

# EXHIBIT 7

## PART 3

1 A. Where is that, sir? Just point it.

2 Q. Then it says, Alessi Properties, LLC; is that  
3 right?

4 A. Yes, sir.

5 Q. Then do you see the next couple pages includes  
6 a letter from Adam Fetterman to the Department of State?  
7 Do you see that?

8 A. Yes, sir.

9 Q. And then the next -- the next page is an  
10 articles -- articles of organization for Florida limited  
11 liability company. Do you see that?

12 A. Yes, sir.

13 Q. And then on the very last page, is that your  
14 signature?

15 A. Yes, sir.

16 Q. Okay. Is that your application to organize  
17 the Florida limited liability company, Alessi  
18 Properties, LLC?

19 A. Yes. I just sign it. This was done by the  
20 lawyer.

21 Q. Did Jeffrey Epstein have anything to do with  
22 the creation of this company?

23 A. Absolutely nothing.

24 Q. Did Jeffrey Epstein pay for Mr. Fetterman's  
25 services to do this?

1 A. Absolutely no.

2 Q. Now, this was -- this Alessi Properties, LLC,  
3 it appears to have been incorporated in August of 2003.  
4 Do you recall that? Does that sound correct?

5 A. Yeah.

6 Q. And between December of 2002, when you left  
7 Mr. Epstein's employment, and August of 2003, when you  
8 incorporated Alessi Properties, LLC, did you speak to  
9 Jeffrey Epstein?

10 A. Never spoke again.

11 Q. Or with anybody on his behalf, such as his  
12 staff or an investigator for him? Anybody?

13 A. Nothing.

14 Q. Okay. Did you go to his home between January  
15 and August of 2003?

16 A. No. Except twice, the two incidents that it  
17 happened.

18 Q. But those -- and those happened later, after  
19 August of 2003, correct? Those happened either --

20 A. Yeah. I never went to the home for any reason  
21 to talk to him or to anybody.

22 Q. Okay. So in September and October when you  
23 went to Mr. Epstein's house --

24 A. Yeah.

25 Q. -- uninvited, --

1 A. Uh-huh.

2 Q. -- you just assumed that he would have money  
3 in his briefcase?

4 A. I assume.

5 Q. You hadn't talked to him in nine months; is  
6 that your testimony?

7 A. That's my testimony.

8 Q. And you said that you needed that money  
9 because of a woman that you were mixed up with?

10 A. That's correct.

11 Q. What's her name?

12 A. Eva DaSilva (phonetics).

13 Q. And where does she --

14 A. I'm sorry. Vonia DaSilva (phonetics). I  
15 already forgot the name.

16 Q. Vonia?

17 A. Vonia DaSilva.

18 Q. Where is she now? Where does she live?

19 A. I have no idea. She left -- she left the  
20 state. She was a girl from Brazil. The biggest mistake  
21 of my life.

22 Q. And then you said during the questioning of  
23 one or two of the attorneys that you entered into a  
24 separation agreement with Mr. Epstein that included a  
25 confidentiality agreement and a release. Do you

1 remember saying that?

2 A. Yeah.

3 MR. CRITTON: Form.

4 BY MR. BERGER:

5 Q. And those were signed by you?

6 A. And Mr. Epstein.

7 Q. And was that signed after the October  
8 incident?

9 A. No. This was signed in January 2003.

10 Q. When you left?

11 A. Right after I left.

12 Q. Okay.

13 A. Right after I left, it was done through the  
14 office in New York. Mr. Epstein never spoke to me  
15 again. It was done through the lawyers in New York.  
16 They send me the paper via Fed Ex. They send us a  
17 check. That was the end of it. That happened in  
18 January, January 2003.

19 Q. Do you have a copy of those documents?

20 A. Not in here.

21 Q. Do you have them at home?

22 A. Yes, I do.

23 Q. And let me just make sure I know what the  
24 documents are.

25 There's a separation agreement?

1 A. Just a separation agreement.

2 Q. And that includes a confidentiality provision?

3 A. It was a -- there's a provision inside.

4 Q. And it also includes in it a release or is the  
5 release separate?

6 A. I don't know. Lawyer terms. I'm not familiar  
7 with that.

8 Q. Did you have a lawyer represent you in  
9 connection with that?

10 A. No. I never need it.

11 Q. And you said Mr. Epstein paid you \$30,000 to  
12 you and \$20,000 to your wife?

13 A. That's correct.

14 Q. And how was that paid to you?

15 A. Cash -- I mean, check. It was a check but it  
16 was taken -- taxes were taken out. So it was minus  
17 taxes.

18 Q. Was it one check for each of you?

19 A. Yes.

20 MR. CRITTON: Can we take a five-minute break?

21 MR. BERGER: Sure.

22 MR. CRITTON: Do you want to finish one line  
23 of questioning?

24 MR. BERGER: No, go ahead. Go ahead.

25 VIDEOGRAPHER: Off the record at 2:15.

1 (Brief recess.)

2 VIDEOGRAPHER: We're back on the record at  
3 2:21.

4 BY MR. BERGER:

5 Q. How many times have you talked with  
6 investigators of Mr. Epstein?

7 A. One time.

8 Q. And that's the one time that you've mentioned  
9 already?

10 A. Yes.

11 Q. And have you met -- talked to Mr. Critton  
12 before today?

13 A. Oh, wait a minute. Sorry. I have to go back  
14 on that. Twice. One time when the criminal case  
15 started when they, like, find the card and Jeffrey says,  
16 I cannot talk to you, somebody will call you. I talked  
17 the investigator that I told you.

18 And the second time was, I guess, you -- I  
19 don't know who was it, but they send -- they send me  
20 the -- I don't know if it was an investigator or they  
21 just give me your notice that I was going to be  
22 subpoena.

23 MR. CRITTON: I think that came from  
24 Mr. Willits' office.

25 MR. WILLITS: Jack Hill's office.

1 MR. CRITTON: That wasn't an investigator. It  
2 was a subpoena server?

3 THE WITNESS: Yeah.

4 BY MR. BERGER:

5 Q. Process server. Process server.

6 Now, this is Mr. Robert Critton. Have you  
7 talked to him before today?

8 A. Yes, sir.

9 Q. How many times have you talked to Mr. Critton?

10 A. Once in my house. And we talk about ten  
11 minutes yesterday? Monday? Monday?

12 Q. Yesterday?

13 A. Yesterday.

14 Q. Okay. And what did you discuss?

15 A. Discuss the same questions that you telling  
16 me. And he told me basically, say the truth. Tell the  
17 truth, nothing but the truth. And be firm and be --  
18 speak your mind and don't be afraid.

19 I thought that this incident about my life  
20 never would have come out. I wish it would have never  
21 come out. But I guess it come out and it's too late.

22 Q. Well, you know what this case is about, don't  
23 you?

24 A. Of course. I think it's a case against  
25 Mr. Epstein. But it's not a case against me, is it?



1 Q. No.

2 A. Oh.

3 Q. And you know it's --

4 (Brief interruption.)

5 BY MR. BERGER:

6 Q. And you know it's a serious case for the  
7 people that are bringing it?

8 THE COURT: Form.

9 THE WITNESS: Absolutely.

10 BY MR. BERGER:

11 Q. So you had this conversation with Mr. Critton  
12 yesterday?

13 A. Not about the seriousness, no.

14 Q. No. No. But the conversation that you had  
15 with Mr. Critton was yesterday, correct?

16 A. Yes. Told him he -- he told me basically he  
17 was going to be here, that a bunch of lawyers were going  
18 to ask me questions and that I should be truthful and  
19 nothing else, basically.

20 Q. Well, what else did he say?

21 A. What else did Mr. Critton says? Nothing. He  
22 asked me about my health, because I was in the hospital  
23 this week. He asked me how I felt.

24 And I says, well, I want to get this done. I  
25 want to get it over, done, and go on with my life for

1 the rest of my life. I want to finish with this. I  
2 don't want nothing to do with Jeffrey Epstein or this  
3 case, once and for all.

