

# EXHIBIT 4

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.

<p style="text-align: right;">Page 2</p> <p>1 JANE DOE NO. 6, Case No: 08-CV-80994  2 Plaintiff,  3 Vs  4 JEFFREY EPSTEIN,  5 Defendant.  6 _____/  7 JANE DOE NO. 7, Case No. 08-CV-80993  8 Plaintiff,  9 Vs  10 JEFFREY EPSTEIN,  11 Defendant.  12 _____/  13 C.M.A., Case No: 08-CV-80811  14 Plaintiff,  15 Vs  16 JEFFREY EPSTEIN,  17 Defendant.  18 _____/  19 JANE DOE, Case No: 08-CV-80893  20 Plaintiff,  21 Vs  22 JEFFREY EPSTEIN,  23 Defendant.  24 _____/  25</p>	<p style="text-align: right;">Page 4</p> <p>1 VIDEOTAPED  2 DEPOSITION  3 of  4 ALFREDO RODRIGUEZ  5  6 taken on behalf of the Plaintiffs pursuant  7 to a Re-Notice of Taking Deposition (Duces Tecum)  8  9 ---  10 APPEARANCES:  11  12 MERMELSTEIN &amp; HOROWITZ, P.A.  13 BY: STUART MERMELSTEIN, ESQ.  14 18205 Biscayne Boulevard  15 Suite 2218  16 Miami, Florida 33160  17 Attorney for Jane Doe 2, 3, 4, 5,  18 6, and 7.  19  20 ROTHSTEIN ROSENFELDT ADLER  21 BY: BRAD J. EDWARDS, ESQ., and  22 CARA HOLMES, ESQ.  23 Las Olas City Centre  24 Suite 1650  25 401 East Las Olas Boulevard  Fort Lauderdale, Florida 33301  Attorney for Jane Doe and E.W.  And L.M.    PODHURST ORSECK  BY: KATHERINE W. EZELL  25 West Flagler Street  Suite 800  Miami, Florida 33130  Attorney for Jane Doe 101 and 102.</p>
<p style="text-align: right;">Page 3</p> <p>1 JANE DOE NO. II, Case No: 08-CV-80469  2 Plaintiff,  3 Vs  4 JEFFREY EPSTEIN,  5 Defendant.  6 _____/  7 JANE DOE NO. 101, Case No: 09-CV-80591  8 Plaintiff,  9 Vs  10 JEFFREY EPSTEIN,  11 Defendant.  12 _____/  13 JANE DOE NO. 102, Case No: 09-CV-80656  14 Plaintiff,  15 Vs  16 JEFFREY EPSTEIN,  17 Defendant.  18 _____/  19  20 1031 Ives Dairy Road  21 Suite 228  22 North Miami, Florida  23 July 29, 2009  24 11:00 a.m. to 5:30 p.m.  25</p>	<p style="text-align: right;">Page 5</p> <p>1 APPEARANCES:  2  3 LEOPOLD-KUVIN  4 ADAM J. LANGINO, ESQ.  5 2925 PGA Boulevard  6 Suite 200  7 Palm Beach Gardens, Florida 33410  8 Attorney for B.B.  9  10 RICHARD WILLITS, ESQ.  11 2290 10th Avenue North  12 Suite 404  13 Lake Worth, Florida 33461  14 Attorney for C.M.A.  15  16 BURMAN, CRITTON, LUTTIER &amp;  17 COLEMAN, LLP  18 BY: ROBERT CRITTON, ESQ.  19 515 North Flagler Drive  20 Suite 400  21 West Palm Beach, Florida 33401  22 Attorney for Jeffrey Epstein.  23  24 ALSO PRESENT:  25  26 JOE LANGSAM, VIDEOGRAPHER  27  28 ---  29  30  31  32  33  34  35</p>

