

EXHIBIT 16

(Filed Under Seal)

1 JANE DOE NO. 6, Case No: 08-CV-80994
 2 Plaintiff,
 3 Vs
 4 JEFFREY EPSTEIN,
 5 Defendant.

6 JANE DOE NO. 7, Case No. 08-CV-80993
 7 Plaintiff,

8 Vs
 9 JEFFREY EPSTEIN,
 10 Defendant.

11 C.M.A., Case No: 08-CV-80811
 12 Plaintiff,
 13 Vs
 14 JEFFREY EPSTEIN,
 15 Defendant.

17 JANE DOE, Case No: 08-CV-80893
 18 Plaintiff,
 19 Vs
 20 JEFFREY EPSTEIN,
 21 Defendant.

22 JANE DOE NO. II, Case No: 08-CV-80469
 23 Plaintiff,
 24 Vs
 25 JEFFREY EPSTEIN,
 Defendant.

6 JANE DOE NO. 101, Case No: 09-CV-80591
 7 Plaintiff,
 8 Vs
 9 JEFFREY EPSTEIN,
 10 Defendant.

11 JANE DOE NO. 102, Case No: 09-CV-80656
 12 Plaintiff,
 13 Vs
 14 JEFFREY EPSTEIN,
 15 Defendant.

20 1031 Ives Dairy Road
 Suite 228
 21 North Miami, Florida
 July 29, 2009
 22 11:00 a.m. to 5:30 p.m.

1 VIDEOTAPED
 2 DEPOSITION
 3 of
 4 ALFREDO RODRIGUEZ
 5
 6 taken on behalf of the Plaintiffs pursuant
 7 to a Re-Notice of Taking Deposition (Duces Tecum)
 8
 9 - - -
 10 APPEARANCES:

11 MERMELSTEIN & HOROWITZ, P.A.
 12 BY: STUART MERMELSTEIN, ESQ.
 13 18205 Biscayne Boulevard
 Suite 2218
 14 Miami, Florida 33160
 Attorney for Jane Doe 2, 3, 4, 5,
 6, and 7.

15 ROTHSTEIN ROSENFELDT ADLER
 16 BY: BRAD J. EDWARDS, ESQ., and
 17 CARA HOLMES, ESQ.
 18 Las Olas City Centre
 Suite 1650
 19 401 East Las Olas Boulevard
 Fort Lauderdale, Florida 33301
 Attorney for Jane Doe and E.W.
 20 And L.M.

21 PODHURST ORSECK
 22 BY: KATHERINE W. EZELL
 23 25 West Flagler Street
 Suite 800
 24 Miami, Florida 33130
 Attorney for Jane Doe 101 and 102.

1 APPEARANCES:
 2 LEOPOLD-KUVIN
 3 ADAM J. LANGINO, ESQ.
 4 2925 PGA Boulevard
 Suite 200
 5 Palm Beach Gardens, Florida 33410
 Attorney for B.B.

6 RICHARD WILLITS, ESQ.
 7 2290 10th Avenue North
 8 Suite 404
 Lake Worth, Florida 33461
 9 Attorney for C.M.A.

10 BURMAN, CRITTON, LUTTIER &
 COLEMAN, LLP
 11 BY: ROBERT CRITTON, ESQ.
 12 515 North Flagler Drive
 Suite 400
 13 West Palm Beach, Florida 33401
 Attorney for Jeffrey Epstein.

14
 15
 16 ALSO PRESENT:
 17 JOE LANGSAM, VIDEOGRAPHER

18
 19 - - -
 20
 21
 22
 23
 24
 25

2 (Pages 2 to 5)

1 written down anywhere?

2 A. No.

3 Q. It's my understanding that C. and T.
4 either came to his house alone to visit with Mr.
5 Epstein or brought other girls in their age group
6 to Mr. Epstein.

7 Were you familiar with that type of
8 recruitment process of girls bringing other girls?

9 MR. CRITTON: Form.

10 THE WITNESS: Yes.

11 BY MR. EDWARDS:

12 Q. Can you tell me more about what you know
13 about girls bringing other girls that are
14 relatively the same age to come to Jeffrey
15 Epstein's house and to use your words, have a good
16 time?

17 MR. CRITTON: Form.

18 THE WITNESS: It's hard to know who they
19 knew. But I think that was -- they feel
20 better themselves when they're in a group
21 than going by themselves, but I don't know
22 somebody recruiting.

