

the house had already been sanitized, revealed photographs of nudity displayed, including a photograph of Maxwell herself in the nude. *See McCawley Dec. at Exhibit 44, Search Warrant Video attached to the Deposition of Recarey.*

Johanna Sjorberg testified that the Defendant bought her a camera for the specific purpose of her taking nude photos of herself. *See McCawley Dec. at Exhibit 16 Sjoberg Tr. at 150.* Finally, Virginia Giuffre testified that there was a nude photograph of her at the house. *See McCawley Dec. at Exhibit 5 Virginia Giuffre Tr. at 232 and 333.*

DEFENDANT'S PURPORTED FACTS

50. **Ms. Giuffre intentionally destroyed her “journal” and “dream journal” regarding her “memories” of this case in 2013 while represented by counsel.** Ms. Giuffre drafted a “journal” describing individuals to whom she claims she was sexually trafficked as well as her memories and thoughts about her experiences with Epstein. In 2013, she and her husband created a bonfire in her backyard in Florida and burned the journal together with other documents in her possession. *Id.* Ms. Giuffre also kept a “dream journal” regarding her thoughts and memories that she possessed in January 2016. To date, Ms. Giuffre cannot locate the “dream journal.”

MS. GIUFFRE’S STATEMENT CONTROVERTING DEFENDANT’S FACTS

The dream journal contained memories of Ms. Giuffre’s dreams. While Ms. Giuffre has looked for this journal, which is wholly irrelevant to this case, she has been unable to locate it. Ms. Giuffre also wrote in a personal journal some of her experiences with Maxwell and Epstein, which were harmful and painful. In an effort to relieve herself of those past painful experiences, Ms. Giuffre followed the advice of a therapist, and burned the journal as a form of cathartic release at a time when she was under no obligation to maintain the personal memorialization of personal and painful experiences. *See McCawley Dec. at Exhibit 5, Giuffre Dep. Tr. at 205:13-206:10.*

DEFENDANT'S PURPORTED FACTS

51. **Ms. Giuffre publicly peddled her story beginning in 2011.** Ms. Giuffre granted journalist Sharon Churcher extensive interviews that resulted in seven (7) widely distributed articles from March 2011 through January 2015. Churcher regularly communicated with Ms. Giuffre and her “attorneys or other agents” from “early 2011” to “the present day.” Ms. Giuffre received approximately \$160,000 for her stories and pictures that were published by many news organizations.

MS. GIUFFRE'S STATEMENT CONTROVERTING DEFENDANT'S FACTS

Defendant's statement misrepresents history. In 2011, Ms. Giuffre was still in hiding from Epstein and Maxwell in Australia. Ms. Giuffre was not looking to sell anything or even speak with anyone about what had happened to her in her previous life from which she dramatically escaped. Journalist, Sharon Churcher, located Ms. Giuffre and impressed the importance of Ms. Giuffre standing up to those who had harmed her and speak with Federal authorities, which Ms. Giuffre did in 2011. *See McCawley Dec. at Exhibit 31, Redacted 302 GIUFFRE001235-01246.*

In addition, Churcher impressed the importance of bringing the abuse of Defendant and Epstein to public light to prevent their continued abuse of others. *See McCawley Dec. at Exhibit 35, Giuffre003690.* After much deliberation, Ms. Giuffre agreed to be interviewed by Churcher, and was compensated for sharing her story, which came at a heavy price of being publicly scrutinized.

DEFENDANT'S PURPORTED FACTS

52. **Ms. Giuffre drafted a 144-page purportedly autobiographical book manuscript in 2011 which she actively sought to publish.** In 2011, contemporaneous with her Churcher interviews, Ms. Giuffre drafted a book manuscript which purported to document Ms. Giuffre’s experiences as a teenager in Florida, including her interactions with Epstein and Maxwell. Ms. Giuffre communicated with literary agents, ghost writers and potential independent publishers in an effort to get her book published. She generated marketing materials and circulated those along with book chapters to numerous individuals associated with publishing and the media.

MS. GIUFFRE'S STATEMENT CONTROVERTING DEFENDANT'S FACTS

Defendant's characterization of these activities are out of context and thus misleading. In 2008, Ms. Giuffre received a Victim Notification Letter from the United States Attorney's office for the Southern District of Florida, *see McCawley Dec.* at Exhibit 30, GIUFFRE0010202, regarding her sexual victimization by Epstein. Thereafter, in 2011, she sought psychological counseling from a psychologist for the trauma she endured. Also that year, journalist Sharon Churcher sought her out, and traveled half way around the globe to interview her on painful subjects. Ms. Giuffre was interviewed by the FBI in 2011. *See McCawley Dec.* at Exhibit 31, FBI Redacted 302 GIUFFRE01235-1246. She was also getting psychological help. *See McCawley Dec.* at Exhibit 38, Lightfoot Records, GIUFFRE005431-005438. In that situation, Ms. Giuffre began to draft a fictionalized account of what happened to her. It was against this backdrop of her trauma being unearthed, her steps to seek psychological counseling for it, that she drafted this manuscript. Doing so was an act of empowerment and a way of reframing and taking control over the narrative of her past abuse that haunts her.

“Writing ‘I’ has been an emancipatory project for women.” Perreault, Jeanne, “AUTOGRAPHY/ TRANSFORMATION/ ASYMMETRY,” *Women, Autobiography, Theory A Reader* edited by Sidonie Smith & Julia Watson. Indeed, scholars have written that the act of engaging in autobiography or even accounts loosely based on autobiography, is a process of taking control of one’s own narrative and one’s own self: “Thus a specific recitation of identity involves the inclusion of certain identity contents and the exclusion of others; the incorporation of certain narrative itineraries and internationalities, the silencing of others; the adoption of certain autobiographical voices, the muting of others.” Smith, Sidonie, PERFORMATIVITY,

AUTOBIOGRAPHICAL PRACTICE, RESISTANCE, *Women, Autobiography, Theory A Reader edited by Sidonie Smith & Julia Watson.*

Indeed, even a cursory look at the manuscript penned by Ms. Giuffre informs the reader that she is trying to put forth a more palatable and more empowering narrative to over-write that powerlessness she felt when being abused by Defendant and Epstein. While Ms. Giuffre explored trying to publish her story to empower other individuals who were subject to abuse, she ultimately decided not to publish it. *See McCawley Dec. at Exhibit 5, Giuffre Dep. Tr. 249:16-18; 250:19-251:3.*

DEFENDANT'S PURPORTED FACTS

53. **Ms. Giuffre's publicly filed "lurid" CVRA pleadings initiated a media frenzy and generated highly publicized litigation between her lawyers and Alan Dershowitz.** On December 30, 2014, Ms. Giuffre, through counsel, publicly filed a joinder motion that contained her "lurid allegations" about Ms. Maxwell and many others, including Alan Dershowitz, Prince Andrew, Jean-Luc Brunel. The joinder motion was followed by a "corrected" motion and two further declarations in January and February 2015, which repeated many of Ms. Giuffre's claims. These CVRA pleadings generated a media maelstrom and spawned highly publicized litigation between Ms. Giuffre's lawyers, Edwards and Cassell, and Alan Dershowitz. After Ms. Giuffre publicly alleged Mr. Dershowitz of sexual misconduct, Mr. Dershowitz vigorously defended himself in the media. He called Ms. Giuffre a liar and accused her lawyers of unethical conduct. In response, attorneys Edwards and Cassell sued Dershowitz who counterclaimed. This litigation, in turn, caused additional media attention by national and international media organizations.