<p style="text-align: right;">Page 94</p> <p>1 A. I don't remember, sir.</p> <p>2 Q. The next page is a message in the upper</p> <p>3 left dated January 13, 2005, from C.W. Correct?</p> <p>4 A. Yes.</p> <p>5 Q. That's the same C. that we've been</p> <p>6 talking about. Correct?</p> <p>7 A. Yes.</p> <p>8 Q. That was at 7:30 p.m. Correct?</p> <p>9 A. Yes.</p> <p>10 Q. And you don't recall what that particular</p> <p>11 call was about. Right?</p> <p>12 A. No, sir.</p> <p>13 Q. The message dated January 20, 2005, from</p> <p>14 Maria. Do you see that on the bottom right?</p> <p>15 A. Yes.</p> <p>16 Q. Do you know who that is?</p> <p>17 A. I think I have a different page.</p> <p>18 Q. You're a little ahead of me. January 20,</p> <p>19 2005.</p> <p>20 MR. CRITTON: I think that's page 31.</p> <p>21 THE WITNESS: I don't remember who she</p> <p>22 was, sir.</p> <p>23 BY MR. MERMELSTEIN:</p> <p>24 Q. You don't recall what that message was</p> <p>25 about?</p>	<p style="text-align: right;">Page 96</p> <p>1 Q. Okay. Do you recall on any occasion who</p> <p>2 would travel with him to the Virgin Islands?</p> <p>3 MR. CRITTON: Form.</p> <p>4 THE WITNESS: No, sir.</p> <p>5 BY MR. MERMELSTEIN:</p> <p>6 Q. I think we were talking about the money</p> <p>7 before, the household account, sometimes you gave</p> <p>8 gifts?</p> <p>9 A. Yes, I was told to buy some gifts.</p> <p>10 Q. For whom?</p> <p>11 A. For the guests.</p> <p>12 Q. Okay. And what kind of gifts?</p> <p>13 A. Shoes, sweaters, clothes.</p> <p>14 Q. So were you instructed to buy something</p> <p>15 in particular at a particular store?</p> <p>16 A. They would go to the store, if they like</p> <p>17 something I will go after and pay them and</p> <p>18 retrieve it.</p> <p>19 Q. Okay. So would this be a girl who was</p> <p>20 staying at the house?</p> <p>21 A. Yes.</p> <p>22 Q. Okay. This was one of the girls who</p> <p>23 travelled with Mr. Epstein to Palm Beach.</p> <p>24 Correct?</p> <p>25 A. Yes.</p>
<p style="text-align: right;">Page 95</p> <p>1 A. No, sir.</p> <p>2 Q. What about the next page there is a</p> <p>3 message that Eva called?</p> <p>4 A. Yes.</p> <p>5 Q. Dated January 21, 2005?</p> <p>6 A. Yes.</p> <p>7 Q. Do you know who Eva is?</p> <p>8 A. Yes.</p> <p>9 Q. Who is Eva?</p> <p>10 A. The assistant comptroller from the New</p> <p>11 York office.</p> <p>12 Q. Do you remember her last name?</p> <p>13 A. Polish last name I guess. She was</p> <p>14 Russian. She is Russian actually.</p> <p>15 Q. Did you ever travel to any other</p> <p>16 residences that Mr. Epstein had?</p> <p>17 A. No.</p> <p>18 Q. Are you aware he had a residence in the</p> <p>19 Virgin Islands?</p> <p>20 MR. CRITTON: Form.</p> <p>21 THE WITNESS: Yes.</p> <p>22 BY MR. MERMELSTEIN:</p> <p>23 Q. And would he sometimes travel to that</p> <p>24 residence from Palm Beach?</p> <p>25 A. Yes.</p>	<p style="text-align: right;">Page 97</p> <p>1 Q. And so Mr. Epstein would instruct you to</p> <p>2 go shopping with this girl?</p> <p>3 A. Yes.</p> <p>4 Q. And instructed you to pay for whatever it</p> <p>5 is she wanted to buy?</p> <p>6 A. Yes.</p> <p>7 Q. Was there a price limit or anything of</p> <p>8 that nature?</p> <p>9 A. No, sir.</p> <p>10 Q. So when the girl decided what she wanted</p> <p>11 you would --</p> <p>12 A. I would write them a check.</p> <p>13 Q. In that instance you would pay by check?</p> <p>14 A. Yes.</p> <p>15 Q. Any other instances where you gave gifts</p> <p>16 to girls at the instruction of Mr. Epstein?</p> <p>17 A. No. I was just told, you know, when they</p> <p>18 told me I will buy the item.</p> <p>19 Q. I'm sorry?</p> <p>20 A. You know, when I was told to purchase</p> <p>21 this item for them, you know, I will do that, but</p> <p>22 not on any other occasions.</p> <p>23 Q. What do you mean not in any locations?</p> <p>24 A. Any other occasions.</p> <p>25 Q. Not any other occasions. Okay. Did you</p>

25 (Pages 94 to 97)

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1 ever buy flowers for a girl?  
 2 A. Yes, sir.  
 3 Q. Tell me about that.  
 4 A. I was told to buy flowers and roses for a  
 5 girl performing in high school.  
 6 Q. Which girl was that?  
 7 A. I don't remember the name, sir.  
 8 Q. What was Mr. Epstein's relationship to  
 9 this girl?  
 10 MR. CRITTON: Form.  
 11 THE WITNESS: I think she was an  
 12 acquaintance, friend.  
 13 BY MR. MERMELSTEIN:  
 14 Q. She was a friend?  
 15 A. Yes, sir.  
 16 Q. Now, she was performing at the high  
 17 school in what capacity?  
 18 A. There was like a -- like a play in the  
 19 graduation for high school.  
 20 Q. A play for graduation?  
 21 A. Yes, in the high school theatre there was  
 22 some kind of performance.  
 23 Q. Was it like a theatre production?  
 24 A. Yeah, something like that. I didn't go  
 25 inside so I didn't know what was going on inside.