4 Q. Did you talk to him about the confidentiality  
5 agreement that you mentioned?

6 A. No.

7 Q. Or the separation agreement?

8 A. No.

9 Q. Or the arrest?

10 A. No.

11 Q. Or the \$30,000 that you were paid?

12 A. No.

13 Q. Did he tell you that this case that we're here  
14 about --

15 A. \$30,000 where? What \$30,000?

16 Q. You said you were paid \$30,000 and your wife  
17 was paid \$20,000.

18 A. Yes. Yes. The separation agreement. No.

19 No.

20 Q. You didn't talk about that?

21 A. No.

22 Q. Did he tell you there were young women suing  
23 Mr. Epstein? Did he tell you that yesterday?

24 A. No. He mentioned to me that it was a lot of  
25 lawsuits against Mr. Epstein, criminal and civil suits.

1 And -- not yesterday, but when he was in my house with  
2 his secretary.

3 Q. Not yesterday?

4 A. Not yesterday.

5 Q. When was he was at your house with the  
6 secretary?

7 A. About two months ago, a month and a half ago.

8 Q. You can't look to him to answer. You've got  
9 to answer.

10 A. I cannot remember exactly the date, but I  
11 would say it was about a month ago.

12 Q. Maybe I misunderstood. Was Mr. Critton at  
13 your house yesterday?

14 A. No. He called me yesterday.

15 Q. He called you yesterday?

16 A. Yes, sir.

17 Q. And you talked for about ten minutes yesterday  
18 on the phone?

19 A. No more.

20 Q. Did you tell me everything that you and  
21 Mr. Critton talked about yesterday?

22 A. Yes.

23 Q. Now, he visited your house --

24 A. Yes.

25 Q. -- a month and a half or two months ago --

1 A. Absolutely.

2 Q. -- with his secretary?

3 A. Yes.

4 Q. And did she take notes?

5 A. Yes, she did.

6 Q. Pardon me?

7 A. She did.

8 Q. She took notes. Just by pen and paper?

9 A. Pen and paper.

10 Q. Not a machine like the court reporter?

11 A. No.

12 Q. Were you taped? Did somebody tape record you?

13 A. No.

14 Q. Did he show you the notes that she took down?

15 A. No.

16 Q. Typed up and show you the transcript?

17 A. No.

18 Q. No? Now, how long was Mr. Critton at your

19 house then?

20 A. For about half an hour.

21 Q. And did you know that he was coming? Did he  
22 call ahead of time?

23 A. Yeah.

24 Q. And, so, what did you expect was going to  
25 happen?

1           A.    He was going to come in and ask questions  
2    about this case.

3           Q.    So what did he say?

4           A.    Same questions that you guys are asking me,  
5    exactly the same questions.

6           Q.    Nothing more?

7           A.    Basically what you saw, what you did, what  
8    your job description was, what you did, how you start  
9    your day, how was your day and how was -- what time you  
10   started, what time you finish and what you did, and what  
11   was your responsibilities. And that was it.

12          Q.    Okay. And were you paid anything for that?

13          A.    Absolutely not. The only money that I got, it  
14   was from you for this \$47 check for coming in here.

15          Q.    Okay.

16          A.    And I will take no money from nobody.

17          Q.    Okay. Were there -- were there any other  
18   times that you talked to either Mr. Critton or anybody  
19   from his office?

20          A.    No.

21          Q.    You described every time that you've ever  
22   talked to either Mr. Critton or people from his office?

23          A.    No, sir.

24          Q.    You've described all those times that you've  
25   talked to Mr. Critton or people from his office? I'm

1 not asking the question clearly.

2 Did you talk to Mr. Critton any other time?

3 A. No. I talked to Mr. Critton twice, once in my  
4 house, once yesterday.

5 Q. Now, how about Mr. Jack Goldberger,  
6 Mr. Epstein's criminal defense attorney, did you ever  
7 talk to him?

8 A. No.

9 Q. Did you ever talk to Alan Dershowitz about any  
10 of these matters?

11 A. No, sir.

12 Q. Or Roy Black?

13 A. No, sir.

14 Q. Now, I'm just going back over some different  
15 things that you mentioned.

16 You said that there was a Roladex that you  
17 created of names of women?

18 A. Not it was a name just woman. It was  
19 companies, air condition companies. It was cleaning  
20 companies. It was suppliers. And it was -- it was a  
21 Roladex that I left it there.

22 Q. Did you have a list of girls on your Roladex?

23 MR. CRITTON: Form.

24 THE WITNESS: No. We had a list of girls in  
25 a -- in a -- in a sheet with plastic that we have

1 all the massage therapists. It was two pages or  
2 three pages of people in a plastic sheet that we  
3 had it where -- by the telephones. That was it.

4 BY MR. BERGER:

5 Q. Have the names?

6 A. Names and phones.

7 Q. Telephone numbers?

8 A. Uh-huh.

9 Q. What about addresses?

10 A. No, no addresses.

11 Q. What about dates?

12 A. No, sir.

13 Q. And who prepared the list?

14 A. Either Ms. Maxwell -- Ms. Maxwell.

15 Q. Was it typed?

16 A. Yeah. They were types.

17 Q. No. Typed.

18 A. Yeah.

19 Q. Who typed it?

20 A. I don't know who type it, but it came from New  
21 York.

22 Q. The list?

23 A. Yeah.

24 Q. Did you -- did you give the information that  
25 went into the list?

1 A. No.

2 Q. Where was the list kept?

3 A. In many places. It was in Mrs. Maxwell's  
4 desk. It was one in the kitchen, one in my office, one  
5 in my room because sometimes I was in my room and I have  
6 to call these people. It was one in the new house when  
7 they build the new house. It was all over. And it was  
8 also those -- those files for the house -- the house  
9 running operation.

10 Q. Was it the same list that was in all those  
11 places?

12 A. Basically, yes.

13 Q. Was the list updated?

14 A. Yes.

15 Q. Did you keep a copy of the list?

16 A. No, I don't have a copy of the list.

17 Q. When you left Mr. Epstein's employment, you  
18 didn't take a copy with you?

19 A. Not at all.

20 Q. And when you worked for Mr. Epstein, you  
21 didn't write notes about what you did and what you saw?

22 A. No.

23 Q. No?

24 A. No. I had too much to do.

25 Q. You didn't put anything in a computer about



1 what you saw at the house?

2 A. No, sir.

3 Q. Did you ever talk to your wife about what you  
4 saw at the house?

5 A. Like what? Saw about what?

6 Q. About the dildos. About the massages. Did  
7 you ever talk to your wife about that?

8 A. Yeah. And that's one of the reasons that I  
9 never send my wife after -- this hap -- these dildos and  
10 things like that happened right at the end of my stay  
11 there. It never happened before. Right at the last  
12 couple months before I left. And that --

13 Q. And that's when young girls --

14 MR. CRITTON: Let him finish his answer.

15 THE WITNESS: And my -- my worry about was  
16 that my wife will panic. And I never send her up  
17 there to clean up the rooms or anything else.

18 BY MR. BERGER:

19 Q. Is that when young girls started coming to the  
20 house?

21 MR. CRITTON: Form.

22 THE WITNESS: One girl that I can think of.

23 BY MR. BERGER:

24 Q. Just one?

25 A. One girl. That girl that she show me the

1 picture.

2 Q. V.R.?

3 A. That's the only one that I can think she was  
4 young, but I don't know how old.

5 Q. Do you still have the transcript from -- from  
6 the police in front of you, from the State Attorney's  
7 Office?

8 It's below that. It's at the bottom. Keep  
9 going.

10 You see? Turn to page 9.

11 Page 9. Now, look at me. It says, page 10,  
12 but it also says page 9.

13 So you got page 9?

14 A. Page 9 and page 10.

15 Q. Okay.

16 A. Oh, okay. Page 9. Okay.

17 Q. I want you to see page 9.

18 MR. CRITTON: You want the transcript page 9?

19 MR. BERGER: Yeah.

20 BY MR. BERGER:

21 Q. Let me just make sure you're on the right  
22 page. Yeah.

23 Look at line 13.

24 It says, answer: "No, sir. Mostly no. We  
25 saw one or two young ones in the last year."

1 Do you see that?

2 MR. CRITTON: Form. It's taken out of  
3 context. There's no question.

4 BY MR. BERGER:

5 Q. Do you see those words?

6 A. Did they seem -- did they seem young to you?  
7 No, sir, mostly were no. We saw two young ones in the  
8 last year.

9 Q. Well, it actually says, "we saw one or two  
10 young ones in the last year."

11 A. "We saw one or two young ones in the last  
12 year. Before that they were all adults."

13 Q. The one or two young ones in the last year  
14 that you're referring to, who are they?

15 A. One was V. and the another one was N.B.

16 Q. Don't write on that. Okay? Don't write on  
17 that with your pen.

18 Look at paragraph -- look at line 19.

19 A. Yes.

20 Q. It says, quote, I remember one girl was young,  
21 unquote.

22 Do you see that?

23 A. Yeah.

24 MR. CRITTON: Form.

25 BY MR. BERGER:

1 Q. Who were you referring to?

2 A. V.

3 Q. And then you see under that at line 22, it  
4 says, quote, but I imagine she was 16, 17. In my  
5 judgment she was 16, 17, unquote.

