

TERMINATIONS

LAST NAME	FIRST NAME	
Vasquez	Sosmar	Box #5
Vasquez	Christian	Box #2
Vaughn	Matthew	Box #2
Velasquez	Rodolfo	Box #2
Vidalis	Chantal	Box #2
Voluck	Justin	Box #2
Vyskrebentsev	Aleksey	Box #5
Wahl	Steven	Box #5
Walker	Sylvia	Box #7
Walkowiak	Toni	Box #7
Wallace	Philip	Box #2
Ward	Terry	Box #5
Webb	Jacob	Box #7
Weber	Ronald	Box #2
Weidner	James	Box #7
Weisman	Brian	Box #2
Wentworth	Gayle	Box #2
Weslowski	Elaine	Box #2
White	Scott	Box #5
Whitley	Deborah	Box #7
Whitney	Moriah	Box #7
Whittle	Tamara	Box #2
Wilburn	Jennifer	Box #2
Williams	Arhon	Box #2
Williams	Gretchen	Box #2
Williams	Jacqueline	Box #2
Williams	Ellen	Box #7
Williams	Kristin	Box #7
Willoughby	William	Box #2
Willson	Howard	Box #5
Willson	Joseph	Box #2
Woolf	Elena	Box #2
Wynn	Beverly	Box #2
Yancey	Kathryn	Box #2
Yancey	Scott	Box #7
Yeskey	Dean Martin	Box #5
Young	Todd	Box #2
Zervoulis	Matthew	Box #2
Zivkovic	Milo	Box #2
Zorn	Christopher	Box #7
Zwick	Danielle	Box #2

Box #1 1998 terms
 Box #2 1998 & 1999 terms
 Box #3 1999 terms
 Box #4 2000 terms
 Box #5 2000 terms
 Box #6 2001 terms

TERMINATIONS

LAST NAME	FIRST NAME
Box #7	2001 terms

EXHIBIT T

UNITED STATES DISTRICT COURT
for the
Southern District of New York

Civil Action No. 15-cv-07433-RWS

VIRGINIA GIUFFRE,

Plaintiff,

vs.

GHISLAINE MAXWELL,

Defendant.

VIDEO-DEPOSITION Sky Roberts
OF:

TAKEN BY: Defendant

REPORTED BY: Karla Layfield, RMR
Stenographic Court Reporter
Notary Public
State of Florida at Large

DATE AND TIME: May 20, 2016; 8:33 a.m.

PLACE: Millhorn Law Firm
11294 North US Highway 301
Oxford, Florida

APPEARANCES: Laura A. Menninger, Esquire
HADDON, MORGAN & FOREMAN, PC
150 East 10th Avenue
Denver, Colorado 80203
Attorney for Defendant

Brad Edwards, Esquire
Farmer, Jaffe, Weissing, Edwards,
FISTOS & LEHRMAN, PL
425 Andrews Avenue, Suite 2
Fort Lauderdale, Florida 33301
Attorney for Plaintiff

ALSO PRESENT: Kenneth Sarcony, Videographer

Owen & Associates Court Reporters
P.O. Box 157, Ocala, Florida
352.624.2258 * owenassocs@aol.com

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(Exhibits attached.)

1 Q Do you remember there being a job posting that
2 you felt like was appropriate for Virginia or did you just
3 go out and talk to the woman who ran the spa area on your
4 own?

5 A I just talked to Angela.

6 Q Okay. Do you recall whether this was intended
7 to be a full-time job?

8 A I don't remember if it was full time or just
9 summer jobs or, you know, during season. It was probably
10 for a season because Mar-a-Lago is seasonal.

11 I mean, I was there year round but a lot of
12 people are seasonal, you know, because it's like
13 snowbirds, you know, summertime comes and nobody wants to
14 be down in south Florida.

15 Q What would you call the season, the seasonal
16 aspect of Mar-a-Lago? What's the season?

17 A Probably from September or October to, you know,
18 maybe May, I guess.

19 Q Is that the coolest time?

20 A Times of the year, yes.

21 Q And it's more guests that come during that
22 period of time?

23 A Yes.

24 Q And is there more staff brought on during that
25 period of time?

1 A Yes.

2 Q You saw that happen every year that you were
3 there?

4 A Every year.

5 Q And in the summer, it's relatively dead because
6 it's so hot?

7 A Basically, it closed during the summer. That's
8 when we would kind of work on everything and then make
9 sure everything is up to snuff for the next year, you
10 know.

11 Q Do you remember what capacity Virginia was hired
12 to work in, what her job title was, for example?

13 A I don't know. I would have lunch with Virginia.
14 That's about as much as I know about what she did. I was
15 busy all the time.

16 Q I understand.

17 A I didn't have time to go see what she was doing.
18 I didn't really talk to Angela about what she had to do.
19 I think that was her name, Angela. But it's kind of the
20 name that sticks out.