MS. GIUFFRE'S STATEMENT CONTROVERTING DEFENDANT'S FACTS

See Ms. Giuffre's Paragraph 7, *supra*, explaining why the allegations were necessary and appropriate for multiple reasons. Ms. Giuffre disputes Defendant's false characterization of these events, and, indeed, the media attention was caused by Defendant's is suing her defamatory press release.

DEFENDANT'S PURPORTED FACTS

54. **Ms. Giuffre formed non-profit Victims Refuse Silence to attract publicity and speak out on a public controversy.** In 2014, Ms. Giuffre, with the assistance of the same counsel, formed a non-profit organization, Victims Refuse Silence. According to Ms. Giuffre, the purpose of the organization is to promote Ms. Giuffre's professed cause against sex slavery. The stated goal of her organization is to help survivors surmount the shame, silence, and intimidation typically experienced by victims of sexual abuse. Ms. Giuffre attempts to promote Victims Refuse Silence at every opportunity. For example, Ms. Giuffre participated in an interview in New York with ABC to promote the charity and to get her mission out to the public.

MS. GIUFFRE'S STATEMENT CONTROVERTING DEFENDANT'S FACTS

Ms. Giuffre did not form the non-profit Victims Refuse Silence to "speak out on a public controversy," but instead to simply help survivors of sexual abuse and sexual trafficking. In order to provide assistance to victims, Ms. Giuffre attempted to talk about the non-profit's mission when she had the opportunity to do so. See www.victimsrefusesilece.org.

MS. GIUFFRE'S STATEMENT OF UNDISPUTED FACTS

55. Virginia Roberts was born August 9, 1983. *See* McCawley Dec. at Exhibit 51, Driver's License GIUFFRE009209.

56. Virginia Roberts turned 18 on August 9, 2001.

57. In 2000, Virginia's father Sky Roberts worked at the Mar-a-Lago. *See* McCawley Dec. at Exhibit 17, Sky Roberts Dep. Tr. at 72, 74.

58. Sky Roberts got Virginia a job at Mar-a-Lago in 2000, either months before or just after Virginia's 17th birthday. *See* McCawley Dec. at Exhibit 17, Sky Roberts Dep. Tr. at 72, 74; Giuffre Dep. Tr. at 25:19-25:21; 28:10-28:12.

59. The only year in which Virginia was employed at Mar-a-Lago was 2000. *See* McCawley Dec. at Exhibit 49, MAR-A-LAGO 0173, 0176.

60. Virginia worked at Mar-a-Lago as a spa bathroom attendant. *See McCawley Dec.* at Exhibit 5, Giuffre Dep. Tr. at 61:9-61:24; Austrich Dep. Tr. at 100:3-12.

61. Virginia was not a masseuse at Mar-a-Lago as she had no massage experience. *See McCawley Dec.* at Exhibit 5, Giuffre Dep. Tr. at 111:12-111:21; 116:19-117:12; Austrich Dep. Tr. at 34-35, 100-101, 127-128; Figueroa Dep. Tr. at 82:10-15; 168:24-169:1; Sky Roberts Dep. Tr. at 80:7-19; 84:18 -85:1.

62. Maxwell approached Virginia at Mar-a-Lago, and recruited her to come to Jeffrey Epstein's house. *See McCawley Dec.* at Exhibits 1, 5, and 17, Giuffre Dep. Tr. at 111:12-111:21; 116:19-117:12; Alessi Dep. Tr. at 94:24-95:2; Sky Roberts Dep. Tr. at 80:7-19; 84:18 -85:1.

63. At the time Maxwell recruited Virginia to Jeffrey Epstein's house, Virginia was either 16 or 17 years old, depending on whether this occurred just before or just after Virginia's birthday. *See McCawley Dec.* at Exhibit 49, MAR-A-LAGO 0173, 0176.

64. Virginia followed Maxwell's instructions and reported to Jeffrey Epstein's house on the night of the day when Maxwell approached Virginia at Mar-a-Lago. *See McCawley Dec.* at Exhibits 5 and 18, Giuffre Dep. Tr. at 117:20-118:1; Alessi Dep. Tr. at 96-98; GIUFFRE000102-103 at p. 48-49.

65. Maxwell told Virginia at Mar-a-Lago that Virginia could get paid for giving a massage to Jeffrey Epstein. *See McCawley Dec.* at Exhibit 5, Giuffre Dep. Tr. at 111:12-111:21; 116:19-117:12.

66. When Virginia arrived at Epstein's house, she was taken upstairs to Epstein's bedroom, and instructed by Maxwell and Epstein how to give Epstein a massage. *See McCawley Dec.* at Exhibit 5, Giuffre Dep. Tr. at 198:20-199:3; 199:15-199:18; Epstein Dep. Tr. at 74:3-14.

67. Epstein and Maxwell turned the massage into a sexual encounter. *See McCawley Dec.* at Exhibit 5, Giuffre Dep. Tr. at 198:20-199:3; 199:15-199:18.

68. Virginia was not a professional masseuse, and was not old enough to be a masseuse in Florida even though Maxwell testified she only hired professional masseuses. *See McCawley Dec.* at Exhibit 5, Giuffre Dep. Tr. at 61:9-61:24, 111:12-111:21, 116:19-117:12; Fla. Stat. § 480.041; Maxwell Dep. Tr. at 23:21-24:9; 31:6-18; 41:7-13; 220:13-221:2; 225:23-226:20; 248:5-16; 310:6-17; 383:2-18.

69. Maxwell and Epstein promised Virginia money and a better life in exchange for complying with their sexual demands. *See McCawley Dec.* at Exhibit 5, Giuffre Dep. Tr. at 198:20-199:3; 199:15-199:18.

70. Maxwell had sex with Virginia and other females. *See McCawley Dec.* at Exhibit 5, Giuffre Dep. Tr. at 138:17-139:16; Maxwell 07-22-2016 Dep. Tr. at 86:25-87:9; 91:15-91:21.

