concerning Alan Dershowitz and his visits at my former employer Jeffrey Epstein's home in Palm Beach, Florida.
2. I worked for Mr. Epstein from January 1991 to December 2002 as a full-time employee performing maintenance services and then also became the manager for the home on 358 El Brillo Way in Palm Beach, Florida.
3. Since Mr. Epstein was investigated and arrested, I have spoken with police, investigators, and attorneys concerning my time working for Mr. Epstein.
4. On September 8, 2009, I gave a deposition in the case captioned *Jane Doe No. 2 v. Jeffrey Epstein*, Case No. 08-CV-80119 in which I truthfully answered the questions posed by the attorneys. I also gave a sworn statement on November 21, 2005 to

Detective Joseph Recarey of the Palm Beach P.D. during their investigation of Mr. Epstein.

5. I have reviewed the statements that Bradley Edwards and Paul Cassell attribute to me in their papers in the cases against the Government and against Mr. Dershowitz. Because I do not believe they accurately reflect the statements I previously made, I submit this affidavit to have my statements accurately reflected and made clear on the record.

B. Summary of My Knowledge of Massages at Mr. Epstein's Palm Beach Home

6. As I stated in my deposition, a massage was like a treat for all the guests at Mr. Epstein's home. Mr. Epstein usually received his massages in his private suite, but guests would also be given massages in their respective rooms or by the pool area.
7. There were between fifty (50) to one hundred (100) masseuses – mostly women but also some men - who would come to give massages during this time. I provided names of masseuses in my deposition.
8. As I stated in my deposition, I was unaware of any masseuses being under the age of 18. I believed that the females' age ranged from overage to maybe mid-forties. As I stated in my deposition, I received as a gift a massage from a male masseuse at Mr. Epstein's home in Palm Beach.
9. In my deposition, I was asked about cleaning up after massages. I stated that when I cleaned Mr. Epstein's bedroom suite, which included the bathroom of Ms. Maxwell, after massages, I would, on occasion, find vibrators and sex toys. I have specific recollection of finding these items in the sink of Ms. Maxwell's bathroom. I did not state or imply that vibrators or sex toys were found after massages in other rooms used by guests because that was not the case. Guests having massages did not have

massages in Mr. Epstein's private bedroom suite. This area was private and off-limits to guests, which I explained to the lawyers during my deposition. As I said in my deposition, massage tables were located in almost every room, including guest rooms and by the pool. I never found, and never heard anyone in the house finding, a vibrator or a sex toy in the same room where any guest, including Alan Dershowitz, had a massage.

10. The following statement made by Virginia Roberts's attorneys in a filing on January 21, 2015 is not accurate and is a misrepresentation of what I said in my deposition: "The private, upstairs room where Dershowitz got his 'massages' was one that contained a lot of vibrators – Maxwell had 'a laundry basket . . . full of those toys' in that room."

C. Summary of My Interaction with Alan M. Dershowitz

11. During the approximate thirteen years I worked for Mr. Epstein, I believe I saw Mr. Dershowitz visit Mr. Epstein's Palm Beach home approximately four or five times a year. I recall driving him to the airport on multiple occasions.
12. At the time, I understood that Mr. Dershowitz was a famous lawyer. His visits to the house would typically involve a group of intellectuals or business men in social, but professional type gatherings.
13. I can recall that Mr. Dershowitz had a massage on at least one occasion during a visit to Mr. Epstein's home in Palm Beach (although I cannot recall that Mr. Dershowitz received a massage on more than one occasion). I do not recall Mr. Dershowitz being massaged by anyone who I thought was less than 18 years old. I have no reason to doubt Mr. Dershowitz's statement that this massage was done by a woman named Olga who was in her forties. In fact, I do remember a masseuse named Olga that

lived in Palm Beach, though I do not know her last name. As I have said, I never saw Mr. Dershowitz around young girls. I have also explained that there were masseuses, both male and female, that were in their mid-forties.