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1 Q. Why do you say it was for graduation?  
 2 A. Because everybody was the graduation  
 3 outside, there were parents, there were a lot of  
 4 people at the school.  
 5 Q. Okay. A lot of high schools have theatre  
 6 production companies and they put on plays.  
 7 Correct?  
 8 MR. CRITTON: Form.  
 9 THE WITNESS: It was towards the end of  
 10 the year. Well, I think I overheard that  
 11 there was a graduation performance of some  
 12 kind.  
 13 BY MR. MERMELSTEIN:  
 14 Q. But you didn't go in so you don't know?  
 15 A. No, sir.  
 16 Q. But this was a high school student you  
 17 were bringing the flowers to. Is that correct?  
 18 A. Yes.  
 19 Q. Had you seen this girl before at the El  
 20 Brillo Way property?  
 21 A. Yes, sir.  
 22 Q. You had seen her a number of times?  
 23 A. Yes, sir.  
 24 Q. Do you recall her name?  
 25 A. I don't remember her name, sir.

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1 Q. Now, you said you never went inside the  
 2 theatre?  
 3 A. No, sir.  
 4 Q. Okay. How did you get to the flower  
 5 store?  
 6 A. I called the girl to her cell and she  
 7 will come to the back door and I give her the  
 8 flowers.  
 9 Q. Was anyone else around at the time?  
 10 A. No, sir.  
 11 Q. And you mentioned this was a girl you had  
 12 seen before?  
 13 A. Yes.  
 14 Q. Was this girl who had come to give  
 15 massages to Mr. Epstein?  
 16 MR. CRITTON: Form.  
 17 THE WITNESS: I don't know if she was  
 18 doing massages but she was at the house.  
 19 BY MR. MERMELSTEIN:  
 20 Q. What would she have been there for?  
 21 A. To visit him.  
 22 Q. This was a high school girl who was  
 23 coming to visit Mr. Epstein at the house?  
 24 A. She came to the house, I open the door  
 25 and I left, you know.

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1 Q. Did you take her to the kitchen like you  
 2 did --  
 3 A. Yes.  
 4 Q. So you brought her to the kitchen just  
 5 like you did for the girls who gave him massages.  
 6 Correct?  
 7 A. Yes, sir.  
 8 Q. Did you ever pay her?  
 9 A. I don't remember, sir, but probably I  
 10 did.  
 11 MR. CRITTON: Form, move to strike,  
 12 speculation.  
 13 BY MR. MERMELSTEIN:  
 14 Q. Why do you say you probably did?  
 15 A. Because I was the only one paying --  
 16 well, not the only one but, you know, but chances  
 17 are I paid her but I don't remember that  
 18 particular instance that I gave her money.  
 19 Q. Is it fair to say that the girls who came  
 20 to the Palm Beach residence, these are not the  
 21 girls who are staying there, the girls who came --  
 22 were there to give massages. Correct?  
 23 MR. CRITTON: Form.  
 24 THE WITNESS: Yes.  
 25 BY MR. MERMELSTEIN:

26 (Pages 98 to 101)

