

EXHIBIT 13

PART 2

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

JANE DOE NO. 2, CASE NO: 08-CV-80119

Plaintiff,

Vs.

JEFFREY EPSTEIN,

Defendant.

JANE DOE NO. 3,

CASE NO: 08-CV-80232

Plaintiff,

Vs.

JEFFREY EPSTEIN,

Defendant.

JANE DOE NO. 4,

CASE NO: 08-CV-80380

Plaintiff,

Vs.

JEFFREY EPSTEIN,

Defendant.

JANE DOE NO. 5,

CASE NO: 08-CV-80381

Plaintiff,

Vs

JEFFREY EPSTEIN,

Defendant.

CONDENSED

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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.

16 JANE DOE, CASE NO: 08-CV-80893
 17 Plaintiff,
 18 Vs.

19 JEFFREY EPSTEIN,
 20 Defendant.

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1 JANE DOE NO. II, CASE NO: 08-CV-80469
 2 Plaintiff,
 3 Vs.
 4 JEFFREY EPSTEIN,
 5 Defendant.

6 JANE DOE NO. 101 CASE NO: 08-CV-80591
 7 Plaintiff,
 8 Vs.

9 JEFFREY EPSTEIN,
 10 Defendant.

11 JANE DOE NO. 102, CASE NO: 08-CV-80656
 12 Plaintiff,
 13 Vs.
 14 JEFFREY EPSTEIN,
 15 Defendant.

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1 IN THE CIRCUIT COURT OF THE 15TH
 2 JUDICIAL CIRCUIT IN AND FOR
 3 PALM BEACH COUNTY, FLORIDA
 4 CASE NO. 502008CA037319XXXMB AB

5 B.B.,

6 Plaintiff,

7 Vs.

8 JEFFREY EPSTEIN.

9 Defendant.

10 1031 Ives Dairy Road
 11 Suite 228
 12 North Miami, Florida
 13 August 7, 2009
 14 1:15 p.m. to 5:30 p.m.

15 CONTINUED
 16 VIDEOTAPED
 17 DEPOSITION
 18 of
 19 ALFREDO RODRIGUEZ

20 taken on behalf of the Plaintiffs pursuant
 21 to a Re-Notice of Taking Continued Videotaped
 22 Deposition (Duces Tecum)
 23 ---
 24
 25

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1 APPEARANCES:

2 MERMELSTEIN & HOROWITZ, P.A.
 3 BY: ADAM HOROWITZ, ESQ.
 4 18205 Biscayne Boulevard
 5 Suite 2218
 6 Miami, Florida 33160
 7 Attorney for Jane Doe 2, 3, 4, 5,
 8 6, and 7.

9 ROTHSTEIN ROSENFELDT ADLER
 10 BY: BRAD J. EDWARDS, ESQ., and
 11 CARA HOLMES, ESQ.
 12 Las Olas City Centre
 13 Suite 1650
 14 401 East Las Olas Boulevard
 15 Fort Lauderdale, Florida 33301
 16 Attorney for Jane Doe and E.W.
 17 And L.M.

18 PODHURST ORSECK
 19 BY: KATHERINE W. EZELL, ESQ.
 20 25 West Flagler Street
 21 Suite 800
 22 Miami, Florida 33130
 23 Attorney for Jane Doe 101 and 102.

24 LEOPOLD-KUVIN
 25 BY: ADAM J. LANGINO, ESQ.
 26 2925 PGA Boulevard
 27 Suite 200
 28 Palm Beach Gardens, Florida 33410
 29 Attorney for B.B.

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1 APPEARANCES:

2 RICHARD WILLITS, ESQ.
3 2290 10th Avenue North
4 Suite 404
5 Lake Worth, Florida 33461
6 Attorney for C.M.A.
7 Appeared via telephone.

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

15 ALSO PRESENT:

16 JOE LANGSAM, VIDEOGRAPHER
17
18
19
20
21
22
23
24
25

1 Deposition taken before MICHELLE PAYNE, Court
2 Reporter and Notary Public in and for the State of
3 Florida at Large, in the above cause.
4 - - -

5 THE VIDEOGRAPHER: This is a continuation
6 of the deposition of Alfredo Rodriguez.

7 Today is Friday, August the 7th, the year
8 2009, starting time approximately 1:15 p.m.

9 Will the court reporter please swear in
10 the witness?

11 Thereupon,

12 ALFREDO RODRIGUEZ,
13 having been first duly sworn or affirmed, was
14 examined and testified as follows:

15 MR. CRITTON: Before we get started just
16 with regard to Ms. Ezell represents Jane Doe
17 101 and 102, the alleged time of her
18 incidents as of least have been plead in the
19 complaint for 101 is '99 -- I'm sorry, '98
20 through 2002, with Jane Doe 102 the Spring
21 of -- Spring/Summer of 2003. Mr. Rodriguez
22 never even began employment until '04 and
23 '05. I think her questioning I think -- I
24 can't say she doesn't have standing based on
25 the court order, but I would say it's

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1 CONTINUED INDEX OF EXAMINATION

2 WITNESS DIRECT CROSS REDIRECT RECROSS

3 ALFREDO RODRIGUEZ

4 (By Ms. Ezell) 278 441, 467

5 (By Mr. Willits) 334 453, 469

6 (By Mr. Critton) 338 464

7 (By Mr. Edwards) 419, 454, 468

8 (By Mr. Langino) 452

9 CONTINUED INDEX OF EXHIBITS

10 PLAINTIFF'S PAGE

11 3 Drawing 315

12 4 Photograph 327

13 5 Photograph 331

14 6 Photograph 331

15 7 Photograph 331

16 8 Photograph 331

17 9 Report 446

18 (Exhibits 4, 5, 6, 7, and 8 were retained by Ms.
19 Ezell.)

1 completely irrelevant and immaterial and has
2 no probative value with regard to this
3 particular witness based upon the two
4 clients at least that are in suit at this
5 point in time.

6 MS. EZELL: As Mr. Critton well knows I
7 represent a number of other clients whose
8 cases have not been filed and I believe we
9 do have standing to ask questions, and I do
10 intend to do that today.

11 EXAMINATION

12 BY MS. EZELL:

13 Q. Mr. Rodriguez, you stated last time that
14 there were guests at the house, frequent guests,
15 friends from Harvard.

16 Do you remember that testimony?

17 A. Yes, ma'am.

18 Q. And was there a lawyer from Harvard named
19 Alan Dershowitz?

20 A. Yes, ma'am.

21 Q. And are you familiar with the fact that
22 he's a famous author and famous lawyer?

23 A. Yes, ma'am.

24 Q. How often during the six months or so
25 that you were there was Mr. Dershowitz there?

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1 A. Two or three times.
 2 Q. And did you have any knowledge of why he
 3 was visiting there?
 4 A. No, ma'am.
 5 Q. You don't know whether or not he was a
 6 lawyer -- acting as a lawyer or whether he was
 7 there as a friend?
 8 A. I believe as a friend.
 9 Q. Were there also young ladies in the house
 10 at the time he was there?
 11 MR. CRITTON: Form.
 12 THE WITNESS: Yes, ma'am.
 13 BY MS. EZELL:
 14 Q. And would those have included, for
 15 instance, Sarah Kellen and Nadia Marcenacova?
 16 A. Yes, ma'am.
 17 Q. Were there other young ladies there when
 18 Mr. Dershowitz was there?
 19 MR. CRITTON: Form.
 20 THE WITNESS: Yes, ma'am.
 21 BY MS. EZELL:
 22 Q. Do you have any idea who those young
 23 women were?
 24 A. No, ma'am.
 25 Q. Were any of those the young women that

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1 you have said came to give massages?
 2 A. Yes, ma'am.
 3 Q. And do you have any idea whether or not
 4 Mr. Dershowitz was also receiving massages?
 5 A. I don't know, Ma'am.
 6 Q. I want to ask you to take this piece of
 7 paper, please, and a pencil --
 8 MR. WILLITS: Can anybody hear me?
 9 MS. EZELL: Yes. Can you hear me?
 10 MR. WILLITS: I've heard nothing for
 11 about a minute or so.
 12 MR. CRITTON: Can you hear me now?
 13 MR. WILLITS: Yes.
 14 MS. EZELL: I'm asking questions, I'm
 15 sorry.
 16 MR. CRITTON: Why don't we go off the
 17 record for a second.
 18 (Thereupon, a discussion was held off the
 19 record.)
 20 THE VIDEOGRAPHER: We're back on the
 21 record.
 22 BY MS. EZELL:
 23 Q. Mr. Rodriguez, you indicated that there
 24 were several staircases in the house?
 25 A. Yes, ma'am.

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1 Q. Can you tell me where those were?
 2 A. One in the kitchen, and the one in the
 3 formal -- the main entrance. And there was one
 4 more added later on, but there is two when I was
 5 working there.
 6 Q. Could you just give me a rough sketch of
 7 the house of where the main entrance was and where
 8 the kitchen was?
 9 A. I'm not an architect but it's something
 10 like this. This is the kitchen, this is the main
 11 entrance.
 12 Q. Will you mark the kitchen with a K,
 13 please, and the main entrance with ME?
 14 A. This is the pool.
 15 Q. The pool?
 16 A. Yes, ma'am.
 17 Q. And in the upper left?
 18 A. In the terrace, yeah, there was a balcony
 19 here.
 20 Q. And where were the staircases?
 21 A. This is one, the kitchen, one in the
 22 foyer, and the pool.
 23 Q. Okay. And would you just put an F where
 24 the foyer staircase began? And KS where the
 25 kitchen staircase began.

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1 And you said that later another staircase
 2 was added?
 3 A. Yeah, we rehabilitated this, you know,
 4 but you asked me how many stairs there were, to
 5 answer your question there were three.
 6 Q. Three. So where was the third one?
 7 A. The pool, this leads to the pool.
 8 Through the outside master bedroom you could go
 9 downstairs to the pool.
 10 Q. Okay. A stairway then from the outside,
 11 from outside the master bedroom?
 12 A. Yes, ma'am.
 13 Q. Down to the pool?
 14 A. Yes, ma'am.
 15 Q. One of your duties was to answer the
 16 door. Is that correct?
 17 A. Yes, ma'am.
 18 Q. Which door would you answer?
 19 A. Mainly the kitchen.
 20 Q. And why was that, why would people mainly
 21 come to the kitchen?
 22 A. I'll say it was for practicable reasons
 23 because not to go to the main -- it was shorter
 24 because the entrance was here, so this was the
 25 driveway and we used to take into the back door of

4 (Pages 279 to 282)

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1 the kitchen and they will wait there.
 2 Q. All right. Would you just put BD where
 3 the back door of the kitchen was, please?
 4 Now, these young women that came to give
 5 Mr. Epstein massages, would they usually come to
 6 the kitchen door?
 7 A. Yes, ma'am.
 8 MR. CRITTON: Form.
 9 BY MS. EZELL:
 10 Q. Did any ever come to the front door?
 11 A. Very rarely.
 12 Q. And you would let them in the kitchen?
 13 A. Yes, ma'am.
 14 Q. And then how did you then turn them over
 15 to Sarah Kellen?
 16 MR. CRITTON: Form.
 17 THE WITNESS: I will call her.
 18 BY MS. EZELL:
 19 Q. How would you call her?
 20 A. On her cell phone and she will know they
 21 were waiting in the kitchen.
 22 Q. And would you bring them in the kitchen
 23 and then just leave?
 24 A. Yes, ma'am.
 25 Q. And where would you go?

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1 A. To my -- to the staff house that was
 2 here.
 3 Q. Good, I was going to ask you to show me
 4 where the staff house is. Just put SH.
 5 A. It was just maybe five feet, I used to
 6 stay here.
 7 Q. Okay. So what you're saying, it's about
 8 five feet from the kitchen?
 9 A. More or less, yes.
 10 Q. Was it connected to the house?
 11 A. No, it's detached but it's very close
 12 proximity.
 13 Q. Okay. So to get to the staff house would
 14 you come out the kitchen door?
 15 A. Yes, ma'am. And I came through my --
 16 there was two entrances, one through the laundry
 17 here and one to the main entrance to the staff
 18 house.
 19 Q. All right. And what was your usual
 20 pathway if you left the kitchen to enter the staff
 21 house, how would you generally do it?
 22 A. Normally I will came to the laundry, the
 23 laundry was here and my office was next to the
 24 laundry.
 25 Q. Okay. Thank you.

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1 A. You're welcome.
 2 Q. Could you see the pool from the staff
 3 house?
 4 A. No, ma'am.
 5 Q. How would you know, or would you know
 6 when the young women were brought downstairs after
 7 giving the massages?
 8 MR. CRITTON: Form.
 9 THE WITNESS: I will hear the commotion,
 10 some voices, but I was not told they were
 11 leaving.
 12 BY MS. EZELL:
 13 Q. And so did you have any duties that had
 14 anything to do with their leaving?
 15 A. Check the security and see if the gate
 16 was closed, that the cars were locked because the
 17 garage were here.
 18 Q. Would you put a G where the garage was?
 19 I believe you testified that you were
 20 required to have on your person \$2,000 everyday?
 21 A. More or less, Ma'am.
 22 Q. And if you open the door and a young
 23 woman was there to give a massage you would call
 24 Sarah Kellen and go back to the staff house?
 25 A. Yes, ma'am.

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1 Q. And then you believe Sarah Kellen would
 2 come in and lead the young woman upstairs.
 3 Correct?
 4 MR. CRITTON: Form.
 5 THE WITNESS: I'm sorry, can you repeat
 6 your question?
 7 BY MS. EZELL:
 8 Q. I'll try to, yes.
 9 When you would answer the door and there
 10 would be a young lady there to give a massage.
 11 A. Yes, ma'am.
 12 Q. I believe you testified you would let her
 13 in the kitchen.
 14 A. Yes, ma'am.
 15 Q. And you called Sarah Kellen?
 16 A. Yes, ma'am.
 17 Q. And you then left her in the kitchen
 18 alone?
 19 A. Yes.
 20 Q. And went to the staff house?
 21 A. Yes, ma'am.
 22 Q. And sometimes you heard the commotion
 23 when the young woman was leaving --
 24 A. Yes, ma'am.
 25 Q. -- but you didn't necessarily see them

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1 leave. Is that correct?
 2 A. Exactly, yes, ma'am.
 3 Q. How did you transmit the money that you
 4 were keeping to Sarah Kellen to pay those young
 5 women?
 6 A. Sarah would tell me who to pay and how
 7 much, that's the way we work.
 8 Q. And when would she tell you that?
 9 A. She will call me by phone and say I'll
 10 give so much to so on and so forth.
 11 Q. Okay. Was that at the conclusion of the
 12 massage?
 13 MR. CRITTON: Form.
 14 THE WITNESS: Yes, ma'am.
 15 BY MS. EZELL:
 16 Q. Okay. Then I'm a little confused because
 17 I thought you said that you didn't see them when
 18 they left from giving the massage.
 19 A. She will call me and she will say pay X,
 20 Y, or Z, and that's the way I knew how much and to
 21 whom. But sometimes they would leave and I didn't
 22 pay those, I don't know who paid them.
 23 Q. Okay. So if she calls you and told you
 24 to pay X, Y, and Z \$200, would you then go back
 25 into the kitchen and give X, Y, and Z \$200 each?

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1 A. Sometimes in the kitchen, sometimes in
 2 the driveway I will pay them in an envelope, you
 3 know.
 4 Q. Okay. And she would tell you how much to
 5 pay them?
 6 A. Yes, ma'am.
 7 Q. Where was Ms. Kellen when you would call
 8 her to tell her that there was someone at the
 9 kitchen door to give a massage?
 10 A. She was inside the house so I call her on
 11 her cell and say, Alfredo, leave them in the
 12 kitchen, but I don't know where she was.
 13 Q. Okay. Did she have an office?
 14 A. No, ma'am.
 15 Q. Did she have a computer in the house?
 16 A. Yes.
 17 Q. Where was her computer?
 18 A. She had a laptop but she usually work in
 19 the dining room.
 20 Q. And where was the dining room?
 21 A. All this area facing the garden facing
 22 north -- I'm sorry, facing south, and Sarah Kellen
 23 was at her desk here.
 24 Q. So did the dining room have large
 25 windows?