21 Q We'll just use Angela.

22 A We'll use that as the name.

23 Q But we know it may not be Angela.

24 A It may not be.

25 Q Just because we have to call her something,

1 A Where did I learn that?

2 Q Uh-huh.

3 A I think Virginia had told me that there was a
4 lady in the spa area named Ms. Maxwell. I don't know her.
5 I couldn't tell you what she looked like.

6 But just she said Ms. Maxwell said she can get
7 me a job with Jeffrey Epstein who is a friend of Donald
8 Trump, so I figured, well, he was a good guy or whatever,
9 you know, and that she was going to learn massage therapy.

10 Q When did Virginia tell you this?

11 A Oh, I can't tell you what date and time but I
12 don't remember.

13 Q I understand.

14 Did she tell you this while she was working at
15 Mar-a-Lago?

16 A Yes. I mean, after she had been there for a
17 little bit, you know, and then she told me, yes, that she
18 could possibly get this other job.

19 Q Okay.

20 A You know.

21 Q So she worked at Mar-a-Lago for a few months?

22 MR. EDWARDS: Form.

23 THE WITNESS: I have no idea. I don't know
24 how long she worked there. I don't remember.

25 BY MS. MENNINGER:

1 A Uh-huh. Yes. It's not to me. It's up to her.
2 I think that's the way I told her, you know.

3 Q Did you ever meet Jeffrey Epstein?

4 A Once.

5 Q When was that?

6 A I dropped Virginia off at the house once and he
7 came out and I met him and seemed just fine to me. I
8 mean, you can't tell people by looking at them.

9 I mean, I know now from, you know, what I've
10 read that he's not a good guy. But you can't tell. You
11 know, you don't even know your neighbors sometimes, you
12 know.

13 Q Do you remember about when you dropped Virginia
14 off at his house that you met him?

15 A What do you mean?

16 Q Was it about the same time Virginia started
17 working with him?

18 A Yeah.

19 Q Was it later?

20 A I think it was about the time she started.
21 Because I wanted to see where she was at, you know. And
22 it was just a mansion down the street from, you know,
23 Mar-a-Lago. So I didn't think twice about it. I didn't
24 think nothing of it. He came out. He was very cordial,
25 very nice.

1 Q Do you remember any part of your conversation
2 with him?

3 A No. It was just that, you know how a parent has
4 to meet -- you know, if my daughter is going to work
5 somewhere, I just want to meet the guy and see what was
6 going on, you know. But I don't remember any
7 conversation, you know.

8 I just remember meeting him and that was it and
9 she walked into the house and --

10 Q All right. So you recall Mr. Epstein coming
11 outside of his home and greeting you?

12 A Yes.

13 Q Were you invited into his home?

14 A No.

15 Q Did you ever go inside of his home?

16 A No.

17 Q Other than that one time you dropped her off
18 there, do you ever remember going to that home?

19 A No. I couldn't tell you where it was at.

20 Q Okay. Did you meet anyone else while you were
21 there at the home?

22 A No.

23 Q Did you have a conversation with anyone else?

24 A No.

25 Q Did you every call Virginia at that home?

1 massage therapy.

2 Q All right. When she came home at night from
3 working with Mr. Epstein, did she look distressed to you
4 in any way?

5 A Not that I remember.

6 Q Okay. Did she report any complaints about her
7 job with Mr. Epstein?

8 A Not to me.

9 Q Okay. Did she report them to anyone else who
10 then reported them to you?

11 A No.

12 Q Your wife, for example?

13 A I have no idea. Like I said, if she did tell my
14 wife, I never heard about it.

15 Q Okay. Have you ever met Ms. Maxwell?

16 A Not that I remember ever meeting her.

17 Q Do you know what she looks like?

18 A No.

19 Q Did you ever meet anyone else who worked with
20 Mr. Epstein?

21 A No.

22 Q Do you remember anyone else who worked for
23 Mr. Epstein bringing your daughter home, for example?

24 A No.

25 Q Did your daughter ever move into the home where

C E R T I F I C A T E

STATE OF FLORIDA

COUNTY OF MARION

I, Karla Layfield, RMR, Stenographic Court Reporter, do hereby certify that I was authorized to and did stenographically report the foregoing deposition of Sky Roberts; that said witness was duly sworn to testify truthfully; and that the foregoing pages, numbered 1 through 142, inclusive, constitute a true and correct record of the testimony given by said witness to the best of my ability.

I FURTHER CERTIFY that I am not a relative or employee or attorney or counsel of any of the parties hereto, nor a relative or employee of such attorney or counsel, nor am I financially interested in the action.

WITNESS MY HAND this day of May, 2016, at
Ocala, Marion County, Florida.

Karla Layfield, RMR
Stenographic Court Reporter

1 CERTIFICATE OF OATH

2 STATE OF FLORIDA

3 COUNTY OF MARION

4 I, the undersigned authority, certify that Sky
5 Roberts personally appeared before me and was duly sworn
6 on the 20th day of May 2016.

