

EXHIBIT 6

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
CASE No.08-CV-80119-CIV-MARRA/JOHNSON

JANE DOE NO. 2,

Plaintiff,

-vs-

JEFFREY EPSTEIN,

Defendant.

Related cases:
08-80232, 08-80380, 98-80381, 08-80994,
08-80993, 08-80811, 08-80893, 09-80469,
09-80591, 09-80656, 09-80802, 09-81092

VIDEOTAPED DEPOSITION OF JUAN ALESSI
VOLUME I

Tuesday, September 8, 2009
10:12 a.m. - 3:45 p.m.

2139 Palm Beach Lakes Boulevard
West Palm Beach, Florida 33401

Reported By:
Sandra W. Townsend, FPR
Notary Public, State of Florida
PROSE COURT REPORTING AGENCY
West Palm Beach Office

Page 1

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

On behalf of the Defendant:
ROBERT J. CRITTON, ESQUIRE
BURMAN, CRITTON & LUTTIER
515 North Flagler Drive, Suite 400
West Palm Beach, Florida 33401
Phone: 561.842.2820
rcrit@bclclaw.com
mpike@bclclaw.com

APPEARANCES:
On behalf of the Plaintiffs:
RICHARD WILLITS, ESQUIRE
RICHARD H. WILLITS, P.A.
2290 10th Avenue North, Suite 404
Lake Worth, Florida 33461
Phone: 561.582.7600
reelrh@hotmail.com

STUART MERMELSTEIN, ESQUIRE
MERMELSTEIN & HOROWITZ, P.A.
18205 Biscayne Boulevard, Suite 2218
Miami, Florida 33160
Phone: 305.931.2200
ssm@sexabuseattorney.com
ahorowitz@sexabuseattorney.com

WILLIAM J. BERGER, ESQUIRE
ROTHSTEIN ROSENFELDT ADLER
401 East Las Olas Boulevard, Suite 1650
Fort Lauderdale, Florida 33301
Phone: 954.522.3456
bedwards@rra-law.com

KATHERINE W. EZELL, ESQUIRE
PODHURST ORSECK, P.A.
25 West Flagler Street, Suite 800
Miami, Florida 33130
Phone: 305.358.2800
rjosefsberg@podhurst.com
kezell@podhurst.com

ADAM J. LANGINO, ESQUIRE
LEOPOLD KUVIN
2925 PGA Boulevard, Suite 200
Palm Beach Gardens, Florida 33410
Phone: 561.515.1400
skuvin@leopoldkuvin.com

Page 2

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

EXHIBITS

NUMBER	DESCRIPTION	PAGE
Exhibit number 1	Photographs	45
Exhibit number 2	Transcript	130
Exhibit number 3	Incident Report	137
Exhibit number 4	Incorporation Papers	149
Exhibit number 5	Incorporation Papers	150

Page 3

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

1 (Pages 1 to 4)