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1 A. Yes. The whole south face of the house,
 2 but this was Sarah's.
 3 Q. All right. And so did she usually work
 4 with her laptop on the dining room table?
 5 A. She will have all over the house but she
 6 will sit down here to work on the desk.
 7 Q. Do you know whether she kept any lists of
 8 names of girls to come and give massages?
 9 A. She did, Ma'am.
 10 MR. CRITTON: Form.
 11 BY MS. EZELL:
 12 Q. And do you know in what form she kept
 13 those?
 14 A. She had notes, you know, she always have
 15 papers, but I don't know.
 16 Q. Do you recall seeing the papers with
 17 telephone numbers on them?
 18 A. A couple of times.
 19 Q. Do you know whether she also kept records
 20 on the computer relating to the girls?
 21 MR. CRITTON: Form.
 22 THE WITNESS: Yes, ma'am.
 23 BY MS. EZELL:
 24 Q. And how do you know that?
 25 A. Everything was recorded in -- everything

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1 we did as employees we used to record and kept in
 2 the internal circuit we used to have among the
 3 employees.
 4 Q. And so would it be, if I understand you
 5 correctly then, was there some sort of a program
 6 so that you could access information that
 7 Ms. Kellen was putting into that program and she
 8 could access information you put in?
 9 A. Yes, ma'am.
 10 Q. And did you also send each other e-mails
 11 that way or did you use a different program for
 12 e-mails?
 13 A. Sarah didn't send direct e-mails to me
 14 but she will call me on her cell. But I was
 15 supposed to send through Citrix to other
 16 employees.
 17 Q. E-mail them through Citrix?
 18 A. Yes, ma'am.
 19 Q. Okay. And who would those other
 20 employees be, have been, I mean, while you were
 21 there?
 22 A. Mrs. Maxwell, Bella in New York, mostly
 23 the main people, you know, Bella and --
 24 Q. Lesley was --
 25 A. Lesley, yes, the secretary, and somebody

6 (Pages 287 to 290)

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1 else, I don't recall.
 2 Q. Was there anyone else that you could
 3 e-mail?
 4 A. We could e-mail anybody in the
 5 organization.
 6 Q. On that particular program?
 7 A. Yes, ma'am.
 8 Q. And so who else would be in that
 9 organization?
 10 A. Other household managers from Paris or
 11 the Island, Manhattan.
 12 Q. Do you know whether Ms. Kellen kept any
 13 pictures of the young women who would come to give
 14 massages on her laptop?
 15 A. Yes, ma'am.
 16 Q. You saw those pictures?
 17 A. Yes.
 18 Q. Were the pictures uniform? And by that I
 19 mean, were they all taken, for instance, there at
 20 the house so that they would all be fairly
 21 standard?
 22 MR. CRITTON: Form.
 23 THE WITNESS: They will be all over, you
 24 know, sometimes out of the country and
 25 sometimes in the house.

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1 BY MS. EZELL:
 2 Q. Were these pictures that were taken by
 3 someone for the purpose of keeping them in that
 4 program?
 5 A. I don't know.
 6 MR. CRITTON: Form.
 7 BY MS. EZELL:
 8 Q. Or opposed to, for instance, one of the
 9 young ladies bringing a picture to give to
 10 Ms. Kellen?
 11 A. I don't know.
 12 Q. You don't know where the pictures came
 13 from?
 14 A. No, ma'am.
 15 Q. Do you know was there anyone staying in
 16 the house who often took pictures of young women?
 17 MR. CRITTON: Form.
 18 THE WITNESS: There was several cameras
 19 in the house and they were used often, but I
 20 don't know who used them.
 21 BY MS. EZELL:
 22 Q. Okay. Do you remember what kind of
 23 cameras they were?
 24 A. The small compact camera.
 25 Q. Any other kind?

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1 A. I don't remember, ma'am.
 2 Q. Did you ever see Sarah Kellen using that
 3 small compact camera to take a picture of the
 4 girls?
 5 A. Yes, ma'am.
 6 MR. CRITTON: Form.
 7 BY MS. EZELL:
 8 Q. When you saw her doing that where were
 9 they, the girls?
 10 A. The dining room, the library, the first
 11 floor of the house.
 12 Q. Did you ever see Ms. Maxwell taking
 13 pictures of the girls?
 14 A. No, ma'am.
 15 Q. Did you ever see Mr. Epstein taking
 16 pictures of the girls?
 17 A. No, ma'am.
 18 Q. Were you ever told by anyone that Mr.
 19 Epstein sometimes took pictures of the girls?
 20 MR. CRITTON: Form.
 21 THE WITNESS: Yes, ma'am.
 22 BY MS. EZELL:
 23 Q. And do you recall who told you that?
 24 A. I think it was Sarah.
 25 Q. Do you recall what she said about that?

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1 A. He likes photography and he likes -- like
 2 a hobby.
 3 Q. Do you know which camera or what kind of
 4 camera he used to take those pictures?
 5 A. No, ma'am.
 6 Q. And you said I think you never saw him
 7 taking them?
 8 A. Yes.
 9 Q. So --
 10 MR. CRITTON: Yeah meaning correct?
 11 THE WITNESS: Yes.
 12 BY MS. EZELL:
 13 Q. Was it your understanding that he took
 14 those pictures upstairs?
 15 MR. CRITTON: Form.
 16 THE WITNESS: Yes, ma'am.
 17 BY MS. EZELL:
 18 Q. And when you had occasion to go upstairs
 19 do you recall seeing camera equipment?
 20 A. No, ma'am.
 21 Q. Were you ever told that he took pictures
 22 of the girls nude?
 23 A. No, ma'am.
 24 Q. Were you ever told that he liked to have
 25 pictures taken of the girls nude?

7 (Pages 291 to 294)

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1 MR. CRITTON: Form.

2 THE WITNESS: No, ma'am.

3 BY MS. EZELL:

4 Q. I believe you were asked before in the
5 deposition about the stairway leading from the
6 kitchen upstairs and whether or not there were
7 pictures on that stairway.

8 A. Yes, there were pictures.

9 Q. Were those pictures some of them of nude
10 young women?

11 MR. CRITTON: Form.

12 THE WITNESS: Not on the stairway, they
13 were in the foyer in the second -- on the
14 foyer and the foyer leading to the master
15 bedroom.

16 BY MS. EZELL:

17 Q. I see. Were those -- what size generally
18 were those pictures?

19 A. They were, you know, I'll say three by
20 five.

21 Q. So very large --

22 A. Yes, ma'am.

23 Q. -- pictures? Were there lots of
24 photographs just around the house on top of
25 furniture in the various rooms?

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1 A. Yes, ma'am.

2 Q. And were any of those photographs of
3 young women in the nude?

4 A. Yes, ma'am.

5 Q. Did you recognize any of those young
6 women?

7 A. Yes, a couple.

8 Q. And who was it that you recognized?

9 A. Nadia and some other girl from Brazil
10 that was in the house but I don't remember her
11 name.

12 Q. Was this a girl that would come and stay
13 in the house or one of the girls that would come
14 and give massages?

15 A. The witness is not sure.

16 Q. Stay at the house. Do you recall a

17 person who would come to the house and

18 give massages?

19 MR. CRITTON: Form.

20 THE WITNESS: No, I don't remember.

21 BY MS. EZELL:

22 Q. Was there surveillance equipment
23 installed in the house?

24 A. Yes, ma'am.

25 MR. CRITTON: Form.

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1 BY MS. EZELL:

2 Q. And was that already installed when you
3 came there?

4 A. Yes, ma'am.

5 Q. Where is it you -- first of all, did they
6 tell you where the equipment was installed?

7 A. No.

8 Q. Did you have any understanding of where
9 the equipment was installed?

10 A. No.

11 Q. Do you know whether or not there was
12 surveillance photography equipment upstairs and
13 downstairs?

14 MR. CRITTON: Form.

15 THE WITNESS: Yes, ma'am.

16 BY MS. EZELL:

17 Q. And how do you know that?

18 A. I read it through the FBI report after
19 the fact that I -- after I left the job.

20 Q. Before reading through the FBI report did
21 you have any knowledge of the fact that there was
22 surveillance equipment both upstairs and
23 downstairs?

24 A. No, ma'am.

25 Q. While you were there was there ever an

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1 occasion when someone came to do any maintenance
2 or repair on the surveillance equipment?

3 A. Yes, ma'am.

4 MR. CRITTON: Object to the form of the
5 last question.

6 MS. EZELL: Pardon?

7 MR. CRITTON: Form of the last question.

8 BY MS. EZELL:

9 Q. Did that happen more than one time?

10 A. I believe so, yes, ma'am.

11 Q. Do you have any recollection of who came
12 there, either the name of the company or the name
13 of the person who would come to repair or do
14 maintenance on the video equipment?

15 A. We used to have a young technician from
16 Ohio who used to maintain all the computers and
17 would be the only one dealing with those things.

18 Q. So he maintained the computers and the

19 video equipment?

20 A. Yes.

21 Q. Is that correct?

22 MR. CRITTON: Form.

23 BY MS. EZELL:

24 Q. Do you have any recollection of what his
25 name was?

8 (Pages 295 to 298)

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1 A. I don't remember, Ma'am. He came from
 2 New Albany, Ohio.
 3 Q. From New --
 4 A. New Albany, Ohio.
 5 Q. New Albany, Ohio. Did he have his own
 6 business?
 7 A. No, he worked for Mr. Epstein. He will
 8 maintain all the computers.
 9 Q. Was he there everyday?
 10 A. No, ma'am.
 11 Q. Do you know whether at that time Mr.
 12 Epstein had an office in Palm Beach?
 13 A. Not outside the house, no.
 14 Q. Do you have any knowledge of whether or
 15 not the video equipment was -- and I don't know
 16 the technical term, forgive me, but was it the
 17 kind of equipment that would record for a certain
 18 amount of time and then record over that film?
 19 A. I don't know.
 20 MR. CRITTON: Form.
 21 BY MS. EZELL:
 22 Q. You don't know?
 23 A. No, ma'am.
 24 MR. CRITTON: Just for clarification, I
 25 may have misunderstood, but I thought he

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1 said he didn't even know the video equipment
 2 existed until he read the FBI report.
 3 MS. EZELL: He said he didn't know that
 4 it was upstairs and downstairs, I believe.
 5 MR. CRITTON: I thought he said he didn't
 6 know that it even existed.
 7 MS. EZELL: I may be wrong.
 8 BY MS. EZELL:
 9 Q. Did you know it existed before you read
 10 the FBI report?
 11 A. No, ma'am.
 12 Q. I'm sorry, then I was wrong.
 13 How did you know then that the young
 14 technician from Ohio maintained the computers and
 15 the video equipment?
 16 A. Because we used to request -- there were
 17 always problems with the computers so he came to
 18 the house and he was the programmer. It was very
 19 sophisticated.
 20 MR. CRITTON: Form to the last question,
 21 move to strike the answer as nonresponsive.
 22 BY MS. EZELL:
 23 Q. How did you know then that he maintained
 24 the video equipment as well?
 25 A. Because he was in charge of computers,

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1 video, even phones.
 2 Q. Would he also repair the televisions if
 3 they needed work?
 4 A. No.
 5 Q. No. Did you have any kind of intercom
 6 system in the house?
 7 A. Yes, ma'am.
 8 Q. And what kind of system was that?
 9 A. It was standard office equipment, Lucid
 10 Technologies maybe, but it was an intercom like we
 11 using right now.
 12 MS. EZELL: Just let the record reflect
 13 that the witness pointed to the telephone on
 14 the table that has a speaker phone.
 15 THE WITNESS: Yes, ma'am.
 16 BY MS. EZELL:
 17 Q. And did you use that in your work?
 18 A. Yes, ma'am.
 19 Q. And what did you use it for?
 20 A. Mr. Epstein used to page me when he
 21 needed me.
 22 Q. Did you have one of those phones in the
 23 kitchen?
 24 A. Yes, ma'am.
 25 Q. And was there one out in the staff house

Page 302

1 as well?
 2 A. Yes, ma'am.
 3 Q. Do you know where others were in the
 4 house?
 5 A. Probably have like 15 phones. We used to
 6 have three in the staff house, one in the cabana,
 7 two in the master bedroom, one in each room,
 8 kitchen, dining room, Mrs. Maxwell's office, the
 9 garage.
 10 Q. Where was Mrs. Maxwell's office?
 11 A. Under the stairs next to the kitchen.
 12 Q. Can you give me some idea of what size
 13 space that was?
 14 A. It was probably -- we change the floor.
 15 Twelve by five, something like that.
 16 Q. And was the computer equipment in that
 17 space?
 18 A. Yes, ma'am.
 19 Q. Do you know whether Ms. Maxwell kept the
 20 names and telephone numbers of the girls who came
 21 to do massages?
 22 A. Yes, ma'am.
 23 MR. CRITTON: Form.
 24 BY MS. EZELL:
 25 Q. Do you know that because you saw the

9 (Pages 299 to 302)

Page 303

1 names and phone numbers?
 2 MR. CRITTON: Form.
 3 THE WITNESS: Yes, ma'am.
 4 BY MS. EZELL:
 5 Q. Do you know if she kept pictures of the
 6 girls on the computer?
 7 A. Yes, she did.
 8 Q. And you know that as well because you
 9 happen to see them?
 10 A. Yes, ma'am.
 11 MR. CRITTON: Form to the last two
 12 questions.
 13 BY MS. EZELL:
 14 Q. Were they similar to the pictures that
 15 Ms. Kellen had on her computer?
 16 MR. CRITTON: Form.
 17 THE WITNESS: Yes, ma'am.
 18 BY MS. EZELL:
 19 Q. Did the pictures that they kept there
 20 look like pictures that were posed?
 21 A. They were more casual.
 22 Q. Did they look as though the person being
 23 photographed knew that they were being
 24 photographed?
 25 MR. CRITTON: Form.

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1 THE WITNESS: No, ma'am.
 2 BY MS. EZELL:
 3 Q. And what can you tell me about that, what
 4 lead you to draw that conclusion?
 5 A. They were probably taken in parties in
 6 big reception or banquet.
 7 MR. CRITTON: Let me offer as a
 8 suggestion, not that you have to accept or
 9 that you would, you're using the term young
 10 girls generically, he has probably seen
 11 many, many young girls, there was no --
 12 you've used it interchangeably with just
 13 young girls versus young girls who may have
 14 come to -- purported to give a massage and,
 15 therefore, that may be a different answer,
 16 so that's part of my form objection.
 17 MS. EZELL: Okay, thank you.
 18 BY MS. EZELL:
 19 Q. When I asked you about Ms. Kellen whether
 20 she had a list of the girls and telephone numbers,
 21 I think I asked about those girls that came to
 22 give massages, but let me go back and just ask it
 23 that way.
 24 Did you notice that Ms. Kellen had a list
 25 of the girls that came to give massages on her

Page 305

1 computer?
 2 MR. CRITTON: Form.
 3 THE WITNESS: Yes, ma'am.
 4 BY MS. EZELL:
 5 Q. And did she generally have phone numbers
 6 for those girls?
 7 A. Yes, ma'am.
 8 Q. And were they generally pictures of the
 9 girls?
 10 MR. CRITTON: Form.
 11 THE WITNESS: No, ma'am.
 12 BY MS. EZELL:
 13 Q. And did Ms. Maxwell have a list of the
 14 girls who came to give massages?
 15 MR. CRITTON: Form.
 16 THE WITNESS: Yes, ma'am.
 17 BY MS. EZELL:
 18 Q. Did she have telephone numbers generally?
 19 A. Yes, ma'am.
 20 MR. CRITTON: Form.
 21 BY MS. EZELL:
 22 Q. Were there pictures on her computer of
 23 the girls who came to give massages?
 24 MR. CRITTON: Form.
 25 BY MS. EZELL:

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1 Q. Ms. Maxwell I'm talking about.
 2 A. Yes, ma'am.
 3 Q. And were those pictures the more casual
 4 ones that you described when I asked whether or
 5 not the subject looked as though she knew she was
 6 being photographed?
 7 MR. CRITTON: Form.
 8 THE WITNESS: I'm sorry, can you repeat?
 9 BY MS. EZELL:
 10 Q. Yeah. The pictures of the young girls
 11 who came to the house to give massages that were
 12 on Ms. Maxwell's computer, did they appear to have
 13 been taken when the girls knew they were being
 14 photographed?
 15 MR. CRITTON: Form.
 16 THE WITNESS: I don't think they knew
 17 they were being photographed.
 18 BY MS. EZELL:
 19 Q. I believe you said they were more casual
 20 pictures.
 21 A. Yes, ma'am.
 22 Q. Did you notice any nude photographs in
 23 those pictures?
 24 A. Yes, ma'am.
 25 MR. CRITTON: Form for the last question.

10 (Pages 303 to 306)

Page 307

1 BY MS. EZELL:

2 Q. Among those pictures in Ms. Maxwell's
3 computer of the young women who came there to give
4 massages, were the nude photographs in that group
5 taken, did they appear to be taken in the house?