7 WITNESS MY HAND AND OFFICIAL SEAL this day
8 of May 2016.

9
10
11 Karla Layfield, RMR
12 Notary Public
13 State of Florida at Large
14 My Commission No. FF942806
15 My Commission Expires 12/10/2019

16 Personally Known
17 Professionally Known
18 Produced Identification of FDL
19
20
21
22
23
24
25

EXHIBIT U

**THE MAR-A-LAGO CLUB, L.C.
EMPLOYMENT POLICIES
OCTOBER 28, 1995**

exh
EXHIBIT **19**
Giuffre
AGREN BLANDO REPORTING
11-14-16

MAR-A-LAGO 0178

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INTRODUCTION

The Mar-A-Lago Club, L.C. ("the Club") seeks to provide the quality of work which will develop the potential of each employee as well as the Club as a whole. In this regard, this policy and procedures manual is designed to acquaint each employee with the administrative and personnel practices of the Club. These guidelines provide a framework for the fair and equitable treatment of all employees regardless of location, department, manager or supervisor. Each employee should be familiar with the responsibilities and opportunities available to make work as rewarding as possible.

These policies and procedures should be read carefully and clearly understood. Each department head, manager or supervisor will be able to answer, or obtain an answer, to any questions involving interpretation or clarification of these policies and procedures. Each employee is expected to apply these general policy and procedure guidelines conscientiously in a constructive and supportive manner.

The policies in this manual are only guidelines and the Club reserves the right to add to, subtract from, or change these provisions in any way, at any time, without being bound to the previously replaced or revised provisions. This handbook is not to be construed as an employment agreement or employment contract and the Club is under no obligation to provide the benefits set forth in this manual if it determines, at a subsequent time, that these benefits are to terminate.

EQUAL EMPLOYMENT OPPORTUNITY

The Club is an equal opportunity employer which is committed to prohibiting discrimination on the basis of race, color, sex, age, religion, national origin, sexual orientation, marital status, or disability throughout the employment process, from selection through termination.

The Club intends to provide a pleasant work environment that is healthful and comfortable and will not tolerate any form of employee harassment, either verbal, written, physical, or visual, based on race, color, religion, sex, national origin, age, disability or marital status.

Harassment can take many forms. It may be, but is not limited to: words, signs, jokes, pranks, intimidation, physical contact, violence toward any employee by a fellow employee, a supervisor, or a person doing business with the Club. Harassment is not necessarily sexual in nature.

All necessary steps will be taken to comply with existing federal, state and local fair employment laws and guidelines.

ORIENTATION POLICY

The first ninety days of employment are considered to be an orientation or probationary period during which you and the Club have an opportunity to know each other. Your performance will be evaluated during this time to assess your potential for continued employment. Evaluations will continue as long as you are employed, but during the orientation period your supervisor may observe and evaluate your performance more closely and more frequently to ensure that you are learning your job. During this orientation period, employees may earn but may not use vacation or personal days, except with permission of the Club Manager's office. If the employment relationship is terminated during this ninety day period, you shall not be entitled to receive any payment for benefits, e.g., personal days, vacation days, or unemployment compensation.

SEXUAL HARASSMENT

The Club strictly prohibits any form of harassment in the workplace, including sexual harassment.

Definition of Sexual Harassment:

1. Unwelcome sexual advances, requests for sexual favors, and other such verbal or physical conduct constitute sexual harassment under the following conditions:
 - A. Submission to such conduct is made either explicitly or implicitly a term or condition of an individual's employment.
 - B. Submission to or rejection of such conduct by an individual is used as the basis for employment decisions affecting such individual.
 - C. Such conduct has the purpose or effect of unreasonably interfering with an individual's work performance or creating an intimidating, hostile or offensive work environment.
2. Conduct which falls into the definition of sexual harassment may include, but is not limited to:
 - A. Unwelcome physical contact of a sexual nature such as patting, pinching or unnecessary touching.
 - B. Overt or implied threats against an individual to induce him or her to perform sexual favors or to engage in an unwelcome sexual relationship.
 - C. Verbal harassment or abuse of a sexual nature, including intimating by way of suggestion a desire for sexual relations or making jokes or remarks of a sexual nature to or in front of a person who finds them offensive.
 - D. Use of sexually suggestive terms or gestures to describe a person's body, clothing, or sexual activities.
 - E. Displaying or posting offensive sexually suggestive pictures or materials in the workplace.

Recourse:

3. If an employee feels that an incident of any form of harassment has occurred, the employee is encouraged to report the matter to the Club Manager's office. All such issues will be handled in strict confidence to the extent possible with minimum embarrassment to the involved parties. As in any grievance procedure, the facts of the situation will be reviewed objectively so that appropriate disciplinary action, including discharge, can be taken if misconduct has occurred.

A timely resolution of each complaint is to be reached and communicated to the parties involved. Retaliation against any employee for filing a complaint or participating in an investigation is strictly prohibited.