(561) 832-7500 PROSE COURT REPORTING AGENCY, INC. (561) 832-7506

Page 37	Page 39
<p>1 bathroom was in the same quarters, his quarters. 2 So we had quite a bit of expensive tables. 3 Q. Did you ever get a massage while you were 4 working for Mr. Epstein? 5 A. I wasn't that lucky. 6 Q. Okay. I'm sorry. 7 A. I don't want to lie. Yes, I did. By a guy. 8 It was a -- occasionally it was male massage 9 therapists there, there were called. They did massages 10 for Mr. Epstein and Ms. Maxwell. 11 And one time I had some pains in my back and I 12 was given as a gift. 13 Q. Now, there came to be an incident where you 14 were arrested that caused you to be terminated from 15 Mr. Epstein? 16 A. No. 17 Q. Were you terminated from Mr. Epstein's 18 employment? 19 A. Yes. 20 Q. Did you promise to pay him back some money? 21 A. Yes. 22 Q. Did you make all the payments? 23 A. Yes, I did. 24 Q. When was the last time you made a payment? 25 A. I made a payment immediately, the same</p>	<p>1 Q. The latter? 2 A. The latter. 3 Q. What, if anything, can you remember or tell us 4 about your separation agreement? 5 A. It was basically an agreement between him and 6 myself that we will leave after all those years of 7 service. 8 And I regret to agree with the amount, but it 9 was \$30,000 for me and \$20,000 for my wife. 10 And it was -- he give my wife the car that she 11 usually drive. It was a minivan, Chrysler minivan, as 12 part of the -- as part of the separation. She loved 13 that car and she did all the shopping, it was done in 14 that car. 15 So Mr. Epstein was kind enough to give her the 16 car. 17 The rest of the stuff is, was mainly lawyer 18 stuff that you can't understand. But basically that was 19 it. And that it was a part that I think I can -- I 20 would says, it was more or less that I will not sue him 21 later or he cannot sue me for any reasons or -- and it 22 was like a confidentiality issue in that separation 23 agreement. 24 Q. And do you understand that in this instance 25 you are subpoenaed under the power of the Court?</p>
Page 38	Page 40
<p>1 payment, same amount. 2 Q. The full amount? 3 A. Full amount. 4 Q. Okay. It wasn't a payment plan? 5 A. No. 6 MR. WILLITS: I don't have any other 7 questions. You want to take a short break? 8 MR. CRITTON: Would you like to take a short 9 break? 10 THE WITNESS: I'm fine. 11 VIDEOGRAPHER: Off the record, 10:56. 12 (Brief recess.) 13 CROSS EXAMINATION 14 BY MS. EZELL: 15 Q. I'm Catherine Ezell. I want to ask you a few 16 questions about some things that came up during your 17 deposition, your earlier questioning in this deposition. 18 A. Okay. 19 Q. The book of policies that you mentioned that 20 was there by the time you left, I just wanted to 21 clarify, was that done by somebody in Palm Beach to be 22 used by different households in Palm Beach or was it 23 done by someone employed by Jeffrey Epstein to apply to 24 all the homes he -- 25 A. Yes.</p>	<p>1 A. Absolutely. 2 Q. And that would include matters that would 3 otherwise be confidential? 4 A. Can you repeat that again? 5 Q. Yeah. Do you understand that because you're 6 under subpoena by the Court to give your testimony, -- 7 A. Today. 8 Q. -- truthfully -- yes. 9 A. Uh-huh. 10 Q. That the confidentiality agreement would not 11 control; the Court's subpoena -- 12 A. Oh, yeah. 13 Q. -- controls? 14 A. I understand that. 15 Q. You mentioned Ghislaine Maxwell did photo 16 shoots and kept an album? 17 A. Yes. She was fanatic about photographs -- 18 camera. She had a whole bunch of different cameras and 19 she took all the pictures all over. 20 Q. Did you ever observe her doing a photo shoot 21 of V.? 22 A. No. 23 Q. Did you ever observe her doing a photo shoot 24 of any of the other young women whose names you 25 mentioned?</p>

10 (Pages 37 to 40)

(561) 832-7500

PROSE COURT REPORTING AGENCY, INC.