6 MR. CRITTON: Form.

7 THE WITNESS: No, ma'am.

8 BY MS. EZELL:

9 Q. You said before they appeared to be taken
10 at receptions or banquets?

11 A. Yes, ma'am.

12 Q. And I'm a little confused about how they
13 were casual and taken while the girls were nude at
14 receptions and banquets?

15 A. What I saw there were parties in Russia,
16 Eastern Europe, I don't know which country, but
17 there were also pictures of nude girls in a
18 shower, for instance, in a shower stall.

19 Q. You said for instance, so were there
20 other places other than the shower?

21 A. Yes, ma'am.

22 Q. Like what?

23 A. Gatherings, you know, in a party. You
24 could tell everybody is smiling so I believe it
25 was a place where they're having fun.

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1 Q. Were any of those pictures, if you
2 recall, taken in the cabana?

3 A. I don't remember.

4 Q. Do you recall there being parties and
5 gatherings in the cabana at the house?

6 A. I don't remember.

7 MR. CRITTON: Form.

8 BY MS. EZELL:

9 Q. When Mr. Epstein entertained did you have
10 anything to do with seeing that the bars were
11 stocked and that there was food that was needed
12 and so forth?

13 MR. CRITTON: Form.

14 THE WITNESS: There was no alcohol in the
15 house, only for guests. But, yeah, he will
16 ask sometimes for food.

17 BY MS. EZELL:

18 Q. And do you ever recall him asking for
19 food for parties in the cabana?

20 A. No, ma'am.

21 Q. Was there a chef at the house on El
22 Brillo Way when you were there?

23 A. I'm sorry?

24 Q. A chef.

25 A. Yes, there was.

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1 Q. And was there more than one during the
2 time you were there?

3 A. Yes.

4 Q. Do you remember their names?

5 A. One was David, I don't remember the other
6 one name.

7 Q. Did they appear to be American?

8 A. Yes, ma'am.

9 Q. Do you know the name David Mulligan?

10 A. Could be, ma'am, but I'm not sure of his
11 last name.

12 Q. Do you have any idea where those chefs
13 had gotten their training?

14 A. David was working in San Francisco when
15 he was hired.

16 Q. Was he still there when you left Mr.
17 Epstein's employ?

18 A. Yes, to my knowledge, ma'am.

19 Q. Did the chef interact with the girls who
20 came to give massages?

21 A. In the kitchen, yes.

22 Q. And did he often offer them some food
23 while they were there?

24 A. Yes, ma'am.

25 Q. Were there occasions where a girl came to

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1 give a massage accompanied by another girl, or
2 another person, let me say?

3 A. Yes, ma'am.

4 Q. And sometimes was that other person a
5 woman and sometimes a man?

6 A. No, ma'am, always a woman.

7 Q. Always a woman. Usually would it have
8 been a woman about the same age as the young woman
9 coming to give the massage?

10 MR. CRITTON: Form.

11 THE WITNESS: Yes, ma'am.

12 BY MS. EZELL:

13 Q. Were you ever told by Ms. Kellen to pay
14 the person who came who didn't give a massage?

15 A. Yes, ma'am.

16 Q. Do you recall how much you paid that
17 person?

18 A. Yes, ma'am.

19 MR. CRITTON: Form.

20 BY MS. EZELL:

21 Q. How much?

22 A. 300 to 500 dollars.

23 Q. Were some of those young women who
24 brought other young women for massages regulars, I
25 mean, did they regularly bring other young women?

11 (Pages 307 to 310)

Page 311

1 MR. CRITTON: Form.
 2 THE WITNESS: Yes, ma'am.
 3 BY MS. EZELL:
 4 Q. And were there some who maybe came just
 5 once or twice with other young women?
 6 A. That's correct, ma'am.
 7 Q. Now, where would the young woman who was
 8 bringing another young woman go during the time
 9 the person that she brought was upstairs giving
 10 the massage?
 11 MR. CRITTON: Form.
 12 THE WITNESS: I will take them to the
 13 kitchen and Sarah would take them from
 14 there.
 15 BY MS. EZELL:
 16 Q. Do you know where she took them?
 17 A. No, ma'am.
 18 Q. Were they ever taken to just sit in the
 19 living room and wait?
 20 MR. CRITTON: Form.
 21 THE WITNESS: I don't know, ma'am.
 22 BY MS. EZELL:
 23 Q. These pictures of nude young women taken
 24 in gatherings where they were smiling, did they
 25 appear to you to be taking part in an orgy?

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1 MR. CRITTON: Form.
 2 THE WITNESS: I don't know, ma'am.
 3 BY MS. EZELL:
 4 Q. Do you know the word cavorting?
 5 A. No, ma'am, I don't know.
 6 Q. I need my Thesaurus. You said they were
 7 smiling, did they appear to be having a good time?
 8 A. Yes, ma'am.
 9 Q. Did they appear to be doing anything
 10 sexual?
 11 A. Yes, ma'am.
 12 Q. And in these instances were there girls
 13 doing sexual things with other girls?
 14 A. Yes, ma'am.
 15 Q. And I'm still talking about the pictures
 16 on Ms. Maxwell's computer.
 17 A. Yes, ma'am.
 18 MR. CRITTON: You're talking about the
 19 group shots that he's mentioned from Russia
 20 and Eastern Europe?
 21 MS. EZELL: And girls in the shower.
 22 MR. CRITTON: Let me object to the form
 23 then the way you just now described that.
 24 MS. EZELL: He said for instance.
 25 MR. CRITTON: He had said a girl in the

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1 shower, I don't know whether he ever used
 2 plural.
 3 BY MS. EZELL:
 4 Q. Was there more than one picture of a girl
 5 in the shower?
 6 A. There were two girls in the shower.
 7 Q. Two girls in the shower together?
 8 A. Yes, ma'am.
 9 Q. And were those two girls engaged in
 10 something sexual?
 11 A. Yes, ma'am.
 12 Q. And I may have asked you this question,
 13 forgive me if I did, did you know those two girls?
 14 A. No, ma'am.
 15 Q. Did Ms. Maxwell have nude pictures of
 16 Nadia on her computer?
 17 MR. CRITTON: Form.
 18 THE WITNESS: I don't know, ma'am.
 19 BY MS. EZELL:
 20 Q. Did you ever meet a young woman named
 21 Emmy who had an association with Ms. Maxwell?
 22 MR. CRITTON: Emmy?
 23 MS. EZELL: Emmy.
 24 THE WITNESS: I don't remember, ma'am.
 25 BY MS. EZELL:

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1 Q. Did you ever have any conversations with
 2 Ms. Maxwell about any of the women in those
 3 pictures?
 4 A. No, ma'am.
 5 Q. And did you ever have a conversation with
 6 Sarah Kellen about any of the pictures of the
 7 girls in her computer?
 8 A. No, ma'am.
 9 Q. You were asked last time about the creams
 10 and lotions that Mr. Epstein typically had
 11 available to him and you said you thought there
 12 was a favorite one but you couldn't remember it.
 13 A. Spa.
 14 Q. Spa, you did say Spa.
 15 A. Yeah.
 16 Q. Thank you.
 17 Where did the stairway from the kitchen
 18 lead -- to where did it lead?
 19 A. To the second floor between the first and
 20 second bedrooms.
 21 Q. Were either of those bedrooms the master
 22 bedroom?
 23 A. No, ma'am.
 24 Q. Could one go up that staircase through --
 25 could one go up that staircase and reach the

12 (Pages 311 to 314)

Page 315

1 master bedroom?
 2 A. Yes, ma'am.
 3 Q. And how would you do that? If you want
 4 to turn the page over for the upstairs you could
 5 do that.
 6 A. Okay.
 7 MR. CRITTON: Are you going to mark this
 8 as an exhibit?
 9 MS. EZELL: Uh-huh.
 10 MR. CRITTON: Would that be Exhibit 3?
 11 MR. EDWARDS: I think so.
 12 (Exhibit No. 3 was marked for
 13 Identification.)
 14 THE WITNESS: This is the master bedroom,
 15 master bath, and there were one, two -- the
 16 rest of the bedrooms were here and the
 17 master bedroom was here. This is master
 18 bath one and master bath two.
 19 So the staircase came to the second floor
 20 like this and it was between the first and
 21 second bedroom. And you could go through
 22 here and you enter a foyer with double doors
 23 here, double doors here, and you enter the
 24 master bedroom.
 25 BY MS. EZELL:

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1 Q. All right. How would you get to the
 2 master bathroom on that end?
 3 A. You go through these double doors, go
 4 around the bed and you gain access to the master
 5 bedroom -- master bathroom, sorry.
 6 Q. And then there was another master
 7 bathroom on the other side of the room?
 8 A. Yes, ma'am.
 9 Q. Where generally did the massages take
 10 place?
 11 A. Right here, ma'am.
 12 Q. And is that in the master bathroom?
 13 A. Master bathroom, yes.
 14 Q. Do you recall what color the tile was in
 15 that bathroom?
 16 A. There was carpet.
 17 Q. Was there tile on the walls or marble
 18 or --
 19 A. There was a sauna here with marble but
 20 outside the sauna everything was carpet, and the
 21 walls, they didn't have any tile. Oh yes, I will
 22 say four feet off the floor they will have marble.
 23 Q. And do you remember what color marble it
 24 was?
 25 A. White.

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1 Q. White. By the way, I have some more
 2 water, would you like some?
 3 A. Thank you, ma'am.
 4 Q. I figure if I'm a little dry you may be
 5 too.
 6 I believe one of the items that you
 7 mentioned that sometimes had to be picked up after
 8 girls were there giving massages was a back
 9 massager.
 10 A. Yes, ma'am.
 11 Q. Could you describe that for me, please?
 12 A. It was a piece about this big.
 13 Q. Would you say that's about 18 inches?
 14 A. Yes, ma'am. And two prongs with the
 15 rubber tips and a cord.
 16 Q. Okay.
 17 A. Or it could be detached too.
 18 Q. Do you have any recollection of what make
 19 that was?
 20 A. No, ma'am.
 21 Q. Were there any other massagers that you
 22 recall seeing there regularly?
 23 A. Those are the ones I remember. I think
 24 they are from Sharper Image, but I don't --
 25 Q. Okay. Were there often girls around the

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1 pool at the house?
 2 A. Yes, ma'am.
 3 Q. And were these sometimes the same girls
 4 that came to give massages?
 5 A. Yes, ma'am.
 6 Q. Were there girls in addition to those who
 7 came to give massages who hung around the pool?
 8 A. The girls who were staying at the house.
 9 Q. Okay. And so they weren't girls who just
 10 regularly came to hangout around the pool?
 11 A. No, ma'am.
 12 MS. EZELL: Excuse me. Can we go off the
 13 record for a minute?
 14 (Thereupon, a recess was had.)
 15 THE VIDEOGRAPHER: We're back on the
 16 record with tape number two.
 17 BY MS. EZELL:
 18 Q. Mr. Rodriguez, did you receive a subpoena
 19 that asked you to bring documents with you to the
 20 deposition?
 21 A. Yes, ma'am.
 22 Q. And did you bring any with you?
 23 A. I couldn't find anything at my house.
 24 Q. Okay. I believe we talked about a
 25 journal that you kept, and you looked for that?

13 (Pages 315 to 318)

Page 319

1 A. Yes, ma'am.
 2 Q. And you couldn't find it?
 3 A. I give it to Detective Joe.
 4 Q. Recarey?
 5 A. Yes, ma'am.
 6 Q. You mentioned that you called Mr.
 7 Jean-Luc Bernell about a recommendation when you
 8 were looking for a job.
 9 A. Yes, ma'am.
 10 Q. And did you know him from his visits in
 11 the home?
 12 A. Yes, ma'am.
 13 Q. Did you say that his wife's name was Eva?
 14 MR. CRITTON: Form.
 15 THE WITNESS: No, ma'am.
 16 BY MS. EZELL:
 17 Q. Do you know what his wife's name was?
 18 A. Eva was a model, a former model from
 19 years past who was friend of Mr. Epstein.
 20 Q. Do you know if she was married to Glenn
 21 Dubin? Do you know Mr. Dubin?
 22 MR. CRITTON: Form.
 23 THE WITNESS: I believe, yeah, I'm not
 24 sure, ma'am.
 25 BY MS. EZELL:

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1 Q. Is she now a doctor?
 2 A. No, she was a model, her husband could be
 3 a doctor but I don't think she is.
 4 Q. Okay. So is Jean-Luc Bernell married; to
 5 your knowledge?
 6 A. I don't know, ma'am.
 7 Q. I think I must have gotten confused
 8 because we were talking about the picture in the
 9 house of the little girl who is lifting up her
 10 skirt or her underpants, I'd forgotten what it
 11 was.
 12 A. Yes, ma'am.
 13 MR. CRITTON: Form.
 14 BY MS. EZELL:
 15 Q. And I thought you said that that was
 16 Jean-Luc's child.
 17 A. No, ma'am, she is Mrs. Eva.
 18 Q. Eva's child?
 19 A. Yes, ma'am.
 20 Q. And she is Jeffrey Epstein's Goddaughter?
 21 A. Yes, ma'am.
 22 Q. Do you know where she and her mother
 23 live?
 24 A. They live in Manhattan.
 25 MR. CRITTON: Form.

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1 BY MS. EZELL:
 2 Q. Did they ever visit Mr. Epstein at the
 3 home when you were there?
 4 A. Yes, ma'am.
 5 Q. How old was the little girl at that time?
 6 A. Eight years old.
 7 Q. Did the girl's father come to visit as
 8 well?
 9 A. Yes, ma'am.
 10 Q. And do you remember his name?
 11 A. No, ma'am.
 12 Q. Do you remember hearing anything about
 13 what he does for a living?
 14 A. No, ma'am.
 15 Q. Can you describe him?
 16 A. Tall, American born, I will say 50 years
 17 old.
 18 Q. What color hair did he have?
 19 A. At that time it was black with a few
 20 white hairs.
 21 Q. Were there drawings of nude women in the
 22 house?
 23 A. No, ma'am.
 24 Q. Were there paintings of nude women in the
 25 house?

Page 322

1 A. Yes, ma'am.
 2 Q. Did any of those appear to be
 3 Ms. Maxwell?
 4 A. Yes, ma'am.
 5 Q. You mentioned that Louella who was still
 6 working there when you left --
 7 A. Yes, ma'am.
 8 Q. -- was a very religious woman --
 9 A. Yes, ma'am.
 10 Q. -- and would sometimes be upset about
 11 seeing pictures of nude girls or having to pick up
 12 sex toys, et cetera.
 13 MR. CRITTON: Form.
 14 THE WITNESS: Yes, ma'am.
 15 BY MS. EZELL:
 16 Q. And you said that you remembered her
 17 crying because there was a picture of the Pope
 18 next to a picture of a naked girl.
 19 MR. CRITTON: Form.
 20 THE WITNESS: Yes, ma'am.
 21 BY MS. EZELL:
 22 Q. Do you know who that naked girl was?
 23 A. I don't remember, ma'am.
 24 Q. I believe David Copperfield's name came
 25 up in the last deposition as someone who would

14 (Pages 319 to 322)

Page 323

1 call or visit.
 2 A. Yes, ma'am.
 3 Q. Were you ever there when he visited?
 4 A. Yes, ma'am.
 5 Q. And do you remember did he spend the
 6 night?
 7 A. No, ma'am.
 8 Q. Did he come for dinner?
 9 A. Yes, ma'am.
 10 Q. Did that happen more than one time when
 11 you were there?
 12 A. Yes, ma'am.
 13 Q. Do you remember whether or not any of the
 14 young ladies who came to perform massages also
 15 stayed for dinner?
 16 A. No, ma'am.
 17 MR. CRITTON: Just so it's clear, no, you
 18 don't remember?
 19 THE WITNESS: No, they were not there.
 20 BY MS. EZELL:
 21 Q. Did any of them ever stay for dinner?
 22 Just any dinner, not the dinner with David
 23 Copperfield.
 24 A. You said they, the girls?
 25 Q. The girls who came to give massages.