71. Virginia was trafficked nationally and internationally for sexual purposes. *See McCawley Dec.* at Exhibits 5, 1, 41? GIUFFRE007055-007161 (Flight Logs); Giuffre Dep. Tr. at 193:22-194:16; 201:24; 204:24:205:5; Alessi Dep. Tr. at 104:9-104:14; Andrew Photo GIUFFRE007167; Spain Photo GIUFFRE007166.

72. Maxwell recruited other non-professionals under the guise of being a masseuse, but in reality only recruited girls for sexual purposes. *See McCawley Dec.* at Exhibits 5, 16, 4, 1, 18 Giuffre Dep. Tr. at 198:20-199:3; Sjoberg Dep. Tr. at 13-15; Figueroa Dep. Tr. at 88:12-22; Alessi Dep. Tr. at 34; GIUFFRE000105 at 57-58; GIUFFRE000241-242 at p. 212-213.

73. Maxwell was the boss of others whose job it was to recruit minor females for Epstein for sex, such as Sarah Kellen. *See McCawley Dec.* at Exhibit 21, Rodriguez Dep. Tr. at 26:10-26:20.

74. Maxwell was a recruiter of underage girls and other young females for Epstein for sex, and was the boss in charge of those females. *See McCawley Dec.* at Exhibits 16, 4, 21, and 1, Sjoberg Dep. Tr. 8-9, 13-15, 27; Figueroa Dep. Figueroa Dep. Tr. at 200:6-18; 228:23-229:21; Rodriguez Dep. Tr. 169:1-169:4; Alessi Dep. Tr. at 23:11-23:20; 34:19-35:3; 98:5-98:12; 104:15-104:23.

Dated: January 31, 2017

Respectfully Submitted,

BOIES, SCHILLER & FLEXNER LLP

By: /s/ Sigrid McCawley

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on January 31, 2017, I electronically filed the foregoing document with the Clerk of Court by using the CM/ECF system. I also certify that the foregoing document is being served this day on the individuals identified below via transmission of Notices of Electronic Filing generated by CM/ECF.

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/s/ Sigrid S. McCawley
Sigrid S. McCawley

**United States District Court
Southern District of New York**

Virginia L. Giuffre,

Plaintiff,

Case No.: 15-cv-07433-RWS

v.

Ghislaine Maxwell,

Defendant.

/

**DECLARATION OF SIGRID MCCAWLEY IN SUPPORT OF
PLAINTIFF'S RESPONSE TO DEFENDANT'S MOTION FOR SUMMARY
JUDGMENT AND UNDISPUTED FACTS**

I, Sigrid McCawley, declare that the below is true and correct to the best of my knowledge as follows:

1. I am a Partner with the law firm of Boies, Schiller & Flexner LLP and duly licensed to practice in Florida and before this Court pursuant to this Court's Order granting my Application to Appear Pro Hac Vice.

2. I respectfully submit this Declaration in Support of Plaintiff's Response to Defendant's Motion for Summary Judgment and Undisputed Facts.

3. Attached hereto as Sealed Exhibit 1 are true and correct copies of Excerpts from June 1, 2016 Depositions of Juan Alessi.

4. Attached here to as Sealed Exhibit 2 is a true and correct copy of Excerpts from June 23, 2016, Deposition of James Austrich.

5. Attached hereto as Sealed Exhibit 3 is a true and correct copy of Excerpts from September 9, 2016, Deposition of Jeffrey Epstein.

6. Attached hereto as Sealed Exhibit 4 is a true and correct copy of Excerpts from June 24, 2016, Deposition of Tony Figueroa (Volumes I and II).

7. Attached hereto as Sealed Composite Exhibit 5 are true and correct copies of Excerpts from May 3, 2016 and November 14, 2016, Deposition of Virginia Giuffre.

8. Attached hereto as Sealed Exhibit 6 is a true and correct copy of Excerpts from November 18, 2016, Deposition of Ross Gow.

9. Attached hereto as Sealed Exhibit 7 is a true and correct copy of Excerpts from June 20, 2016, Deposition of [REDACTED].

10. Attached hereto as Sealed Exhibit 8 is a true and correct copy of Excerpts from January 25, 2017, Deposition of Sarah Kellen.

11. Attached hereto as Sealed Exhibit 9 is a true and correct copy of Excerpts from November 29, 2016, Deposition of Peter Kent.

12. Attached hereto as Sealed Exhibit 10 is a true and correct copy of Excerpts from January 17, 2017, Deposition of Nadia Marcinko.

13. Attached hereto as Sealed Composite Exhibit 11 are true and correct copies of Excerpts from April 22, 2016 and July 22, 2016, Depositions of Ghislaine Maxwell.

14. Attached hereto as Sealed Exhibit 12 is a true and correct copy of Excerpts from May 24, 2016, Deposition of Lynne Trudy Miller

15. Attached hereto as Sealed Exhibit 13 is a true and correct copy of Excerpts from June 21, 2016, Deposition Joseph Recarey.

16. Attached hereto as Sealed Exhibit 14 is a true and correct copy of Excerpts from June 10, 2016, Deposition of Rinaldo Rizzo.

17. Attached hereto as Sealed Exhibit 15 is a true and correct copy of Excerpts from June 3, 2016, Deposition of David Rodgers.

18. Attached hereto as Sealed Exhibit 16 is a true and correct copy of Excerpts from May 18, 2016, Deposition of Johanna Sjoberg.

19. Attached hereto as Sealed Exhibit 17 is a true and correct copy of Excerpts from May 20, 2016, Deposition of Sky Roberts.

20. Attached hereto as Sealed Composite Exhibit 18 are true and correct copies of Excerpts from September 8, 2009, Depositions of Juan Alessi (GIUFFRE000102-000103; GIUFFRE000105; GIUFFRE000241-000242).

21. Attached hereto as Sealed Exhibit 19 is a true and correct copy of Excerpts from February 16, 2010, Deposition of Janusz Banasiak (GIUFFRE004431-004432; GIUFFRE004437-004438; GIUFFRE004477).

22. Attached hereto as Sealed Exhibit 20 is a true and correct copy of Excerpts from October 20, 2009, Deposition of Louella Rabuyo (GIUFFRE004386).

23. Attached hereto as Sealed Composite Exhibit 21 is a true and correct copy of Excerpts from July 29, 2009 and August 7, 2009, Deposition of Alfredo Rodriguez (GIUFFRE000936-000937; GIUFFRE000942; GIUFFRE000953-000954; GIUFFRE000974; GIUFFRE000978; GIUFFRE000996; GIUFFRE000999-001000; GIUFFRE001003).