(561) 832-7506

Page 41	Page 43
<p>1 A. Young woman?</p> <p>2 Q. Yes.</p> <p>3 A. No, I can't remember. I know that she went</p> <p>4 out and took pictures in the pool because later on I</p> <p>5 would see them at the desk or at the house.</p> <p>6 And nude -- 99.9 percent of the time they were</p> <p>7 topless. They were European girls. They were --</p> <p>8 Q. You stated that you believe V.'s name was P.,</p> <p>9 but you weren't sure?</p> <p>10 A. Not sure.</p> <p>11 Q. Could it have been R.?</p> <p>12 A. R., yeah. Yeah. Could have been.</p> <p>13 Q. I want to show you a picture and have it</p> <p>14 marked as an Exhibit to this deposition.</p> <p>15 MS. EZELL: And did we have the agreement</p> <p>16 beforehand that we've been having all along that</p> <p>17 we're just using initials and not names?</p> <p>18 MR. WILLITS: My client has waived the</p> <p>19 confidentiality as to herself. But I certainly</p> <p>20 agree as to everybody else.</p> <p>21 MR. LANGINO: As do I.</p> <p>22 MS. EZELL: Is that okay?</p> <p>23 MR. CRITTON: That's what we agreed to on the</p> <p>24 last.</p> <p>25 MS. EZELL: Right.</p>	<p>1 V.R.? Obviously the tape preserves it. We're not</p> <p>2 asking the tape gentleman to edit it.</p> <p>3 MS. EZELL: Right.</p> <p>4 MR. BERGER: So how is it preserved that V.R.</p> <p>5 means your client's full name?</p> <p>6 MS. EZELL: Well, we had just agreed in</p> <p>7 previous depositions that that's the way it would</p> <p>8 read. The written transcript would not have the</p> <p>9 full name, but would just have the initials.</p> <p>10 MR. BERGER: I'm not so sure that constitutes</p> <p>11 an identification by Mr. Alessi that's going to be</p> <p>12 clear. But this is the first deposition I've</p> <p>13 attended, so I'm not sure if I'm -- if what I'm</p> <p>14 saying has been dealt with or not.</p> <p>15 MR. MERMELSTEIN: I think we're working on</p> <p>16 good faith. Mr. Critton is agreeing that the</p> <p>17 name -- and I don't think anyone's going to come</p> <p>18 back later and say, oh, you meant Vince Robinson or</p> <p>19 anything like that, so...</p> <p>20 MR. BERGER: Well, I'm not -- I'm not talking</p> <p>21 about Mr. Critton. Bob Critton I have the full</p> <p>22 trust in. I'm just talking about a jury watching</p> <p>23 this or reading this transcript believing that</p> <p>24 Mr. Alessi has accurately identified one of these</p> <p>25 victims. That's all. I don't know if you've all</p>
Page 42	Page 44
<p>1 MR. CRITTON: For the court reporter, at</p> <p>2 least, in terms of the -- I guess in terms of the</p> <p>3 transcript she gives to us, if you would just use a</p> <p>4 first initial and a last initial.</p> <p>5 MR. WILLITS: So when you ask about V., it</p> <p>6 would be V.R. is what the court reporter would</p> <p>7 write down?</p> <p>8 MS. EZELL: Right.</p> <p>9 MR. CRITTON: But make sure everybody uses the</p> <p>10 full name, because that way we'll have two</p> <p>11 initials.</p> <p>12 MR. WILLITS: When they speak, but she's going</p> <p>13 to write it down as initials. Is that what you're</p> <p>14 saying? I'm confused about everything.</p> <p>15 MR. CRITTON: The reason is, is there may be</p> <p>16 25, you know, there may be three V.s. So if you</p> <p>17 just mention V. and it just shows up as a V., it</p> <p>18 won't make sense. So ergo you need to do that.</p> <p>19 But Carolyn Andriano, his client, she gets the</p> <p>20 whole megillah.</p> <p>21 MR. WILLITS: Right.</p> <p>22 MR. BERGER: How is it preserved that we're</p> <p>23 talking about your client? You gave her full name</p> <p>24 a minute ago. How is it preserved if she's -- the</p> <p>25 court reporter is going to change the full name to</p>	<p>1 thought about that.</p> <p>2 MS. EZELL: Well, for one thing, the jury</p> <p>3 might, if they're -- if they're hearing or reading</p> <p>4 his testimony, they most likely would be seeing the</p> <p>5 video, which would have the full name. Unless the</p> <p>6 Judge allows us to block out names and we haven't</p> <p>7 come to that point.</p> <p>8 MR. MERMELSTEIN: I think the idea at trial,</p> <p>9 V.R., if it's read to the jury would become then</p> <p>10 V.R. It would be read as V.R. But if it's filed</p> <p>11 with the Court, this transcript, it will be V.R.,</p> <p>12 and that way it doesn't have to be redacted.</p> <p>13 MR. WILLITS: As I also understood it, if</p> <p>14 there would be any question at all, we could simply</p> <p>15 ask the court reporter and she would say, according</p> <p>16 to my notes, V.R. is Virgil Robinson and not -- or</p> <p>17 whatever her notes show. Wouldn't she be the final</p> <p>18 authority?</p> <p>19 MS. EZELL: Well, she would certainly have</p> <p>20 that record.</p> <p>21 MR. CRITTON: You could listen to the tape.</p> <p>22 It would be pretty easy. I think we're making it a</p> <p>23 lot more complicated than it need be.</p> <p>24 MR. WILLITS: For once, I agree.</p> <p>25 MR. CRITTON: I think it will be all right.</p>

11 (Pages 41 to 44)

(561) 832-7500

PROSE COURT REPORTING AGENCY, INC.