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1 A. No, ma'am.
 2 Q. In the earlier part of the deposition you
 3 stated that you didn't drive the girls but then
 4 later you remembered that you did sometimes have
 5 to drive them.
 6 A. Yes, ma'am.
 7 Q. Do you remember a young woman named A.
 8 who came there?
 9 A. Yes, I do remember.
 10 MS. EZELL: And again, we're going to
 11 have the same agreement, if we use a girl's
 12 name it will be shown on the transcript as
 13 the initials only.
 14 MR. EDWARDS: Agreed.
 15 MR. CRITTON: Why don't you give him the
 16 initials? Because in reading the transcript
 17 we could end up with 25 C's or E's or T's,
 18 in looking at it by just using the first, I
 19 am just offering a suggestion because none
 20 of us will remember who in the heck these
 21 people are.
 22 MS. EZELL: So you're asking me to give
 23 both names so we would have two initials?
 24 MR. CRITTON: He may not recognize either
 25 the first or the second name but as long as

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1 we are start with it and then you can use
 2 the initials after that for all I care.
 3 BY MS. EZELL:
 4 Q. Do you remember a girl named A.H.?
 5 A. I heard that name.
 6 Q. So I will refer to her as A.H. from now
 7 on.
 8 I'm going to show you a document, we can
 9 mark it but I'm not going to leave it. I'm going
 10 to take the exhibit.
 11 MR. CRITTON: Wait a minute. Are you
 12 going to make a copy of it?
 13 MS. EZELL: No, I'm not going to leave a
 14 copy.
 15 MR. CRITTON: All right. Then I object
 16 to you showing him a document that is not
 17 part of this record.
 18 MS. EZELL: Then object and the Judge can
 19 rule, but I'm going to ask him to look at
 20 this document. We can mark it as Exhibit 4.
 21 THE WITNESS: Oh yeah.
 22 BY MS. EZELL:
 23 Q. Do you remember this young woman?
 24 A. Yes.
 25 MR. CRITTON: Let's see.

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1 BY MS. EZELL:
 2 Q. And was she one of the ones who came to
 3 the house to give massages?
 4 A. Yes, ma'am.
 5 Q. Do you remember her name?
 6 A. No, ma'am.
 7 Q. Is it possible she was A.H.?
 8 MR. CRITTON: Form.
 9 THE WITNESS: I hear that name but I
 10 cannot say for sure.
 11 BY MS. EZELL:
 12 Q. Okay. Did she come often to the house?
 13 A. Yes, ma'am.
 14 Q. Were you ever aware of her being
 15 photographed?
 16 A. No, ma'am.
 17 Q. I asked you about David Copperfield
 18 before and let me ask you again. In thinking
 19 about it is it possible that you remember that she
 20 was there for dinner with David Copperfield?
 21 MR. CRITTON: Form, asked and answered.
 22 THE WITNESS: Possible, yes, ma'am.
 23 BY MS. EZELL:
 24 Q. Did you ever meet her parents?
 25 A. No, ma'am.

15 (Pages 323 to 326)

Page 327

1 Q. I'll take the pictures back.
 2 MR. CRITTON: Just put on the record that
 3 my client obviously could be here at the
 4 deposition, or anyone's clients could be
 5 here at the deposition and have full access
 6 to the information that's being provided, by
 7 taking the photograph back I'm not going to
 8 be able to provide to that client, nor will
 9 I have possession of it so I could discuss
 10 that photograph, it's now been explored with
 11 this witness.

12 (Exhibit No. 4 was marked for
 13 Identification.)

14 BY MS. EZELL:

15 Q. Do you recall that on occasion you drove
 16 this young woman to or from Mr. Epstein's house?

17 MR. CRITTON: Form.

18 THE WITNESS: I don't remember, ma'am.

19 BY MS. EZELL:

20 Q. Do you ever recall driving her by the
 21 airport and showing her Jeffrey Epstein's plane?

22 MR. CRITTON: Form.

23 THE WITNESS: Yes, ma'am.

24 BY MS. EZELL:

25 Q. Do you ever recall one time perhaps by

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1 accident seeing her naked?

2 MR. CRITTON: Form.

3 THE WITNESS: Yes, ma'am.

4 BY MS. EZELL:

5 Q. How did that happen?

6 A. I told Louella to go upstairs because I
 7 saw Mr. Epstein leave, so we rushed upstairs to
 8 clean and this girl was sleeping naked in the
 9 sauna, she fall asleep there, there was nobody
 10 else there.

11 MR. CRITTON: Can I ask just for
 12 clarification, is he talking now about the
 13 person he thought was A. but he wasn't sure
 14 or the person that's in photo four?

15 MS. EZELL: The person that's in
 16 photo four.

17 THE WITNESS: Yes.

18 MR. CRITTON: Okay, thank you.

19 BY MS. EZELL:

20 Q. And just so we're clear, do you think
 21 this is A.H. but you're not sure?

22 MR. CRITTON: Form.

23 THE WITNESS: I heard the name so many
 24 times but I know I took her, you know, in
 25 the Suburban, so it was her.

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1 BY MS. EZELL:

2 Q. You mentioned last time that Mr. Epstein
 3 asked you to go and rent a car for one of the
 4 girls who gave him massages.

5 A. Right.

6 Q. Do you know if that was A.H.?

7 A. I'm not hundred percent sure, ma'am.

8 Q. Do you know how long that girl kept the
 9 car?

10 A. A couple of months.

11 Q. Did she bring it back to you or did she
 12 turn it in at the agency?

13 A. She brought it back to me.

14 Q. Did you ever have any knowledge of Mr.
 15 Epstein helping this girl with her college
 16 applications?

17 MR. CRITTON: Form.

18 THE WITNESS: I believe Mr. Epstein was
 19 giving her money for good grades, that's
 20 what I -- she told me, I understood that.

21 BY MS. EZELL:

22 Q. Was this the girl that you were
 23 instructed by Mr. Epstein to take roses to at the
 24 completion of her graduation?

25 A. I don't remember exactly, ma'am, but

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1 there were so many faces, you know, but I cannot
 2 say a hundred percent.

3 Q. But it's possible that this is the same
 4 girl?

5 A. Yes, ma'am.

6 MR. CRITTON: Form.

7 BY MS. EZELL:

8 Q. And thinking about it carefully you still
 9 believe she kept that car for two months?

10 A. Yes, ma'am.

11 Q. Do you recall an encounter with this same
 12 girl when you saw a strange vehicle in the
 13 driveway one day?

14 MR. CRITTON: Form.

15 THE WITNESS: Yes, ma'am.

16 BY MS. EZELL:

17 Q. And what happened then?

18 A. I saw, you know, an old car that didn't
 19 belong to the house so I went to the police
 20 department, so the police department follow me and
 21 they with flashlight they went into the driver and
 22 ask her because she was -- I forgot I was suppose
 23 to pay her but it was late at night, 8:00 p.m.,
 24 something like that, 8:30, so I recognize her and
 25 I said to the police department I know this girl,

16 (Pages 327 to 330)

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1 so I paid her and she went off.
 2 Q. Do you recall how much you paid her?
 3 A. Between two and 300 dollars, I believe.
 4 Q. How often was Mr. Epstein in Palm Beach
 5 during the period you were there?
 6 A. He will stay two months -- I mean, two
 7 weeks out of the month.
 8 MS. EZELL: If I could please have these
 9 marked as Exhibits 5 through 8.
 10 (Exhibit No's. 5, 6, 7, and 8 were
 11 marked for Identification.)
 12 MR. CRITTON: Do you want them in the
 13 order you gave them?
 14 MS. EZELL: It doesn't matter.
 15 BY MS. EZELL:
 16 Q. Would you look, please, at the exhibit
 17 that has been marked as number -- what is it;
 18 five?
 19 A. Five.
 20 Q. Five. Do you recall seeing this young
 21 woman at the house when you were there?
 22 A. Yes, ma'am.
 23 Q. And do you recall her name?
 24 A. No, ma'am.
 25 MR. CRITTON: Let the record reflect it's

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1 written on the photographs is a name, so
 2 it's already being suggested to him, I think
 3 that's inappropriate.
 4 MS. EZELL: It shouldn't be there, I'm
 5 sorry. If I can erase it I will, I didn't
 6 realize it was on there.
 7 MR. CRITTON: It's on all of them, Cathy.
 8 MS. EZELL: You're right, sorry.
 9 BY MS. EZELL:
 10 Q. Looking at the girl in number five, if I
 11 told you that her name was F.E., would that
 12 refresh your recollection as to who she was?
 13 A. No, ma'am.
 14 Q. Would you look, please, at the girl in
 15 the picture that's been marked as Exhibit 6?
 16 Do you ever recall seeing that girl come
 17 to the house to give massages?
 18 A. I cannot guarantee that, Ma'am.
 19 Q. I understand, it's not the best picture
 20 in the world either, you can't see.
 21 MR. EDWARDS: I don't know that I
 22 understood the answer. You can't guarantee
 23 it?
 24 THE WITNESS: I cannot guarantee it, sir.
 25 BY MS. EZELL:

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1 Q. Possibly but you're not sure?
 2 A. Yes, ma'am.
 3 Q. Okay. Would you look, please, at the two
 4 photographs that have been marked as Composite
 5 Exhibit 7?
 6 Do you recall seeing this girl come to
 7 the house to give massages?
 8 A. I don't remember, ma'am.
 9 Q. Okay. That's perfectly all right.
 10 MR. CRITTON: Who does that purport to
 11 be; number seven?
 12 MS. EZELL: J.P.C.
 13 BY MS. EZELL:
 14 Q. The last one is exhibit what?
 15 A. Eight.
 16 Q. Eight. Do you recall seeing this girl
 17 come to the house to give massages?
 18 A. No, ma'am.
 19 Q. Okay.
 20 MS. EZELL: I don't have any other
 21 questions right now. If anybody else wants
 22 to go, if I could just reserve that if I
 23 find something.
 24 MR. WILLITS: I don't know who's next,
 25 this is Richard Willits, I have a couple of

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1 questions.
 2 MR. CRITTON: All right, you're up.
 3 MR. EDWARDS: Hold on one second,
 4 Richard, they're going to put a microphone
 5 by the phone.
 6 MR. WILLITS: I only have a couple of
 7 questions.
 8 (Thereupon, an interruption was had.)
 9 THE VIDEOGRAPHER: We're back on the
 10 record.
 11 EXAMINATION
 12 BY MR. WILLITS:
 13 Q. Back on the record. Sir, my name is
 14 Richard Willits and I just have a couple of
 15 questions for you.
 16 Do you remember a young girl coming to
 17 the house by the name of C. or C.?
 18 A. I hear that name, sir.
 19 Q. You know the name, does that ring a bell
 20 at all?
 21 A. I hear the name in the house.
 22 Q. Can you associate that name with a girl?
 23 A. Yes, sir.
 24 Q. I'm sorry?
 25 A. Yes, sir, yes, I do.

17 (Pages 331 to 334)

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1 Q. Do you remember whether she came to the
2 house on more than one occasion?

3 A. I heard her name several times from
4 Sarah, sir, but beyond that I cannot say anything
5 else.

6 Q. Okay. Who have you talked to about your
7 knowledge of Mr. Epstein in the last year?

8 A. My wife.

9 Q. Anyone else?

10 A. No, sir.

11 Q. Well, you talked to Mr. Critton.

12 A. We have a conversation in West Palm
13 Beach.

14 Q. Yes. So you talked to your wife, you
15 talked to Mr. Critton?

16 A. Yes.

17 Q. Had you talked to anyone else in the last
18 year about Epstein?

19 A. No.

20 Q. Did you talk to Mr. Goldberger?

21 A. Yeah, I called Mr. Goldberger first
22 before I talked to Mr. Critton.

23 Q. Okay. So we have your wife, we have Mr.
24 Critton, and we have Mr. Goldberger.

25 Do we have anyone else that you talked to

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1 in the last year?

2 A. No, sir.

3 Q. How about Mr. Epstein of course?

4 A. No.

5 Q. Where did you usually keep the journal
6 with the names of the girls, in what part of the
7 house?

8 A. In the staff house.

9 Q. Sorry?

10 A. The staff house, the guest house.

11 Q. Right. But you said you had a journal at
12 your own residence with the names of the girls.

13 A. I give the whole journal and all the
14 information regarding this case, sir, to Detective
15 Joe Recarey, sir.

16 Q. Okay. And the materials that you gave to
17 the Detective, were they kept -- were any of them
18 kept at your own personal residence?

19 A. Yes, they were with me, sir.

20 Q. Okay. When you gave the materials to the
21 Detective, did all of the materials you gave to
22 him come from your residence?

23 A. Yes.

24 Q. Do you remember exactly what you gave to
25 him?

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1 A. I give him a list of notes that I used to
2 take from frequent people -- I mean, people who
3 used to frequent the house and -- I'm sorry, it's
4 been a few years, I don't remember, but it was
5 those years, like it was a file with my personal
6 notes because he told me it was very important and
7 he kind of said can I borrow this from you, and he
8 still has those documents, sir.

9 Q. So even though they pertain to Mr.
10 Epstein you kept those notes at your residence?

11 A. Yes, sir.

12 Q. Okay. Where in your residence did you
13 keep those notes before you gave them to the
14 Detective?

15 A. In my bedroom.

16 Q. Did you have a file cabinet or --

17 A. No.

18 Q. -- chester drawers or something?

19 A. No, they were laying next to some other
20 papers that I have.

21 Q. Did the other papers pertain to Mr.
22 Epstein?

23 A. No, no, nothing else related to Mr.
24 Epstein.

25 Q. I'm just confused as to why you told us

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1 before that you had a journal at home and today
2 you say that you gave everything to the Detective.

3 MR. CRITTON: Form. You also may have
4 missed a portion of his earlier testimony if
5 you couldn't hear something, but go ahead.

6 MR. WILLITS: Most likely.

7 THE WITNESS: What I said was I thought I
8 had some information, and then I look with
9 my daughter and we couldn't find anything,
10 and I remember now that I put everything in
11 the file that I give to Detective Recarey.

12 BY MR. WILLITS:

13 Q. Did anyone help you assemble those papers
14 to give to the Detective?

15 A. No, sir.

16 MR. WILLITS: I don't have any other
17 questions.

18 CROSS EXAMINATION

19 BY MR. CRITTON:

20 Q. Mr. Rodriguez, my name is Bob Critton and
21 I represent Mr. Epstein as you're aware, I have a
22 few questions for you.

23 What I would like to remind you at the
24 start of this is if you know something, tell us,
25 if you don't know something tell us that.

18 (Pages 335 to 338)

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1 You're not required to speculate, you're
 2 not required to guess, you're not required to
 3 assume because some lawyers ask you a leading
 4 question or suggested in a report or like the
 5 police report like Mr. Mermelstein and Mr. Edwards
 6 did, that did you tell the police officers X, Y,
 7 or Z without showing you the statement. You're
 8 not required to guess, I want personal knowledge,
 9 not speculation. Do you understand?
 10 A. Yes, I do.
 11 Q. All right. Now, when Mr. Edwards and --
 12 Mr. Horowitz is here today for Mr. Mermelstein,
 13 but you remember a lawyer asked you some questions
 14 last time you were here?
 15 A. Yes.
 16 Q. That is he started and he went on for a
 17 few hours. Do you recall that?
 18 A. Yes, I remember.
 19 Q. He asked you do you remember telling the
 20 police officer Y, X, or Z.
 21 Do you remember that? Do you remember
 22 that's how he phrased his question?
 23 A. Yes, yes.
 24 Q. He never showed you a statement that you
 25 made to the police department; did he?

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1 A. I'm sorry?
 2 Q. He didn't show you a document that said,
 3 question, you know, what is your name; answer, my
 4 name is Alfredo Rodriguez --
 5 MR. WILLITS: Object to the form of the
 6 question.
 7 MR. CRITTON: You need to let me finish
 8 it first.
 9 MR. WILLITS: I'm sorry, I thought you
 10 were.
 11 BY MR. CRITTON:
 12 Q. He never showed you a statement of what
 13 the question was and the answer that you gave.
 14 True?
 15 MR. WILLITS: Object to the form of the
 16 question.
 17 THE WITNESS: I don't exactly understand
 18 your question.
 19 BY MR. CRITTON:
 20 Q. Do you know what a deposition is?
 21 A. Yes, I am.
 22 Q. That's what you're doing here.
 23 MR. CRITTON: Could I borrow your
 24 deposition for just a minute?
 25 MR. HOROWITZ: The transcript? It's

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1 marked up, no, you can't.
 2 MR. CRITTON: I just want to show him.
 3 Thank you, Cathy.
 4 BY MR. CRITTON:
 5 Q. This is the first what Ms. Ezell was kind
 6 enough to provide is the first part of your
 7 deposition, it was transcribed by the court
 8 reporter and provided by all counsel.
 9 Do you understand that?
 10 A. Yes, I understand that.
 11 Q. And no one has provided that to you yet
 12 today; have they?
 13 A. No.
 14 Q. Now, I think you told us that with the
 15 police officers you gave a taped statement.
 16 Did I understand you correctly?
 17 A. Yes.
 18 Q. And the only conversation that you had
 19 with the police officers, and it may have been a
 20 state attorney, it was somebody named Ms. Weiss
 21 who I think was referenced in the questions, the
 22 only time that you talked with at least Officer
 23 Recarey and the State Attorney's Office from Palm
 24 Beach County was in a taped statement.
 25 Is that correct?