<p style="text-align: right;">Page 166</p> <p>1 written down anywhere?</p> <p>2 A. No.</p> <p>3 Q. It's my understanding that C. and T.</p> <p>4 either came to his house alone to visit with Mr.</p> <p>5 Epstein or brought other girls in their age group</p> <p>6 to Mr. Epstein.</p> <p>7 Were you familiar with that type of</p> <p>8 recruitment process of girls bringing other girls?</p> <p>9 MR. CRITTON: Form.</p> <p>10 THE WITNESS: Yes.</p> <p>11 BY MR. EDWARDS:</p> <p>12 Q. Can you tell me more about what you know</p> <p>13 about girls bringing other girls that are</p> <p>14 relatively the same age to come to Jeffrey</p> <p>15 Epstein's house and to use your words, have a good</p> <p>16 time?</p> <p>17 MR. CRITTON: Form.</p> <p>18 THE WITNESS: It's hard to know who they</p> <p>19 knew. But I think that was -- they feel</p> <p>20 better themselves when they're in a group</p> <p>21 than going by themselves, but I don't know</p> <p>22 somebody recruiting.</p> <p>23 BY MR. EDWARDS:</p> <p>24 Q. Okay. And you've talked about, at least</p> <p>25 referred to yourself I believe to the police and</p>	<p style="text-align: right;">Page 168</p> <p>1 for now we'll call it a massage -- as well as</p> <p>2 anybody who brought that person over to the house,</p> <p>3 they would both get paid cash. Are you familiar</p> <p>4 with that?</p> <p>5 MR. CRITTON: Form.</p> <p>6 THE WITNESS: No.</p> <p>7 BY MR. EDWARDS:</p> <p>8 Q. If C. brought another girl over to the</p> <p>9 house and C. stayed downstairs but this other girl</p> <p>10 went upstairs with Mr. Epstein, which one would</p> <p>11 you pay?</p> <p>12 A. I don't know because I was told who to</p> <p>13 pay.</p> <p>14 Q. And Sarah Kellen always told you?</p> <p>15 A. Sarah told me pay so and so.</p> <p>16 Q. So if we were going to ask anybody else</p> <p>17 about the exact method in terms of who would get</p> <p>18 paid and for what, who would the people be? I</p> <p>19 mean, other than Mr. Epstein who else could we ask</p> <p>20 these questions?</p> <p>21 A. Sarah.</p> <p>22 Q. Sarah Kellen?</p> <p>23 A. Yes.</p> <p>24 Q. She would know this?</p> <p>25 A. Yes.</p>
<p style="text-align: right;">Page 167</p> <p>1 as well today as a human ATM machine. Right?</p> <p>2 MR. CRITTON: Form.</p> <p>3 THE WITNESS: Something like that. I was</p> <p>4 supposed to carry cash at all times.</p> <p>5 BY MR. EDWARDS:</p> <p>6 Q. One of the primary reasons why you</p> <p>7 carried cash was to pay the girls in this age</p> <p>8 group of C. and T. for whatever happened at the</p> <p>9 house. Right?</p> <p>10 MR. CRITTON: Form.</p> <p>11 THE WITNESS: Yes.</p> <p>12 BY MR. EDWARDS:</p> <p>13 Q. That's a fair statement. Right?</p> <p>14 MR. CRITTON: Form.</p> <p>15 THE WITNESS: Yes.</p> <p>16 BY MR. EDWARDS:</p> <p>17 Q. Okay. And when C., let's use her for</p> <p>18 example, would bring somebody else to the house,</p> <p>19 did you pay C. as well as whomever she brought to</p> <p>20 the house, pay them both?</p> <p>21 A. No, I pay only one person.</p> <p>22 Q. Okay. My understanding, and tell me if</p> <p>23 this is wrong or you can corroborate this, is that</p> <p>24 Mr. Epstein would pay the girl that was actually</p> <p>25 performing whatever was happening in the room --</p>	<p style="text-align: right;">Page 169</p> <p>1 Q. What about Ghislaine Maxwell?</p> <p>2 MR. CRITTON: Form.</p> <p>3 THE WITNESS: You're talking about the</p> <p>4 boss. I don't know.</p> <p>5 BY MR. EDWARDS:</p> <p>6 Q. To your knowledge was Ghislaine Maxwell</p> <p>7 aware of these girls that are in the age group of</p> <p>8 C. and T. coming to Jeffrey Epstein's house to</p> <p>9 have a good time?</p> <p>10 MR. CRITTON: Form.</p> <p>11 THE WITNESS: I have to say something.</p> <p>12 Mrs. Maxwell called me and told me not to</p> <p>13 ever discuss or contact her again in a</p> <p>14 threaten way.</p> <p>15 BY MR. EDWARDS:</p> <p>16 Q. When was this?</p> <p>17 A. Right after I left because I call one of</p> <p>18 the friends for a job and she told me this, but,</p> <p>19 you know, I feel intimidated and so I want to keep</p> <p>20 her out.</p> <p>21 Q. What exactly did she say? First of all,</p> <p>22 was this a telephone call?</p> <p>23 A. Yes, she was in New York.</p> <p>24 Q. She called you on your cell phone?</p> <p>25 A. Yes.</p>



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1 Q. Is this the cell phone that was issued to  
2 you by Mr. Epstein?  
3 A. No, it was my personal phone. I was  
4 already --  
5 Q. Gone?  
6 A. Yeah, this is three, four months down the  
7 road.  
8 Q. So if you left in --  
9 A. February, March -- it was May or June.  
10 Q. Of 2005?  
11 A. Yes.  
12 Q. And you got a call from Ghislaine Maxwell  
13 out of the blue?  
14 A. Yes.  
15 Q. And do you know what prompted that  
16 telephone call?  
17 A. Because I contact somebody in New York to  
18 get a job.  
19 Q. Who was that person?  
20 A. I contact Jean-Luc and I contact Eva, the  
21 Swedish girl, she used to be very good friends  
22 with Mr. Epstein because she asked me she need  
23 somebody in New York.  
24 Q. What does Eva do?  
25 A. Eva was a model many years ago and he