(561) 832-7506



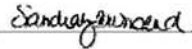
Page 73	Page 75
<p>1 us.</p> <p>2 Q. Where would he sleep?</p> <p>3 A. In the main room, the main guest bedroom.</p> <p>4 That was the blue room.</p> <p>5 Q. And, so, when he would come and stay, during</p> <p>6 that time would he frequently have massages?</p> <p>7 MR. CRITTON: Form.</p> <p>8 THE WITNESS: I would says, daily massages.</p> <p>9 They have a daily massage.</p> <p>10 BY MS. EZELL:</p> <p>11 Q. Was it sometimes more than one a day?</p> <p>12 A. I can't remember if he had more than one, but</p> <p>13 I think it was just a massage for him. We set up the</p> <p>14 tables and --</p> <p>15 Q. Do you have any recollection of V.R. coming to</p> <p>16 the house when Prince Andrew was there?</p> <p>17 A. It could have been, but I'm not sure.</p> <p>18 Q. Not sure. When Mr. Dershowitz was</p> <p>19 visiting, --</p> <p>20 A. Uh-huh.</p> <p>21 Q. -- how often did he come?</p> <p>22 A. He came pretty -- pretty often. I would says,</p> <p>23 at least four or five times a year.</p> <p>24 Q. And how long would he stay typically?</p> <p>25 A. Two, three days.</p>	<p>1 MR. LANGINO: Go ahead. Sure.</p> <p>2 BY MS. EZELL:</p> <p>3 Q. You said that you set up the massage tables.</p> <p>4 And would you also set up the oils and the towels?</p> <p>5 A. Yes, ma'am.</p> <p>6 Q. And I think I read one time you said they used</p> <p>7 40 or 50 towels a day?</p> <p>8 MR. CRITTON: Form.</p> <p>9 THE WITNESS: That's correct. There was a</p> <p>10 tremendous amount of work in the house, especially</p> <p>11 laundry towels, because they were -- we have</p> <p>12 towels, piles of towels. And they use in the pool.</p> <p>13 There was a lot of people in the pool and there</p> <p>14 were a towel that went in the floor, we have to go</p> <p>15 and pick it up, wash it. So it was -- it was a lot</p> <p>16 of towels, yes.</p> <p>17 BY MS. EZELL:</p> <p>18 Q. And did you ever have occasion to go upstairs</p> <p>19 and clean up after the massages?</p> <p>20 A. Yeah, uh-huh.</p> <p>21 Q. Did you ever find any vibrators in that area?</p> <p>22 A. Yes. I told him, yes.</p> <p>23 MS. EZELL: And did you ask that? I'm sorry.</p> <p>24 MR. CRITTON: Yes.</p> <p>25 MS. EZELL: I don't know how I missed that.</p>
Page 74	Page 76
<p>1 Q. Did he have massages sometimes when he was</p> <p>2 there?</p> <p>3 A. Yes. A massage was like a treat for</p> <p>4 everybody. If they want it, we call the massage and</p> <p>5 they have a massage.</p> <p>6 Q. Now, Mr. Trump had a home in Palm Beach,</p> <p>7 correct?</p> <p>8 A. Uh-huh.</p> <p>9 Q. So he didn't come and stay there, did he?</p> <p>10 A. No, never.</p> <p>11 Q. He would come for a meal?</p> <p>12 A. He would come, have dinner. He never sat at</p> <p>13 the table. He eat with me in the kitchen.</p> <p>14 Q. Did he ever have massages while he was there?</p> <p>15 A. No. Because he's got his own spa.</p> <p>16 Q. Sure.</p> <p>17 MS. EZELL: I don't have any other questions</p> <p>18 right now. I'd just like to reserve if something</p> <p>19 comes up to ask. But, otherwise, you may go ahead.</p> <p>20 MR. LANGINO: It is noon, so I don't know what</p> <p>21 everybody else's schedule is. I don't know how</p> <p>22 you're feeling.</p> <p>23 THE WITNESS: I am fine.</p> <p>24 MS. EZELL: I do have another question. May I</p> <p>25 ask it?</p>	<p>1 BY MS. EZELL:</p> <p>2 Q. Since I did miss it, if you don't mind, let me</p> <p>3 just ask you again.</p> <p>4 Would you describe for me what kinds of</p> <p>5 vibrators you found?</p> <p>6 A. I'm not familiar -- not too familiar with the</p> <p>7 names, but they were big dildos, what they call the big</p> <p>8 rubber things like that (indicating). And I used to go</p> <p>9 and put my gloves on and pick them up, put them in the</p> <p>10 sink, rinse it off and put it in Ms. Maxwell --</p> <p>11 Ms. Maxwell had in her closet, she had, like, a laundry</p> <p>12 basket, one of those laundry basket that you put laundry</p> <p>13 in. She have full of those toys. And that was -- and</p> <p>14 that was me being professional, leaving the room ready</p> <p>15 for bed when he would come back to the room again.</p> <p>16 Q. Okay.</p> <p>17 A. That happened a few times, few times.</p> <p>18 Q. Were there other sex toys that you found in</p> <p>19 the area --</p> <p>20 A. No.</p> <p>21 Q. -- sometimes? You mentioned she kept them in</p> <p>22 a basket in her closet?</p> <p>23 A. She kept them in her basket. She had some</p> <p>24 videos there and she have a costume there. I know that</p> <p>25 she bought it, that she brought it with her.</p>

19 (Pages 73 to 76)

(561) 832-7500

PROSE COURT REPORTING AGENCY, INC.