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1 A. No.
 2 Q. Did you talk with them separate and apart
 3 from that?
 4 A. Yes, I did.
 5 Q. Okay. Did they tape that statement?
 6 A. No.
 7 Q. You told us you also spoke with
 8 representatives of the FBI?
 9 A. Yes.
 10 Q. Okay. And you distinguished between the
 11 FBI and between Officer Recarey?
 12 A. Yes.
 13 Q. So how many times did Officer Recarey, or
 14 Detective Recarey, I think he's from the Palm
 15 Beach Police Department speak with you?
 16 A. Like three or four times.
 17 Q. But he only took one statement?
 18 A. One taped.
 19 Q. I'm sorry, one taped statement?
 20 A. Yes.
 21 Q. All right. So as to whether or not if
 22 you said something to Officer Recarey or not that
 23 you would be able to confirm, that would only have
 24 been in a taped statement, one taped statement out
 25 of the three, approximately three times he spoke

19 (Pages 339 to 342)

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1 with you.
 2 MR. EDWARDS: Form.
 3 MR. HOROWITZ: Form.
 4 BY MR. CRITTON:
 5 Q. Is that correct?
 6 A. Yes, correct.
 7 MR. WILLITS: Object to the form.
 8 MR. HOROWITZ: Join.
 9 BY MR. CRITTON:
 10 Q. And when we were here, I think it was
 11 last week or the last ten days anyway -- I could
 12 tell you. On July 29th of this year, and Mr.
 13 Mermelstein started with your deposition and then
 14 others asked questions, when Mr. Mermelstein and I
 15 think Mr. Edwards asked questions about did you
 16 tell Officer Recarey X, Y, or Z, they didn't show
 17 you a statement, they didn't give you like a
 18 transcript like this and say see what the question
 19 and see what the answer is?
 20 A. No.
 21 MR. EDWARDS: Form.
 22 MR. WILLITS: Object to the form of the
 23 question.
 24 BY MR. CRITTON:
 25 Q. And you haven't had an opportunity to see

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1 your taped statement since you gave it many years
 2 ago?
 3 A. No, sir.
 4 Q. Would you agree that your taped statement
 5 would probably be a little more accurate than your
 6 testimony today because of the time period that
 7 has transpired?
 8 A. That's correct.
 9 MR. HOROWITZ: Object to the form.
 10 MR. WILLITS: Object to the form of the
 11 question.
 12 BY MR. CRITTON:
 13 Q. When you spoke with the FBI over at
 14 Greens -- I think it was Greens Pharmacy?
 15 A. Yes.
 16 Q. Did they take a statement from you, that
 17 is, did they have a tape recorder or did they just
 18 make notes?
 19 A. They took notes.
 20 Q. All right. Did you sign anything?
 21 A. No, sir.
 22 Q. That is like did they take notes of what
 23 you said and then you signed it to say yep, that
 24 accurately reflects what I said?
 25 A. No, I didn't sign anything.

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1 Q. When Officer Recarey took -- spoke with
 2 you on those approximately two times when he did
 3 not take a taped statement, did he ever present
 4 anything for you, anything in writing that he had
 5 written to say, Mr. Rodriguez, I would like you to
 6 review this to make certain that I took down
 7 correctly what you said?
 8 A. No, sir.
 9 Q. If he had offered to do that would you
 10 have read what he wrote down to determine whether
 11 or not he took down that which you had said or
 12 told him?
 13 MR. EDWARDS: Object to the form.
 14 THE WITNESS: Probably I will read it
 15 first.
 16 BY MR. CRITTON:
 17 Q. All right. And if in fact he had
 18 recorded something incorrectly or recorded in a
 19 particular way that he wanted it phrased and it
 20 was not accurate, would you have told him that?
 21 MR. EDWARDS: Object to the form.
 22 THE WITNESS: No, I never told him that.
 23 BY MR. CRITTON:
 24 Q. Listen to my question.
 25 If he, Officer Recarey, had taken down

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1 what you said and it was not accurate, that is, he
 2 put his interpretation of what you said, would you
 3 have told him that's not accurate, Officer
 4 Recarey?
 5 MR. HOROWITZ: Form.
 6 MR. EDWARDS: Object to the form.
 7 THE WITNESS: I will tell him.
 8 MR. CRITTON: Go ahead and change. We're
 9 going to change the tape. We do have time.
 10 Cathy, could I borrow back the
 11 photographs, please?
 12 While you're giving me those back, would
 13 it be correct that you're going to keep --
 14 you took as you did with photograph
 15 number four you took back five, six, seven,
 16 and eight, and you're going to keep those
 17 and not allow me or anyone else to have a
 18 copy of them?
 19 MS. EZELL: Yes.
 20 MR. CRITTON: You're going to be equally
 21 restrictive; right?
 22 MS. EZELL: Right.
 23 MR. CRITTON: All right. Thank you.
 24 BY MR. CRITTON:
 25 Q. You were shown photograph five of a lady,

20 (Pages 343 to 346)

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1 F.E., and I think you told us that you had seen
 2 her, you recognized her photograph.
 3 A. Yes, I did.
 4 Q. On how many occasions did you ever see
 5 her at the Epstein home?
 6 A. More than three times.
 7 Q. More than three?
 8 A. Yes, sir.
 9 Q. That's as accurate as you can be?
 10 A. Yes.
 11 Q. More than three?
 12 A. More than three.
 13 Q. Whether it was four or five you don't
 14 know, but more than three?
 15 A. More than three, sir.
 16 Q. In terms of F.E.'s age, did you ever ask
 17 her what her age was?
 18 A. No, sir.
 19 Q. Did she appear to you to be someone at
 20 least from seeing her and recalling her that she
 21 appeared at least to you to be while a young woman
 22 appeared to be someone who was 18 or older?
 23 A. No, sir.
 24 Q. Okay. Well, did you ever say anything to
 25 the police or did you ever -- were you ever

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1 concerned about that such that you told someone?
 2 A. No, sir.
 3 Q. Haven't you told the police, sir -- let
 4 me strike that, let me ask it this way.
 5 In your taped statement that you gave to
 6 the police did you not tell them that all of the
 7 girls appeared to you to be 18 or above?
 8 A. Sir, as far as when all these actions
 9 that were taking place I was under an environment
 10 that I thought I was going to be -- in other
 11 words, I was afraid of any reprisal Mr. Epstein
 12 and Mrs. Maxwell if I say something that is any
 13 idea of me because I have this confidentiality
 14 agreement. What I saw that they were very young,
 15 but I cannot say that they were 18 and old.
 16 Q. Right. Let me just take you back to my
 17 question again and see if you can answer my
 18 question.
 19 MR. CRITTON: Could you please read it
 20 back?
 21 (Thereupon, a portion of the record was
 22 read by the reporter.)
 23 THE WITNESS: I think I told the police
 24 that.
 25 BY MR. CRITTON:

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1 Q. I'm sorry?
 2 A. Yes, I did, I told the police.
 3 Q. And at the time that you spoke with the
 4 police and gave them a statement, isn't it true,
 5 Mr. Rodriguez, that you were no longer employed by
 6 Mr. Epstein?
 7 A. Yes.
 8 Q. And you understood that you were required
 9 to tell the police officers the truth at that
 10 time?
 11 A. Yes.
 12 Q. And if I understood your testimony I
 13 believe from July 29th through today, you at no
 14 time asked any of these girls how old they were.
 15 True?
 16 A. No.
 17 Q. And as to whether the girls were under 18
 18 or 18 or over 18, you really didn't know one way
 19 or the other at the time. Would that be a fair
 20 statement?
 21 A. Yes.
 22 MR. WILLITS: Object to the form of the
 23 question.
 24 BY MR. CRITTON:
 25 Q. On Exhibit 6 there is a person who's

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1 covered, the lady that Ms. Ezell asked you about I
 2 believe was on the right-hand side of the
 3 photograph. There is a young lady on the
 4 left-hand side with a black hat on.
 5 Do you recognize her at all?
 6 A. No, I don't recognize her.
 7 Q. Okay. Thank you. With regard to the
 8 photograph four that you saw that you think
 9 possibly might be A.H., I think you told us that
 10 you recall seeing that woman in the sauna at Mr.
 11 Epstein's house on one occasion and she was naked.
 12 A. Yes.
 13 Q. Was that near the end of your employment
 14 or the middle or the front end?
 15 A. I saw her on January 2005, sir, and I was
 16 terminated in March, so that was two months prior.
 17 Q. And did you ever tell anyone that you had
 18 seen her naked in the sauna?
 19 A. I told Louella.
 20 Q. Okay. And what did Louella say?
 21 A. She was surprised.
 22 Q. Okay. Did you wake the young lady up in
 23 the sauna?
 24 A. No.
 25 Q. And do you know how old the young lady

21 (Pages 347 to 350)

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1 was at that time?
 2 A. No, I didn't know.
 3 Q. If I was to tell you she was born in
 4 December of '86 which would have made her 18 at
 5 the time, and you would say, not surprised?
 6 MS. EZELL: Objection, form.
 7 MR. WILLITS: Object to the form of the
 8 question.
 9 MR. HOROWITZ: Join.
 10 THE WITNESS: I would say I wouldn't
 11 know.
 12 BY MR. CRITTON:
 13 Q. Other than telling Louella did you say
 14 anything to anyone else when you saw A.H., the
 15 lady you believe was A.H. naked in the sauna?
 16 A. I believe I mentioned that to my wife.
 17 Q. All right. Anyone else?
 18 A. No.
 19 Q. And did A.H. continue -- assuming it was
 20 A.H., did she continue to sleep in the sauna, that
 21 is, she didn't know you were there?
 22 A. She never knew that I was there.
 23 Q. She didn't at least acknowledge that she
 24 knew. Correct?
 25 A. Yes, correct.

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1 Q. You were asked by Ms. Ezell -- I'm just
 2 going to cover a couple of things as long as I'm
 3 staying with Cathy here -- whether Louella, you
 4 had told us something about the picture of the
 5 Pope near a picture of a naked person, naked
 6 woman. That's what Louella told you, you never
 7 saw those photos. Correct?
 8 A. I did saw the pictures.
 9 Q. You did see the pictures?
 10 A. Yes.
 11 Q. And the photos that you saw of the naked
 12 woman that was near the Pope's photograph, was
 13 that someone that you knew or just a picture of a
 14 naked woman?
 15 A. It was somebody -- somebody that was a
 16 visitor in the house, but I don't know her name.
 17 Q. And the visitors, that would have been
 18 one of the plane women, you described the women
 19 who came in on planes, or that they came with Mr.
 20 Epstein from time to time?
 21 A. They came with Mr. Epstein from time to
 22 time.
 23 Q. All right. And those are women that I
 24 think you testified at your last deposition all
 25 appeared to be in their 20's or older. Is that

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1 correct?
 2 A. I think so, sir.
 3 Q. All right. I assume that in over the
 4 course of your life separate and apart from your
 5 wife you've seen a naked woman before.
 6 A. Yes.
 7 Q. And I assume that in your 50 some odd
 8 years -- how old are you, sir?
 9 A. 55.
 10 Q. In your 55 years you've seen pictures of
 11 naked women both photographs, paintings, statues.
 12 Would that be a fair statement?
 13 A. Yes.
 14 Q. And in terms of at least in this
 15 particular case there is all sorts of -- as you
 16 know there is testimony, and you've been asked a
 17 number of questions about sex related issues, that
 18 is whether you saw in photographs or whether you
 19 saw anyone engaged in any type of sexual activity.
 20 Correct?
 21 A. Correct.
 22 Q. And I assume that you understand that men
 23 and women -- we'll start there first, that men and
 24 women actually do have sex in this world?
 25 A. Yes.

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1 Q. That comes as no grand surprise to you?
 2 A. No.
 3 Q. And you understand that people actually
 4 enjoy sex from time to time?
 5 A. Yes.
 6 Q. Are you familiar with that concept at
 7 least?
 8 A. Yes.
 9 Q. All right. And what may be typical
 10 sexual activity for one man and woman, or whatever
 11 the permutation might be, another couple, or
 12 another man and woman, or another man or woman may
 13 consider to be unusual or overly aggressive.
 14 MS. EZELL: Objection to form.
 15 BY MR. CRITTON:
 16 Q. True?
 17 A. It depends on your point of view.
 18 Q. That's what I mean. Everyone has a
 19 different point of view about sex and what may be
 20 considered typical sexual activity for someone,
 21 someone else may consider that's a bit
 22 adventurous?
 23 MR. EDWARDS: Object to the form.
 24 THE WITNESS: Yes.
 25 BY MR. CRITTON:

22 (Pages 351 to 354)

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1 Q. I'm not trying to make you a sex expert.
2 Also, I assume that when you've been in
3 CVS or Walgreens, for that matter Publix or Winn
4 Dixie I assume that you've -- I don't want to
5 assume anything.

6 Have you ever been in an aisle where
7 you've actually seen condoms being sold?

8 A. Yes.

9 Q. And where lubricants are being sold?

10 A. Yes.

11 Q. And as well as massage oils and other
12 types of oils actually are sold in those kinds of
13 stores?

14 A. Yes.

15 Q. And they're available so that someone
16 walking through Walgreens or Publix or CVS could
17 actually take it off the shelf, put it in their
18 cart, go up and pay for it and take it home?

19 A. Yes.

20 Q. All right. In the photographs that you
21 talked about, and if I understood you correctly,
22 at least during the time that you were there, Mr.
23 Rodriguez, in '04 and '05 there were -- you said
24 that there were -- I think you said downstairs --
25 and I'm talking about really from the kitchen area

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1 up the back stairway, or what would be the kitchen
2 stairway to the upper floor, there was I think you
3 said, but correct me if I'm wrong, please, that
4 you don't recall seeing there being any pictures
5 or photographs of any nude women. Is that
6 correct?

7 A. They were not nude women in the
8 staircase.

9 Q. That's all I'm talking about right now.
10 In that area you never saw any pictures, or
11 photographs, paintings, any type of depiction of a
12 nude woman on that staircase going upstairs.
13 Correct?

14 A. Correct.

15 Q. All right. And I think you said
16 downstairs you saw a picture of -- the only
17 picture that you saw of I'd say of a younger child
18 that displayed some form of -- I don't want to say
19 nudity because it's probably not that, but of some
20 portion of their body that was exposed, and I
21 think you described it as her cheek.

22 A. Yes, that's upstairs.

23 Q. That's upstairs?

24 A. Upstairs.

25 Q. And that was -- was it Eva; is that how

Page 357

1 you say her name?

2 A. Yes, her mother.

3 Q. Okay. It's Eva's daughter, there was a
4 picture where someone it looked like was pulling
5 on their swimsuit?

6 A. Yes.

7 Q. Do you recall ever seeing the old
8 Coppertone --

9 A. Yes.

10 Q. Let me ask the question. I know you know
11 what this is.

12 Have you ever seen the old Coppertone
13 commercials and billboards that used to be
14 plastered all over certainly Florida and other
15 places where there is a cute little girl who
16 appears to be two, three, four years old and
17 someone is pulling down at least a portion of her
18 swimsuit so she's exposing a small portion of her
19 cheek is exposed?

20 A. Yes.

21 Q. Okay. Is that what the picture of the
22 young girl looked like that is Mr. Epstein's God
23 daughter?

24 A. More or less, yes.

25 Q. All right. And downstairs in the kitchen

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1 were there any pictures of women in any stage of
2 undress?

3 A. No.

4 Q. And then I think you said as you walk
5 upstairs, or as you walked up the stairway from
6 the kitchen at the top of the landing, I think you
7 described -- did you describe it as the foyer?

8 A. Yes.

9 Q. Okay. But it's really the landing, the
10 upstairs landing?

11 A. Yes.

12 Q. I think you said there were -- there was
13 -- were or was a three by five picture or
14 pictures?

15 A. Yes.

16 Q. Of women in some stage of undress?

17 A. Yes.

18 Q. Okay. And when you say three by five, I
19 assume you meant three feet?

20 A. Three feet.

21 Q. By five feet?

22 A. Yes.

23 Q. Were they photographs?

24 A. Yes, they were photographs.

25 Q. And I think you also told us that you

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1 didn't recognize who those people were. Is that
 2 correct?
 3 MR. EDWARDS: Object to the form.
 4 THE WITNESS: I knew this particular girl
 5 because it was the daughter of Mrs. Eva.
 6 BY MR. CRITTON:
 7 Q. Okay. And is that the picture you're
 8 talking about?
 9 A. This is the picture I'm talking about.
 10 Q. Okay. And that was a three by five?
 11 A. Yes.
 12 Q. All right. And the only thing that you
 13 could see was a portion, that is of her other than
 14 say her waist or her shoulders or her arms or
 15 something, that's one where you could see kind of
 16 like the Coppertone commercial, a picture of her
 17 cheek?
 18 A. Yes. Part of her buttocks.
 19 MR. LANGINO: Object to the form.
 20 BY MR. CRITTON:
 21 Q. Okay. And was there another picture at
 22 the top of the foyer, large one, or is that the
 23 only one that you can recall?
 24 A. There were two of the same girl in
 25 different poses.