23 BY MR. EDWARDS:

24 Q. Okay. And you've talked about, at least
25 referred to yourself I believe to the police and

1 for now we'll call it a massage -- as well as
2 anybody who brought that person over to the house,
3 they would both get paid cash. Are you familiar
4 with that?

5 MR. CRITTON: Form.

6 THE WITNESS: No.

7 BY MR. EDWARDS:

8 Q. If C. brought another girl over to the
9 house and C. stayed downstairs but this other girl
10 went upstairs with Mr. Epstein, which one would
11 you pay?

12 A. I don't know because I was told who to
13 pay.

14 Q. And Sarah Kellen always told you?

15 A. Sarah told me pay so and so.

16 Q. So if we were going to ask anybody else
17 about the exact method in terms of who would get
18 paid and for what, who would the people be? I
19 mean, other than Mr. Epstein who else could we ask
20 these questions?

21 A. Sarah.

22 Q. Sarah Kellen?

23 A. Yes.

24 Q. She would know this?

25 A. Yes.

1 as well today as a human ATM machine. Right?

2 MR. CRITTON: Form.

3 THE WITNESS: Something like that. I was
4 supposed to carry cash at all times.

5 BY MR. EDWARDS:

6 Q. One of the primary reasons why you
7 carried cash was to pay the girls in this age
8 group of C. and T. for whatever happened at the
9 house. Right?

10 MR. CRITTON: Form.

11 THE WITNESS: Yes.

12 BY MR. EDWARDS:

13 Q. That's a fair statement. Right?

14 MR. CRITTON: Form.

15 THE WITNESS: Yes.

16 BY MR. EDWARDS:

17 Q. Okay. And when C., let's use her for
18 example, would bring somebody else to the house,
19 did you pay C. as well as whomever she brought to
20 the house, pay them both?

21 A. No, I pay only one person.

22 Q. Okay. My understanding, and tell me if
23 this is wrong or you can corroborate this, is that
24 Mr. Epstein would pay the girl that was actually
25 performing whatever was happening in the room --

1 Q. What about Ghislaine Maxwell?

2 MR. CRITTON: Form.

3 THE WITNESS: You're talking about the
4 boss. I don't know.

5 BY MR. EDWARDS:

6 Q. To your knowledge was Ghislaine Maxwell
7 aware of these girls that are in the age group of
8 C. and T. coming to Jeffrey Epstein's house to
9 have a good time?

10 MR. CRITTON: Form.

11 THE WITNESS: I have to say something.

12 Mrs. Maxwell called me and told me not to
13 ever discuss or contact her again in a
14 threaten way.

15 BY MR. EDWARDS:

16 Q. When was this?

17 A. Right after I left because I call one of
18 the friends for a job and she told me this, but,
19 you know, I feel intimidated and so I want to keep
20 her out.

21 Q. What exactly did she say? First of all,
22 was this a telephone call?

23 A. Yes, she was in New York.

24 Q. She called you on your cell phone?

25 A. Yes.

1 Q. Is this the cell phone that was issued to
2 you by Mr. Epstein?
3 A. No, it was my personal phone. I was
4 already --
5 Q. Gone?
6 A. Yeah, this is three, four months down the
7 road.
8 Q. So if you left in --
9 A. February, March -- it was May or June.
10 Q. Of 2005?
11 A. Yes.
12 Q. And you got a call from Ghislaine Maxwell
13 out of the blue?
14 A. Yes.
15 Q. And do you know what prompted that
16 telephone call?
17 A. Because I contact somebody in New York to
18 get a job.
19 Q. Who was that person?
20 A. I contact Jean-Luc and I contact Eva, the
21 Swedish girl, she used to be very good friends
22 with Mr. Epstein because she asked me she need
23 somebody in New York.
24 Q. What does Eva do?
25 A. Eva was a model many years ago and he

1 precisely did she say?
2 A. She said I forbid you that you're going
3 to be -- that I will be sorry if I contact any of
4 her friends again.
5 Q. Okay. Other than you will be sorry if
6 you contact any of my friends again did she say
7 anything else about what you know about Mr.
8 Epstein and/or what goes on at his house?
9 A. She said something like don't open your
10 mouth or something like that. But you have to
11 understand, I'm a civil humble, I came as an
12 immigrant to service people, and right now you
13 feel a little -- I'm 55 and I'm afraid. First of
14 all, I don't have a job, but I'm glad this is on
15 tape because I don't want nothing to happen to me.
16 This is the way they treat you, better do this and
17 you shut up and don't talk to nobody and --
18 Q. When you say this is the way they treat,
19 who specifically are you talking about when you
20 say the word they?
21 A. Maxwell.
22 Q. And usually when you say the word they,
23 you're not only talking about one person --
24 A. Wealthy people.
25 Q. Are you also putting Jeffrey Epstein in