14. I never saw Mr. Dershowitz do anything improper or be present while anyone else was being improper.

15. Before asking me about Jeffrey Epstein speaking to celebrities at the house, the attorney for "Jane Doe 102" asked me about Jean Luc Brunel, Mark Epstein, Daniel Estes, Matt Groening, and Leslie Wexner. I then listed Senator Mitchell, Prince Andrew, Princess Sarah Ferguson, Miss Yugoslavia, Miss Germany, Alan Dershowitz, Princess Diana's secretary with her children, Mr. Trump, Mr. Robert Kennedy, Jr., Frederik Fekkai, and a couple Noble prize winners as celebrities that I had seen while working for Mr. Epstein. I also mentioned a reunion of Nobel prize winners that was held at the house, and that I met President Clinton at Mr. Epstein's plane the last month that I was working for Mr. Epstein.

C. Summary of My Interaction with Virginia Roberts

16. The first time I saw Virginia Roberts was at Mar-a-Lago where I believed she worked in the spa. I only recall seeing Virginia Roberts come to Mr. Epstein's house during the last year that I worked for Mr. Epstein. During this time, I believe she visited Mr. Epstein's home in Palm Beach two or three times a week.

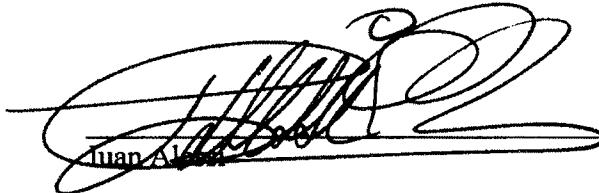
17. I never saw any photographs of Virginia Roberts in Mr. Epstein's house. I was shown a photo of Virginia Roberts during my deposition, and I recognized the woman in the photo as Virginia Roberts.

18. As I stated in my deposition, I am not sure whether Virginia Roberts came to the house when Prince Andrew was there.

19. I was never asked by any attorneys if Virginia Roberts came to the house when Mr. Dershowitz was there. If I had been asked, I would have answered that I never saw Virginia Roberts at the house when Mr. Dershowitz was there.
20. The following statement made by Virginia Roberts's attorneys and their own attorney in a filing on December 4, 2015 is not accurate and is a misrepresentation of what I said in my deposition: "Alessi was able to identify a photograph of Ms. Giuffre as someone who was at the mansion as the same time as Dershowitz."
21. As far as I can recall, since I gave my deposition in 2009, I have never been asked by Brad Edwards or Paul Cassell about my knowledge regarding Virginia Roberts or Alan Dershowitz or about my 2009 deposition testimony.

I understand that I am swearing or affirming under oath to the truthfulness of the claims made in this affidavit and that the punishment for knowingly making a false statement includes fines and/or imprisonment.

Dated: January 13, 2016



STATE OF FLORIDA
COUNTY OF PALM BEACH

Sworn to or affirmed and signed before me on JANUARY 13, 2016
by JUAN PATRICIO ALVAREZ, who provided his driver's
license. ADDRESS:

Linda S. Cohen
NOTARY PUBLIC or DEPUTY CLERK
LINDA S. COHEN
[Print, type, or stamp commissioned name of
notary or clerk.]



EXHIBIT II

1 IN THE CIRCUIT COURT OF THE 17TH JUDICIAL CIRCUIT
2 IN AND FOR BROWARD COUNTY, FLORIDA
3 CASE NO. 15-000072

4 BRADLEY J. EDWARDS and PAUL G.
5 CASSELL,

6 Plaintiffs,

7 - vs - **CONFIDENTIAL**

8 ALAN M. DERSHOWITZ,

9 Defendant.

----- /

10 VIDEOTAPED DEPOSITION OF VIRGINIA ROBERTS GIUFFRE

11

12 Saturday, January 16, 2016
13 9:07 a.m. - 2:48 p.m.

14 401 East Las Olas Blvd., Suite 1200
15 Fort Lauderdale, Florida 33301

16

17

18 Reported By:

19 Deborah A. Harris, Court Reporter
20 Notary Public, State of Florida
21 Phone - 305.651.0706

22 Job No. J0277789

23

24

25

CONFIDENTIAL

GIUFFRE005093
CONFIDENTIAL

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39

40

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1 ALSO PRESENT

2 Edward J. Pozzuoli, Special Master
3 Robert Pacheco, Videographer
4 Ryan Kick, Videographer
5 Bradley J. Edwards
6 Paul G. Cassell
7 Alan M. Dershowitz
8 Brittany N. Henderson, Esq.
9 Meridith Schultz, Esquire