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1 Q. But showed the same thing?
 2 A. Yes.
 3 Q. Okay. As you walked through into -- then
 4 if I understood it correctly, you go to the pretty
 5 much to the end of the hallway, then you go
 6 through another small vestibule, double doors, two
 7 sets of double doors, and as you go straight ahead
 8 then you make a left around the bed and then you
 9 end up in the bathroom.
 10 A. Yes.
 11 Q. In the bathroom -- in the bathroom or in
 12 that location were there any pictures of any women
 13 in any stage of undress?
 14 A. Yes.
 15 Q. All right. And were any of those
 16 pictures, did they involve -- or were they of any
 17 of the girls that have been described as women who
 18 came over to give Mr. -- purportedly to give Mr.
 19 Epstein a massage?
 20 A. Yes.
 21 Q. And do you remember who any of the names
 22 of any of those people were?
 23 A. No.
 24 Q. And the pictures you saw, where were they
 25 located?

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1 A. Inside his closet, the walk-in closet.
 2 Q. And those pictures, I think you called it
 3 a mosaic?
 4 A. Yes.
 5 Q. And of the mosaic, approximately how many
 6 pictures were in the mosaic?
 7 A. 16 or 20.
 8 Q. Okay. And of those pictures how many did
 9 you recognize?
 10 A. About three or four.
 11 Q. All right. Were they -- as to who those
 12 people were, you don't know, you just recognized
 13 three or four of them?
 14 A. Mr. Epstein when he was younger, and then
 15 different girlfriends, but I didn't recognize
 16 except the ones --
 17 Q. Okay. You said three or four of those
 18 were pictures of the girls who came over to give a
 19 massage?
 20 A. Yes.
 21 Q. Okay. But as to who those girls were you
 22 don't know as you sit here today?
 23 A. No, sir.
 24 Q. And as to what their ages were you don't
 25 know?

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1 A. No, sir.
 2 Q. That's correct?
 3 A. That's correct.
 4 Q. And as to what they depicted in the
 5 photographs of the girls were they in different
 6 stages of undress?
 7 A. Yes.
 8 Q. Was everyone undressed to some degree,
 9 that is, they were described as nude, or at least
 10 the questions asked were these people nude? Were
 11 they actually nude or someone may have had their
 12 top off?
 13 A. There were two girls completely naked in
 14 a shower in a sexual act.
 15 Q. Is that the one when Ms. Ezell asked you
 16 questions, that's one of the photographs that you
 17 were talking about?
 18 A. No, sir.
 19 Q. That was a different --
 20 A. Different one.
 21 Q. Okay. And the mosaic that you saw where
 22 you saw two girls involved in a sexual act, do you
 23 know where that photograph was taken?
 24 A. I think it was taken in one of the rooms
 25 in the house because there is an oval bathtub, but

24 (Pages 359 to 362)

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1 I don't know which room, sir.
 2 Q. Okay. Did you recognize both the girls
 3 or just one of the girls?
 4 A. The two girls.
 5 Q. Then there were -- there was one or two
 6 other photographs of girls that you recognized?
 7 A. Yes.
 8 Q. Okay. And were they fully unclothed or
 9 did they have some degree of clothes on and/or
 10 off?
 11 A. They were naked.
 12 Q. All right. And all of the remaining
 13 pictures at least within that mosaic were of
 14 individuals that you did not know?
 15 A. No, sir.
 16 Q. And that you did not recognize as having
 17 been at the house. Is that correct?
 18 A. Yes, that's correct.
 19 Q. You were also asked about some -- let me
 20 switch for just a minute.
 21 You were asked about a vibrator that you
 22 saw, and I think you described it as a back
 23 massager that was approximately 18 inches long
 24 that had a couple of rotating heads on it.
 25 A. Yes.

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1 Q. And I think you ultimately came up with
 2 the idea as it was something you had seen at like
 3 a Sharper Image store.
 4 A. Yes, sir.
 5 Q. Have you ever seen one of those types of
 6 devices, that is a back massager with the rotating
 7 heads also sold -- well, let me ask you this.
 8 Strike that last question.
 9 Have you ever been to Brookstone?
 10 A. Yes.
 11 Q. Okay. Have you ever seen a massager like
 12 that at Brookstone?
 13 A. Yes.
 14 Q. Okay. You were asked whether Ms. Maxwell
 15 kept the names of any of the girls who came to
 16 give massages on -- let me ask it this way.
 17 I think you were asked whether
 18 Ms. Maxwell ever kept the names of any of the
 19 girls who came to give massages and I think your
 20 response was yes.
 21 A. Yes.
 22 Q. Okay. Did she keep them on a pad of
 23 paper, did she keep them in a notebook, did she
 24 keep them in a computer?
 25 A. We used to have internal books for

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1 pilots, masseuses, chefs, so she have a copy of
 2 the black book with herself and as well as the
 3 computer.
 4 Q. Did you ever go on Ms. Maxwell's computer
 5 to see what she had in it?
 6 A. Yes.
 7 Q. And was that something you were allowed
 8 to do?
 9 A. No.
 10 Q. Okay. You actually went in her office?
 11 A. Yes.
 12 Q. And was her computer on so that you
 13 didn't need to access the password?
 14 A. It was off.
 15 Q. Okay. So you just turned it on?
 16 A. Yes, sir.
 17 Q. And then you were able to access her
 18 computer?
 19 A. Exactly.
 20 Q. And what possessed you to go in and to
 21 access her personal computer?
 22 A. I needed to send some documents to the
 23 New York office and it was the only computer
 24 working in the house.
 25 Q. Okay. And how many occasions did you use

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1 her computer?
 2 A. Several times.
 3 Q. Was she ever aware that you used her
 4 computer?
 5 MR. LANGINO: Form.
 6 THE WITNESS: I don't think so.
 7 BY MR. CRITTON:
 8 Q. Did you ever ask Ms. Maxwell for
 9 permission to use her computer?
 10 A. I was the house manager, I believe I was
 11 supposed to use everything in the house to
 12 accomplish my duties, in that case sending
 13 financial reports or e-mails.
 14 Q. So would you have been -- did you ever
 15 use Mr. Epstein's computer?
 16 A. No.
 17 Q. Okay. But you used Ms. Maxwell's
 18 computer?
 19 A. Yes.
 20 Q. Did you ever use Ms. Kellen's computer?
 21 A. Yes.
 22 Q. In looking at Ms. Maxwell still, you went
 23 into Ms. Maxwell's computer with at least the idea
 24 of sending some documents?
 25 A. Yes.

25 (Pages 363 to 366)

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1 Q. Up to New York?
 2 A. Yes.
 3 Q. Were you going to pdf them?
 4 A. Yes.
 5 Q. And did she have a fax machine -- not a
 6 fax machine, a copy machine in her office as well?
 7 A. Yes.
 8 Q. Okay. So how would you generally do
 9 that? Would you do that through a Microsoft
 10 program?
 11 A. Through Citrix.
 12 Q. Through Citrix. All right. With Citrix,
 13 and that is, if you said you saw some names of
 14 individuals on her computer if you were just going
 15 to pdf some documents up to New York why would you
 16 of -- what would of caused you to have seen any
 17 names on her computer?
 18 MS. EZELL: Objection to form.
 19 THE WITNESS: All the calls that came to
 20 358 El Brillo, they came through the
 21 telephone, they have a transcript somehow
 22 that they connect to the computer, so you
 23 can pull it and you register the time, who
 24 called, who didn't call, and you can pull
 25 this at your request. So I used to use that

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1 to go back to some calls that they were
 2 requesting, especially when the hurricane
 3 season happened.
 4 BY MR. CRITTON:
 5 Q. Okay. So if I understand, even the
 6 computer you used would have had that same
 7 feature?
 8 A. No, no, it was totally different. Mine
 9 was slower and all the time was breaking down
 10 that's why we have the guy from Ohio came and
 11 fixed the computers.
 12 Q. Okay. Were there other computers that
 13 you used that had that feature, that is that --
 14 A. Only Sarah, Mrs. Maxwell, and the staff
 15 house.
 16 Q. Staff house being yours?
 17 A. The guest house, yes, my office.
 18 Q. So you could go out to your guest house
 19 then and look for the same information?
 20 A. No.
 21 Q. All right. I don't understand but why
 22 don't we take a break because we're almost out of
 23 tape.
 24 (Thereupon, a recess was had.)
 25 THE VIDEOGRAPHER: We're back on the

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1 record with tape number three.
 2 BY MR. CRITTON:
 3 Q. Mr. Rodriguez, I was asking you about
 4 Ms. Maxwell's computer and you told me how you
 5 went on the computer.
 6 If she was out of town would she take her
 7 computer with her?
 8 A. No.
 9 Q. It was something she left there?
 10 A. Yes.
 11 Q. All right. And when you went on to pdf,
 12 I think you said it was really one time that you
 13 saw the names of some of these girls?
 14 A. Yes.
 15 Q. And if I understand it correctly, it was
 16 -- did it have the name and then a phone number?
 17 A. Yes.
 18 Q. And was that something that was
 19 automatically downloaded from the system?
 20 A. Yeah, from the phone system to the
 21 computer so we have a transcript.
 22 Q. When you say a transcript, the fact that
 23 Sally Jones, phone number 561, whatever it was,
 24 called.
 25 A. It was a transcript of the phone calls of

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1 the house, we can get it from the computer.
 2 Q. Okay. And I'm distinguishing,
 3 transcript, it would tell you the name and phone
 4 number, it wouldn't tell you what was said?
 5 A. It was the message also.
 6 Q. Okay. Now I understand. And so
 7 Ms. Maxwell when you said she had the names of
 8 some of these girls who may have given massages,
 9 or at least were what you called earlier girls
 10 that gave massages, or females that gave massages,
 11 she would have had it because that was information
 12 that was downloaded from the Citrix system into
 13 her computer?
 14 A. Yes.
 15 MS. EZELL: Objection, form.
 16 BY MR. CRITTON:
 17 Q. Okay, I understand. Now, you said she
 18 also had some pictures. Is that that one time you
 19 also saw pictures?
 20 A. Yes.
 21 Q. And were you going through her computer
 22 at that time?
 23 A. No.
 24 Q. The question is, if all you were going to
 25 do was try to pdf some financial information to

26 (Pages 367 to 370)

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1 New York what were you doing getting to names and
2 phone numbers and then pictures of girls?

3 A. I was trying to get some information. I
4 was working the computer and I just happen -- they
5 have the icon of the file and I open and it was
6 right there, so I was not looking but, you know,
7 it was already accessible to me.

8 Q. And how many photographs did you then
9 scroll through to look at?

10 A. Probably 30.

11 Q. Okay. And why?

12 A. Just curiosity, sir.

13 Q. So again, you never told anyone other
14 than your wife?

15 A. No.

16 Q. Correct?

17 A. Yes, correct.

18 Q. Of the pictures that you saw, if I
19 understood it correctly, some of those were
20 pictures of -- well, I think you said some of them
21 reflected parties or banquets?

22 A. Yes.

23 Q. I think you described some of the
24 pictures gatherings that appeared to be either in
25 Russia or Eastern Europe?

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1 A. Yes.

2 Q. All right. And then you talked about a
3 picture of two girls in the shower that you didn't
4 know the girls. Correct?

5 A. Yes.

6 Q. That's correct?

7 A. That's correct.

8 Q. All right. And that in all of the
9 photographs that you saw the individuals seemed to
10 be having a good time?

11 A. Yes.

12 Q. All right. Would it be a correct
13 statement that in none of the photographs did
14 anyone seem to be distressed or disturbed or show
15 any type of negative emotion, at least from what
16 you observed?

17 A. That's correct.

18 MS. EZELL: Objection, form.

19 BY MR. CRITTON:

20 Q. And in terms of the photographs that you
21 did see, were any of the photographs that you saw,
22 did they appear -- did they appear to have been of
23 women that you had seen fly in with Mr. Epstein on
24 his plane?

25 A. Yes.

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1 Q. Okay. Were any of the photographs that
2 were in -- again, I'm talking about Ms. Maxwell's
3 computer now, were those photographs of
4 individuals who were any of the girls or ladies
5 that came over to give massages?

6 A. No. They stay at the house.

7 Q. Okay. So the photographs that you saw on
8 Ms. Maxwell's computer of females in any state of
9 undress or at parties or at banquets, those were
10 all of individuals who would fly in with Mr.
11 Epstein at various periods of time that had
12 traveled with him?

13 A. That's correct.

14 Q. Okay. Those are the girls that you told
15 us I think at your last deposition and reaffirmed
16 here today, those girls all appeared to be in
17 their 20's?

18 A. Yes, sir.

19 Q. All right. Now, you were also asked some
20 questions, a lot of questions about surveillance.
21 And if I understood your testimony, and this is
22 where it goes back to what do you know, what don't
23 you know, what were you speculating on, what did
24 you know at the time, what do you know now, at
25 least I need you to distinguish that for me so

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1 that I know what you knew at the time, and as
2 distinct from what you may have read in the
3 newspaper or been told by some lawyer or someone
4 else that may not be accurate. Okay?

5 A. Yes, sir.

6 Q. With regard to the -- with regard to
7 surveillance equipment, if I understood your
8 testimony today is you were completely unaware of
9 the existence of any surveillance equipment in the
10 house during the 2004/2005 time period that you
11 worked there. Is that correct?

12 A. Yes.

13 Q. And therefore, where it was, what may
14 have existed, whether it in fact actually did
15 exist, whether anyone maintained it, you have no
16 personal knowledge whatsoever. Is that true?

17 A. That's true.

18 MR. WILLITS: Object to the form.

19 BY MR. CRITTON:

20 Q. You talked about pictures of two women
21 who you saw in the house who were nude, one was
22 Nadia?

23 A. Yes.

24 Q. And you knew Nadia was someone who was in
25 her 20's?

Page 375

1 A. Yes.
 2 Q. All right. And then you saw another
 3 picture of a Brazilian woman who had traveled or
 4 flown on the plane before?
 5 A. Yes.
 6 Q. All right. And she also appeared to be a
 7 woman to you not only in the photograph but from
 8 your having seen her who appeared to be in her
 9 20's?
 10 A. Yes.
 11 Q. Excuse me. Thank you. You talked about
 12 Sarah Kellen's computer. Was she hooked into your
 13 main system?
 14 A. Not to my office in the staff house but
 15 she was hooked into the main house.
 16 Q. Okay. The same Citrix system?
 17 A. Yes.
 18 Q. And you said that Sarah had pictures of
 19 women on her computer that you saw. Is that
 20 correct?
 21 A. Yes.
 22 Q. Okay. And were those the same types of
 23 pictures that Ms. Maxwell had, that is, females,
 24 pictures of females who had traveled in with Mr.
 25 Epstein from his plane?