1 married -- Eva is the mother of the girl who was
2 on the wall.
3 Q. Who is on the wall of Mr. Epstein's
4 house?
5 A. Yeah.
6 Q. All right. There is a younger girl model
7 that's on the wall of Mr. Epstein's house and this
8 lady Eva is her mother?
9 A. Yes.
10 Q. And at some point in time you called her
11 in New York to get a job?
12 A. That's right.
13 Q. And you also called Jean-Luc Bernell?
14 That's his name. Right?
15 A. Jean-Luc, yeah, I don't remember his last
16 name.
17 Q. Does that sound familiar to you, Jean-Luc
18 Bernell?
19 A. Yeah.
20 Q. What did Eva and/or Jean-Luc say about
21 employing you?
22 A. No, they said they're going to find out
23 and obviously the first thing they did was talk to
24 Mrs. Maxwell.
25 Q. She made a telephone call to you and what

1 that category?
2 MR. CRITTON: Form.
3 THE WITNESS: I didn't talk to him
4 directly most of the time.
5 BY MR. EDWARDS:
6 Q. What's the reason why if you were his
7 head of security that you wouldn't have more
8 direct contact with him? Why is that?
9 MR. CRITTON: Form.
10 THE WITNESS: He wanted that way, you
11 know, so, yeah, I have to talk to Sarah,
12 Sarah is not available talk to Lesley in New
13 York. He didn't want to be disturbed.
14 BY MR. EDWARDS:
15 Q. Even while you were in the same house
16 with him he still had other people you could talk
17 to directly but he was not one of them?
18 A. Yeah.
19 Q. When you were fired you were not fired
20 directly by him?
21 A. No.
22 Q. It was through somebody else?
23 A. Ms. Maxwell.
24 Q. Okay. But it was for upsetting him for
25 taking the wrong car?

1 A. Yes.
 2 Q. Okay. Ever since this communication that
 3 Ms. Maxwell made to you where she called you
 4 sometime in May or June of 2005, and have you felt
 5 threatened?

6 A. Yes.

7 MR. CRITTON: Form.

8 BY MR. EDWARDS:

9 Q. Have you felt reluctant to come forward
 10 and give truthful, honest, and full disclosure of
 11 all information that you know about this case?

12 MR. CRITTON: Form.

13 THE WITNESS: I said this off the record
 14 but I will say it on the record, being in
 15 the Epstein case for me resulted in two
 16 years I have -- I won't bring the names but
 17 I was in the third interview to get hired as
 18 a household manager in Palm Beach and they
 19 told me you are the Jeffrey Epstein guy.
 20 Not in the sense I did something wrong
 21 because of the scandal, so they shun the job
 22 away from me. And so I was afraid that --
 23 this is very powerful people and one phone
 24 call and you finish, so I'm the little guy.
 25 Even I'm wearing a tie I'm a -- I'm talking

1 this. Because I went through -- the first
 2 time I went to the deposition I was in Palm
 3 Beach and I did my duty, I mean, I tell what
 4 I know, but now I know there is more
 5 digging, all I want is this to be to get on
 6 with my normal life and stuff.

7 BY MR. EDWARDS:

8 Q. So when you come here today to testify,
 9 your main objective is to get back to your normal
 10 life and get out of the spotlight of this case.
 11 Yes?

12 A. Yes.

13 Q. And in doing so have you held back some
 14 of the details that you know about that happened
 15 in this case to remove yourself from the
 16 spotlight?

17 MR. CRITTON: Form.

18 THE WITNESS: No, sir.

19 BY MR. EDWARDS:

20 Q. Okay. Have you ever talked to Ghislaine
 21 Maxwell after that telephone call where she called
 22 you and you felt threatened?

23 A. No.

24 Q. Okay. So going back to where we started
 25 here was, does Ghislaine Maxwell have knowledge of

1 from my heart. This is the way it is.

2 BY MR. EDWARDS:

3 Q. I feel for you, I'm sorry that you have
 4 to be in this position.

5 MR. CRITTON: Move to strike this.

6 BY MR. EDWARDS:

7 Q. Well, when you applied for these jobs and
 8 they turned you down and gave you the reason that
 9 you're the person involved in the Jeffrey Epstein
 10 scandal, was it that they are associated or
 11 friends with Jeffrey Epstein or is it that you
 12 have information and you have this confidentiality
 13 but you're revealing some certain information that
 14 Mr. Epstein would not like?