7 - - -
8 I N D E X
9

10 WITNESS DIRECT CROSS REDIRECT RECROSS
11 Virginia Roberts Giuffre
12 By Ms. Borja 5
13 By Mr. Scarola 201
14 By Ms. Borja 204
15 - - -

14 E X H I B I T S

15 DEFENDANT VR EXHIBITS FOR ID
16 1 - Notice. 6
17 2 - Disclosure list. 26
18 3 - Order. 59
19 4 - E-mail. 92
20 5 - Photo (Confidential) 100
21 6 - Article. 124
22 7 - Daily Mail. 155
23 8 - Daily Mail. 168
24 9 - Declaration. 170
25 10- FBI doc. 187
21 REPORTER'S NOTE: Exhibit 5 marked confidential, sealed,
22 and retained by the Special Master.

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GIUFFRE005095
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1 MR. SCAROLA: It is a minor discrepancy,
2 but I think you read it as when she was a minor
3 and it's while she was a minor.

4 BY MS. BORJA:

5 Q. While she was a minor. Do you see where
6 I'm reading starting in the third line?

7 A. Yes.

8 Q. Is that allegation true?

9 A. Yes.

10 Q. If you go to page 6 of the document, do you
11 see the paragraph that's starts, Epstein also trafficked?

12 A. Yes.

13 Q. Is says Epstein also trafficked Jane Doe #3
14 for sexual purposes to many other powerful men including
15 numerous prominent American politicians, powerful
16 business executives, foreign presidents, a well-known
17 prime minister and other world leaders. Do you see that?

18 A. Yes.

19 Q. Is that allegation true?

20 A. Yes.

21 Q. The reference there to foreign presidents,
22 do you see that?

23 A. Yes.

24 Q. You were sexually trafficked to foreign
25 presidents?

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GIUFFRE005102
CONFIDENTIAL

1 A. No.

2 Q. So that's not true, you were not sexually
3 trafficked to foreign presidents?

4 A. I don't know what foreign president you're
5 talking about.

6 Q. Have you ever been sexually trafficked to
7 any foreign president?

8 MS. MCCAWLEY: I'm going to allow you to
9 ask that question, but with respect to specific
10 identification of an individual we're not going to
11 do that. At this point she has.

12 MS. BORJA: Counsel, your objection has
13 been made. No speaking objections, please. Let's
14 move on.

15 MS. MCCAWLEY: I can make my record, and my
16 record is she's not going to be speaking with
17 respect to individuals' names that are named in
18 generalities in this document.

19 SPECIAL MASTER: Objection overruled. You
20 can answer.

21 A. I understand well-known prime ministers and
22 other world leaders; as far as foreign presidents, I'm
23 not too sure, I don't know.

24 Q. Have you ever met any foreign presidents?

25 A. Foreign presidents as in overseas?

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GIUFFRE005103
CONFIDENTIAL

1 Q. Sure, okay, overseas.

2 A. No.

3 Q. Have you ever met any foreign presidents
4 from countries not overseas such as Canada or Mexico?

5 A. No.

6 Q. So you were not sexually trafficked to any
7 foreign presidents; is that correct?

8 A. As far as I know right now, yes.

9 Q. It's correct that you were not sexually
10 trafficked to them, right?

11 A. You've asked me this three times and I'm
12 telling you.

13 Q. Okay. A well-known prime minister. Were
14 you sexually trafficked to a well-known prime minister?

15 A. Yes.

16 Q. Who was that?

17 MS. MCCAWLEY: I'm going to object to this
18 line of questioning. This has to do with safety
19 concerns for her.

20 MS. BORJA: Counsel, this is under seal.
21 You can answer.

22 MS. MCCAWLEY: No, she's not going to
23 answer.

24 SPECIAL MASTER: Hang on one second.

25 MS. MCCAWLEY: Let me make my objection.

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GIUFFRE005104
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1 SPECIAL MASTER: Okay. I can't twist her
2 arm and force her so we'll deal with it.