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1 A. This were different pictures.
 2 Q. Okay. Were any of hers of any of the
 3 girls who came in on the plane, or the ladies or
 4 women?
 5 A. No.
 6 Q. What were her pictures of?
 7 A. They were young women modeling, you know.
 8 I don't remember seeing nudity on Sarah's
 9 computer.
 10 Q. All right. Hers, when I say hers, the
 11 photographs that Sarah Kellen had on her computer
 12 were all of individuals who appeared -- or not
 13 appeared, but were dressed and appeared to be
 14 modeling?
 15 A. Yes.
 16 Q. Would it be a correct statement that none
 17 of the women that you saw, that is the pictures of
 18 the women that you saw on Sarah's computer were
 19 any of the girls, women, whoever came to give
 20 massages? Is that correct?
 21 MR. EDWARDS: Object to the form.
 22 MS. EZELL: Form.
 23 THE WITNESS: That's correct.
 24 BY MR. CRITTON:
 25 Q. You said that Sarah you thought also had

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1 names and addresses of -- let me start over.
 2 Strike that.
 3 If I understood your testimony, you said
 4 that Sarah had pictures -- start again.
 5 You said that Sarah had the names and
 6 phone numbers of some of the massage girls.
 7 A. Yes.
 8 Q. Or at least of the people that you
 9 thought may have been called to give massages.
 10 A. Yes.
 11 MS. EZELL: Form.
 12 MR. EDWARDS: Form.
 13 BY MR. CRITTON:
 14 Q. And was that in the same format that you
 15 saw on Ms. Maxwell's computer?
 16 A. No.
 17 Q. Okay. What occasion would you have been
 18 -- have had to use Sarah Kellen's computer?
 19 A. She will instruct me to get some
 20 information from her desk or telephone numbers, so
 21 I will.
 22 Q. And that's where you would have seen it?
 23 A. Yes.
 24 Q. I think you testified at your last
 25 deposition, or the start of your deposition that

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1 the number of women that you remember came over to
 2 give massages was something eight to ten, twelve,
 3 I don't remember, what's your best recollection?
 4 A. Can you repeat that, please?
 5 Q. Of the women, of different women that you
 6 knew came over to give massages during the time
 7 that you worked for Mr. Epstein, '04 to '05,
 8 during that time period, approximately how many
 9 women were there?
 10 MR. EDWARDS: Object to the form.
 11 THE WITNESS: To give massages?
 12 BY MR. CRITTON:
 13 Q. Yes, sir.
 14 A. Fifteen, yeah.
 15 Q. So something between one and fifteen of
 16 the names you would have seen on Ms. Kellen's
 17 computer along with a phone number?
 18 MR. EDWARDS: Form.
 19 THE WITNESS: Yes.
 20 BY MR. CRITTON:
 21 Q. Do you remember how many you would have
 22 seen?
 23 A. Fifteen.
 24 Q. Okay. You also told us earlier today
 25 that you saw Sarah Kellen from time to time taking

28 (Pages 375 to 378)

Page 379

1 pictures in the dining room and the library.
 2 A. Yes.
 3 Q. Photographs.
 4 A. Yes.
 5 Q. Okay. Was she taking -- the pictures she
 6 took were people who were clothed?
 7 A. Yes.
 8 Q. And were any of the pictures that she
 9 took of any of the girls that you ever -- let me
 10 strike that.
 11 If I understood your original testimony
 12 -- I don't want to say original. If I understood
 13 your testimony from July 29th to what you told us
 14 today as to the women who did come to give
 15 massages they'd knock or somehow you would be
 16 aware that they were at the back door, you would
 17 punch the security code and lead them into the
 18 kitchen.
 19 A. Yes.
 20 Q. Okay. When you brought them into the
 21 kitchen you would say, hi, they would say hi back
 22 to you, or something to that, short greeting,
 23 you'd offer them water, there was never any
 24 alcohol in the whole house other than I think you
 25 said for one person at one time. Is that a fair

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1 statement?
 2 A. Yes.
 3 Q. All right. You left the kitchen, you
 4 understood Sarah Kellen came down, and what
 5 happened thereafter you don't have any personal
 6 knowledge whatsoever?
 7 A. That's correct.
 8 MR. EDWARDS: Form.
 9 BY MR. CRITTON:
 10 Q. At some point in time Ms. Kellen might
 11 contact you and say pay such and such X amount of
 12 dollars, she is now getting ready to leave.
 13 A. Yes.
 14 Q. That maybe one. Another set of
 15 circumstances might be you use the word commotion,
 16 you might hear a commotion, I assume you don't
 17 mean -- well, let me ask you, when you say
 18 commotion, do you mean a disturbance, something
 19 that was seriously like raised voices or merely
 20 you just heard some people talking?
 21 A. Conversation of people leaving.
 22 Q. Okay. Not a commotion in the form of a
 23 disturbance but a commotion in the sense that you
 24 heard people talking?
 25 A. Yes.

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1 Q. Regular conversation?
 2 A. Yes.
 3 Q. And, therefore, you might interject
 4 yourself back in because you've been asked to pay
 5 someone or to let them out?
 6 MR. LANGINO: Form.
 7 THE WITNESS: Yes, I was called to pay
 8 them.
 9 BY MR. CRITTON:
 10 Q. All right. And when you hear that
 11 conversation that would be another way that you
 12 would know that the women were leaving?
 13 A. Yes.
 14 Q. And sometimes they'd leave without you
 15 even being involved, if I understood it correctly?
 16 A. That's correct.
 17 Q. So, the only places that you ever saw the
 18 women who came to give massages would be -- of the
 19 some fifteen women during the time you were there
 20 would be either when you let them into the house
 21 and escorted them into the kitchen or as they were
 22 leaving?
 23 A. Yes.
 24 Q. And I think you described one instance
 25 earlier today is that you may have had A.H. in the

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1 car, in the Suburban?
 2 A. Yes.
 3 Q. And that's the only person that you can
 4 remember having driven any place, that is, of the
 5 women who were described as having given massages?
 6 MR. EDWARDS: Objection.
 7 MS. EZELL: Objection, form.
 8 THE WITNESS: Sir, I have to clarify
 9 that. I drove a lot of girls, but I don't
 10 remember the names associated with the
 11 faces. But this particular girl A., or
 12 others, C., whatever, I remember driving in
 13 the Suburban, but I cannot say this was --
 14 BY MR. CRITTON:
 15 Q. Let me clarify because what I want to be
 16 clear is, is I do remember you testifying that
 17 when some of the 20 plus year old models or
 18 females would fly in with Mr. Epstein they might
 19 want to go shopping, they might want to go to the
 20 store, they may want to go to the drug store, they
 21 may want to go to the beach, wherever they wanted
 22 to go and you would drive them.
 23 A. Yes.
 24 Q. All right. And then I remember in
 25 response to Ms. Ezell's questions today she asked

29 (Pages 379 to 382)

Page 383

1 you about having driven A.H. and you recalled
 2 having had her in the Suburban specifically.
 3 A. Yes.
 4 Q. Do you remember any of the other girls,
 5 women who came to give massages ever having driven
 6 them, or is A.H. the only one that you remember?
 7 MR. EDWARDS: Form.
 8 THE WITNESS: I only remember A.H. right
 9 now for the fact that I was driving by the
 10 airport and I showed her Mr. Epstein's
 11 plane.
 12 BY MR. CRITTON:
 13 Q. All right. Which really takes me back to
 14 really where I started with this series of
 15 questions.
 16 You saw the girls, the women who came in
 17 to give the massages, when they came in if you
 18 were advised or if you heard conversation and you
 19 saw them you would see them when they left?
 20 A. Yes.
 21 Q. And you saw A.H. because she was in the
 22 Suburban on at least one occasion?
 23 A. Yes.
 24 Q. And, therefore, you never saw these
 25 girls, these women who gave the massages in the

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1 dining room or the library. Would that be a fair
 2 statement?
 3 A. That's correct.
 4 MR. EDWARDS: Form.
 5 BY MR. CRITTON:
 6 Q. All right. So, therefore, the pictures
 7 that you saw Sarah Kellen taking of girls, women,
 8 either in the dining room or library, those were
 9 other individuals other than those who may have
 10 given or who came for massages. Is that correct?
 11 MS. EZELL: Form.
 12 MR. EDWARDS: Form.
 13 THE WITNESS: It's confusing, sir,
 14 because there were a bunch of girls. I
 15 don't know which one they were but I saw her
 16 taking pictures of the groups.
 17 BY MR. CRITTON:
 18 Q. As to whether they were people who came
 19 in on the planes or there may have been a massage
 20 girl or more than one woman who gave a massage,
 21 you just don't know as you sit here, you'd just be
 22 speculating. Is that correct?
 23 MR. EDWARDS: Form.
 24 THE WITNESS: I don't know.
 25 BY MR. CRITTON:

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1 Q. All right. Ms. Ezell asked you about Mr.
 2 Dershowitz being present in Mr. Epstein's home,
 3 and I think she asked -- and I think that you said
 4 Mr. Epstein was a -- and he and Mr. Dershowitz
 5 were friends?
 6 A. Yes.
 7 Q. She also I think asked was Mr. Dershowitz
 8 ever there when one of the women who gave a
 9 massage was present in the home?
 10 A. I don't remember that.
 11 Q. That's what I want to clear up. Is it
 12 your testimony that Mr. Dershowitz was there when
 13 any of the women came to Mr. Epstein's home to
 14 give a massage?
 15 A. Yes.
 16 MR. EDWARDS: Form.
 17 BY MR. CRITTON:
 18 Q. As to whether any of those women were
 19 ever associated with Mr. Dershowitz would it be a
 20 correct statement that you have absolutely no
 21 knowledge?
 22 A. I don't know, sir.
 23 Q. You don't know?
 24 A. I don't know, sir.
 25 MS. EZELL: Form.

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1 BY MR. CRITTON:
 2 Q. Okay. Were you in any way attempting in
 3 your response to Ms. Ezell to imply that Mr.
 4 Dershowitz had a massage by one of these young
 5 ladies?
 6 A. I don't know, sir.
 7 Q. You have no knowledge?
 8 A. No, sir.
 9 Q. And you certainly weren't implying that
 10 that occurred, you just have no knowledge.
 11 Correct?
 12 MR. EDWARDS: Form.
 13 THE WITNESS: I don't know.
 14 BY MR. CRITTON:
 15 Q. Sorry?
 16 A. I don't know.
 17 Q. I think in response to one of Ms. Ezell's
 18 questions you responded that -- let me ask it this
 19 way.
 20 You never saw Mr. Epstein ever take
 21 photographs of anyone. Would that be a correct
 22 statement?
 23 A. Yes.
 24 Q. Would it be a correct statement you never
 25 saw Mr. Epstein initiate a phone call to anyone?

30 (Pages 383 to 386)

Page 387

1 A. To place a phone call?
 2 Q. Yeah. Did you ever see him place a phone
 3 call?
 4 A. Yes.
 5 Q. If in fact, maybe it was this way, is
 6 that you never saw him call someone to schedule a
 7 massage appointment. Correct?
 8 A. That's correct.
 9 Q. I think you said that Ms. Kellen told you
 10 that Mr. Epstein would take photographs. Did I
 11 understand you correctly?
 12 A. I'm sorry, can you repeat that?
 13 Q. Did Ms. Kellen ever tell you that Mr.
 14 Epstein took a photograph of anyone?
 15 A. No, she said to me Mr. Epstein is like
 16 he's an amateur photographer.
 17 Q. Okay. I may have misunderstood you then.
 18 Let me clarify that testimony.
 19 It's your testimony that Ms. Kellen told
 20 you that Mr. Epstein is an amateur photographer?
 21 A. Yes.
 22 Q. She never told you that -- or let me
 23 strike that.
 24 Is it correct that she never told you
 25 that Mr. Epstein took photographs of any of the

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1 girls, women, who came over to give him a massage?
 2 A. That's correct.
 3 Q. All right. Mr. Rodriguez, other than Mr.
 4 Epstein I think you told us you had worked for a
 5 lady named Ms. Hammond?
 6 A. Yes.
 7 Q. And you had worked for a gentleman --
 8 A. Sidney Bowman.
 9 Q. Is he the gentleman from Fisher Island?
 10 A. No, Arturo Torres.
 11 Q. All right. In addition to Ms. Hammond up
 12 in Palm Beach you worked for other individuals as
 13 well?
 14 A. I did it part-time but I don't have her
 15 name right now, sir.
 16 Q. During your career as a -- let me strike
 17 that.
 18 Had you worked other than those places,
 19 Mr. Arturo --
 20 A. Arturo Torres, yes.
 21 Q. Arturo Torres, Ms. Hammond, the other
 22 individual you can't remember, and Mr. Epstein,
 23 have you worked for other individuals as an estate
 24 manager or general house manager?
 25 A. No, sir.

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1 Q. Of the time that you've done that
 2 approximately how many years does that include in
 3 your working life?
 4 A. Eight years, ten years.
 5 Q. All right. And have you worked for --
 6 have you been in other circumstances where you
 7 have worked around -- well, let me step back.
 8 With all of the individuals that you
 9 mentioned, estate manager, house manager, has this
 10 been for individuals who have or at least appear
 11 to have substantial wealth?
 12 A. Yes.
 13 Q. And as part of your duties, or not duties
 14 but as part of being a house manager or general
 15 manager for an estate do you interact with other
 16 estate managers?
 17 A. Yes.
 18 Q. And do you assist each other from time to
 19 time if someone needs help?
 20 A. That's correct.
 21 Q. And I assume that you've been in other
 22 estates in Palm Beach and probably in Fort
 23 Lauderdale and other locations?
 24 A. Yes.
 25 Q. As part of during your working career did

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1 you ever work in restaurant or a personal services
 2 type business where you would provide like
 3 catering or something like that to other wealthy
 4 individuals?
 5 A. I did.
 6 Q. Give us a little of your background if
 7 you could then, Mr. Rodriguez.
 8 A. I work in Long Island, Montauk Lake Club
 9 and Marina, a very exclusive country club where
 10 Mr. Nixon used to spend his summers, Richard
 11 Nixon. I worked for Leona Helmsley in New York.
 12 Very demanding lady. And then Mr. Torres in Texas
 13 in his ranch and as well as Fisher Island. And I
 14 was a general manager of one of his restaurants in
 15 San Antonio, Texas. This is the most high profile
 16 people that I worked for.
 17 Q. Okay. When you worked for Ms. Helmsley,
 18 Leona Helmsley, she used to have the Helmsley
 19 Palace and she with her husband, Harry Helmsley, I
 20 think they owned a number of real estate in
 21 addition to hotel properties.
 22 A. That's correct.
 23 Q. When you would -- I think you described
 24 her as a demanding person?
 25 A. Yes.

31 (Pages 387 to 390)

Page 391

1 Q. All right. In terms of these wealthy
2 people that you've worked for, these individuals,
3 do they all have, that is at least in terms of Mr.
4 Epstein, the way that his household was managed,
5 was it similar to other set of circumstances that
6 you've been involved with?
7 MR. HOROWITZ: Object to form.
8 THE WITNESS: They have a common ground,
9 yes.
10 BY MR. CRITTON:
11 Q. All right. And in terms of you talked
12 about Mr. Epstein that there was some sort of a
13 manual or a procedure book with regard to his
14 house.
15 A. House manual, yes.
16 Q. A house manual. Did other houses have
17 house manuals as well? Is that reasonably -- I
18 mean not common but it's something that you've
19 seen before?
20 MR. EDWARDS: Form.
21 THE WITNESS: I know a lot of houses do
22 but that was the only estate that we have a
23 house manual.
24 BY MR. CRITTON:
25 Q. And other individuals like where you've

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1 worked similar to Mr. Epstein -- now, Mr. Epstein
2 was single?
3 A. Yes.
4 Q. All right. And him having a lot of -- or
5 bringing a lot of attractive women and other
6 people to his house, I assume that didn't offend
7 you in any way?
8 MR. EDWARDS: Object to the form.
9 THE WITNESS: No, sir.
10 BY MR. CRITTON:
11 Q. At least based upon your experience in
12 dealing with other individuals either of some
13 notoriety like Ms. Helmsley or when you said the
14 club that you worked up is in Montauk --
15 A. Montauk Lake Club and Marina.
16 Q. Right. You ran into separate and apart
17 from Richard Nixon were there a lot of people,
18 corporate people, business people?
19 A. Yes.
20 Q. People of substantial resources and
21 wealth?
22 A. Yes.
23 Q. Have you found at least in your
24 experience that most of those people are pretty
25 discreet about -- when I say discreet, private

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1 about what they do?
2 MR. HOROWITZ: Object to the form.
3 THE WITNESS: Yes.
4 BY MR. CRITTON:
5 Q. And have you worked at other locations,
6 that is, in the other houses that you've worked
7 where they have massage tables?
8 A. Yes.
9 Q. And in those other locations where they
10 had a massage table, were they similar to the
11 massage table that was in Mr. Epstein's home?
12 A. Yes, sir.
13 Q. All right. Almost same make and model?
14 A. Same type, yes.
15 Q. And did other individuals in houses that
16 you worked at and other places where you helped
17 out other estate managers, would those individuals
18 have massages from time to time?
19 A. Yes.
20 Q. So having a massage or a massage table in
21 someone's house that you might -- that lives in
22 Palm Beach or Montauk or New York or something,
23 would you consider that unusual?
24 MR. HOROWITZ: Form.
25 THE WITNESS: No.

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1 BY MR. CRITTON:
2 Q. I think you told me at least in Mr.
3 Epstein's home other than for one guest he didn't
4 have any type of alcohol in the house. Is that
5 correct?
6 A. That's correct.
7 Q. Was that basically you understood that
8 that was one of the policies and procedure, no
9 alcohol in the house?
10 A. Yes.
11 Q. And did you ever see any type of illegal
12 or inappropriate drugs?
13 A. No, sir.
14 Q. And was that another policy or procedure,
15 absolutely no drugs of any kind?
16 A. No smoking in the house.
17 Q. All right. So no drugs, no smoking, no
18 alcohol?
19 A. Yes.
20 Q. Was that pretty typical for other Palm
21 Beach places that you were familiar with?
22 A. No.
23 Q. All right. And other places you'd always
24 find alcohol?
25 A. Yes.