6 Do you see that?

7 MR. CRITTON: Form.

8 THE WITNESS: Yeah.

9 BY MR. BERGER:

10 Q. Were you referring to V.?

11 MR. CRITTON: Form.

12 THE WITNESS: I think so, yeah.

13 Oh, can I read this again?

14 BY MR. BERGER:

15 Q. Sure, go ahead. Take your time.

16 A. "During the last year while you were working  
17 for him, what do you mean, they look young? Did they  
18 look like they were still in high school? Yes. And the  
19 only one that I knew was in high school was N. I  
20 remember one girl was young. We never ask her how old  
21 she was. I never asked N. how old she was. I think she  
22 was in the last year of high school.

23 Right. Understand.

24 Question.

25 But I imagine she was 16, 17. I don't know.

1 In my judgment she was 16, 17."

2 I was talking about, I was referring about N.  
3 at that time.

4 Q. So at line 22, look at line 22.

5 A. Yes, sir.

6 Q. It says, quote, but I imagine she was 16, 17,  
7 unquote.

8 You were referring to who?

9 A. To N.

10 Q. Okay. You can put that down.

11 You mentioned Joe Joe. You said Joe Joe was  
12 the house man in New York?

13 A. Yes. I met Joe Joe.

14 Q. And do you know his full name?

15 A. Joe Joe work with his wife. They were  
16 Funtanella (phonetics), Funtanella. Joe Joe and Lynn  
17 was his wife, Funtanella.

18 Q. When is the last time you talked to them?

19 A. Wow. Never talked to them again in over ten  
20 years.

21 Q. Now, you mentioned in response to Ms. Ezell's  
22 questions, you said something about V.'s father. Do you  
23 remember talking about that?

24 A. Uh-huh.

25 Q. How do you know that person was her father?

1           A.     Because either she told me or Ms. Maxwell told  
2     me that her father used to work at Donald Trump's place.  
3     And she -- I think he is the one who bring her to the  
4     house that afternoon, the first time I saw V. drive in  
5     at this -- Donald Trump's house.

6           Q.     Now, you said you know -- you knew who Alan  
7     Dershowitz or you know who Alan Dershowitz is, right?

8           A.     Many times.

9           Q.     And he was at the house?

10          A.     He's been at the house a lot of times.

11          Q.     Was he ever at the house when there were naked  
12     women at the house?

13          A.     No.

14          Q.     No?

15          A.     They were never naked woman at the house, sir.

16                 I remember one occasion when one English  
17     girl -- I think she was English or German girl -- came  
18     to the house. And usually in Europe they use topless,  
19     they don't wear anything. But she was taking the sun  
20     outside and she came to the house with nothing on and I  
21     chase them out. I says, not in this house. You don't  
22     do it. You go outside, put the towel and come in here.  
23     Because she came to get something from the kitchen  
24     wearing nothing. And I did not allow that.

25          Q.     But when Alan Dershowitz was there, were there

1 any women that were topless?

2 A. No, not that I can remember.

3 Q. What about when Prince Andrew was there?

4 A. Not that I can remember, sir.

5 Q. Did you ever see Alan Dershowitz walking  
6 around naked?

7 A. No, sir.

8 Q. How about Prince Andrew?

9 A. No, sir.

10 Q. You mentioned your divorce, that it cost -- it  
11 cost money. Did Jeffrey Epstein pay for anything  
12 connected with the divorce?

13 A. Absolutely nothing.

14 Q. Let me go back for a minute to the  
15 confidentiality provision in the separation agreement.

16 Did you -- did you discuss with anybody why  
17 there had to be a confidentiality provision? Did you  
18 talk to somebody about that?

19 A. No. No. I discuss it with Mr. Epstein when  
20 he told me, he finally come out and says, John -- I know  
21 they were going to try to replace us. And -- and we got  
22 upset because I was not ready to leave yet. But at the  
23 same time we were expecting to be left out. And I left  
24 there before they decide to let me go.

25 And I went to -- I remember very clearly, I

1       went to his office in the pool house and it was -- I  
2       talk to him and says, John, -- I went with some faxes  
3       that came to my office and they were people interviewing  
4       for my job. So I feel very pissed about it.

5               And I went to his office and said, Jeffrey,  
6       what is this? And what is this? And what is this?

7               He says, well, that's Ghislaine. I'm not  
8       involved into that.

9               And I says, okay. We're going to leave,  
10       Jeffrey. That's it. We're done. And what you going to  
11       do for me?

12              And he says, well, what you want?

13              And I says, give me at least a year's salary.

14              And that's what it turn out to be, around  
15       \$50,000, plus the van.

16              And he says, okay, John, wish you good luck.  
17       And the last day I was there we shake hands and we left.

18              But my relationship with him, it was good. It  
19       was friendly. At the beginning of the -- my job was  
20       very friendly. Then he changed when Ms. Maxwell come  
21       in. I didn't like to work for her. She was a bitch.  
22       And she make us life hell. And that's why we left. But  
23       it was not with Mr. Epstein.

24              Q.    Do you know why there was a confidentiality  
25       provision in your agreement?



1 A. No. That's lawyer stuff. I don't know.

2 MR. BERGER: Okay. That's all I have.

3 CROSS EXAMINATION

4 BY MR. CRITTON:

5 Q. Mr. Alessi, my name is Bob Critton, as you  
6 know, and I represent Mr. Epstein.

7 A. Yes, sir.

8 Q. You've been -- this deposition started at  
9 10:00. It's almost -- it's closing in on 3:00 but for  
10 about 45 minutes or an hour that we took for lunch. I'm  
11 going to try to be relatively brief so we can get you  
12 out of here. Okay?

13 A. Okay, sir.

14 Q. You've been asked questions by five different  
15 lawyers who represent various Plaintiffs in this case.

16 A. Yes, sir.

17 Q. In some instances you've been asked the same  
18 question multiple times?

19 A. Yes, sir.

20 Q. The testimony -- you've also been asked a  
21 number of questions about your separation from  
22 Mr. Epstein sometime at the end of December of '02 and  
23 the entrance or your entering into a separation  
24 agreement with him?

25 A. Uh-huh.

1 Q. Correct?

2 A. Yes.

3 Q. And subsequently there was an incident in 2003  
4 that you've described in some detail, based on the  
5 questions that have been asked, and you and Mr. Epstein  
6 reached an amicable agreement; you repaid him the monies  
7 that you had taken and you parted?

8 A. Yes.

9 Q. Is that a fair statement?

10 A. And I will have to add something to that.  
11 When we talk at the luncheonette, we have coffee, he  
12 says, John, if you were not my best employee that I ever  
13 have and that you would not take care of my mother, I  
14 would have put you away. And that's the way he come out  
15 to me.

16 And I says, I like you and let's -- just pay  
17 me back in one or two weeks, because I send the money  
18 back and it got lost. So he give me another -- not him,  
19 but his lawyer says, you got another month to pay. So  
20 between I got the money -- the money order was lost in  
21 the mail. So I send it back. I pay everything, \$6,310.  
22 I think it was 6310. And that was it.

23 Q. And I'm more interested, not so much in the  
24 details, Mr. Alessi, but the color, so to speak, the  
25 lawyers have put on this, is, is that as a result of

1 your separation from Mr. Epstein in late-2002 and the  
2 incident in 2003, that somehow you have colored your  
3 testimony to help Mr. Epstein today.

4 And my question to you is: Have you told us  
5 the truth today as to every question that's been asked  
6 and the questions that are going to be asked of you?

7 A. To every one of you.

8 MR. WILLITS: Object to the form of the  
9 question.

10 BY MR. CRITTON:

11 Q. And with regard to the agreements that you  
12 entered into with Mr. Epstein, in particular the  
13 confidentiality agreement, you were asked a question by  
14 Ms. Ezell whether you understood that you're not bound  
15 by confidentiality today. And you responded in the  
16 affirmative, right? You understand that you're to tell  
17 us -- to answer every question fully to the best of your  
18 knowledge?

19 A. Absolutely.

20 Q. And that you have done today?

21 A. Yes.

22 Q. Okay.

23 MR. WILLITS: Object to the form of the  
24 question.

25 BY MR. CRITTON:

1 Q. You told us off the record -- and I don't know  
2 whether it was on the record, so I want to be clear  
3 because you've been sitting here a long time. You're  
4 currently under care and treatment for having  
5 chemotherapy; is that correct, sir?

