

COMPOSITE
EXHIBIT 5
(File Under Seal)

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

CASE NO. 15-CV-07433-RWS

-----x

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. And where did the massage therapists --
3 where did they come from?

4 A. Most, they came from Palm Beach. Palm
5 Beach County.

6 Q. And over the course of that 10-year period
7 of time while Ms. Maxwell was at the house, do you
8 have an approximation as to the number of different
9 females -- females that you were told were massage
10 therapists that came to the house?

11 MR. PAGLIUSCA: Object to form and
12 foundation.

13 THE WITNESS: I cannot give you a number,
14 but I would say probably over 100 in my stay
15 there.

16 BY MR. EDWARDS:

17 Q. And many of the times would the females
18 come only one time and not return?

19 MR. PAGLIUSCA: Object to form and
20 foundation.

21 BY MR. EDWARDS:

22 Q. Let me ask that a different way.

23 Were there times when some of these
24 females that would come to the house, and you were
25 told that they were massage therapists, would come

1 JOHN ALESSI

2 BY MR. EDWARDS:

3 Q. Okay. And who would find the massage
4 therapist to bring to the house?

5 A. They would call me in my office, and they
6 would say, Get me a massage at 10:00 with this
7 person.

8 I have a list of the massage therapists, a
9 Rolodex, or a card, and I would call them for the
10 specific time they want a massage. And I would do
11 that.

12 Q. I don't think I asked the right -- the
13 question that I was looking to ask, so let me go
14 back.

15 Did you go out looking for the girls --

16 A. No.

17 Q. -- to bring --

18 A. Never.

19 Q. -- as the massage therapists?

20 A. Never.

21 Q. Who did?

22 A. Ms. Maxwell, Mr. Epstein and their
23 friends, because their friends relayed to other
24 friends they knew a massage therapist and they would
25 send to the house. So it was referrals.