3 BY MS. BORJA:

4 Q. Okay. Other world leaders, what other
5 world leaders were you sexually trafficked to?

6 MS. MCCAWLEY: We have the same objection.

7 SPECIAL MASTER: And I would have the same
8 ruling based upon the arguments.

9 MS. MCCAWLEY: Let me just make my record.
10 To the extent that there's a name of an individual
11 that you can reveal that you do not feel would
12 harm your physical safety, you're welcome to
13 reveal them. Anybody else, you don't have to
14 reveal at this time and we'll take that to Judge
15 Lynch.

16 A. Okay. Prince Andrew for one.

17 Q. Other than Prince Andrew?

18 A. There is another individual that I honestly
19 do not know his name.

20 Q. What country is he from?

21 A. I'm not too sure, he spoke in a foreign --
22 he did speak foreign tongue, he spoke English as well,
23 but I'm not too sure where he was from.

24 Q. How do you know he is world leader?

25 A. I was introduced to him as a prince.

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GIUFFRE005107
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1 Q. Okay. Did he have security with him?

2 A. I'm sure he did somewhere around, but not
3 when I was with him.

4 Q. Did you see security?

5 A. No.

6 Q. Did you -- where were you when you met him?

7 A. On this occasion the South of France.

8 Q. Are there witnesses to you being sexually
9 trafficked to this prince?

10 A. Yes.

11 Q. Name them.

12 A. Jeffrey Epstein, Ghislaine Maxwell.

13 Q. Anyone else?

14 A. There was a whole bunch of people in the
15 room so of course.

16 Q. Was this an orgy?

17 A. No.

18 Q. Who else was in the room?

19 A. I can't name them all, there was a lot.

20 Q. Name as many as you can name?

21 A. I don't know their names. I can't name
22 their names.

23 Q. They were present during sexual activity?

24 A. They were present before the sexual
25 activity and then I went to have sexual activity with him

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GIUFFRE005108
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1 alone.

2 Q. So he's the only witness to your sexual
3 activity, the prince?

4 A. On the instruction of Epstein and
5 Ghislaine, yes.

6 Q. Where in the South of France were you?

7 A. I don't know.

8 Q. Were you on a boat, were you in a house?

9 A. We were at a like a cabana, not cabana,
10 like a resort, but it was a big party.

11 Q. Who was throwing the party?

12 A. I don't know. I was just brought there.

13 Q. You also refer to powerful business
14 executives. What powerful business executives were you
15 sexually trafficked to?

16 MS. MCCAWLEY: Again, to the extent you can
17 reveal somebody without a safety concern you're
18 welcome to do that.

19 SPECIAL MASTER: Well, again --

20 MS. MCCAWLEY: Right. I understand.

21 SPECIAL MASTER: Same objection, same
22 ruling.

23 A. George Mitchell.

24 Q. When were you sexually trafficked to George
25 Mitchell?

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1 Q. Do you have the originals?

2 A. Again, between the FBI and giving them to
3 my lawyers and Sharon Churcher, the circulation, I'm not
4 too sure if I have the originals. I know I have copies.
5 So I'm not too sure if they're the originals.