In the event an employee files a frivolous, malicious or false claim, appropriate sanctions for discipline of the complainant, including termination, may result.

CARE OF FACILITIES

The Club has made a large investment in equipment and facilities to provide each employee with the necessary resources to accomplish his/her duties.

It is the responsibility of management and each employee to treat equipment and facilities with respect and care. Neatness and cleanliness are required to maintain these resources at a level at which the employee can and will be proud. Abuse of equipment and facilities will not be tolerated and may lead to disciplinary action including discharge.

ENTRY AND EXIT OF CLUB GROUNDS/PREMISES

All employees must enter and leave the Club at the Southern Boulevard gates unless otherwise directed by management.

Employees may not enter the Club grounds/premises more than 30 minutes before the start of their scheduled shift, and employees must exit the Club grounds/premises directly after their shift ends, unless authorized by your department head.

When conducting Club business off the premises of Mar-a-Lago, you must have approval of your department head or supervisor.

Employees may not patronize the Club facilities without prior written approval of their department head.

If an employee needs to return to the property for any reason, the employee must contact their supervisor or a department head prior to their arrival. Security must be contacted in the event no supervisor is available.

PROOF OF AUTHORIZATION TO WORK

You must comply with government regulations by furnishing valid documentation of both your identity and your authorization to work. The Club Manager will advise you what documents are acceptable. If your immigration or work authorization status changes after you begin work so that you are no longer able to continue to work in the United States, you must advise your supervisor and the Human Resources Manager.

SECURITY

A. INFORMATION -

All financial, contract, production, and administrative records and information of the Club and its members are confidential. Each employee is responsible for making certain that information under his/her control is appropriately safeguarded. An employee will not provide or disclose office or guest information to third parties unless it has been determined that the party has a legitimate right to know and the request has been approved by your Supervisor.

Authorization by the Managing Director must be obtained before written contact is made of any member, client, purveyor, (current or prospective).

Any uncertainties should be cleared with the Managing Director before such information is provided.

B. CONFIDENTIALITY -

No employee shall, during the term of his/her employment or thereafter disclose to others or use, except as authorized by the Managing Director, any of the Club's confidential, technical, or other business information. "Confidential, technical or other business information" shall mean any information, including lists of the Club's vendors and customers, which the employee has used, learned or contributed during the course of his/her employment, regardless of whether it was written or in other tangible form that (i) is not generally available to the public; or (ii) gives one who uses it a competitive advantage over the Club.

C. FACILITIES -

Access to Club facilities will be limited to parties with a legitimate reason to be there. Employees are not permitted to have visitors on the premises unless special arrangements have been made by the employee's supervisor. Outside visitors will be greeted by Post One and escorted to their area of business. Each employee should feel comfortable in politely confronting an unknown individual who appears suspicious or in need of direction.

An essential element of the security procedures of the Mar-a-Lago Club is the key control process. As such, employees who have access to Club keys must recognize the importance of properly safeguarding the keys which have been entrusted to them. All employees should be aware that they may be subject to disciplinary action for any violation of the key control procedures. Guest room keys must never be left in your locker.

In the event of a breach or threatened breach by the employee of provisions A, B or C of this section, the Club shall be entitled to an injunction restraining the employee from disclosing or using, in whole or in part, such information or from rendering any services to any person, Club, corporation, association, or other entity to whom such information, in whole or in part, has been disclosed or is threatened to be disclosed. Nothing herein shall be construed as prohibiting the Club from pursuing other remedies available to the Club for such breach or threatened breach, including the recovery of damages from the Club.

D. GUEST PRIVACY -

Everyone enjoys privacy. Employees are prohibited from revealing any personal or business information about a Club member.

Do not divulge names or room numbers of one guest to another. Do not let a person into any guest room without verifying with the front desk that the person is the guest registered to that room.

All guest floors and areas are off limits to employees unless they are specifically assigned to perform work duties in these areas.

Employees are not allowed to accept invitations from guests to join them in their room. At no time is an employee to ask a member for an autograph or to ask a member to socialize with them off duty.

E. UNAUTHORIZED AREAS -

Employees may not enter areas of the building, especially guest floors, unless they have been assigned by a supervisor. Example:

Building Employees require work orders on guest floors.

Food Service Employees require valid room service checks or authorized pick-up request before going on the guest floors.

F. REPORTING CRIME -

The Security Department, with its able staff, attempts to control crime and provide a safe operation. Due to the enormity of the Club, they cannot be everywhere at once, and your help is needed. Follow these simple security measures:

- 1) Notify Security (ext. 212) of any suspicious person.
- 2) If you are a witness to a crime, relate to the dispatcher as much specific detail as possible, including a description of the individual and the nature of the crime.

G. MEDIA -

Because of the celebrated and historic nature of Mar-a-Lago and its significance to Palm Beach, Florida and the United States, we are contacted daily by the media (television, radio, newspapers, magazines, wire services). They want to know what is happening at the Club and they want comments for their articles or newcasts. It is important that no Club employee other than the Managing Director, Special Events Manager or Director of Membership comment to the press on the Club or it's members.

