

# **EXHIBIT G**

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

CASE NO. 15-CV-07433-RWS

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VIRGINIA L. GIUFFRE,

Plaintiff,

v.

GHISLAINE MAXWELL,

Defendant.

-----x

June 1, 2016  
9:12 a.m.

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

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

1 JOHN ALESSI

2 Q. Sure. So let's talk about that a little  
3 bit.

4 I think 95 percent of the time you paid by  
5 check, correct?

6 A. By check, yes, sir.

7 Q. And that would be you writing the check?

8 A. Yes, sir.

9 Q. And there was a checkbook that you had  
10 signing authority for, correct, that you could sign?

11 A. Yes, sir. It was Mr. Epstein in that  
12 account, and I was in that account.

13 Q. And that was at Palm Beach National Bank;  
14 is that right?

15 A. Yes, Palm Beach National Bank.

16 Q. Okay. And that's the check [sic] that you  
17 would write checks out of to the massage therapists,  
18 correct?

19 A. Yes.

20 Q. And I think you testified earlier that  
21 some of the massage therapists would just kind of  
22 keep a running list, right?

23 A. Right.

24 Q. And then at some point, they would have a  
25 piece of paper, and they would say, Hey, I get paid

1 JOHN ALESSI

2 A. I never got into the house. I saw  
3 outside. And I drove home. I drove her to the  
4 apartment. That's it.

5 Q. She was upset and crying about this,  
6 though?

7 A. Yes.

8 Q. The first time you saw her at Mar-a-Lago,  
9 you identified her as wearing a white uniform?

10 A. Yeah, I remember her wearing a white  
11 uniform.

12 Q. It was a professional-looking uniform?

13 A. I would say it was an old nurse's. You  
14 know, it was not pants, but one piece up to the  
15 knees. It was white and like...

16 Q. Okay. So it was like a knee-length skirt?

17 A. Right. Uh-huh.

18 Q. And then covering the top was also white;  
19 is that right?

20 A. Yes.

21 Q. Okay. You were asked some questions about  
22 photographs. I think you testified that Ms. Maxwell  
23 liked to take photographs?

24 A. She did.

25 Q. Do you recall her taking photographs of

1 JOHN ALESSI

2 A. No. We had -- they had like -- they sell  
3 that -- what was the name of the store?

4 Q. Brookstone?

5 A. Yeah, Brookstone. It's a thing they use  
6 to go for the back and massage their back, massage  
7 their legs, with a long -- it had a head with moving  
8 parts on it. That was it.

9 Q. All right.

10 You talked a little earlier about getting  
11 referrals from friends for massage therapists; do  
12 you recall that?

13 A. Yes, I did.

14 Q. Okay. So from time to time would the  
15 friends of Mr. Epstein give --

16 A. Referrals, yes. They would refer somebody  
17 for massages.

18 Q. Tell me how that would come about, that  
19 you would know about that?

20 A. Because I was told to get this new girl,  
21 get this from Mar-a-Lago. This is from the Breakers  
22 Hotel. We used to get a lot of people from the  
23 Breakers Hotel, the spa at the breakers.

24 Q. But, for example, one of Mr. Epstein's  
25 friends would say, I got a good message from this

1 JOHN ALESSI

2 person; I recommend her to you?

3 A. Yes, he would give to me the number.

4 Q. And most of the people, I take it, were  
5 from these spas or clubs; is that right? Most of  
6 the massage people?

7 A. Yes.

8 Q. And do you know, did they have what I'll  
9 call regular day jobs at the spas, and then they  
10 would come into Mr. Epstein's after?

11 MR. EDWARDS: Objection, speculation.

12 THE WITNESS: I think so.

13 BY MR. PAGLIUSCA:

14 Q. Okay. And why do you think so?

15 A. Because they were working at the Breakers,  
16 and sometimes I have to get in touch with these  
17 people. I used to call -- have to call the Breakers  
18 or the Mar-a-Lago or the -- all the clubs. There be  
19 clubs, even in Boca Raton, the Boca Raton Resort and  
20 Hotel. They have a great spa. I had to call these  
21 people, Can you come in at 10:00 tonight?

22 Q. You would know they were working there  
23 because you would talk to them there?

24 A. Yes.

25 Q. I'm going to have you take a look at

1 JOHN ALESSI

2 A. I remember it was extremely hot.

3 Q. It could have been August, it could have  
4 been September; is that right?

5 A. Yes.

6 MR. EDWARDS: Object to counsel  
7 testifying.

8 BY MR. PAGLIUSCA:

9 Q. It is fair to say that you don't really  
10 know the date?

11 A. I don't. I don't.

12 Q. Okay. You saw Ms. Roberts, then, later  
13 that day, and she was -- she came in through the  
14 back door; is that correct?

15 A. Yes. The kitchen door.

16 Q. All right.

17 And you never spoke to either her mother  
18 or her father; is that right?

19 A. No, I never met him.

20 Q. And you did not drive her home that day,  
21 correct?

22 A. No, sir.

23 Q. And you don't recall her going upstairs  
24 that day, do you?

25 A. No, sir.

1 JOHN ALESSI

2 THE VIDEOGRAPHER: On the record at 1:36.

3 BY MR. PAGLIUSCA:

4 Q. Just a few more questions, Mr. Alessi.

5 With regard to the ages of any of the  
6 people giving massages, most of them were over 20;  
7 is that correct?

8 A. Yes.

9 MR. EDWARDS: Objection, argumentative.

10 THE WITNESS: Or they looked like.

11 BY MR. PAGLIUSCA:

12 Q. You believed they would be over 20; is  
13 that right?

14 A. Yes, mostly.

15 Q. And do you recall -- take a look at -- I  
16 think it's Exhibit 3 maybe, at page 108, lines 1 and  
17 2.

18 Do you recall, when you were testifying  
19 under oath in your continued deposition, which  
20 occurred on September 8th, 2009, you were asked a  
21 lot of age questions, correct?

22 A. Yes.

23 Q. And in response to one of those questions,  
24 you said --

25 MR. EDWARDS: What page are we on?

1 JOHN ALESSI

2 MR. PAGLIUSCA: 108, the top of the page,  
3 lines 1 through 3.

4 BY MR. PAGLIUSCA:

5 Q. "Most of them were, I would say, over 20."  
6 Do you remember giving that testimony?

7 A. Yes.

8 Q. And that was true then, correct?

9 A. Yes. And it's true now. I don't think it  
10 was underage before I left, that I can remember.

11 MR. PAGLIUSCA: Okay. Thank you. I don't  
12 have any further questions at this point.

13 FURTHER EXAMINATION

14 BY MR. EDWARDS:

15 Q. Sir, let me pick up right where we left  
16 off, page 107 through 108.

17 A. Yes, sir.

18 Q. So if you read the whole sentence that  
19 wasn't just read to you, it says, "They could have  
20 being 16 or 20. Most of them, I would say, over  
21 20."

22 Do you remember giving that testimony?

23 A. Okay. The girls appear, they appeared to  
24 be very young. Again, the same question you asked.  
25 Everyone asked me the same thing. They could be 16