32 (Pages 391 to 394)

Page 395

1 Q. All right. And you might find drugs?
 2 A. Yes.
 3 Q. And some pretty wild parties?
 4 A. Yes.
 5 Q. Now, with regard to the women who came to
 6 give massages, of those women, of those
 7 approximately fifteen that you described, how many
 8 of them came more than one -- more than one
 9 occasion?
 10 MR. HOROWITZ: Form.
 11 THE WITNESS: I'd say more than half.
 12 BY MR. CRITTON:
 13 Q. So maybe seven, eight, nine, ten?
 14 A. Yes.
 15 Q. Of those people that came on -- of those
 16 seven to ten that came on more than one occasion,
 17 did those individuals come on many occasions?
 18 A. Yes.
 19 Q. And as to the women who were -- who you
 20 understood were coming to give the massages --
 21 MR. EDWARDS: Form.
 22 MR. CRITTON: I'm not done yet.
 23 THE VIDEOGRAPHER: I need to go off the
 24 record for a second.
 25 (Thereupon, an interruption was had.)

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1 THE VIDEOGRAPHER: We're back on the
 2 record.
 3 BY MR. CRITTON:
 4 Q. Mr. Rodriguez, I want to turn to the --
 5 stay with the women who came to give or at least
 6 were called to give the massages.
 7 You were shown a number of message pads,
 8 I think Mr. Mermelstein who represents a number of
 9 -- or at least certainly Jane Doe 2 and some
 10 others, you were identified or shown a bunch of
 11 message pads that had I think in most instances
 12 your initials, A.R. Do you recall that?
 13 A. Yes, I do.
 14 Q. I think one of the individuals that you
 15 identified that called often was C.W.?
 16 A. Yes.
 17 Q. Which is one of Mr. Edwards' clients.
 18 This lady called on a regular basis, or
 19 at least from looking at your pad she would call
 20 on a pretty regular basis. Is that true?
 21 A. Yes.
 22 Q. And she and others who are reflected on
 23 those message pads, they were calling to come to
 24 give massages. Correct?
 25 A. Yes.

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1 MR. EDWARDS: Object to the form.
 2 BY MR. CRITTON:
 3 Q. And I don't know whether he asked, do you
 4 remember a person named T.M.?
 5 A. Yes.
 6 Q. And would she call from time to time
 7 asking if she could come to give a massage just
 8 like C.W.?
 9 MR. EDWARDS: Object to the form.
 10 THE WITNESS: Yes.
 11 BY MR. CRITTON:
 12 Q. So at least those two individuals, they
 13 were overtly, that is, they were asking whether
 14 they could come to give Mr. Epstein a massage.
 15 Correct?
 16 A. They will call and they will say I need
 17 to talk to Sarah, and Sarah fifteen minutes later
 18 will tell, Alfredo, we're going to have a massage
 19 with so and so.
 20 Q. So either C.W. or T.M. would call to ask
 21 if they could come and then a massage would be set
 22 then they would show up?
 23 A. That's correct, sir.
 24 Q. Okay. And from time to time they would
 25 bring other people as well?

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1 A. That's correct.
 2 Q. Both C.W. and T.M.?
 3 A. Yes.
 4 Q. Of the females that -- the women that
 5 came to the house, did you ever see anyone force
 6 any of these women onto the property?
 7 A. No, sir.
 8 Q. Did you ever see anyone force them into
 9 the house?
 10 A. No.
 11 Q. Did you ever see anyone force them into
 12 the kitchen?
 13 A. No, sir.
 14 Q. Did you ever use any force, any type of
 15 intimidation or coercion to bring them into the
 16 house and get them into the kitchen?
 17 A. No, sir.
 18 Q. Did you ever observe Ms. Kellen using any
 19 force or intimidation or coercion --
 20 A. No, I did not.
 21 Q. -- with any of these individuals?
 22 A. I did not.
 23 MR. EDWARDS: Object to the form.
 24 BY MR. EDWARDS:
 25 Q. Did Ms. M. -- let me use the initials

33 (Pages 395 to 398)

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1 that way it will show up correctly.
 2 Did T.M. ever use from what you saw, did
 3 she ever use any force or coercion or intimidation
 4 with any of the women that she brought to the
 5 house?

6 MR. HOROWITZ: Form.

7 MR. EDWARDS: Object to the form.

8 THE WITNESS: No, sir.

9 BY MR. CRITTON:

10 Q. Okay. I'm just talking about what you
 11 observed during the time. And you know what I
 12 mean by force?

13 A. Yes.

14 Q. You know what I mean by intimidation?

15 A. Yes.

16 Q. Could to be verbal intimidation or
 17 coercion, either verbally or using some form of
 18 her body, or their bodies.

19 A. Yeah, I understand that.

20 MR. EDWARDS: Form.

21 MR. HOROWITZ: Form.

22 MS. EZELL: Objection, form.

23 BY MR. CRITTON:

24 Q. When C.W. brought individuals to the
 25 house, did you ever see her use any force or

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1 intimidation or coercion from what you could
 2 observe with those women who had come to give a
 3 massage?

4 A. No.

5 MR. EDWARDS: Form.

6 MR. HOROWITZ: Form.

7 MS. EZELL: Form.

8 BY MR. CRITTON:

9 Q. With any of the fifteen women that you
 10 observed who came to the home to give massages
 11 during the time period '04 through I think you
 12 said February of '05, the time period I think was
 13 it August, Mr. Rodriguez --

14 A. August.

15 Q. -- August of '04 through February of '05?

16 A. March of '05.

17 Q. Through the beginning of March '05?

18 A. Yes.

19 Q. Okay. That's the time period I'm
 20 focussing on.

21 Of the approximately fifteen women that
 22 you came to see to give massages that you let in
 23 the back door after punching the security code,
 24 did any of them ever appear to be scared?

25 A. No.

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1 Q. Did any of them ever appear to be
 2 frightened?

3 MR. HOROWITZ: Form.

4 THE WITNESS: No.

5 BY MR. CRITTON:

6 Q. Did any of the women appear to be
 7 fearful?

8 A. No.

9 Q. Did any of them appear to be
 10 uncomfortable in coming into the house?

11 MR. EDWARDS: Form.

12 THE WITNESS: No.

13 BY MR. CRITTON:

14 Q. At any time did any of them express to
 15 you verbally that they were in fear when they came
 16 into the house?

17 A. No, sir.

18 Q. Did any one of the fifteen girls that
 19 came to the back door, then into the kitchen, and
 20 prior to your leaving them in the kitchen say, Mr.
 21 Rodriguez, or Alfredo, or sir, could you get me
 22 out of here?

23 A. No, sir.

24 Q. Did any of them tell you verbally that
 25 they were uncomfortable?

Page 402

1 A. No.

2 Q. Did anyone say help me or I'm scared?

3 A. No.

4 Q. Did all of them appear to be at least
 5 when they came to the back door in a reasonably
 6 good mood?

7 A. Yes.

8 Q. They all appeared to be happy?

9 A. Yes.

10 Q. Smile, I'd say interact with you verbally
 11 in your greetings?

12 A. That's correct.

13 Q. Did any one of the fifteen girls that you
 14 observed during the August '04 through March 2005
 15 time period from your personal observation appear
 16 to be there -- appear to be at the Epstein home
 17 not voluntarily?

18 MR. EDWARDS: Object to the form.

19 MR. HOROWITZ: Object to the form.

20 THE WITNESS: No.

21 BY MR. CRITTON:

22 Q. Did any one of the fifteen women who came
 23 to give the massage ever tell you that they had
 24 been forced to come to the house or coerced into
 25 coming to the house?

Page 403

1 A. No.
 2 MR. EDWARDS: Form.
 3 BY MR. CRITTON:
 4 Q. For those women -- I think I need -- let
 5 me strike that.
 6 On some occasions you'd see the women
 7 come down from upstairs because you would either
 8 let them out of the house or you might give them
 9 an envelope that had money in it. Is that
 10 correct?
 11 A. Yes.
 12 Q. Did any of those -- Mr. Edwards asked you
 13 some questions -- I think it was Mr. Edwards,
 14 whether they had sat down and had anything to eat,
 15 whether they had cereal or anything like that.
 16 A. Yes.
 17 Q. Did you ever observe any of those women
 18 before they went upstairs eating anything at the
 19 house?
 20 A. Sometimes.
 21 Q. And I think he used -- he meaning Mr.
 22 Edwards, used cereal and ice cream.
 23 A. Yes.
 24 Q. And he said, if I recall from the last
 25 deposition, kids like ice cream.

Page 404

1 A. Yes.
 2 Q. Do you remember him asking you that?
 3 A. Yes.
 4 Q. Are you familiar that teenagers like ice
 5 cream?
 6 A. Yes.
 7 Q. Are you familiar that people who are 20
 8 and 30 years old like ice cream?
 9 A. Yes.
 10 Q. Are you familiar that older people, even
 11 our age, Mr. Rodriguez, like ice cream too?
 12 A. Yes.
 13 Q. Okay. And when the individuals would sit
 14 there, and that is these women who would come over
 15 to give a massage and they would -- you would
 16 observe them eating, did they appear to be
 17 comfortable?
 18 A. Yes.
 19 MR. HOROWITZ: Form.
 20 BY MR. CRITTON:
 21 Q. Did they appear to be interacting with
 22 either you or the chef?
 23 A. Yes.
 24 Q. When any of those women would come over
 25 to give massage came downstairs, did you ever see

Page 405

1 them stop and have anything to eat or did you
 2 always see them at the end, that is they're ready
 3 to go?
 4 A. I didn't know, they came from downstairs,
 5 they went to the kitchen, but I didn't know they
 6 were there because I was in the guest house.
 7 Q. Okay, that's my question. You only
 8 observed them either if you heard conversation or
 9 Sarah had called you and said would you pay such
 10 and such?
 11 A. Yes.
 12 Q. At which time you would give them the
 13 envelope with money?
 14 A. Yes.
 15 Q. In that set of circumstances they were on
 16 their way basically to leave?
 17 A. Yes.
 18 Q. When you saw them leave did any of them
 19 at any time, any of the ones that you saw during
 20 August of '04 through March of '05 appear to you
 21 to be scared?
 22 A. No, sir.
 23 Q. Did any girls, women ever appear to have
 24 been injured in any way?
 25 MR. EDWARDS: Form.

Page 406

1 THE WITNESS: No, sir.
 2 BY MR. CRITTON:
 3 Q. Did anyone appear to be in shock?
 4 A. No, sir.
 5 Q. Was anyone ever crying?
 6 A. No, sir.
 7 Q. Was anyone disheveled or appeared to be
 8 unhappy?
 9 A. No, sir.
 10 Q. Did all of them appear, that is the ones
 11 that you saw leave the house that you had an
 12 opportunity to observe during that time period,
 13 did they appear to be approximately the same
 14 personality, same demeanor that they had had when
 15 they came into the house?
 16 MR. HOROWITZ: Form.
 17 THE WITNESS: Yes.
 18 BY MR. CRITTON:
 19 Q. Did anyone ever tell you when they came
 20 down the stairs that they had been injured?
 21 A. No.
 22 Q. I'm talking about the young lady, the
 23 women who had given the massages that you saw
 24 actually leave the house, that is you had some
 25 interaction with, either some interaction as they

35 (Pages 403 to 406)

1 MR. EDWARDS: Form.

2 THE WITNESS: No.

3 BY MR. CRITTON:

4 Q. Did you ever hear anyone yell rape or
5 assault or battery?

6 MR. HOROWITZ: Form.

7 THE WITNESS: No.

8 BY MR. CRITTON:

9 Q. Did you ever hear anyone yell out in
10 anger?

11 A. No.

12 Q. You've gone online, Mr. Rodriguez, and
13 looked at various articles or postings that have
14 been made regarding these cases. Is that a fair
15 statement?

16 A. I'm sorry?

17 Q. If I understood your testimony from July
18 29th and a little bit today, is that you've gone
19 online and read some articles and/or what the
20 police report may have said, that is, you've read
21 information that you've -- about these lawsuits
22 after the time that you left Mr. Epstein's
23 employment.

24 A. Yes.

25 Q. Correct?

1 A. Yes.

2 Q. And, therefore, you have at least seen
3 certain allegations and what people say occurred,
4 or at least their recitation of what may have
5 occurred at Mr. Epstein's home.

6 A. Yes.

7 Q. You have no personal knowledge one way or
8 the other.

9 MR. HOROWITZ: Object to the form.

10 MR. EDWARDS: Form.

11 BY MR. CRITTON:

12 Q. Correct?

13 A. That's correct.

14 Q. Are you also aware that the individuals
15 who have filed lawsuits want in some instance
16 millions of dollars?

17 A. Yes.

18 Q. Okay. Are you aware that some of them
19 are now claiming that they were sexually
20 assaulted?

21 A. Yes.

22 Q. And battered?

23 A. Yes.

24 Q. And you have no information, no personal
25 knowledge in that regard. Is that true?

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1 A. Yes.
 2 MR. EDWARDS: Form.
 3 MR. HOROWITZ: Form.
 4 BY MR. CRITTON:
 5 Q. All right. Were you aware of the
 6 backgrounds of any of these women who came over to
 7 give massages?
 8 MR. HOROWITZ: Form.
 9 THE WITNESS: No, sir.
 10 BY MR. CRITTON:
 11 Q. Well, have you -- did any one of the
 12 females who ever came to give massages, did they
 13 ever tell you that they were prostitutes?
 14 A. No, sir.
 15 Q. Did they ever tell you that they had been
 16 lead into a life of prostitution?
 17 MR. HOROWITZ: Form.
 18 THE WITNESS: No.
 19 BY MR. CRITTON:
 20 Q. Did they ever tell you about their family
 21 life, whether it involved prostitution, abuse,
 22 prior posttraumatic stress syndrome, drugs,
 23 alcohol, abuse by individuals, physical abuse as
 24 well as verbal abuse?
 25 A. No, they didn't tell me.

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1 Q. And, obviously, you have no personal
 2 knowledge one way or the other --
 3 A. No, sir.
 4 Q. -- with regard to what their backgrounds
 5 were before they ever met or came in contact with
 6 Mr. Epstein?
 7 A. No, sir.
 8 Q. Did any person, female, who came to give
 9 a massage at the Epstein home, did anyone ever
 10 come downstairs and say, Mr. Rodriguez, or sir,
 11 call the police?
 12 MR. EDWARDS: Form.
 13 MR. HOROWITZ: Form.
 14 THE WITNESS: No, sir.
 15 BY MR. CRITTON:
 16 Q. I think you said on one occasion you saw
 17 someone parked in a vehicle inside the gate that
 18 you didn't recognize.
 19 A. Exactly.
 20 Q. You called the police?
 21 A. Yes, I did.
 22 Q. Did you go to the police or you called
 23 the police and they came?
 24 A. I went to the police department.
 25 Q. So how did you -- did you actually leave

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1 the property in your car?
 2 A. I was pulling over from Publix so I
 3 turned around and I went to the police and say --
 4 Q. Okay. You were coming back to the home
 5 when you saw that car there?
 6 A. Exactly.
 7 Q. And they sent -- they, the police, sent a
 8 police car with you to come there?
 9 A. Yes.
 10 Q. Did you and the police officer walk up to
 11 the car?
 12 A. The police went first.
 13 Q. All right. And if I understand that,
 14 that was in January of '05?
 15 A. Yes.
 16 Q. And when you did that then did you follow
 17 behind the police officer to see who was in the
 18 car?
 19 A. Yes.
 20 Q. And then you recognized that as A.H.?
 21 A. Yes.
 22 Q. And A.H. said she had come back or was
 23 there to get some money?
 24 A. Yes.
 25 Q. And did you in fact give her money?

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1 A. Yes, I did.
 2 Q. And I think you said you told the police
 3 officer you recognized her?
 4 A. Yes.
 5 Q. Did you have to get permission to pay her
 6 or did you just pay her?
 7 A. No, because Sarah told me already but I
 8 forgot she was going to be that late, so that was
 9 my concern in calling the police.
 10 Q. Okay. And that person who came, do you
 11 have any idea what her age was at that time?
 12 A. That night?
 13 Q. Right, January of '08.
 14 A. No, no.
 15 Q. I'm sorry, January of '05.
 16 A. No.
 17 Q. You mentioned some conversations that you
 18 had had with Louella who was I think she was one
 19 of the house -- the main housekeeper.
 20 A. Yes.
 21 Q. And Louella told you a number of thoughts
 22 that she had. Is that correct?
 23 A. Yes.
 24 Q. And as to Louella what she told you about
 25 -- let me strike that.

37 (Pages 411 to 414)