15 MR. CRITTON: Form.

16 THE WITNESS: Both.

17 BY MR. EDWARDS:

18 Q. Both?

19 A. Both.

20 Q. And since then given what you just told
 21 us about these people being very powerful, are you
 22 afraid for your life given the fact that you're
 23 involved to some extent in this case?

24 MR. CRITTON: Form.

25 THE WITNESS: I just start thinking about

1 the girls that would come over to Jeffrey
 2 Epstein's house that are in roughly the same age
 3 group as C. and T. and to have a good time as you
 4 put it?

5 MR. CRITTON: Form.

6 THE WITNESS: Yes.

7 BY MR. EDWARDS:

8 Q. And what was her involvement and/or
 9 knowledge about that?

10 MR. CRITTON: Form.

11 THE WITNESS: She knew what was going on.

12 BY MR. EDWARDS:

13 Q. You referred to her at one point in time
 14 as Jeffrey Epstein's companion. But then later on
 15 you said that if she flew she flew on a different
 16 airplane and oftentimes or sometimes she slept in
 17 a different bed from Mr. Epstein. Did that seem
 18 unusual to you?

19 MR. CRITTON: Form.

20 THE WITNESS: It was odd but, I mean, and
 21 again, everything is odd in Palm Beach.

22 BY MR. EDWARDS:

23 Q. Okay, I don't mean to laugh.

24 A. Mr. Epstein fly to Jet Aviation, she fly
 25 to Galaxy Aviation, but they never flew the same

1 BY MR. LANGINO:

2 Q. Are you currently in fear of Mr. Epstein?

3 A. Not at this particular moment but it's
4 something I have to be worry about, yes.

5 Q. Are you personally afraid of criminal
6 prosecution?

7 A. No.

8 Q. Do you believe that you did anything
9 illegal?

10 A. Illegal, no.

11 MR. LANGINO: I have no further
12 questions. Thank you.

13 MR. CRITTON: We're going to break in
14 about 15 minutes. Do you want to start and
15 go for 15 minutes or do you want to -- it's
16 up to you.

17 MS. EZELL: I'll start.

18 MR. WILLITS: When are we going to quit,
19 folks?

20 MR. CRITTON: In 15 minutes.

21 THE VIDEOGRAPHER: Might as well change
22 tapes.

23 MR. EDWARDS: Bob has to get back so
24 we've agreed we're going to come back some
25 other time.

1 THE STATE OF FLORIDA,)

2 COUNTY OF DADE.)

3

4
5 I, the undersigned authority, certify
6 that ALFREDO RODRIGUEZ personally appeared before
7 me on the 29th day of July, 2009 and was duly
8 sworn.

9

10 WITNESS my hand and official seal this
11 31st day of July, 2009.

12

13

14

15

16 MICHELLE PAYNE, Court Reporter
17 Notary Public - State of Florida

18

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25

1 MR. WILLITS: Why don't we just stop now?

2 MS. EZELL: Okay.

3 MR. EDWARDS: Rather than you start.

4 MS. EZELL: Yeah, I won't get very far.

5 MR. EDWARDS: Sorry to do this with you,
6 we didn't finish.

7 MR. CRITTON: So we're stopped?

8 MR. EDWARDS: We're stopped.

9 THE VIDEOGRAPHER: Off the record.

10 (Thereupon, the videotaped deposition was
11 adjourned at 5:30 p.m.)

12 - - -

1 CERTIFICATE

2 The State Of Florida,)
3 County Of Dade.)

4

5 I, MICHELLE PAYNE, Court Reporter and
6 Notary Public in and for the State of Florida at
7 large, do hereby certify that I was authorized to
8 and did stenographically report the videotaped
9 deposition of ALFREDO RODRIGUEZ; that a review of
10 the transcript was requested; and that the
11 foregoing pages, numbered from 1 to 269,
12 inclusive, are a true and correct transcription of
13 my stenographic notes of said deposition.

14 I further certify that said videotaped
15 deposition was taken at the time and place
16 hereinabove set forth and that the taking of said
17 videotaped deposition was commenced and completed
18 as hereinabove set out.

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

20 The foregoing certification of this
21 transcript does not apply to any reproduction of
22 the same by any means unless under the direct
23 control and/or direction of the certifying
24 reporter.

25 DATED this 31st day of July, 2009.

MICHELLE PAYNE, Court Reporter