(561) 832-7506

<p style="text-align: right;">Page 77</p> <p>1 Q. What kind of costume?</p> <p>2 A. I don't know. It was a black, shiny costume.</p> <p>3 I never saw it on her.</p> <p>4 Q. Was it leather?</p> <p>5 A. No. I think it was like a vinyl. But we were</p> <p>6 very fussy about touching any of that stuff. We just...</p> <p>7 MS. EZELL: No other questions. Thank you,</p> <p>8 sir.</p> <p>9 THE WITNESS: You're welcome.</p> <p>10 MR. LANGINO: I shouldn't have more than a</p> <p>11 half hour's worth of questions, if everybody is</p> <p>12 okay to power through.</p> <p>13 MR. BERGER: I probably have a half hour to an</p> <p>14 hour.</p> <p>15 MR. LANGINO: Okay.</p> <p>16 MR. BERGER: Unless you cover what I cover.</p> <p>17 MR. MERMELSTEIN: I could say the same thing,</p> <p>18 so probably less than that.</p> <p>19 MR. LANGINO: So I guess my question is --</p> <p>20 MR. BERGER: I think we ought to take a break.</p> <p>21 MR. LANGINO: That was my question.</p> <p>22 MR. BERGER: We're going to take a break.</p> <p>23 Do you have any problem with that?</p> <p>24 THE WITNESS: No. Whatever you guys want to</p> <p>25 do.</p>	<p style="text-align: right;">Page 79</p> <p>1 CERTIFICATE OF OATH</p> <p>2 STATE OF FLORIDA</p> <p>3 COUNTY OF PALM BEACH</p> <p>4</p> <p>5</p> <p>6 I, the undersigned authority, certify that</p> <p>7 JUAN ALESSI personally appeared before me and was duly</p> <p>8 sworn on the 8th day of September, 2009.</p> <p>9</p> <p>10 Dated this 19th day of September, 2009.</p> <p>11</p> <p>12</p> <p>13</p> <p>14</p> <p>15  </p> <p>16 Sandra W. Townsend, Court Reporter</p> <p>17 Notary Public - State of Florida</p> <p>18 My Commission Expires: 6/26/12</p> <p>19 My Commission No.: DD 793913</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>
<p style="text-align: right;">Page 78</p> <p>1 (Lunch recess.)</p> <p>2 (Continued to Volume II.)</p> <p>3</p> <p>4</p> <p>5</p> <p>6</p> <p>7</p> <p>8</p> <p>9</p> <p>10</p> <p>11</p> <p>12</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>	<p style="text-align: right;">Page 80</p> <p>1 CERTIFICATE</p> <p>2 STATE OF FLORIDA</p> <p>3 COUNTY OF PALM BEACH</p> <p>4</p> <p>5 I, Sandra W. Townsend, Court Reporter and</p> <p>6 Notary Public in and for the State of Florida at Large,</p> <p>7 do hereby certify that the aforementioned witness was by</p> <p>8 me first duly sworn to testify the whole truth; that I</p> <p>9 was authorized to and did report said deposition in</p> <p>10 stenotype; and that the foregoing pages numbered 1 to</p> <p>11 78, inclusive, are a true and correct transcription of</p> <p>12 my shorthand notes of said deposition.</p> <p>13</p> <p>14 I further certify that said deposition was</p> <p>15 taken at the time and place hereinabove set forth and</p> <p>16 that the taking of said deposition was commenced and</p> <p>17 completed as hereinabove set out.</p> <p>18 I further certify that I am not attorney or</p> <p>19 counsel of any of the parties, nor am I a relative or</p> <p>20 employee of any attorney or counsel of party connected</p> <p>21 with the action, nor am I financially interested in the</p> <p>22 action.</p> <p>23 The foregoing certification of this transcript</p> <p>24 does not apply to any reproduction of the same by any</p> <p>25 means unless under the direct control and/or direction</p> <p>of the certifying reporter.</p> <p>Dated this 19th day of September, 2009.</p> <p>21 </p> <p>22 Sandra W. Townsend, Court Reporter</p> <p>23</p> <p>24</p> <p>25</p>

20 (Pages 77 to 80)

(561) 832-7500

PROSE COURT REPORTING AGENCY, INC.

(561) 832-7506