24. Attached hereto as Sealed Exhibit 22 is a true and correct copy of August 1, 2016, Defendant's Privilege Log.

25. Attached hereto as Sealed Exhibit 23 is a true and correct copy of September 15, 2016, Expert Report of Professor Terry Coonan.

26. Attached hereto as Sealed Exhibit 24 is a true and correct copy of September 15, 2016, Expert Report of Doctor Bernard Jansen.

27. Attached hereto as Sealed Exhibit 25 is a true and correct copy of November 28, 2016, Expert Report of Peter Kent

28. Attached hereto as Sealed Exhibit 26 is a true and correct copy of January 2, 2015, Email Correspondence (GM_00068).

29. Attached hereto as Sealed Exhibit 27 is a true and correct copy of Excerpts of Palm Beach School County Records (GM_00888-00898).

30. Attached hereto as Sealed Exhibit 28 is a true and correct copy of Excerpts of Message Pads (GIUFFRE001388; GIUFFRE001409; GIUFFRE001412-4213; GIUFFRE001417-18, GIUFFRE001421; GIUFFRE001423; GIUFFRE001426-1428; GIUFFRE001432-1433; GIUFFRE001435; GIUFFRE001446; GIUFFRE001448-1449; GIUFFRE001452-1454; GIUFFRE001456; GIUFFRE001462; GIUFFRE001474; GIUFFRE001563).

31. Attached here to as Sealed Exhibit 29 is a true and correct copy of Epstein's Black Book (GIUFFRE001573-GIUFFRE001669).

32. Attached hereto as Sealed Exhibit 30 is a true and correct copy of September 3, 2008, U.S. Attorney Victim Notification Letter (GIUFFRE002216-002218).

33. Attached hereto as Sealed Exhibit 31 is a true and correct copy of July 5, 2013, Federal Bureau of Investigation Interview (GIUFFRE001235-001246).

34. Attached hereto as Sealed Exhibit 32 is a true and correct copy of Handwritten Note from Defendant. (GIUFFRE003191-003192).

35. Attached hereto as Sealed Exhibit 33 is a true and correct copy of July 2001 New York Presbyterian Hospital Records (GIUFFRE003258-003290).

36. Attached hereto as Sealed Exhibit 34 is a true and correct copy of a February 17, 2011, Email Correspondence to Sharon Churcher (GIUFFRE003678).

37. Attached hereto as Sealed Exhibit 35 is a true and correct copy of February 13, 2011, Email Correspondence to Sharon Churcher (GIUFFRE003690).

38. Attached hereto as Sealed Exhibit 36 is a true and correct copy of February 25, 2011, Email Correspondence to Sharon Churcher (GIUFFRE003731).)

39. Attached hereto as Exhibit 37 is a true and correct copy of a Passport Application

(GIUFFRE004721).

40. Attached hereto as Sealed Exhibit 38 is a true and correct copy of Judith Lightfoot Psychological Records (GIUFFRE005431-005438).

41. Attached hereto as Sealed Exhibit 39 is a true and correct copy of July 25, 2006, Palm Beach Police Department Incident Report (GIUFFRE005614-005700).

42. Attached hereto as Sealed Exhibit 40 is a true and correct copy of an Amazon Receipt (GIUFFRE006581).

43. Attached hereto as Sealed Exhibit 41 is a true and correct copy of David Rodger's June 3, 2016, Deposition Exhibit 1, Flight Log, (GIUFFRE007055-007161).

44. Attached hereto as Sealed Exhibit 42 are true and correct copies of Photographs (GIUFFRE007162-7182).

45. Attached hereto as Sealed Exhibit 43 is a true and correct copy of Travel Documents to Thailand (GIUFFRE007411-GIUFFRE007432).

46. Attached hereto as Sealed Exhibit 44 is a true and correct copy of Walkthrough Video CD (GIUFFRE007584).

47. Attached hereto as Sealed Exhibit 45 is a true and correct copy of West Palm Beach Contact List (GIUFFRE007834-GIUFFRE007847).

48. Attached hereto as Sealed Exhibit 46 is a true and correct copy of October 23, 2016, Social Security Administration records (GIUFFRE009176-GIUFFRE009179).

49. Attached hereto as Sealed Exhibit 47 is a true and correct copy of November 7, 2016, Employment Records from Courtyard Animal Hospital (GIUFFRE009203).

50. Attached hereto as Sealed Exhibit 48 is a true and correct copy of January 2, 2015, Email Correspondence (RG (UK) _000009).

51. Attached hereto as Sealed Exhibit 49 are true and correct copies of Termination

Documents (MAR-A-LAGO 0173 & MAR-A-LAGO 0176).

52. Attached hereto as Sealed Exhibit 50 is a true and correct copy of January 2, 2015, Joinder Motion (GIUFFRE000319-000333).

53. Attached hereto as Sealed Exhibit 51 is a true and correect copy of Virginia Roberts Driver License (GIUFFRE009209).

I declare under penalty of perjury that the foregoing is true and correct.

/s/ Sigrid McCawley
Sigrid McCawley, Esq.

Dated: January 31, 2017.

Respectfully Submitted,

BOIES, SCHILLER & FLEXNER LLP

By: /s/ Sigrid McCawley

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 31st day of January, 2017, I electronically filed the foregoing document with the Clerk of Court by using the CM/ECF system. I also certify that the foregoing document is being served to all parties of record via transmission of the Electronic Court Filing System generated by CM/ECF.

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/s/ Sigrid McCawley

Sigrid McCawley

EXHIBIT 1

(Filed Under Seal)

Page 1

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

CASE NO. 15-CV-07433-RWS

-----x
VIRGINIA L. GIUFFRE,

Plaintiff,

v.

GHISLAINE MAXWELL,

Defendant.

-----x
June 1, 2016

9:12 a.m.

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

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

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1 JOHN ALESSI

2 Q. You're ready to start, correct?

3 A. Yes.

4 Q. Can you tell us your current address?

5 A. [REDACTED] Boynton Beach,
6 Florida 33472.

7 Q. And your date of birth?

8 A. [REDACTED].

9 Q. And was there a time when you worked for a
10 man named Jeffrey Epstein?

11 A. Yes.

12 Q. And can you tell us when you began working
13 for Mr. Epstein?

14 A. I began working for Mr. Epstein part-time.

15 I cannot exactly tell you the date, but it was
16 1990/'91, probably. I worked a total of 13 years
17 for him.

18 Q. Okay. So you began in 1990 part-time,
19 correct?

20 A. Right.

21 Q. And you stopped working for him when?

22 A. I stopped working for him on
23 December 31st, 2001. I was out -- yes, 2001.

24 Q. Okay.

25 A. The end of 2001. I left the last day of

1 JOHN ALESSI

2 the year.