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1 married -- Eva is the mother of the girl who was  
2 on the wall.  
3 Q. Who is on the wall of Mr. Epstein's  
4 house?  
5 A. Yeah.  
6 Q. All right. There is a younger girl model  
7 that's on the wall of Mr. Epstein's house and this  
8 lady Eva is her mother?  
9 A. Yes.  
10 Q. And at some point in time you called her  
11 in New York to get a job?  
12 A. That's right.  
13 Q. And you also called Jean-Luc Bernell?  
14 That's his name. Right?  
15 A. Jean-Luc, yeah, I don't remember his last  
16 name.  
17 Q. Does that sound familiar to you, Jean-Luc  
18 Bernell?  
19 A. Yeah.  
20 Q. What did Eva and/or Jean-Luc say about  
21 employing you?  
22 A. No, they said they're going to find out  
23 and obviously the first thing they did was talk to  
24 Mrs. Maxwell.  
25 Q. She made a telephone call to you and what

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1 precisely did she say?  
2 A. She said I forbid you that you're going  
3 to be -- that I will be sorry if I contact any of  
4 her friends again.  
5 Q. Okay. Other than you will be sorry if  
6 you contact any of my friends again did she say  
7 anything else about what you know about Mr.  
8 Epstein and/or what goes on at his house?  
9 A. She said something like don't open your  
10 mouth or something like that. But you have to  
11 understand, I'm a civil humble, I came as an  
12 immigrant to service people, and right now you  
13 feel a little -- I'm 55 and I'm afraid. First of  
14 all, I don't have a job, but I'm glad this is on  
15 tape because I don't want nothing to happen to me.  
16 This is the way they treat you, better do this and  
17 you shut up and don't talk to nobody and --  
18 Q. When you say this is the way they treat,  
19 who specifically are you talking about when you  
20 say the word they?  
21 A. Maxwell.  
22 Q. And usually when you say the word they,  
23 you're not only talking about one person --  
24 A. Wealthy people.  
25 Q. Are you also putting Jeffrey Epstein in

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1 that category?  
2 MR. CRITTON: Form.  
3 THE WITNESS: I didn't talk to him  
4 directly most of the time.  
5 BY MR. EDWARDS:  
6 Q. What's the reason why if you were his  
7 head of security that you wouldn't have more  
8 direct contact with him? Why is that?  
9 MR. CRITTON: Form.  
10 THE WITNESS: He wanted that way, you  
11 know, so, yeah, I have to talk to Sarah,  
12 Sarah is not available talk to Lesley in New  
13 York. He didn't want to be disturbed.  
14 BY MR. EDWARDS:  
15 Q. Even while you were in the same house  
16 with him he still had other people you could talk  
17 to directly but he was not one of them?  
18 A. Yeah.  
19 Q. When you were fired you were not fired  
20 directly by him?  
21 A. No.  
22 Q. It was through somebody else?  
23 A. Ms. Maxwell.  
24 Q. Okay. But it was for upsetting him for  
25 taking the wrong car?