GUEST NAMES

All guests are to be treated in a friendly, courteous, professional manner. Systems or procedures are used within each department to inform employees of our guests' names. We want you to use the guests' name at all times if possible. Be friendly to guests and call them by name; however, do not be too familiar with a guest by using his/her first name.

SAFETY AND HEALTH

The Club's goal is to provide a safe and healthy environment for employees. Each employee is expected to comply with all safety and health requirements whether it is established by management or by federal, state or local law.

The Club does not expect any employee to take unnecessary risks. Study the job assigned to you and learn the safety rules of your department. In everything you do, make sure that you have observed every reasonable safety precaution.

Most Club accidents are simple and common, such as slips and falls, cuts, burns, sprains and strains. They are easy to prevent. Observation of the following general rules will prevent many employee accidents:

1. Report all injuries at once to your supervisor.
2. If you are not sure how to do a job safely, ask your department head.
3. Horseplay and practical jokes are prohibited.
4. Put equipment away after use. Don't block passages.
5. Broken chairs, loose and worn carpeting, missing lights and other equipment needing maintenance may cause accidents. Report these along with any other safety hazard at once to your department head.
6. Wear the right clothing for the job.
7. Show other employees the safe way to do the job.
8. If the load seems too heavy to lift safely, get help. When lifting any load, follow the safe lifting practice listed below:
 - a. Be sure you can handle it alone. If not get help.
 - b. Face the load squarely.
 - c. Secure a firm footing with your feet properly spread.
 - d. Bend your knees.
 - e. Get a grip on the load.
 - f. Keep a straight back and lift by straightening your legs gradually not suddenly.

- g. Keep the load close to your body.
- h. Don't twist your body.
- 9. Do not carry a load so that it will block your vision. Make sure you can see where you are going.
- 10. Avoid slippery, wet or greasy floors. Clean up wet or greasy spots as they occur.
- 11. Use a ladder to reach things that are up high. See that the ladder is firmly placed. While on the ladder, don't reach too high or too far to one side.
- 12. Place broken glasses, dishes, etc., in special receptacles designated for this purpose.
- 13. Do not operate equipment unless properly trained and specifically instructed to do so by your supervisor.

All accidents occurring on the Club's premises or to Club employees, regardless of whether they result in an injury, must be reported immediately to your supervisor. The Club is required to report all work-related injuries as soon as possible. If you are too seriously injured to describe the facts surrounding the accident, it is the responsibility of the supervisor to supply the information to the Human Resources Manager.

If a member has an accident, you should see that he or she is comfortable and then immediately notify your supervisor, department head, Managing Director and the Security Department. Any property damage due to accidents should be reported in the same manner.

WORKERS' COMPENSATION

We all do the best job we can to prevent accidents and injuries at home and at work. If you spot a safety hazard on the job, report it to your supervisor immediately. Workers' Compensation is provided by the company to pay an employee partial compensation if he or she loses time due to a work-related accident.

In case you are injured:

- 1. Report the injury immediately to your supervisor.
- 2. Following first-aid or medical treatment, your supervisor will contact security to file an incident report and then notify the Human Resources Manager.

3. The Human Resources Manager completes the Workers' Compensation Report and submits copies to the insurance carrier. When you lose work time because of an injury on the job, a medical certificate from your doctor or the Health Center must be submitted to the Human Resources Manager with a return to work date prior to return to work.

Remember to **report all injuries immediately**, no matter how small they may be, to your supervisor. Though the injury may seem small at first, it may become serious later, and result in lost work time.

EMERGENCY PROCEDURES:

Adhere to the following procedures in emergency situations:

A. FIRE -- In case of fire or smoke: STAY CALM

1. Pull fire alarm
2. Dial Security at Extension 212 and give location of fire, (closest room number, floor, type of fire or smoke), remain on the phone to give additional information as required.
3. When the fire department or Club fire brigade arrives, direct them to the location. Remember, most persons die from smoke and poisonous gases. Stay low to the ground if there is any smoke at all. If you encounter smoke or fire at lower levels, turn around and walk up to clearer air, or use another exit.
4. Be certain to follow instructions of the fire department and the Club fire brigade in order to ensure the safety of all guests and employees.

B. BOMB SCARE OR WARNING

You all know your own work areas, and are usually aware of any unfamiliar items. A bomb may be concealed in a length of pipe, small parcel, suitcase or paper bag. When a suspicious item is discovered DO NOT TOUCH and report immediately to:

1. Club operator - dial 300
2. Security - dial 212

C. GUEST ILLNESS

- Follow the same procedures as listed above.

The most important thing to remember in an emergency is

DO NOT PANIC!