3 Q. Okay. I know that it's been a long time.

4 A. It's been a long time.

5 Q. I know. So I'm going to ask that you
6 refer to the statement that you provided to the
7 police November 21st, 2005, and please go to page 5.
8 I just want you to start reading at line 2 and 3,
9 and tell me if that refreshes your recollection as
10 to your time or duration of employment.

A. You're right. It was 2002, then. 2002.

12 Q. So sometime in 1990, you were a part-time
13 employee?

14 A. Uh-huh.

15 Q. And you worked until December 31st, 2002;
16 is that right?

17 A. Yes.

18 Q. Okay. And is it also correct that you
19 began full-time employment with Mr. Epstein on
20 January 1st, 1991, as stated in that report?

21 A. Yes.

22 Q. Prior to 1990, who did you work for?

23 A. Prior to 1990, I had a company, a
24 maintenance company, myself, my own company, Alessi
25 Maintenance. And before that, I worked for another

Page 11

1 JOHN ALESSI

2 family, the Radi family in Palm Beach.

3 Q. Did you ever work for a man named Les
4 Wexner?

5 A. I did some work for him in his mother's
6 house.

7 Q. Where was that?

8 A. Palm Beach. What year? Before -- before
9 I came to work for Jeffrey.

10 Q. Is that who recommended that you work for
11 Jeffrey Epstein?

12 A. I guess so.

13 Q. Okay. When you started with Jeffrey
14 Epstein, what were your job duties?

15 A. I was doing maintenance. I was doing
16 building and rebuilding and maintenance work
17 basically. Because he just bought the house at that
18 time. And because of Mr. Wechsler knowing me, they
19 recommend me to go to the house and take a look at
20 the house. And we start tearing the house down,
21 basically, at the beginning of my job.

22 Q. Did you assist in the teardown?

23 A. Yes.

24 Q. Okay. So your job duties then was that of
25 a maintenance?

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1 JOHN ALESSI

2 A. Maintenance, building.

3 Q. Got it.

4 And did you meet Mr. Epstein when you
5 were -- in 1990?

6 A. Yes, I met him.

7 Q. Okay. And in 1991, who made the decision
8 for you to become a full-time employee?

9 A. Jeffrey.

10 Q. And as a full-time employee initially,
11 what was your job?

12 A. I was basically maintenance, the same
13 thing as I was doing with -- I was exclusively
14 working for him. I was full-time working for him as
15 maintenance, because the house was still on
16 renovation, and he wanted me there.

17 Q. Okay. And how was your relationship with
18 Mr. Epstein back then, 1991?

19 A. Great. No problem.

20 Q. It was good?

21 A. It was good.

22 Q. Did he have a girlfriend back then, in
23 1991?

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

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1 JOHN ALESSI

2 You can answer the question.

3 Occasionally, I'll need to object for the
4 record in case we need to have a discussion
5 about this with the judge. And so that's just
6 me preserving those objections.

7 THE WITNESS: Yes, he had a girlfriend.

8 Her name was Dr. Andersson, Eva Andersson. And
9 she was there just for a few months after I
10 came to the house.

11 BY MR. EDWARDS:

12 Q. And how was your relationship with
13 Dr. Andersson?

14 A. Fine.

15 Q. Okay. And at the time when Mr. Epstein
16 was -- at the time when Dr. Andersson was Jeffrey
17 Epstein's girlfriend, did you see any other female
18 companions around the house?

19 A. Eventually -- they have a lot of guests,
20 too. They did have guests coming in. But I can't
21 remember exactly who. It's a socialite. So they
22 have friends.

23 Q. At the time when Dr. Andersson was
24 Mr. Epstein's girlfriend, was Mr. Epstein getting
25 massages?

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1 JOHN ALESSI

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

4 THE WITNESS: I think so. I was not
5 involved in the house, inside of the house that
6 much. But they always got massages. Always.

7 BY MR. EDWARDS:

8 Q. Okay. I'm talking about the time period
9 when Dr. Andersson was there.

10 A. Yes, they got massages.

11 Q. Okay. So do you remember other female
12 visitors when Dr. Andersson was Mr. Epstein's
13 girlfriend?

14 A. I don't remember. I remember people being
15 there, visitors, but I cannot remember that far.

16 Q. Okay. After -- did there come a point in
17 time when Dr. Andersson was no longer Mr. Epstein's
18 girlfriend?

19 A. Right.

20 Q. Yes?

21 A. Yes.

22 Q. And did he -- did he have a new
23 girlfriend?

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

Page 23

1 JOHN ALESSI

2 Q. All right.

3 Who was in charge of the Palm Beach house?

4 A. I was.

5 Q. All right.

6 Who was your direct supervisor?

7 A. Mr. Epstein. He would deal with me
8 directly, or if he was not available, Ms. Maxwell.

9 Q. Okay. I want you to go to Exhibit 3 and
10 page -- page 179, line 8.

11 A. Line 8, "QUESTION: And then Maxwell came
12 and she took over you as your immediate supervisor?

13 Yes. That's correct. Yes. She became
14 the supervisor not only for this house, but for all
15 the homes.

16 Q. Okay. So your immediate supervisor was
17 Ms. Maxwell?

18 A. Ms. Maxwell. But if Mr. Epstein was at
19 the house, I would never go to Ms. Maxwell; I would
20 go to him directly, or he would come to me.

21 Q. Okay. At some point in time towards the
22 end of your tenure, did you come to resent
23 Ms. Maxwell?

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

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1 JOHN ALESSI

2 Q. And where did the massage therapists --
3 where did they come from?

4 A. Most, they came from Palm Beach. Palm
5 Beach County.

6 Q. And over the course of that 10-year period
7 of time while Ms. Maxwell was at the house, do you
8 have an approximation as to the number of different
9 females -- females that you were told were massage
10 therapists that came to the house?

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

13 THE WITNESS: I cannot give you a number,
14 but I would say probably over 100 in my stay
15 there.

16 BY MR. EDWARDS:

17 Q. And many of the times would the females
18 come only one time and not return?

19 MR. PAGLIUSCA: Object to form and
20 foundation.

21 BY MR. EDWARDS:

22 Q. Let me ask that a different way.

23 Were there times when some of these
24 females that would come to the house, and you were
25 told that they were massage therapists, would come

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1 JOHN ALESSI

2 BY MR. EDWARDS:

3 Q. Okay. And who would find the massage
4 therapist to bring to the house?

5 A. They would call me in my office, and they
6 would say, Get me a massage at 10:00 with this
7 person.

8 I have a list of the massage therapists, a
9 Rolodex, or a card, and I would call them for the
10 specific time they want a massage. And I would do
11 that.