<p style="text-align: right;">Page 174</p> <p>1 A. Yes.</p> <p>2 Q. Okay. Ever since this communication that</p> <p>3 Ms. Maxwell made to you where she called you</p> <p>4 sometime in May or June of 2005, and have you felt</p> <p>5 threatened?</p> <p>6 A. Yes.</p> <p>7 MR. CRITTON: Form.</p> <p>8 BY MR. EDWARDS:</p> <p>9 Q. Have you felt reluctant to come forward</p> <p>10 and give truthful, honest, and full disclosure of</p> <p>11 all information that you know about this case?</p> <p>12 MR. CRITTON: Form.</p> <p>13 THE WITNESS: I said this off the record</p> <p>14 but I will say it on the record, being in</p> <p>15 the Epstein case for me resulted in two</p> <p>16 years I have -- I won't bring the names but</p> <p>17 I was in the third interview to get hired as</p> <p>18 a household manager in Palm Beach and they</p> <p>19 told me you are the Jeffrey Epstein guy.</p> <p>20 Not in the sense I did something wrong</p> <p>21 because of the scandal, so they shun the job</p> <p>22 away from me. And so I was afraid that --</p> <p>23 this is very powerful people and one phone</p> <p>24 call and you finish, so I'm the little guy.</p> <p>25 Even I'm wearing a tie I'm a -- I'm talking</p>	<p style="text-align: right;">Page 176</p> <p>1 this. Because I went through -- the first</p> <p>2 time I went to the deposition I was in Palm</p> <p>3 Beach and I did my duty, I mean, I tell what</p> <p>4 I know, but now I know there is more</p> <p>5 digging, all I want is this to be to get on</p> <p>6 with my normal life and stuff.</p> <p>7 BY MR. EDWARDS:</p> <p>8 Q. So when you come here today to testify,</p> <p>9 your main objective is to get back to your normal</p> <p>10 life and get out of the spotlight of this case.</p> <p>11 Yes?</p> <p>12 A. Yes.</p> <p>13 Q. And in doing so have you held back some</p> <p>14 of the details that you know about that happened</p> <p>15 in this case to remove yourself from the</p> <p>16 spotlight?</p> <p>17 MR. CRITTON: Form.</p> <p>18 THE WITNESS: No, sir.</p> <p>19 BY MR. EDWARDS:</p> <p>20 Q. Okay. Have you ever talked to Ghislaine</p> <p>21 Maxwell after that telephone call where she called</p> <p>22 you and you felt threatened?</p> <p>23 A. No.</p> <p>24 Q. Okay. So going back to where we started</p> <p>25 here was, does Ghislaine Maxwell have knowledge of</p>
<p style="text-align: right;">Page 175</p> <p>1 from my heart. This is the way it is.</p> <p>2 BY MR. EDWARDS:</p> <p>3 Q. I feel for you, I'm sorry that you have</p> <p>4 to be in this position.</p> <p>5 MR. CRITTON: Move to strike this.</p> <p>6 BY MR. EDWARDS:</p> <p>7 Q. Well, when you applied for these jobs and</p> <p>8 they turned you down and gave you the reason that</p> <p>9 you're the person involved in the Jeffrey Epstein</p> <p>10 scandal, was it that they are associated or</p> <p>11 friends with Jeffrey Epstein or is it that you</p> <p>12 have information and you have this confidentiality</p> <p>13 but you're revealing some certain information that</p> <p>14 Mr. Epstein would not like?</p> <p>15 MR. CRITTON: Form.</p> <p>16 THE WITNESS: Both.</p> <p>17 BY MR. EDWARDS:</p> <p>18 Q. Both?</p> <p>19 A. Both.</p> <p>20 Q. And since then given what you just told</p> <p>21 us about these people being very powerful, are you</p> <p>22 afraid for your life given the fact that you're</p> <p>23 involved to some extent in this case?</p> <p>24 MR. CRITTON: Form.</p> <p>25 THE WITNESS: I just start thinking about</p>	<p style="text-align: right;">Page 177</p> <p>1 the girls that would come over to Jeffrey</p> <p>2 Epstein's house that are in roughly the same age</p> <p>3 group as C. and T. and to have a good time as you</p> <p>4 put it?</p> <p>5 MR. CRITTON: Form.</p> <p>6 THE WITNESS: Yes.</p> <p>7 BY MR. EDWARDS:</p> <p>8 Q. And what was her involvement and/or</p> <p>9 knowledge about that?</p> <p>10 MR. CRITTON: Form.</p> <p>11 THE WITNESS: She knew what was going on.</p> <p>12 BY MR. EDWARDS:</p> <p>13 Q. You referred to her at one point in time</p> <p>14 as Jeffrey Epstein's companion. But then later on</p> <p>15 you said that if she flew she flew on a different</p> <p>16 airplane and oftentimes or sometimes she slept in</p> <p>17 a different bed from Mr. Epstein. Did that seem</p> <p>18 unusual to you?</p> <p>19 MR. CRITTON: Form.</p> <p>20 THE WITNESS: It was odd but, I mean, and</p> <p>21 again, everything is odd in Palm Beach.</p> <p>22 BY MR. EDWARDS:</p> <p>23 Q. Okay, I don't mean to laugh.</p> <p>24 A. Mr. Epstein fly to Jet Aviation, she fly</p> <p>25 to Galaxy Aviation, but they never flew the same</p>