6 Q. The booklet that you gave pages from to Ms.
7 Churcher where is that booklet?

8 A. Burned.

9 Q. When did you burn it?

10 A. In, I think it was 2013. Me and my husband
11 had a bonfire.

12 Q. What did you put in the bonfire?

13 A. Any kind of memories that I had written
14 down about all the stuff going on.

15 Q. Had you written anything about Professor
16 Dershowitz?

17 A. He could have been there, yes.

18 Q. And you burned that?

19 A. I wanted to burn my memories. I wanted to
20 get rid of it. It was very painful stuff.

21 Q. Other than what you had written down did
22 you burn anything else? I don't mean the wood, when you
23 talk about burning your memories, what were you burning?

24 A. I was burning like memories, thoughts,
25 dreams that I had, just everything that was kind of

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GIUFFRE005156
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1 affiliated with the abuse I endured, and there was a lot
2 of it in there. My husband is pretty spiritual so he
3 said the best thing to do would be burn them.

4 Q. Is there anything you decided to keep and
5 not burn?

6 A. Just the photographs.

7 Q. Anything else that you can think of?

8 A. Photographs, that's it.

9 Q. Approximately when in 2013 was this
10 bonfire?

11 A. I don't know what month it was.

12 Q. Did you do it outside?

13 A. Yeah, it was outside. I wasn't going to do
14 it in my living room.

15 Q. Did it feel good to be close to the fire
16 because it was cold out or was it a summertime bonfire?

17 A. I believe I had just bought my house in
18 Titusville, Florida. I bought my house in, I think, I
19 either got it October or November of 2013. It would have
20 been around probably November.

21 Q. Why did you decide to keep the photos?

22 A. They're evidence.

23 Q. Do you have any photographs of yourselves
24 with Professor Dershowitz?

25 A. No.

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GIUFFRE005157
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1 Beach, I've seen him in New York. So I mean, if we're
2 going to pin point how many times I've seen him or the
3 next time I saw him after that I don't know.

4 Q. Then tell me -- let's do it this way, what
5 was the most recent time that you recall having sex with
6 Professor Dershowitz?

7 MS. MCCAWLEY: Objection.

8 SPECIAL MASTER: You can answer.

9 A. The first time I recall having sex with
10 Professor Dershowitz was in New York.

11 Q. My question was, the most recent time now.
12 What's the most current, most recent memory of having sex
13 with Professor Dershowitz?

14 MS. MCCAWLEY: Objection. Just so I'm
15 clear, you're going backward?

16 MS. BORJA: Correct.

17 MS. MCCAWLEY: The last time.

18 A. The last time that I remember having sex
19 with him? Okay. I believe it was on an airplane.

20 Q. Where were you going?

21 A. On, I believe it was Massachusetts. I
22 don't know. It's very hard for me to remember exactly
23 where we were going, what were the circumstances.

24 Q. So that's the time you testified about
25 earlier?

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GIUFFRE005177
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1 age of 30?

2 Q. That were providing massages to Jeffrey
3 Epstein?

4 A. Just the male that was teaching me on the
5 USVI and Sheridan, but she was also involved in sexual
6 acts. She wasn't over the age of -- she could have been
7 around 30, but she would have been over 30.

8 Q. Did you keep a list of the masseuses who
9 came to Epstein's properties?

10 A. No.

11 Q. Did some of them come only once?

12 A. Uh-huh.

13 Q. Are there some that came when you weren't
14 there?

15 A. I wasn't there, how am I to know.

16 Q. You don't know if any came as a masseuse
17 while you were not at Jeffrey Epstein's property?

18 MS. MCCAWLEY: Objection, asked and
19 answered.

20 A. I wasn't there so I couldn't have.

21 Q. What's the sixth incident that you say
22 happened where you were sexually trafficked to Professor
23 Dershowitz?

24 A. We've talked about New York, we talked
25 about Palm Beach, New Mexico, U.S. Virgin Islands, talked

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1 about we took the airplane?