6 A. Yes, I have.

7 Q. And I think you told us earlier that you were  
8 in the hospital two days last week?

9 A. Last week, yeah.

10 Q. And, so, we've -- you've done great. You've  
11 probably done better than the lawyers today. But you'd  
12 like to get this over today and finished?

13 A. I hope so.

14 Q. All right. There have been a lot of questions  
15 about your job description and duties at Mr. Epstein's.  
16 And if I understood it correctly, is basically, once you  
17 became the full-time house manager, you were responsible  
18 for all aspects of the operation of the El Brillo  
19 residence?

20 A. I was.

21 MR. WILLITS: Object to the form of the  
22 question.

23 BY MR. CRITTON:

24 Q. And during the time that you were responsible  
25 for all aspects of the El Brillo residence, that

1 included not only maintenance and repair, but  
2 appropriate staffing, laundry, cleaning, shopping,  
3 cooking, whatever -- whatever needed to be done at the  
4 home?

5 A. That's correct.

6 MR. WILLITS: Object to the form of the  
7 question.

8 BY MR. CRITTON:

9 Q. And during the time that you were there as the  
10 full-time -- as the house manager from 1992 up until  
11 December of 2002, you did all those different types of  
12 responsibilities; is that a fair statement?

13 A. Yes.

14 MR. WILLITS: Object to the form of the  
15 question.

16 BY MR. CRITTON:

17 Q. And at some point -- let me strike that.

18 The original deal, so to speak, that you cut  
19 was with Mr. Epstein; that is, when you became the  
20 full-time house manager; is that true?

21 A. That's true.

22 Q. And some point within -- what? -- a year or  
23 so, I think Eva -- Eva --

24 A. Eva.

25 Q. Anderson --

1 A. Left.

2 Q. -- was no longer Mr. Epstein's -- Dr. Eva  
3 Anderson was no longer Mr. Epstein's girlfriend, --

4 A. That's correct.

5 Q. -- and a new girlfriend came in and that was  
6 Ghislaine Maxwell?

7 A. That's correct.

8 Q. And when Ms. Maxwell came in, she, in essence,  
9 took over as your immediate supervisor?

10 A. That's correct.

11 Q. During the time that you worked for  
12 Mr. Epstein, did you have a good, excellent, fair, what  
13 was -- how would you describe your relationship with  
14 him?

15 A. Good, excellent or fair.

16 I will think good.

17 Q. And did you interact with him very much or  
18 does he interact with anybody very much?

19 A. He doesn't interact very much. At the early  
20 years, yes, he did come to the kitchen and we used to  
21 sit down in the kitchen and he would discuss my kids, my  
22 family, his family, and he will talk to me.

23 At the end of my stay there, it was -- I  
24 was -- we were told not even to look at his face. Not  
25 even to -- this was done by -- this was even done by,

1       they hire a Countess from Europe to write this book and  
2       to write ideas of how the house of royalty should be.  
3       And that's the way Ms. Maxwell wanted the house to run,  
4       as a royal house. And I was pissed off at that and I  
5       never agreed with that and I never went with the book.  
6       I threw the book away. And that was it.

7               MR. CRITTON: Let me move as non-responsive to  
8       my question. Move to strike.

9               MR. WILLITS: He should allowed to finish what  
10      he thinks is responsive to your question, even if  
11      you don't agree.

12      BY MR. CRITTON:

13            Q.    Were you finished, sir?

14            A.    Yes, I finish.

15            MR. CRITTON: See, he's finished.

16            MR. WILLITS: He wasn't, but okay.

17      BY MR. CRITTON:

18            Q.    I'm trying to -- listen carefully to my  
19      question because I'm trying to get you out of here  
20      sooner rather than later.

21                    If I understood your testimony is, is that,  
22      you had -- you considered your relationship with  
23      Mr. Epstein to be good during those years?

24            A.    Good.

25            Q.    And would you describe your relationship with

1 Ms. Maxwell as not being as good?

2 A. Yes.

3 Q. When -- you were -- you had an opportunity  
4 over lunch, Mr. Berger gave you a copy of a statement  
5 that you gave to the State Attorney's Office on  
6 November 21, 2005, we've marked as Exhibit, I think,  
7 Exhibit --

8 MR. CRITTON: What did we mark it as, 2?

9 THE WITNESS: At what page?

10 MR. WILLITS: Yes. It was 2.

11 MR. CRITTON: Thank you.

12 BY MR. CRITTON:

13 Q. No, just statement, the whole statement.  
14 You had an opportunity to look at it over  
15 lunch?

16 A. Yes.

17 Q. And that's a statement you gave back on  
18 November 21st of 2005?

19 A. Uh-huh.

20 Q. Is that correct?

21 A. That's correct.

22 Q. And at that time you were there with  
23 Mr. Murrell, who was your attorney. And you gave a  
24 statement and I think as well your wife spoke with the  
25 State Attorney's Office?



1 A. That's correct.

2 Q. And whatever questions the State Attorney  
3 asked of you at that time, I assume you fully answered;  
4 is that correct?

5 A. Absolutely.

6 Q. And then page 9 where Mr. Berger took you with  
7 regard to the questions -- and before I get -- I'm going  
8 to come back to page 9 in a minute.

9 But if I understood your earlier testimony in  
10 response to one of the lawyers who asked you questions,  
11 is, there were a number of European women, all who you  
12 deemed to be 20-plus years old, that would travel with  
13 Mr. Epstein to various places and as well would come to  
14 the house from time to time?

15 A. That's correct.

16 Q. And I think you testified in response to  
17 Mr. Berger's questions today, is that the only female  
18 that you understood that came to the house during the  
19 time that you were the house manager who you knew to be  
20 under the age of 18 was N.B.?

21 A. That's correct.

22 Q. And you knew she was under 18 because you  
23 would pick her up from high school?

24 A. That's correct.

25 Q. And that's a young girl who I think you

1 said --

2 A. 16, 17.

3 Q. And I think you said she never was involved in  
4 giving any massages to Mr. Epstein?

5 A. I don't think so, never.

6 Q. And the times that you saw her, Mr. Epstein  
7 was mentoring her on a career which ultimately turned  
8 into her becoming an actress?

9 A. I think so. Yeah, that was the main purpose.

10 Q. And on multiple occasions when she would be  
11 over, she would be over there at Mr. Epstein's home with  
12 her mother; is that correct?

13 A. Yes, that's correct.

14 Q. And of the girls that came or the women that  
15 came to give massages to Mr. Epstein over the years you  
16 were there, I think you've described on page 9 of your  
17 deposition that you may have seen a hundred or 200  
18 different massage therapists?

19 A. It could be less. I don't think it's more  
20 than 200, but it could be less than 200, yes. It was --  
21 it was 11 years or 12 years or 13 years of constant  
22 people going in and out and people that were coming to  
23 the house, he will bring for another state, he will  
24 bring in his planes. People that it came from Europe,  
25 massage therapists, there were men and woman. They live

1 in Miami, we -- so it was so many that I cannot remember  
2 how many.

3 Q. Okay. And I understand that. I'm just  
4 referring back to your statement where it says at page  
5 9, line 9, the question was: "Yeah. Yeah. Not the  
6 same girl. I mean, during 11 years I probably saw a  
7 hundred, 200 different massage therapists."

8 Do you see that?

9 A. Yes.

10 Q. All right. And if I understood your testimony  
11 is, the ones the -- that is, of the massage therapists,  
12 as you've just described, you saw some men?

13 A. Yes.

14 Q. You saw more women?

15 A. More woman.

16 Q. And all of the women, at least from your  
17 viewpoint, were 18, 19 or older?

18 A. Yes.

19 MR. CRITTON: Why don't you change your tape  
20 right now.

21 VIDEOGRAPHER: Off the record at 2:54.

22 (Brief recess.)

23 VIDEOGRAPHER: We're back on the record at  
24 2:55.

25 BY MR. CRITTON:

1 Q. Mr. Alessi, in the 11 years that you worked  
2 for Mr. Epstein, with regard to the massage  
3 therapists -- and I'm talking about all of them, women,  
4 men, the ones that were 18, 19, 20, or the ones that  
5 were older -- did you ever see -- or, first of all, did  
6 you ever hear any complaints about -- from the massage  
7 therapists about the massage they had given to  
8 Mr. Epstein?