12 Q. I don't think I asked the right -- the
13 question that I was looking to ask, so let me go
14 back.

15 Did you go out looking for the girls --

16 A. No.

17 Q. -- to bring --

18 A. Never.

19 Q. -- as the massage therapists?

20 A. Never.

21 Q. Who did?

22 A. Ms. Maxwell, Mr. Epstein and their
23 friends, because their friends relayed to other
24 friends they knew a massage therapist and they would
25 send to the house. So it was referrals.

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1 JOHN ALESSI

2 foundation. Hold on. That misstates what is
3 happening in this deposition, because the word
4 "recruit" was introduced by the lawyers in this
5 deposition. So I object to your
6 characterization of the testimony.

7 BY MR. EDWARDS:

8 Q. I'll read for you the question and the
9 answer.

10 The question was: "QUESTION: When did
11 that role get transferred from you to Ms. Maxwell,
12 the role of looking after girls or calling the
13 girls?

14 "ANSWER: I didn't look after -- out for
15 girls. Ms. Maxwell was the one that recruit. I
16 remember one occasion or two occasions she would say
17 to me, John, give me a list of all the spas in Palm
18 Beach County, and I will drive her from one to the
19 other to PGA in Boca; and she would go in and drop
20 credit cards -- not credit cards but business cards,
21 and she would come out. And then we'd go to -- she
22 will recruit the girls. Was never, never done by me
23 or Mr. Epstein or anyone else that I know of."

24 Is that truthful testimony?

25 A. It is truthful; however, I think

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1 JOHN ALESSI

2 "recruiting," for myself, for my point of view, is
3 hiring immediately and recruit the person.

4 I think she was looking for massage
5 therapists. She was looking for the best kind. She
6 went -- and you're right, I went one time with her,
7 or twice maybe, to different spas and different
8 clubs, great clubs, I mean, in Boca, in Fort
9 Lauderdale, in -- in Palm Beach. She was looking
10 for the best massage therapists available.

11 How she find these girls, I don't know. I
12 just drove there. I just was the driver. I never
13 was involved with any of the offerings or
14 negotiations or meeting these girls. Never.

15 Q. Okay. Ms. Maxwell was the one that would
16 meet the girls?

17 A. Yeah.

18 Q. Okay. Did you ever check any of the IDs
19 for any of these girls?

20 A. I was not -- that was not in my everyday
21 things to do. It was not.

22 Q. That was just not part of your job?

23 A. That was not my job.

24 Q. Did Ms. Maxwell take photographs while she
25 was at the Palm Beach house?

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1 JOHN ALESSI

2 MR. PAGLIUSCA: Object to form and
3 foundation.

4 THE WITNESS: Himself. Himself.

5 BY MR. EDWARDS:

6 Q. And you do not know the ages of the
7 various massagists, right?

8 A. No.

9 Q. Did you have occasion to clean up after
10 the massages?

11 A. Yes.

12 Q. Okay. And that is after both a massage
13 for Jeffrey Epstein, as well as clean up after a
14 massage that Ghislaine Maxwell may have received?

15 A. Yes.

16 Q. And on occasion, after -- in cleaning up
17 after a massage of Jeffrey Epstein or Ghislaine
18 Maxwell, did you have occasion to find vibrators or
19 sex toys that would be left out?

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

22 THE WITNESS: Yes, I did.

23 BY MR. EDWARDS:

24 Q. Can you describe the types of vibrators or
25 sex toys that you found left out after a massage

1 JOHN ALESSI

2 that Jeffrey Epstein had just received or Ghislaine
3 Maxwell had just received?

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

6 THE WITNESS: It was probably two to three
7 times, I would say. It was not all the time.
8 I would find things like a dildo, it's called a
9 double. I hate to say it because these ladies.
10 But I find these things, put my gloves on, took
11 it out and rinse it, and put it in
12 Ms. Maxwell's closet.

13 BY MR. EDWARDS:

14 Q. Why would you put the dildo or sex toy in
15 Ms. Maxwell's closet?

16 A. Because I knew that's where they were
17 kept.

18 Q. How did you know that the sex toys were
19 kept in Ms. Maxwell's closet?

20 A. Because I know where everything was in
21 that house. Every single room, every single thing,
22 it was a place, it was placed by me, by the cleaning
23 lady or my wife. Every -- everything that happened
24 in that house, I knew it.

25 Q. Who showed you where the dildo or sex toys

1 JOHN ALESSI

2 were kept in the house the first time?

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

5 THE WITNESS: Nobody. Nobody show me.

6 BY MR. EDWARDS:

7 Q. You just saw it?

8 A. I saw it.

9 Q. So you knew where to put it back?

10 A. Yeah. We had to open the closet, clean
11 the closet, put the clothes in place, put the shoes
12 in place, put everything in place. So it was a
13 matter of tidying things up.

14 Q. Did you ever find any costumes?

15 A. I saw one shiny black costume, but I
16 didn't even know --

17 Q. Where did you see it?

18 A. The same place.

19 Q. In Ms. Maxwell's closet?

20 A. Yes.

21 Q. And where was Ms. Maxwell's closet in the
22 house?

23 A. In the house? It was in the opposite side
24 of his bathroom. It was her bathroom in the master
25 bedroom. It was in the middle. So it was on the

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1 JOHN ALESSI

2 BY MR. EDWARDS:

3 Q. That demonstrates that she was, I believe,
4 terminated from her employment in 2000.

5 My question to you is: Do you remember
6 what time of year or what month it would have been,
7 whether spring, summer, fall, winter; January,
8 February, December?

9 A. Of what year?

10 Q. Of 2000, that you would have gone to the
11 Mar-a-Lago?

12 A. It wasn't 2000.

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

15 BY MR. EDWARDS:

16 Q. Okay. Do you think it was a different
17 year that you went to Mar-a-Lago?

18 A. Yes.

19 Q. Okay. What year do you believe that you
20 went to the Mar-a-Lago to pick Virginia up?

21 A. I think it was 2000 and -- I think it was
22 the summer of 2002.

23 Q. Okay.

24 A. Summer, because I remember that day that I
25 was sweating like hell in the -- in the car, waiting

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1 JOHN ALESSI

2 for Ms. Maxwell to come out of the massage.

3 Q. Okay. So what month of the summer do you
4 remember it being?

5 A. I think in June, July, maybe, 2001.

6 Q. 2000 and what?

7 A. 2001.

8 Q. June, July, 2001, that's when you believe
9 that it was?

10 A. Yes.

11 Q. Okay. And do you remember the month --

12 A. No, sorry. Sorry. Not 2001. We left in
13 December 31st. It was 2000 -- the last year that I
14 was working for Jeffrey, when I met Virginia.