2 Q. Yes.

3 A. There was an instance in a car, but it was
4 more -- it wasn't intercourse, it was more --

5 MS. MCCAWLEY: Use a term you're
6 comfortable with.

7 A. More oral is the good term to use, oral
8 sex.

9 Q. Where were you? Where was his car, what
10 city, what state, what jurisdiction? Where were you?

11 A. This was in Massachusetts. It was a black
12 limousine.

13 Q. Who else was in the car other than yourself
14 and Professor Dershowitz?

15 A. Jeffrey Epstein and another young girl.

16 Q. How many people participated in the sexual
17 activity in the car?

18 A. Including myself?

19 Q. Uh-huh.

20 A. Four.

21 Q. Where was everybody in the car?

22 A. Sitting down.

23 Q. Were people -- was this a town car, was
24 this a limousine?

25 A. Like a long limousine.

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1 Q. Where was the car going?

2 A. To Mr. Dershowitz' house.

3 Q. Where was it coming from?

4 A. An airport.

5 Q. When was this?

6 A. I don't know.

7 Q. What's your best recollection?

8 A. It wasn't snowing. It wasn't hot. So I
9 would like to say -- I'm trying to think of the trees
10 around, but I don't know, maybe spring.

11 Q. Why were you going to Professor Dershowitz'
12 house?

13 A. Jeffrey and him were doing some business.
14 They were doing something at his house. Nothing sexual
15 happened at his house.

16 Q. Did you go in Professor Dershowitz' house?

17 A. Yes, I did.

18 Q. How long were you there?

19 A. Not even twenty minutes, half an hour.

20 Q. What did you do while you were in the
21 house?

22 A. I sat in, I don't know, a foyer with
23 another girl and Jeffrey and Dershowitz went to a
24 different part of the house. There was a desk there and
25 we just sat, not sat, stood in the foyer.

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1 Q. Who was this other girl?

2 A. I don't know who she is.

3 Q. Had you ever met her before?

4 A. No.

5 Q. When you were coming from the airport had
6 you flown in?

7 A. Yes, me and Jeffrey and the girl had flown
8 in, Dershowitz had not.

9 Q. How did he get into the limousine?

10 MS. MCCAWLEY: Objection.

11 SPECIAL MASTER: You can answer.

12 BY MS. BORJA:

13 Q. Where did he get into the limousine?

14 A. At the airport.

15 Q. He was not on a flight with Mr. Epstein?

16 A. Not on this occasion.

17 Q. Did you tell anybody about this incident in
18 the car?

19 A. Like anybody that I know personally?

20 Q. Anybody in the world?

21 MS. MCCAWLEY: Objection to the extent you
22 relayed something to your lawyer. You can say
23 that you told your lawyers but you can't discuss
24 what you said.

25 SPECIAL MASTER: Other than --

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1 A. No, I told my lawyers.

2 Q. Did you tell anybody about it closer in
3 time to the event?

4 A. Like my boyfriend or something like that,
5 no.

6 Q. After you left Professor Dershowitz's house
7 where did you go?

8 A. Back to the airport.

9 Q. Where did you fly in from?

10 A. I believe it was New York.

11 Q. When you went back to the airport where did
12 you go?

13 A. I believe, see, that's the hard thing. I
14 want to say either New York or Palm Beach. I'm no 100
15 percent sure.

16 Q. So I understand the time frame, did you fly
17 in on a private jet or commercial?

18 A. Private.

19 Q. You flew out again on private?

20 A. Yes.

21 Q. So the time frame is that you and Jeffrey
22 were on the plane?

23 MS. MCCAWLEY: Objection.

24 A. Yes.

25 MS. MCCAWLEY: Objection, mischaracterizes

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1 the testimony. Go ahead.

2 A. Yes, me and Jeffrey were on the plane
3 together.

4 Q. And the girl was on the plane?

5 A. Yes.

6 Q. Anybody else?

7 A. The pilots.

8 Q. So the three of you took the flight,
9 correct?

10 A. Yes.

11 Q. And you flew into an airport in
12 Massachusetts?

13 A. Yes.

14 Q. Then you took a limousine to the
15 Professor's house and you were there for about ten
16 minutes, is that right?

17 MS. MCCAWLEY: Objection. Go ahead.

18 A. About 20, 25 minutes. I didn't look at my
19 watch.

20 Q. A very brief period of time?

21 A. Very brief.

22 Q. And then you went back to the airport and
23 you flew out?

24 A. Yes.

25 Q. And you flew back either to New York or to

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1 A. Besides what's in these?