USE OF CLUB'S COMPUTER SYSTEM AND SOFTWARE PROGRAMS:

A. GENERAL

The Club has invested a large sum of money in its computer system and software programs. The information in the computer system represents much work by many employees and is an important component of the Club. In order to protect this valuable

information, no employee is allowed to bring to work any computer games, hardware, programs or software which is not licensed and registered under the Club name, or install or otherwise use any such items unless they have been approved in advance, in writing, by the Managing Director. The reason for this is simple. Outside programs may contain viruses which can disrupt or destroy our computer system. Even if you are sure that the program you bring does not contain a virus, and that it would not damage our computer system, you are not to use any outside program without written advance approval. If software programs are not properly registered, there may be criminal and civil penalties for their use.

In addition, the Club has noted that some computer programs also contain games or programs which are not related to the work of the Club. These programs are not to be played by any employee at any time during the work day. Only computer programs that are directly related to the work of the Club are to be used on Club computers.

No employee is authorized to download or remove any information from the Club's computer system without the expressed advance permission of the appropriate supervisor. (See the Club's policy on security.)

B. ELECTRONIC MAIL

During your workday, the electronic mail and other information systems are not to be used in a way that may be disruptive, offensive to others, or harmful to morale.

Specifically, it is against Club policy to transmit E-mail communications that contain ethnic slurs, racial epithets, or anything that may be construed as harassment or offensive to others based on their race, national origin, sex, sexual orientation, age, disability, religious or political beliefs, is strictly prohibited and may constitute grounds for termination.

Employees should use the information systems for Club business only. The E-mail system also should not be used to solicit others for commercial ventures, religious or political causes, outside organizations, or other personal matters unrelated to your job.

For privacy reasons, employees should not attempt to gain access to another employee's personal file of E-Mail messages without the latter's express permission. Further, employees shall not use a code, access a file or retrieve any stored communication, other than where authorized, unless there has been prior clearance by an authorized Club representative.

Management reserves the right to enter an employee's E-mail files on an "as needed" basis by authorized personnel to ensure the Club's legitimate business interest in the proper use of its property. System security features such as passwords and message

delete functions do not neutralize the employer's ability to access any message at any time. Employees who use E-mail for private, non-job-related purposes do so at their own risk. By using the Club's equipment and E-mail systems, employees consent to have such E-mail use, messages and files monitored by authorized firm personnel.

C. VOICE MAIL

The Club utilizes a voice mail system which allows employees, clients, etc. to leave voice messages. The Club reserves the right to monitor and review all messages left on the voice mail system at any time. All voice messages should be confined to business or work-related matters.

D. RIGHT TO INSPECT

No employee is to have an expectation of privacy with regard to any voice mail messages, E-mail or computer files, and the Club has the right to monitor and review these electronic and computer systems at any time.

DISCLOSURE OF EMPLOYEE INFORMATION

REFERENCE CHECKS

All inquiries regarding a current or former employee of The Mar-a-Lago Club must be referred to the Human Resources Manager.

Should an employee receive a written request for a reference, he/she should refer the request to the Human Resources Manager for handling. No Mar-a-Lago Club employee may issue a reference letter to any current or former employee without the permission of the Human Resources Manager or Managing Director.

Under no circumstances should any Mar-a-Lago Club employee release any information about any current or former Mar-a-Lago Club employee over the telephone. All telephone inquiries regarding any current or former employee must be referred to the Human Resources Manager.

In response to an outside request for information regarding a current or former Mar-a-Lago Club employee, the Human Resources Manager will furnish or verify only an employee's name, dates of employment, job title and department. No other data or information regarding any current or former Club employee, or his/her employment with Mar-a-Lago will be released unless the employee authorizes the Club to release such information in writing or Mar-a-Lago is required by law to furnish any information.

NO SOLICITATION/NO DISTRIBUTION

Persons who are not employees of the Club are prohibited from soliciting our employees, distributing literature, or selling merchandise to our employees, on our premises at any time. The purpose of this rule is to prevent employees and customers from being disrupted or imposed upon by such activities and to maintain our operations at peak efficiency at all times.

For similar reasons, solicitation and distribution of literature are prohibited during the working time of either the employee making the solicitation or distribution, or the targeted employee. The term "working time" does not include an employee's authorized lunch or rest periods, or other time when the employee is not required to be working.

Distribution of literature is prohibited in work and customer areas at all times. The distribution of literature in such a manner as to cause litter on the Club's property is prohibited. Off-duty employees are not allowed to return to the interior or working areas of the Club's premises until the next scheduled work time.

The Club maintains bulletin boards to communicate Club information to employees and to post notices required by law. These bulletin boards are for the posting of Club information and notices only, and only persons designated by the Managing Director may place notices on or take down material from the bulletin boards. The unauthorized posting of notices, photographs or other printed or written materials on bulletin boards or any other Club property is prohibited.

INSPECTIONS

The Club respects its employees' right to privacy. However, for security purposes, we maintain the right to inspect certain personal belongings.

Each employee agrees, as a condition of continued employment, to allow management to inspect employee personal property on our premises. Any package brought into or taken out of our premises may be inspected. Our premises and equipment, including Club vehicles, lockers and desks, are subject to inspection at any time.