9 A. No.

10 Q. Did you ever see a massage therapist during  
11 those 11 years that appeared to you to be distraught?

12 A. Never.

13 Q. To be in some form of a shock?

14 A. Never.

15 Q. To be scared?

16 A. I never see anybody scared.

17 Q. Did you ever see someone who looked like they  
18 were upset or crying?

19 A. No, sir.

20 Q. I think you, in response to Mr. -- well, not  
21 sure who asked the question -- but they -- you were  
22 asked whether you ever spoke to the individuals --

23 A. Yes.

24 Q. -- when they came down. And I think you said  
25 from time to time you might have some small talk with

1           them afterward?

2           A.     Yeah.

3           Q.     Did you usually see them if they came down?

4           A.     Yeah.

5           Q.     So you would have had an opportunity to  
6           observe their appearance, correct?

7           A.     That's correct.

8           Q.     Have you seen people who look distraught, in  
9           shock, scared, upset, angry in the past -- not massage  
10          therapists -- have you seen people in your life  
11          experiences?

12          A.     Oh, yeah, yes.

13                   MR. MERMELSTEIN: Object to the form.

14          BY MR. CRITTON:

15          Q.     So if -- well, let me ask it this way: In  
16          your life experiences before you worked for Mr. Epstein,  
17          and, in fact, during the time you worked for  
18          Mr. Epstein, have you seen individuals not associated

19          with Mr. Epstein who appeared to be distraught, in  
20          shock, scared, upset, angry or injured?

21          A.     Yes.

22                   MR. MERMELSTEIN: Object to form.

23          BY MR. CRITTON:

24          Q.     Have you seen people who appeared to you to  
25          have been traumatized by a particular event?

1 MR. MERMELSTEIN: Object to form.

2 THE WITNESS: Yes.

3 BY MR. CRITTON:

4 Q. Have you seen people who seem to be -- well, I  
5 assume you've seen people who have yelled or screamed as  
6 a result of some event that had occurred in your  
7 presence?

8 A. Yes.

9 Q. On the massage therapists that you saw at  
10 Mr. Epstein's house from 1992 up until the time you left  
11 in December of '02, did you ever see any type of  
12 reaction, distraught, shock, scared, upset, crying,  
13 disheveled, injured, disoriented, yelling or screaming  
14 for help at any time?

15 A. No, sir.

16 Q. Once the massage -- once -- let me strike  
17 that.

18 If I understood your testimony, you helped set  
19 up -- either you set up the room or you helped set up  
20 the massage room?

21 A. Uh-huh.

22 Q. And you might be the person or it might be  
23 someone else who would lead the massage therapists or  
24 the female up to the room, the male or the female up to  
25 the room?

1 A. Yes, sir.

2 Q. Once that person was upstairs, you then would  
3 come back down and resume your multiple duties  
4 downstairs?

5 A. Absolutely.

6 Q. As to what occurred during the course of a  
7 massage, do you have any personal knowledge during the  
8 11 years you were there?

9 A. There was absolutely no way to know or to get  
10 into the room. The windows were what they have, those  
11 automatic electric shutters. They were completely dark,  
12 completely a hundred percent dark, the rooms. And it  
13 was -- nobody saw it. I knew it when I was at the house  
14 that I never saw anything was going on inside.

15 Q. So you have no personal knowledge what  
16 occurred during any particular massage?

17 A. Nothing.

18 Q. And I think you said -- well, let me strike  
19 that.

20 In other individuals whom you have done work  
21 for at big houses in Palm Beach, did those people from  
22 time to time have massages, too?

23 A. I never work in a house inside as I did work  
24 for Mr. Epstein.

25 Q. Yours was outside maintenance work?

1 A. I was the maintenance guy outside.

2 Q. All right. And if -- well, let me strike  
3 that.

4 You're aware that there's all sorts of spas.  
5 The Breakers? PGA? Trump?

6 A. Absolutely.

7 Q. The Ritz Carlton? The Four Seasons? And  
8 probably a thousand other places in Palm Beach County?

9 MR. WILLITS: Object to the form of the  
10 question.

11 BY MR. CRITTON:

12 Q. Well, let me strike that.

13 Are you aware that there's more than ten  
14 places that someone can get a massage in Palm Beach  
15 County?

16 A. Of course.

17 Q. Are you aware that there's probably more than  
18 a hundred places, maybe a thousand places in Palm Beach  
19 County from Boca Raton up through Jupiter and all the  
20 way out west where people can get a therapeutic or a  
21 massage?

22 A. Yes.

23 Q. And I assume you were aware that -- or were  
24 you aware of that during the time period that you worked  
25 for Mr. Epstein?



1 A. Yes.

2 Q. And I think you told us that you were aware  
3 that there were massage schools?

4 A. Yes.

5 Q. And is it your understanding that generally  
6 massages are given in a -- in a room with a table where  
7 the lights are generally turned down?

8 A. And music on, yeah.

9 Q. All right. You were asked a question about  
10 vibrators or I think that the word was sex toys.

11 If you'll turn to page 20 of your statement,  
12 sir.

13 If you look at page -- if you just glance at  
14 line 9 --

15 A. Okay.

16 Q. -- through line 22. Take a chance. If you'll  
17 just look at that, then I'll ask you a couple questions.

18 Read to yourself, please. Otherwise, the  
19 court reporter will have to take down everything you  
20 say.

21 A. Yeah.

22 Q. And at least the statement that you gave back  
23 in -- on November 21st of 2005, almost -- almost four  
24 years ago now, you describe that there were -- that you  
25 saw two types of massagers or vibrators; is that

1 correct?

2 A. That's correct.

3 Q. And is that your best recollection, as you sit  
4 here today?

5 A. That's the best recollection.

6 Q. And one of the vibrators, you said was, as you  
7 described earlier, looked like a dildo?

8 A. Right.

9 Q. And --

10 MR. WILLITS: Object to the form of the  
11 question.

12 BY MR. CRITTON:

13 Q. Well, let me ask you this: Was the item that  
14 you described, that's described at lines 12, 13 and 14,  
15 and 15 -- 12, 13 and 14 on page 20, is that what you  
16 described, is that what you were talking about as the  
17 dildo?

18 A. Yes.

19 Q. And I assume you're familiar with what a dildo  
20 is?

21 A. I know that it's one of those --

22 Q. You don't have to describe it. Just are you  
23 familiar with what one is?

24 A. No, I don't. I'm not really familiar with  
25 that type of instruments. But what did I saw it and is

1       it true now, is it true when I make this statement, it  
2       was a big rubber man's --

3             Q.     Penis?

4             A.     -- looking penis, with double head, two heads.

5             Q.     And --

6             A.     And I don't know how is it even called. And I  
7       am sorry. It's a little unpleasant.

8             Q.     That's all right.

9                    The second item that you described was a neck  
10      and back vibrator; is that correct?

11            A.     Yeah. They have this vibrators, they have the  
12      cordless and they have these balls and they have  
13      different types of those vibrators, too.

14            Q.     Like you can get them at Brookstone or  
15      something like that?

16            A.     Yeah. Yeah. Yes, sir.

17            Q.     So at least when you were at Mr. Epstein's,  
18      and I think as you described in response to lawyer's  
19      questions today, is during the last couple of months  
20      that you worked at Mr. Epstein's you saw these two  
21      vibrators?

22            A.     Yes.

23            Q.     And on those two occasions you'd take those  
24      vibrators, if you went up to clean afterwards, you'd put  
25      on your gloves, pick them up with a towel and you'd

1 clean them off and you'd put them back in  
2 Mrs. Maxwell's --

3 A. Closet.

4 Q. -- closet in her bathroom?

5 MR. WILLITS: Object to the form of the  
6 question.

7 THE WITNESS: I put it back in the closet and  
8 inside the closet there was a laundry basket that  
9 is where she had those.

10 BY MR. CRITTON:

11 Q. And as to whether or not someone actually used  
12 those items or how they were used, all you know is you  
13 found them --

14 A. I find it in the sink.

15 MR. BERGER: Objection. Mr. Critton is  
16 testifying. Leading.

17 MR. WILLITS: Objection, also, to the form.

18 BY MR. CRITTON:

19 Q. Let me ask you this: Do you know, if I  
20 understand it correctly, you found the two vibrators,  
21 one for the neck and back and the other one that you  
22 described as a dildo, you found them in the sink on  
23 those few occasions near the end of your employment?

24 A. Yes.

25 MR. BERGER: Objection. Testifying. Leading.

1 THE WITNESS: I find it in the sink.

2 BY MR. CRITTON:

3 Q. And then you would clean up and put it back in  
4 Ms. --

5 A. I will put my rubber gloves, get a towel, put  
6 them under the sink, run the water and put them in the  
7 closet.