15 Q. Your recollection, as you sit here
16 today --

17 A. It was 2002.

18 Q. -- is that it was June or July of 2002 --

19 A. 2002.

20 Q. -- when you met Virginia Roberts at the
21 Mar-a-Lago?

22 A. My recollection.

23 Q. Okay. And other than the fact that you
24 were sweating, what else tells you what month that
25 it was that you remember meeting her at the

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1 JOHN ALESSI

2 Mar-a-Lago?

3 A. It was -- I know it was summer of 2002,
4 and she spoke to -- far away. I wasn't -- I was in
5 the driveway, and she was far away talking to
6 Virginia. She spoke to her maybe five minutes.

7 Q. Okay.

8 A. And she came to the car, and we went home.
9 In the afternoon, about 4:00 or 5:00 in the
10 afternoon, the same day, Virginia came to the house.

11 Q. Who brought her to the house?

12 A. I don't know. She came to the back door,
13 I remember. And she was dressed differently. She
14 came to the house.

15 Q. When you first arrived to the Mar-a-Lago
16 with -- are you driving the car and Ms. Maxwell is
17 in the passenger seat?

18 A. Yes.

19 Q. And could you see Virginia Roberts from
20 the car?

21 A. Yes.

22 Q. Where was she sitting or standing? How
23 far away from the car?

24 A. She was standing right in front of the
25 driveway. This is the Mar-a-Lago, the house, and

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1 JOHN ALESSI

2 here is the spa, and the driveway that's here. I
3 was parked this way, and I would see her with
4 Ms. Maxwell, talking.

5 Q. Did you --

6 A. I could not hear what they were saying,
7 but I did see it.

8 Q. Did you park the car or did you stop right
9 there and --

10 A. I parked the car because we are not
11 allowed to go into Mar-a-Lago.

12 Q. Okay. Let me finish my question.

13 Did you park the car in a parking space in
14 the parking lot or did you just stop on the side of
15 the road and Ms. Maxwell got out?

16 A. Mar-a-Lago has a -- has a long wide
17 driveway, and on the right of the driveway is -- is
18 the parking spots like this or something. And I
19 parked in one of those spaces. And waiting for her,
20 I think it was over an hour that I wait for her.

21 Q. Okay. So did you watch her first talk
22 to --

23 A. No. At the end. Right at the end,
24 before -- when she was leaving.

25 Q. So Ms. Maxwell gets out of the car. And

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1 JOHN ALESSI

2 when you're pulling up to the Mar-a-Lago, could you
3 see Virginia Roberts then?

4 A. No. No.

5 Q. So after you wait an hour, Ms. Maxwell is
6 coming out?

7 A. And then she saw Virginia and she
8 stopped -- she went to her, she talked to her, she
9 came back to the car.

10 Q. And prior to that day, you had never seen
11 Virginia at the house?

12 A. Never. Never.

13 Q. Okay. Did Ms. Maxwell tell you that
14 Virginia's father worked at the Mar-a-Lago?

15 A. I don't think so. I think it was -- I
16 think we find out later, after the -- she says, My
17 father works -- I think it was from Virginia, that
18 she says her father works at Mar-a-Lago.

19 It is information from her. I don't think
20 it was Ms. Maxwell that told me anything. She don't
21 have to -- she don't have to talk to me. I mean,
22 Ms. Maxwell will not go and talk to me about this --
23 these people's family. I don't know. She never
24 did.

25 Q. Okay. I only have to go by what I have.

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1 JOHN ALESSI

2 I don't remember that day, how she got
3 home. I don't know. I can't remember.

4 Q. After that day, do you recall that she
5 started coming to the house more frequently?

6 A. Yes, she did.

7 Q. In fact, did she start coming to the house
8 approximately three times a week?

9 A. Yes, probably.

10 Q. And at times, would you go pick her up?

11 A. Yes. This happened maybe twice, three
12 times.

13 Q. And at times, would you take her home?

14 A. Yes.

15 Q. And did there come a point in time where
16 Virginia starting bringing other girls with her?

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

19 THE WITNESS: That was maybe two weeks
20 before we left. I saw her bringing some
21 friends with her to the house. And I cannot
22 remember how many times, but I was at the end
23 of our stay.

24 BY MR. EDWARDS:

25 Q. At the end of her [sic] stay, you saw when

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1 JOHN ALESSI

2 she would come over to the house, she would bring
3 certain friends who were girls --

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

6 BY MR. EDWARDS:

7 Q. -- to the house, right?

8 A. Yes, females, yes.

9 Q. Do you know how long Virginia had been
10 coming over to the house before she started
11 traveling on an airplane with Ghislaine and Jeffrey?

12 MR. PAGLIUSCA: Object to foundation.

13 THE WITNESS: Not too long. I don't think
14 it was too long after that.

15 BY MR. EDWARDS:

16 Q. Would you drive her to the airport with
17 them?

18 A. Occasionally, I think so, yes. I would
19 drive everybody to the airport. My wife would drive
20 the chefs, the service people, the luggage to Jet
21 Aviation.

22 Q. Is that where Mr. Epstein kept his plane,
23 Jet Aviation?

24 A. Yes.

25 Q. At some point did Ghislaine Maxwell become

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1 JOHN ALESSI

2 MR. PAGLIUSCA: Seven.

3 MR. EDWARDS: Seven?

4 (The referred-to document was marked by
5 the court reporter for Identification as
6 Deposition Exhibit 7.)

7 MR. EDWARDS: I apologize, Jeff. I just
8 can't find a copy right now.

9 MR. PAGLIUSCA: I have it.

10 MR. EDWARDS: Okay.

11 BY MR. EDWARDS:

12 Q. So this is a composite exhibit. It is
13 four pages. The first one that you're looking at
14 should be -- do you have SAO 01456?

15 MR. PAGLIUSCA: Yes.

16 MR. EDWARDS: Okay.

17 BY MR. EDWARDS:

18 Q. Does the format of this look familiar to
19 you?

20 A. Yes. It looks like the books that we used
21 to have that has -- the message books.

22 Q. How would that work? How would that
23 process work?

24 A. Somebody called, you write it down, and
25 you take the -- you leave the copy in the -- in the

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1 JOHN ALESSI

2 many things?

3 A. Yes, she did.

4 Q. Interesting buildings?

5 A. No. She -- she liked -- she had a dog,
6 and she took a lot of photographs of her dog. And
7 us. And she took photographs of the cars and the
8 house. Everything inside. She had an album full of
9 photographs of people, young girls, girls. And I
10 remember that she had. Like a hobby.

11 Q. Right.

12 You never saw any pictures that were very
13 upsetting to you, though, correct?

14 A. No. No.

15 Q. Okay. And the pictures that you saw were
16 sort of -- would you describe them as being artistic
17 kind of pictures?