Refusal to cooperate in an inspection or search will be considered a violation of your terms of hire and insubordination.

INTERNAL INVESTIGATIONS

From time to time The Mar-a-Lago Club may be required to conduct internal investigations pertaining to security, auditing or work-related matters. Employees are required to cooperate fully with and assist in these investigations if requested to do so.

Whenever necessary, in Management's discretion, employees' work areas (i.e., desks, file cabinets, etc.) and personal belongings (i.e., brief cases, handbags, etc.) may be subject to a search. Employees are required to cooperate.

Management will generally try to obtain an employee's consent before conducting a search of work areas or personal belongings, but may not always be able to do so.

OUTSIDE EMPLOYMENT

The Club does not object to your holding other jobs, provided that there is no conflict of interest and your job at the Club comes first. However, outside employment which interferes with your obligations to the Club is prohibited. In addition, no employee shall claim to be a Club representative in connection with any outside employment.

Before accepting any supplementary job, it is mandatory that you notify your Supervisor and the Department Head to determine if there is a conflict of interest or if it would adversely affect your job performance at the Club. If the Club determines that a conflict of interest exists or acceptance would adversely affect your job performance, you shall not engage in outside employment. Failure to notify the Supervisor and the Department Head in advance of any outside employment will be grounds for immediate termination.

Please note that if at any time your job at the Club suffers due to additional employment elsewhere, the Club reserves the right to ask you to give it up. Failure to comply with such a request will also be grounds for immediate termination.

PROPERTY OF EMPLOYER

Employees may not remove from the Club premises any Club property not belonging to the employee. Any other property that an employee removes from Club premises, must be accompanied by a Club Package Pass, signed by a department head or his/her designated supervisor.

Upon termination of your employment, you must surrender to the Club any and all material including, but not limited to, drawings, manuals, reports, documents, lists of the Club's vendors and customers, and the like (including all copies thereof), that you have in your possession relating to the business of the Club, or its affiliates. You recognize that all such materials are the property of the Club solely and that you have no right, title, or other interests in or to such materials.

EMPLOYEE APPRAISAL

It is the objective of the Club to provide an atmosphere in which each employee can receive periodic, thorough appraisals of their performance and compensation. The Club uses the performance evaluation as a means to achieve these objectives. Each Manager, Supervisor and employee should be familiar with their role in contributing to the success of the appraisal system.

TELEPHONE COURTESY PROCEDURES

Telephone Calls - Personal calls are prohibited, except in an emergency, since it interferes with the flow of business. Telephone courtesy is an essential part of every employee's interaction with guests. All incoming calls should be answered according to the following mandatory procedures:

1. All calls are to be answered within three rings

2. Answering a Department line:
 - a. standard greeting (i.e., Good Morning/Afternoon/Evening).
 - b. Give the name of the department.
 - c. Give your name.
 - d. Offer assistance: "Good morning, Reception Desk. This is John. How may I help you?"
3. Answering another individual's line:
 - a. Standard greeting.
 - b. Identify whose office or department.
 - c. Give your name.
 - d. Offer assistance or to take a message: "Good afternoon, Mr. Smith's office. This is Mary. How may I help you?"
4. When placing a call on "hold:"
 - a. Use the word "wait," not "hold."
 - b. Always ask permission and wait for guest's response: "Are you able to wait?"
5. Returning to a call placed on "hold":
 - a. Always thank the guest for waiting or apologize for the wait.
 - b. Give your name.
 - c. Offer assistance: "Thank you for waiting, this is Mary. How may I help you?"
6. When transferring a call:
 - a. Always announce the transfer of a call to the party receiving the call: "Mr. Smith, I am transferring Bob Jones to you."
 - b. The caller should then be connected and an announcement of the connection made: "I have Mr. Smith on the line now. Go ahead, please."
7. When ending a conversation:
 - a. Always say "thank you" or "you're welcome."
 - b. Use the guest's name if possible.
 - c. Let the caller know you are happy to be of service or sorry you are unable to help.
 - d. End the conversation with "good-bye" and hand up the receiver gently: "Thank you for calling, Mr. Smith. We're glad we could help. Good-bye."

EMPLOYEE ATTENDANCE AND TARDINESS

Your schedule is developed after considering the Club's needs and flow of business. Your adherence to the schedule and flexibility concerning any necessary changes will help ensure our Club's success.

Each employee is required to work the hours normally scheduled for his or her assigned position.

Employee's work schedules will be those hours authorized by their Supervisor to meet operational requirements.

If you are unable to report to work for any reason, you must notify your supervisor no later than Three (3) hours prior to your scheduled reporting time, stating your reason for lateness or absence, and when you expect to arrive at work. Check with your supervisor to see if additional notice time is required.

In the event your supervisor is not available, you are to contact SECURITY Ext.212 or the Human Resources Manager. You must call in each day of your absence. Upon the third consecutive day of absence, a Health Care Provider's note will be required of the employee before returning to work. An employee who is absent for three consecutive days without proper notice to the Club may be considered to have voluntarily resigned his or her position with the Club.