8 Q. And you put them back in Ms. Maxwell's closet?

9 A. Closet.

10 Q. Why? Why into her closet?

11 A. Because they were always kept there.

12 Q. All right. You testified earlier, is that if  
13 you were going to call someone for a massage, it would  
14 either be you or Ms. Maxwell, if I understood you  
15 correctly?

16 A. Yeah.

17 Q. Okay.

18 A. At the end -- at the end of my stay was also  
19 another girl, Sarah, Sarah that came. And then she was  
20 handling everything, as far as calls to these girls.

21 Q. Did Mr. Epstein ever make these calls?

22 A. I never heard.

23 Q. If Mr. Epstein was not in residence, that is,  
24 if he was in New York or some place else other than Palm  
25 Beach, did you and your wife still stay at the home or

1 would you go to one of your apartment?

2 A. No. We went to our apartment.

3 Q. And then when he wasn't there, would you have  
4 pretty more regular hours around the house?

5 A. Pretty much. Pretty much, yeah. That was the  
6 days that we had to have the cleaning crew, I still had  
7 to go to the house and oversee the cleaning operation,  
8 oversee the gardener because there was not, when they  
9 were there the gardener weren't supposed to make noise,  
10 so we have to take care of the pool, the chlorine and  
11 all that stuff.

12 Q. So you would still do your regular but you  
13 could finish pretty much 9:00 to 5:00?

14 A. Yes. That was much easier.

15 Q. And when he was -- how often would he  
16 generally be in Palm Beach?

17 A. Too much.

18 Q. All right. But if -- would he be here at  
19 least a couple --

20 A. I would says, at least three times a year -- a  
21 month, three weeks a month, three weekends a month.  
22 Usually they come in on a Thursday. Either they left a  
23 Monday or Tuesday.

24 Q. And then they go wherever else they were going  
25 and then things would get back to more of a 9:00 to 5:00

1 type routine?

2 A. That's right.

3 Q. And if he was in residence, that's when your  
4 job became much more all encompassing?

5 A. Exhausting.

6 Q. Okay. You were asked about a female named  
7 V.R. I think you originally thought it was V.P., but  
8 V.R.?

9 A. Yeah.

10 Q. You recall now; is that correct?

11 A. Yes. Yes.

12 Q. And I think you described her, I think your  
13 recollection was, is that you remember her being at the  
14 house the last few months that you worked for  
15 Mr. Epstein?

16 A. Yeah. The last few months.

17 Q. And that's the only time that you remember her  
18 actually being there?

19 A. Yeah.

20 Q. Because you actually recall when she used to  
21 work at Mar-a-lago, and then you recall her starting to  
22 come to --

23 A. To the house.

24 Q. -- Mr. Epstein's home?

25 A. Right.

1 Q. And I think you testified that at one time you  
2 had to pick her up and she lived at her house or she was  
3 living with her boyfriend at some house out in Royal  
4 Palm Beach; is that correct?

5 A. That's right.

6 Q. Did you know anything about Ms. R.?

7 A. Not necessarily. Not that I can remember. I  
8 knew the one time either Ms. Maxwell or Mr. Epstein told  
9 me that she was arrested because she was working in --  
10 in the restaurant and she took her -- the tips, her tips  
11 for that day. And the next day she was arrested and the  
12 money have to be returned and -- it was something about  
13 that, but that's it. That's all I know.

14 Q. Okay. Was it -- let me ask you this: Do you  
15 remember her stealing some money from the Roadhouse  
16 Restaurant where she was working?

17 A. That's what I heard, that it was a report,  
18 there was a police report.

19 Q. All right. And, so, at least you understood  
20 from Mr. Epstein or Ms. Maxwell that she had stolen  
21 money from her employment?

22 A. Yeah.

23 Q. Again, you never saw the police report?

24 A. No.

25 Q. Nor the date of it?



1 A. No.

2 Q. That's correct?

3 A. That's correct.

4 Q. And as to whether she repaid the money or what  
5 happened with that criminal charge, do you know?

6 A. No, I don't.

7 Q. Do you know whether there's an arrest out for  
8 her -- a warrant out for her arrest at the current time?

9 A. No, sir.

10 Q. Were you aware of any of her other background;  
11 that is, before she ever met Mr. Epstein, were you aware  
12 that she, back in, say, 1997, that she was involved in a  
13 sexual battery between with her and three girls and  
14 three boys that were engaged in sexual or lewd acts and  
15 they were found by some individuals in, as was  
16 described, compromising positions with the males on top  
17 of the females, including her, and she was intoxicated?  
18 Did she ever talk about that with you?

19 A. No.

20 MR. BERGER: Objection. Compound question.

21 And Counsel is testifying.

22 MR. WILLITS: Object to the form.

23 MS. EZELL: Join.

24 BY MR. CRITTON:

25 Q. Were you aware that she had, prior to the time

1 she ever met Mr. Epstein, that she had -- her mother  
2 described her as having significant drug problems?

3 MR. BERGER: Objection. Counsel is  
4 testifying.

5 THE WITNESS: No.

6 BY MR. CRITTON:

7 Q. Mrs. Ezell used -- she referred to a Tony --

8 MS. EZELL: Santiago.

9 THE WITNESS: Santiago.

10 BY MR. CRITTON:

11 Q. Have you ever heard of a Tony Figueroa?

12 MS. EZELL: Thank you. You're right.

13 THE WITNESS: I know that his name was Tony,  
14 but I don't know if it was Santiago or Figueroa. I  
15 don't remember the last name. I never spoke to  
16 him, except ask him to move his car one time.

17 BY MR. CRITTON:

18 Q. And did Mr. -- got it wrong -- did

19 Mr. Figueroa bring V.R. to the Epstein house on more  
20 than one occasion?

21 A. Yes.

22 Q. And did you consider her, at least from your  
23 viewpoint, was she one of the individuals who came to  
24 give massages?

25 A. She was supposed to be a massage therapist.

1 Q. And, so, Mr. -- at least Mr. Figueroa --  
2 Tony -- assuming, if I asked you to assume his name was  
3 Figueroa, was he aware that his live-in girlfriend was  
4 coming to Mr. Epstein's house to give him a massage?

5 A. I don't know if he was aware of it. He was  
6 waiting outside.

7 Q. All right. And you understood that she, that  
8 is, V.R. and Mr. Figueroa or Tony, a Tony lived together  
9 out in Royal Palm Beach?

10 A. Yes.

11 Q. And as to what their relationship was and as  
12 to what -- that is, their internal relationship was and  
13 whether there was abuse, either physical or verbal,  
14 associated with that, do you have any personal  
15 knowledge?

16 A. Not except that that time that I went to pick  
17 her up and she was crying and she told me the furniture,  
18 the couch was slit with like a razor blade or a knife,  
19 and also the screen porch at the entrance, it was cut.

20 And I ask, I said, what happened here?

21 She says, well, my boyfriend got mad and he  
22 did it.

23 Q. And she indicate -- she, V.R., told you it was  
24 her boyfriend that caused all that damage?

25 A. Yeah.

1 Q. With regard to V.R., did it ever appear to you  
2 that she was forced to come to Mr. Epstein's home?

3 A. I don't think so. I don't know if it was  
4 forced between them, but I never saw force. I never  
5 saw -- I was there the first time Ms. Maxwell met her  
6 immediately that she went into the spa, when she was  
7 walking into the spa. And I was surprised to see that  
8 afternoon she was at the house.

9 Q. Did you ever see anyone forcing Ms. R. onto  
10 the Epstein's premises; that is, either by grabbing her  
11 by the arm or by the hand and dragging her in?

12 A. No. Either her or nobody else.

13 Q. Did you ever see Ms. -- V.R. when she came to  
14 the home where she appeared to be -- that is, when she  
15 arrived at the home to be upset or angry or distraught?

16 A. No.

17 Q. And specifically with regard to V.R., when she  
18 left on those occasions where you saw her in person

19 leave the house, did she appear to be in the same, I'd  
20 say, overall demeanor and mood when she left as she had  
21 been when she came?

22 A. Yeah, normal. She was normal.

23 Q. Did she smile?

24 A. Yeah.

25 Q. Say hello to you?

1 A. They all smile after they got paid.

2 MR. CRITTON: All right. That's all I have.

3 Thank you, Mr. Alessi.

4 THE WITNESS: You're welcome.

5 MR. WILLITS: I don't have any questions.

6 MR. BERGER: Okay.

7 MS. EZELL: I do.

8 RECROSS EXAMINATION

9 BY MS. EZELL:

10 Q. Sorry. Let me find my place, here.

11 First of all, forgive me. I didn't mean to  
12 mislead anyone. It is Figueroa, not Santiago. I think  
13 he lived on Santiago Street.