18 MR. EDWARDS: Objection, counsel
19 testifying.

20 THE WITNESS: I think so. I don't think
21 they were pornographic. I don't think it was
22 any vaginal or things, you know, female parts
23 showing. It was some girls were topless,
24 taking the sun. It was a beautiful house, it
25 was a beautiful setting, so she took a lot of

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1 JOHN ALESSI
2 CERTIFICATE OF OATH
3 STATE OF FLORIDA)
4 COUNTY OF MIAMI-DADE)
5

I, the undersigned authority, certify
that JOHN ALESSI personally appeared before me
and was duly sworn.

7 WITNESS my hand and official seal
this 1st day of June, 2016.

8
9

Kelli Ann Willis, RPR, CRR
Notary Public, State of Florida
Commission FF928291, Expires 2-16-20

11 +
12 CERTIFICATE

13 STATE OF FLORIDA)
14 COUNTY OF MIAMI-DADE)

15 I, Kelli Ann Willis, Registered
Professional Reporter and Certified Realtime
16 Reporter do hereby certify that I was
authorized to and did stenographically report the
17 foregoing deposition of JOHN ALESSI; that a review
of the transcript was not requested; and that the
18 transcript is a true record of my stenographic
notes.

19 I FURTHER CERTIFY that I am not a
relative, employee, attorney, or counsel of any
20 of the parties, nor am I a relative or employee of
any of the parties' attorney or counsel connected
21 with the action, nor am I financially interested
in the action.

22 Dated this 1st day of June, 2016.

23
24
25

KELLI ANN WILLETS, RPR, CRR

EXHIBIT 2

(Filed Under Seal)

UNITED STATES DISTRICT COURT
for the
SOUTHERN DISTRICT OF NEW YORK

Civil Action No. 15-cv-07433-RWS

VIRGINIA GIUFFRE,

Plaintiff,

vs.

GHISLAINE MAXWELL

Defendant.

1 A Yes.

2 Q Was it is a franchise, if you know?

3 A I know when I first started there, they were
4 corporate, but then they were a franchise. They were
5 bought out. But I'm not sure if when I got there they
6 were a franchise or not.

7 Q Got it.

8 Do you know if Ms. Roberts had any previous
9 employment before she worked at Taco Bell?

10 A I think by the apartment, she worked for KFC for
11 a little while.

12 MS. MENNINGER: Are you looking at Ms.
13 Roberts?

14 THE WITNESS: I'm thinking. I can't
15 remember. I remember something with KFC. They
16 had one really close to us. I think she worked
17 there for a tiny, tiny bit. I'm not sure.

18 MS. MENNINGER: Okay.

19 BY MS. MENNINGER:

20 Q Before the Taco Bell?

21 A Or she could've applied there. It's just in my
22 head. She might have just applied there, and didn't get
23 it, and that's why I brought her to Taco Bell.

24 Q Okay.

25 A Because we were both the night managers.

1 A No.

2 Q Do you know about what years this was?

3 A Not really.

4 Q Do you know about how old you were?

5 A When, what?

6 Q I'm just focused on the period of time in which
7 you were living at her parent's house in the trailer.

8 A I was probably 18 when we moved in there.

9 Q And you said you were only there for a couple of
10 months?

11 A Not that I remember. Like, it might have been a
12 little longer. I'm not sure.

13 Q Were you engaged to Ms. Roberts?

14 A Yes.

15 Q When did you become engaged to her?

16 A When we were living in Oakland Park.

17 Q Tell me about the engagement. How did it come
18 about?

19 A Well, we fell in love, and -- I believe it was
20 Valentine's Day when I proposed.

21 Q Did you have a ring?

22 A Yes.

23 Q Did she accept?

24 A Yes.

25 Q How long were you engaged?

1 A Yes -- well, for a while. I mean, I know at the
2 end, I wasn't working anywhere.

3 Q Why weren't you working?

4 A I don't remember the exact reason.

5 Q Had you quit?

6 A I believe so. I know the pet store let me go
7 for walking on to the other side talking to somebody. But
8 I don't remember why I left Dunkin' Donuts.

9 Q Do you believe that you were fired from Dunkin'
10 Donuts?

11 A No. That pet store was the only time anybody
12 ever fired me.

13 Q That will stick in your brain.

14 A Yeah.

15 Q At the time that you left the pet store, was
16 Ms. Roberts still working there?

17 A Yes.

18 Q And how long do you recall her working there?

19 A Not long.

20 Q I hate to do this to you, but what does "not
21 long" mean to you, weeks, months, days?

22 A Over a month. That's really all I can say.
23 Maybe over a month before she went to work at the
24 Mar-a-Lago or Donald Trump's country club.

25 Q Did she leave the pet store to go work at
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P.O. Box 157, Ocala, Florida
352.624.2258 * owenassocs@aol.com

1 BY MS. MENNINGER:

2 Q Did you know her friend by the name of Tony
3 Figueroa?

4 A Somewhat.

5 Q Tell me what you remember about Tony Figueroa.

6 A Other than him being an idiot, not much.

7 Q Did you have any interactions with Mr. Figueroa?

8 A Very little.

9 Q When do you recall seeing him, like, in what
10 city, I mean?

11 A Up in West Palm Beach.

12 Q Did he come over to your apartment?

13 A I believe so.

14 Q Did you believe them to be having a
15 relationship?

16 A At the very end when I left, yes.

17 Q Was that one of the reasons for your leaving?

18 A One of them.

19 Q What were the others?

20 A Well, after I found out about that, that's when
21 I heard about all the other stuff that was happening.

22 Q What did you hear about all the other stuff?

23 A Well, I mean, after she went to work for
24 Mar-a-Lago then she was, I guess, recruited to go work for
25 Jeff something. I don't remember his last name.

1 Q Is that what she told you "she was recruited"?

2 A Yeah. Well, she didn't use those words. But I
3 don't know why else anybody would take -- like, they hired
4 her over there as a massage therapist, but she didn't have
5 any experience.

6 Q At Mar-a-Lago --

7 A At Mar-a-Lago, yes. Then all of a sudden one
8 day, she was working for Jeff, whatever his name was.

9 Q Let me just take a step back. You found out
10 towards the end of your relationship with Ms. Roberts that
11 she was then having a relationship with Mr. Figueroa. Is
12 that right?

13 A I don't know if it was a relationship. But,
14 yes.

15 Q Enough to cause you to think you didn't want to
16 be engaged anymore?

17 A Yes.

18 Q Did you and Ms. Roberts have a fight at that
19 time?

20 A Yes.

21 Q What do you remember about the fight? What do
22 you recall?

23 A I don't recall. I remember us having a fight
24 and then leaving not too long afterwards.

25 Q You referred to finding out all this other stuff