<p style="text-align: right;">Page 198</p> <p>1 that tape it's going to be Assistant Attorney 2 Weiss and Detective Recarey asking questions? 3 A. Yes. 4 Q. It says, during the sworn taped statement 5 Mr. Rodriguez stated he was employed by Jeffrey 6 Epstein for approximately six months. 7 I think we already talked about that. 8 I'm skipping ahead a little bit. 9 If Rodriguez needed to relay a message to 10 Epstein he would have to notify Epstein's 11 secretary Lesley in New York who would then notify 12 Epstein's personal assistant Sarah who would relay 13 the message to Epstein. 14 A. Yeah. 15 MR. CRITTON: Form. 16 BY MR. EDWARDS: 17 Q. That's pretty much the process you 18 described? 19 A. Yes, it was normal procedure. 20 Q. Rodriguez stated Epstein did not want to 21 see or hear the staff when he was in the 22 residence? 23 MR. CRITTON: Form. 24 THE WITNESS: That's correct. 25 BY MR. EDWARDS:</p>	<p style="text-align: right;">Page 200</p> <p>1 friends, I will say, yeah. 2 Q. Then you mentioned that you typed into 3 Google, I guess you Googled Prince Andrew and Bill 4 Clinton. Why would you pick those names, were 5 they associated with Mr. Epstein? 6 A. Yes. 7 Q. And what is your understanding as to how 8 Prince Andrew is associated with Jeffrey Epstein? 9 A. Because there were pictures with him 10 together. 11 Q. In the house? 12 A. Yes. 13 Q. Many pictures or are we talking about 14 one? 15 A. Many pictures. 16 Q. Were these pictures that looked that 17 appeared to be at social events, at Mr. Epstein's 18 house or where? 19 A. Mrs. Maxwell took him to England to 20 introduce him to the royalty. 21 Q. Is it's your understanding that Ghislaine 22 Maxwell knew Prince Andrew and introduced -- 23 A. Yes. 24 Q. Is it also your understanding that at 25 some point in time Ghislaine dated or had a</p>
<p style="text-align: right;">Page 199</p> <p>1 Q. That's something you agree with? 2 A. Yes. 3 MR. CRITTON: Form. 4 BY MR. EDWARDS: 5 Q. Rodriguez advised Mr. Epstein had many 6 guests. 7 In addition to the girls who are roughly 8 C. and T. age who had come to the house to have a 9 good time, who were some of the other guests that 10 you know of, if you know their name? 11 MR. CRITTON: Form. 12 THE WITNESS: I mentioned Alan 13 Dershowitz. 14 BY MR. EDWARDS: 15 Q. That's a lawyer from Harvard? 16 A. Yes. The magician, David Copperfield, 17 some other lawyers from New York, you know. There 18 were some other guests. 19 Q. And how frequently would these other 20 guests come over? 21 A. Once a month, something like that. 22 Q. Okay. So if it's only once a month and 23 you were only there six months you're saying you 24 only saw six guests come over in addition to -- 25 A. They have people, you know, they have</p>	<p style="text-align: right;">Page 201</p> <p>1 romantic relationship with Prince Andrew? 2 MR. CRITTON: Form. 3 THE WITNESS: I don't know that. 4 BY MR. EDWARDS: 5 Q. Do you know around what time period it 6 was that Mr. Epstein was introduced to Prince 7 Andrew? 8 A. 2003, I believe. 9 Q. How do you know that? 10 A. I've heard dates. 11 Q. From people in the Epstein group? 12 A. Yes. 13 Q. Okay. 14 MR. CRITTON: Let me note my objection, 15 move to strike, it's based on -- his 16 testimony is based on hearsay. 17 BY MR. EDWARDS: 18 Q. During the six month period of time when 19 you worked directly for Mr. Epstein, how often did 20 Mr. Epstein get together with or hangout with 21 Prince Andrew; if you know? 22 A. I didn't see him once. 23 Q. You never saw Prince Andrew at the house? 24 A. No, no, he called. 25 Q. I'm sorry, how often would he call?</p>

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1 A. I will say once a week we used to get a  
2 call from him.  
3 Q. Did you ever hear or did you ever know of  
4 Prince Andrew being involved with any of the same  
5 girls that Jeffrey Epstein was involved?  
6 A. No.  
7 Q. All right. Same question with Bill  
8 Clinton, were you ever aware of him being involved  
9 with any girls?  
10 A. No.  
11 Q. And David Copperfield?  
12 A. No.  
13 Q. What would he do when he was in town?  
14 A. He came to the house, played tricks and  
15 he leave.  
16 Q. Did you watch?  
17 A. Yeah. Cards and --  
18 Q. That's nice, you get an up close and  
19 personal show from David Copperfield.  
20 How often would David Copperfield and  
21 Jeffrey Epstein talk?  
22 A. When I was there he was maybe two or  
23 three times in the house.  
24 Q. Besides those guests have you pretty much  
25 listed the guests that you were aware of?