14 A. Yeah. Santiago Street in Royal Palm Beach.

15 Q. Right. And I confused the two.

16 A. My head is not going very well now, so...

17 Q. Do you need to take a break?

18 A. Please. No, I am fine. I am fine.

19 Q. Well, it was my head that wasn't going very  
20 well then.

21 You mentioned that your wife, I believe you  
22 said that -- let me start over.

23 I believe you said one reason you wanted to  
24 stay was that it was causing psychological problems --

25 A. Yes, it is.

1 Q. -- and problems with your marriage?

2 A. Absolutely.

3 Q. What kind of psychological problems?

4 A. I say, psychological problems. I says,  
5 marital problems. That would be a better answer it.  
6 Because the stressful was on me. If there was a dust,  
7 spot of dust, they never came to her. And she was able  
8 to -- she was over involved with the cleaning crew, but  
9 it was never from Mr. Epstein or Ms. Maxwell yell, they  
10 will never go to Mari to ask, hey, Mari, why this  
11 doesn't look good.

12 And, so, I had all the blame. And the only  
13 person I have to take it out was my wife, unfortunately.  
14 And that was the worst mistake, to have my wife working  
15 in there.

16 Q. Did she ever complain to you or seem disturbed  
17 by what she thought was going on there?

18 A. No. She never saw anything.

19 Q. Was there ever a guest there by the name of  
20 Tommy Matola?

21 A. Tommy Matola? No. Not when I was there.

22 Q. You mentioned this morning that there were  
23 some visitors who were very important men, Noble Prize  
24 winners?

25 A. Yes, ma'am.

1 Q. Are you -- do you recall a Martin Nowak?

2 A. I think that sounds familiar. If he is an old  
3 guy, old man?

4 Q. I think so. Mathematician?

5 A. Yes.

6 Q. Biologist?

7 A. Yes. His name Martin. I recall that, yes.

8 Q. And do you recall a guest, Murray Gell-Mann?

9 A. Mary Gell-Mann?

10 MR. WILLITS: I think you said --

11 MS. EZELL: Murray.

12 MR. WILLITS: -- Murray and he said Mary.

13 BY MS. EZELL:

14 Q. Murray, Murray Gell-Mann. And, again, I'm  
15 speaking of these -- these --

16 A. Is that a man or a woman?

17 Q. I believe it's a man.

18 A. Murray Gell-Mann. Could be, but I don't  
19 recall.

20 Q. Do you recall the name Jerry Edelman?

21 A. No.

22 Q. What about -- can't read my own writing  
23 here -- Henry Risorski (phonetics)?

24 A. Henry Risorski, yes. Yes.

25 Q. Was he a frequent visitor or --

1           A.    Not too frequent.  But, also, he was a  
2   science -- I think so, he was into the science.

3           Q.    And Larry Summers?

4           A.    Larry Summers.  Yes.  Larry Summers was a  
5   lawyer?

6           Q.    I think perhaps he was the president of a  
7   college?

8           A.    I don't know.

9           Q.    No?

10          A.    No.

11          Q.    Well, then among those that you recall,  
12   Mr. Nowak, the biologist and Mr. Risorski, did they ever  
13   have massages that you can recall?

14          A.    I cannot recall, no.

15          Q.    Was it your impression that Mr. Epstein liked  
16   to surround himself with extraordinarily bright people?

17          A.    Yes.

18                MR. CRITTON:  Form.

19   BY MS. EZELL:

20          Q.    And is it your impression, also, that he's  
21   rather bright and brilliant himself?

22          A.    Yes.

23                MR. WILLITS:  Form.

24   BY MS. EZELL:

25          Q.    Did -- did you ever gain the impression that



1 he was some sort of brain scientist?

2 MR. CRITTON: Form.

3 THE WITNESS: No. No. No. I know his  
4 background. And I -- over the years I learn how he  
5 come up and into the business and how he make his  
6 fortune. And I don't think he was a brain  
7 scientist.

8 BY MS. EZELL:

9 Q. Nobody ever told you that?

10 A. No.

11 Q. If you take a look again at page 9 of the  
12 transcript, Exhibit 2?

13 A. Okay.

14 Q. Let me call your attention to line 2, which  
15 begins with the question: "Did he have girls come over  
16 to give massages?"

17 A. Yes.

18 Q. And you said: "Yes."

19 A. Yes.

20 Q. The next question is: "How many massages  
21 would he have in one day?"

22 And I think you said earlier, maybe --  
23 sometimes they'd have three a week?

24 A. No. No. That was not the question.

25 Sometimes he had one, two or three a day.

1 Q. That's what I wanted to ask you. Up to three  
2 a day sometimes?

3 A. Up to three a day.

4 Q. And did that happen often?

5 A. Very often. Or he had yoga in the morning or  
6 in the afternoon it was a massage. I don't know that  
7 again. When it was yoga, it was in the pool house.  
8 When it was massage, it was upstairs. So I don't what  
9 they did when closed doors, you know. But it was a  
10 couple of these girls that were yoga experts and they  
11 were massage therapists at the same time, so I don't  
12 know. But there were -- many times there were two,  
13 three massages a day.

14 Also, she had a massage just about every day.

15 Q. Meaning, Ghislaine?

16 A. Yes.

17 Q. Then on line 12, the question was: "Did the  
18 massage therapists seem young to you?"

19 And you said: "Mostly, no. You saw one or  
20 two young ones in the last year."

21 A. Yeah.

22 Q. Then, again, still --

23 MR. CRITTON: Object to form.

24 BY MS. EZELL:

25 Q. -- still talking about the massage therapist,

1       they asked you: "What do you mean, when they looked  
2       young?" On line 17.

3               Do you see that?

4               MR. CRITTON: Form.

5               THE WITNESS: Yeah.

6       BY MS. EZELL:

7               Q.    Then you go on to say: "I remember one girl  
8       was young. We never asked how old she was. It was not  
9       my job."

10              And the questioner said: "Right. I  
11      understand."

12              And you said: "I imagine she was 16 or  
13      17," --

14              A.    That's correct.

15              Q.    -- "in my judgment."

16              A.    Yes.

17              MR. CRITTON: Form, I think.

18      BY MS. EZELL:

19              Q.    There was -- the only people being discussed  
20      in all of this conversation were the massage therapists,  
21      right?

22              MR. CRITTON: Form.

23              THE WITNESS: Well, we discuss about N., this  
24      girl that I mention in here. I thinking about her  
25      because -- what's her name?

1 BY MS. EZELL:

2 Q. V.?

3 A. V. I think she was a massage therapist for  
4 sure, because we set up the tables for her. But at  
5 this --

6 MS. EZELL: Let me just -- excuse me. Just a  
7 minute. Let's make it V.R. That's all.

8 MR. CRITTON: Okay. I'm sorry.

9 THE WITNESS: V.R. And I lost my  
10 concentration.

11 MR. CRITTON: Why don't you read his response  
12 to him?

13 She can read it back to you.

14 (Previous answer was read.)

15 THE WITNESS: Yeah. I was -- in this  
16 statement I was thinking of her, V.R. -- no, V.

17 BY MS. EZELL:

18 Q. R.?

19 A. Sorry again.

20 It was N.B. that I knew she was underage and I  
21 knew it because I went to the high school and pick her  
22 up.

23 Q. But she was not a massage therapist, --

24 A. No, she was not.

25 Q. -- as far as you know?

1 A. As far as I know, she was not.

2 Q. And you were talking throughout this page  
3 about those girls that came to give massages?

4 MR. CRITTON: Form.

5 BY MS. EZELL:

6 Q. Correct?

7 MR. CRITTON: Form. Argumentative. Asked and  
8 answered.

9 THE WITNESS: No. If I says she was a massage  
10 therapist, I would says, no. But, then again, I  
11 don't know if she was a massage therapist, too.

12 BY MS. EZELL:

13 Q. Okay. You do mention N. on page 21 of your  
14 statement.

15 If you look at line 7, you mention a young  
16 girl, but she was not a massage therapist?

17 A. Let me take a look. Page 21.

18 Q. At about line 7.

19 A. Line 7.

20 MR. CRITTON: But it in the context of your  
21 answer --

22 MS. EZELL: Sure.

23 MR. WILLITS: And the question, too.

24 THE WITNESS: Question: "How" -- let me start  
25 it from the beginning -- from the end.

1           Many of the -- it's been a while. It was J.  
2           It was D. It was R. It was so many, V., L. It was  
3           so many names, that I think if you name -- if  
4           you -- any girl's name, she's been there probably,  
5           S., J., J.