2 Q. Did you ever look to see if you had any
3 personal notes in your writing that pertain to Professor
4 Dershowitz?

5 A. Like from my old journal, the one that I
6 burned?

7 Q. From anywhere. Did you ever make an effort
8 to look?

9 A. Dershowitz could have been in my journal,
10 he could have been. We're talking about an 85 page, if
11 not more, you know, things that I had written to get my
12 story out of my head and into pages; and yes, Dershowitz
13 could have been in there, but that's up in the clouds
14 now, bonfire.

15 Q. That's what you call your journals, what
16 you burned, right?

17 A. Yes.

18 Q. And you wrote that journal in order to
19 collect your thoughts?

20 A. To get everything out of here and on to
21 paper.

22 Q. Have you made any other notes, though,
23 since then to help you when you think of things?

24 A. Yes, sometimes like I said, sometimes when
25 I read my affidavits and stuff like that, you know, and I

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1 think of something else like a description of something
2 that I forget about, you know what I mean, then yeah,
3 I'll go back and I'll write it in the journal, you know,
4 for instance, you know, what another girl would have
5 looked like. Even though I can't identify her name or
6 her age or anything like that, but I do remember like
7 flashes of blonde, little things like that, but nothing
8 -- I don't have any more journals.

9 Q. But those notes, they help your memory?

10 A. Sometimes. I'm a very visual person.

11 Q. And they help you with your affidavits?

12 A. No, they don't help me with my affidavits,
13 my affidavits are already done, I just go back and it
14 helps my memory. It helps me bring stuff out.

15 Q. What do you do with those notes?

16 A. Nothing, literally nothing. They're in a
17 notebook that if I need to write it down. I have a dream
18 notebook as well where I'll just write down my dreams and
19 stuff. I do nothing, no one is seeing it.

20 Q. You read it? You keep it?

21 A. Yeah, I keep it.

22 Q. Okay. Have you gone back and read that
23 recently?

24 A. No.

25 Q. Okay. You continue to make entries into

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1 it?

2 A. Not so much about Dershowitz. It's mostly
3 like feelings, dreams, you know, past things that I've
4 gone through. Like I said, not so much pertaining to
5 Dershowitz himself.

6 Q. And that's separate from your dream book?

7 A. No, it's all in one.

8 Q. Is it a spiral bound notebook?

9 A. Yes, it's just a cheap, like, actually it's
10 in my kid's closet.

11 Q. At this point in time are you angry with
12 Mr. Epstein?

13 A. Furious.

14 Q. Are you angry with Professor Dershowitz?

15 A. Absolutely.

16 Q. Are you angry with famous politicians?

17 A. I'm angry with anybody who has it in their
18 mind that they can hurt and abuse a minor child and
19 continue to lie about getting away with it and that what
20 they've done is okay and they can continue to harass
21 victims, yes, I'm furious.

22 Q. Are you angry with Professor Dershowitz for
23 his role in representing Jeffrey Epstein in the criminal
24 action?

25 A. Do I think he played a big part getting him

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1 C E R T I F I C A T E O F O A T H

2

3

4 STATE OF FLORIDA,

5 COUNTY OF DADE,

6

7 I, Deborah A. Harris, the undersigned
8 authority and Notary Public certify that VIRGINIA ROBERTS
9 GIUFFRE personally appeared before me and was duly sworn
10 on the 16th day of January, 2016.

11

12 Sworn to before me this 20th day of
13 January, 2016.

14

15

16

17

18

19 _____
20 Deborah A. Harris, Court Reporter
21 Notary Public - State of Florida
22 My Commission No. FF 246867
23 My Commission Expires: October 31, 2019
24 Job No. J0277789

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