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1 A. Mr. Dershowitz was there, I took him two  
2 or three times to the airport. And like I say,  
3 lawyers from New York, business matters.  
4 Q. Okay. And Donald Trump, did you ever see  
5 him at the house?  
6 A. No, he used to call.  
7 Q. Is it your understanding that -- or  
8 through your knowledge do you know if Donald Trump  
9 owned or runs the Mara Lago Club?  
10 A. Yes.  
11 Q. Did Mr. Epstein go to the Mara Lago Club?  
12 A. No.  
13 Q. Why not?  
14 MR. CRITTON: Form.  
15 THE WITNESS: He's a very private person.  
16 BY MR. EDWARDS:  
17 Q. So it's your understanding that Mr.  
18 Epstein didn't go to the Mara Lago Club just  
19 because he's private?  
20 MR. CRITTON: Form.  
21 THE WITNESS: Yes.  
22 BY MR. EDWARDS:  
23 Q. Are you aware, has he ever been there?  
24 A. That I don't know.  
25 Q. Do you know if he's a member?

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1 A. Probably is.  
2 MR. CRITTON: Form, move to strike, it's  
3 a guess, speculation.  
4 BY MR. EDWARDS:  
5 Q. When you say he probably is, what are you  
6 basing that on?  
7 A. Because he belongs to all the clubs in  
8 Palm Beach.  
9 Q. Okay. But you don't have a list of all  
10 of the clubs that he belongs to?  
11 A. I used to.  
12 Q. And on that list --  
13 A. I don't remember, you know.  
14 Q. Okay. Do you know where that list is?  
15 A. Probably it's in the house.  
16 Q. Skipping down on page 71 of the report to  
17 the third paragraph, Rodriguez stated once the  
18 masseuses would arrive, he would allow them entry  
19 into the kitchen area and offer them something to  
20 eat or drink. Do you agree with that?  
21 A. Yes.  
22 MR. CRITTON: Form.  
23 BY MR. EDWARDS:  
24 Q. They would then be encountered by Sarah  
25 or Epstein.

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1 MR. CRITTON: Form.  
2 THE WITNESS: (Shakes head.)  
3 BY MR. EDWARDS:  
4 Q. Yes?  
5 A. (Shakes head.)  
6 Q. They would then be taken upstairs to  
7 provide a massage. Right?  
8 MR. CRITTON: Form.  
9 THE WITNESS: Yes.  
10 BY MR. EDWARDS:  
11 Q. Again, you don't know what happened  
12 behind closed doors?  
13 A. No.  
14 Q. But you were told to refer to these girls  
15 as masseuses?  
16 A. Yes.  
17 Q. Aside from being told that, you have  
18 absolutely no idea what went on up there?  
19 A. No.  
20 Q. All right. I asked Rodriguez any of the  
21 masseuses appeared to be young in age, he advised  
22 he didn't ask their ages but felt they were very  
23 young.  
24 A. Early 20's, you know. They're all very  
25 young, but I mean, it's hard to say who's underage

52 (Pages 202 to 205)

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.

**CONDENSED**

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.

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1 JANE DOE NO. 6, CASE NO: 08-CV-80994  
 2 Plaintiff,  
 3 Vs.  
 4 JEFFREY EPSTEIN,  
 5 Defendant.

6  
 7 JANE DOE NO. 7, CASE NO: 08-CV-80993  
 8 Plaintiff,  
 9 Vs.  
 10 JEFFREY EPSTEIN,  
 11 Defendant.

12 C.M.A., CASE NO: 08-CV-80811  
 13 Plaintiff,  
 14 Vs.  
 15 JEFFREY EPSTEIN,  
 16 Defendant.

17 JANE DOE, CASE NO: 08-CV-80893  
 18 Plaintiff,  
 19 Vs.  
 20 JEFFREY EPSTEIN,  
 21 Defendant.

22  
 23  
 24  
 25

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

6  
 7 JANE DOE NO. 101 CASE NO: 08-CV-80591  
 8 Plaintiff,  
 9 Vs.  
 10 JEFFREY EPSTEIN,  
 11 Defendant.

12 JANE DOE NO. 102, CASE NO: 08-CV-80656  
 13 Plaintiff,  
 14 Vs.  
 15 JEFFREY EPSTEIN,  
 16 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. 502008CA037319XXXXMB AB

5 B.B.,  
 6 Plaintiff,  
 7 Vs.  
 8 JEFFREY EPSTEIN.  
 9 Defendant.

10  
 11  
 12 1031 Ives Dairy Road  
 13 Suite 228  
 14 North Miami, Florida  
 15 August 7, 2009  
 16 1:15 p.m. to 5:30 p.m.

17 CONTINUED  
 18 VIDEOTAPED  
 19 DEPOSITION  
 20 of  
 21 ALFREDO RODRIGUEZ

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

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1 APPEARANCES:  
 2  
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 30 Attorney for B.B.

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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)