6           It was also a young girl but she was not a  
7           massage therapist. She came to the house as a  
8           friend.

9           I talking about B. because I knew she was not  
10          a massage therapist because she went to high school  
11          and she was a singer, an opera singer and she was  
12          brought to the house by her mother. So I knew they  
13          had nothing to do with massages. They were friends  
14          and they were going to the movie with her, dinner  
15          with her. And she had -- I think she travelled  
16          with her, too. They travel.

17          Q. My only point is, that on page 9 you were  
18          talking about the massage therapists. And you said that  
19          you remember that there were a couple of young ones the  
20          last year.

21                 And, so, among the young massage therapists  
22          that you might remember in the last year, would V. be  
23          that person or --

24                 MR. CRITTON: Form.

25                 BY MS. EZELL:

1 Q. -- would be the young one?

2 A. Yeah.

3 Q. You stated that Ms. Maxwell was very hard on  
4 you and you got blamed for everything, and that you --  
5 you liked the job and you liked Mr. Epstein, but you  
6 didn't like working for Mrs. Maxwell?

7 A. That's correct.

8 Q. Can you tell me why, other than that she  
9 blamed you for everything?

10 A. She came from a very wealthy family and she  
11 was -- just my opinion; I give my personal opinion --  
12 that she was rotten spoiled and she tried to drive the  
13 house like a palace and not a home.

14 I was -- I discussed it with her, many, many  
15 times we have discussions. And sometimes I even refuse  
16 to do her orders, knowing that I was going to be backed  
17 up by Mr. Epstein or do the right thing, my thinking of  
18 running the house should be. But we never had a good  
19 relationship at all from the beginning, I don't think  
20 so. But I was -- have to be her driver and she will go  
21 and shop all over the malls and I will have to go behind  
22 her, pay for it and bring the bags to the car.

23 Next day or the same day she will do shopping  
24 and buy and say, John, go to this store and get it. It  
25 was a lot of work. It was a lot that she created and

1 most of this jobs that she created.

2 Q. And one of those things you also had to do  
3 with her was to take her to different spas?

4 A. Yes.

5 Q. And there she would recruit young women to  
6 come and do massages?

7 A. Because she was English. And she didn't know  
8 the area too much as well as I knew. So she -- she  
9 says, John, make a list of all the massage -- the spas  
10 in the area from Jupiter to Boca Raton. And we went to  
11 all the main spas. And then we went to the schools for  
12 massage therapists, and all the massage parlors, and  
13 massage, the small massage.

14 So I make a list from the telephone book and  
15 we would go from one to the another one. I would wait  
16 in the car and she goes in.

17 And sometime she took a couple minutes and  
18 walk out with cards, business cards. And that -- she  
19 did the recruiting.

20 And from then, she pick up the girls and that  
21 was the end of it. I never did any recruiting and I  
22 never really saw him doing it.

23 Q. You really never saw?

24 A. Never saw Mr. Epstein recruiting anybody.

25 MS. EZELL: All right. I have no other



1 questions. Thank you, sir.

2 MR. MERMELSTEIN: I just have a couple follow  
3 up.

4 RECROSS EXAMINATION

5 BY MR. MERMELSTEIN:

6 Q. Mr. Alessi, I'll be very brief.

7 You testified that a process server came and  
8 gave you the subpoena to appear here today, correct?

9 A. Yes.

10 Q. For your deposition?

11 A. Yes.

12 Q. Did you call anyone after you received the  
13 subpoena to talk to them about this?

14 A. No.

15 Q. You didn't call anyone?

16 A. No.

17 Q. Did you -- how did you come in contact with  
18 Mr. Critton's office to set up the meeting that you  
19 discussed?

20 A. His -- his secretary left me a messages on  
21 my -- in my machine.

22 Q. And then you called back?

23 A. Then I called back.

24 Q. And you set up the meeting that you mentioned?

25 A. And we set up a meeting for the Labor Day,

1 Labor Day, Monday.

2 Q. What about -- but you said a month and a half  
3 ago -- oh, this was before you were subpoenaed, is when  
4 you had the meeting at your house with Mr. --

5 A. Yes, before I was subpoenaed.

6 Q. How did that meeting come about? How did that  
7 get set up? Who called who?

8 A. Okay. Before -- I am stuck on this question.  
9 I don't know. I think it was Mr. Critton office. I  
10 think it was Mr. Critton office. They call me. And  
11 they left me a message that I must discuss -- call Mr.  
12 -- yeah. I had a message in my phone that to call  
13 Mr. Critton because he would like to speak to me about  
14 Jeffrey Epstein. That was the message.

15 And I call it. Then I spoke to him. We set  
16 up an appointment. I was sick at that time. And he  
17 came to my house and we discussed it.

18 Q. Other than Mr. Critton, --

19 A. Yes.

20 Q. -- in the last few months have you spoken to  
21 anyone about the civil cases or your testimony?

22 A. No, not even my kids.

23 Q. Did you discuss this with your wife?

24 A. My wife, yes. My kids, no.

25 Q. What did you and your wife talk about?

1           A.    Same thing, what's going on.  How bad the  
2           situation was.

3           Q.    What do you mean, "how bad the situation was?"

4           A.    How -- I guess how he got into this mess.

5           Q.    How Mr. Epstein got into this mess?

6           A.    (Nods head.)

7           Q.    Can you be more specific as to what you and  
8           your wife said?

9           A.    No.  It was just the publicity, you know, that  
10          his name was on the -- on the magazines and the paper  
11          and tv.  And I thought that that would never happen.

12          Q.    And you and your wife felt bad for Mr. Epstein  
13          because of that?

14          A.    You know, after you know somebody and he  
15          becomes a friend of yours for ten years, I think you  
16          feel bad, no matter how bad he has made.  And I don't  
17          know what he has done or what -- what the final results  
18          of this will be.  I still will feel bad about it, just  
19          because the person that he was and how generous he was  
20          with me and other people.

21          Q.    Just to be clear, other than Mr. Critton and  
22          your wife, you haven't spoken to anyone else about the  
23          civil cases or your deposition testimony?

24          A.    No, sir.

25               MR. MERMELSTEIN:  All right.  That's all I

1 have.

2 MR. CRITTON: I have one last question.

3 RECROSS EXAMINATION

4 BY MR. CRITTON:

5 Q. I want to just clear up one thing, Mr. Alessi.  
6 Go to page 9.

7 A. Page 9, looks like the one that is important.

8 Q. That's right. We've belabored this one to  
9 death.

10 MR. WILLITS: I think the ink has worn off the  
11 page by now.

12 BY MR. CRITTON:

13 Q. It's Exhibit 2. This is the statement that  
14 you gave to the State Attorney's Office on November 21st  
15 of '05.

16 Mr. Berger asked you questions about the young  
17 girl. Ms. Ezell just asked you some questions about  
18 that.

19 So what I want to do is clarify, so that I  
20 know what -- so there's no confusion, at least in the  
21 record.

22 On page 9, line 16, it says: "During the last  
23 year when you were working with him, what do you mean  
24 they looked young? Did they look like they were still  
25 in high school?"

1                   And your answer was: "I remember one girl was  
2           young. We never asked how old she was. It was not my  
3           job."

4                   Did I read that question and answer correctly?

5           A.     That's correct.

6           Q.     If I understood your testimony in response to  
7           Mr. Berger, the girl that you were referring to, because  
8           there's a reference to high school, was N.B.?

9           A.     Yeah, that's correct.

10          Q.     Not V.R.?

11          A.     No. V.R. didn't look to me like a 16 year  
12          old.

13                 MR. WILLITS: All right. Thank you. That's  
14                 all I have.

15                 MR. WILLITS: You have the right to read and  
16                 sign this deposition if it's typed up. I'm not  
17                 going to be ordering it, but if somebody types it  
18                 up you have the right to read and sign it or you  
19                 can waive that right. It's up to you entirely. If  
20                 you want to waive the right to read it, tell the  
21                 court reporter you want to waive the right.

22                 THE WITNESS: Can you repeat that again?

23                 MR. CRITTON: Why don't we go off the record.

24                 (Discussion held off the record.)

25                 THE WITNESS: I waive that right. I don't

1 think I need to see.

2 (Witness excused.)

3 (Deposition was concluded.)

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