Failure to adhere to employee attendance policies results in time consuming arrangements and costly replacements and may lead to disciplinary action.

Tardiness places an unfair burden upon your supervisors and co-workers. All efforts should be made to be at work according to schedule. Your supervisor is to be contacted if it is unavoidable for you to be late to work. Continued tardiness will result in disciplinary action, up to and including termination.

LINEN ABUSE

Linen abuse is considered to be any type of mishandling or misuse of linen, causing damage to the point that the linen would be unfit to place before a guest.

The following are the most common abuse occurrences.

1. Using linen as rags for cleaning.
2. Leaving linen lying on the floor.
3. Cleaning ashtrays with linen.
4. Using napkins as food covers.
5. Carrying linen on your person to be used as sweatbands, handkerchiefs, etc.
6. Throwing rags or linen in the trash.
7. Mixing rags with linen.

Violation of these linen abuse standards may lead to disciplinary action. The replacement of lost or damaged linen is a costly process, and we need everyone's help in curtailing this enormous expense.

TIME REPORTING - SIGNING IN AND OUT

You must check in first at the guard post at the employee's entrance on Southern Boulevard, and then again upon your arrival at Post One. At the end of your shift you must check out at Post One and also at the guard post at the employees' exit on Southern Boulevard.

When reporting in and out of work employees will be solely responsible for keeping their own hours worked by logging in and out at the timekeeping terminal. Pay is calculated for the actual hours worked by the actual entry of this information. Any deviations in the schedule including overtime can be done with the supervisors approval only. These deviations are indicated in writing at the end of the work week for presentation to payroll.

Under no condition shall an employee enter for time other than his/her own. An employee who leaves the Club during his/her work schedule must first obtain their supervisor's permission. Failure to adhere to these procedures, will result in disciplinary action, up to and including termination of employment.

NOTE:All Wait Staff employees must also sign in on the "DAILY SIGN IN SHEET" which will be located with your Captain.

CHANGE OF ADDRESS OR STATUS - PERSONNEL RECORDS

To keep necessary Club records up-to-date, it is extremely important that you notify the Human Resources Department of any changes in:

1. Name and/or marital status.
2. Address and/or telephone number.
3. # of eligible dependents.
4. W4 Deductions.

INITIAL EMPLOYMENT PERIOD

Every new employee goes through an initial period of adjustment in order to learn about the Club and about his/her job. During this time, the employee will have an opportunity to find out if he/she is suited to, and likes, his/her new position.

Additionally, the initial employment period gives the employee's supervisor a reasonable period of time to evaluate his/her performance. The initial employment period is 3 months.

During this time, the new employee will be provided with training and guidance from his/her Supervisor. He/she may be discharged at any time during this period if his/her Supervisor concludes that he/she is not progressing or performing satisfactorily. Additionally, under appropriate circumstances, the initial employment may be extended.

At the end of the initial employment period, the employee and his/her supervisor may discuss his/her performance. Provided his/her job performance is "satisfactory" at the end of the initial employment period, he/she will continue in our employment.

EMPLOYEE CATEGORIES

- * Full Time - Year Round Employee
- * Seasonal Employee

WORK HOURS, SALARY AND OVERTIME PREMIUMS

A. WORK HOURS

The Club never shuts down from November 1 to Mother's Day; for 24 hours a day, 7 days a week, it serves the diverse needs of our members. Therefore to ensure adequate coverage at all times, departments have arranged different schedules for their employees.

B. SALARY

The Club's policy regarding personnel is to offer competitive starting wages and to maintain a fair and equitable wage structure. Wage increases are given when appropriate based upon results of performance evaluations and/or employment status change.

The work week at the Club begins on Monday and ends on Sunday. Scheduled paydays are as follows: Friday pay vouchers indicating deposit into your existing Great Western banking account will be issued.

If there is a discrepancy in your paycheck, advise your department head immediately. Do not call or go to the payroll department. If your department head is not available, contact the Human Resources Manager and assistance will be provided.

The Club is unable to make advances on employee paychecks.

C. OVERTIME PREMIUMS

1. Hourly and Salaried Employee (non-exempt)

Hourly or salaried employees are eligible for overtime premium at one and one-half (1.5) times their base hourly rate under the following conditions:

Overtime work has been specifically authorized by the direct Supervisor in advance or in writing after the fact. More than forty (40) hours are actually worked by that individual in one work week, not including sick time, vacation, holidays and time off for personal business and other non work time.

The work week commences on Monday morning and ends Sunday at midnight.

2. Salaried Employee (exempt)

A salaried exempt employee is not compensated directly for specific overtime hours worked. A salaried employee is paid to accomplish a specific job and his/her salary is based upon the fact that hours in excess of 40 per week may be necessary on occasion.

Overtime is at the request of a supervisor or department