

EXHIBIT 12
(Filed Under Seal)

09 - 22783

Condensed Transcript

IN THE CIRCUIT COURT OF THE FIFTEENTH JUDICIAL CIRCUIT
IN AND FOR PALM BEACH COUNTY, FLORIDA
CIVIL DIVISION

L.M.,

Plaintiff,

vs.

CASE No.
502008CA028051XXXXMB AB

JEFFREY EPSTEIN,

Defendant.
~~~~~

**DEPOSITION OF  
LOUELLA RABUYO  
VOLUME I**

October, 20, 2009  
10:10 a.m.

515 N. Flagler Drive  
Suite 200-P  
West Palm Beach, Florida 33401

Reported By: Teresa Whalen, RPR, FPR, Notary Public, State of Florida



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| <p style="text-align: center;">9</p> <p>1 head or shake your head, and she can't take that down.</p> <p>2 A All right.</p> <p>3 Q It's also very easy to say uh-huh or huh-uh,</p> <p>4 but it kind of looks the same on paper, so you can't do</p> <p>5 that either. I'm going to wait until you finish your</p> <p>6 answer, and you have to wait until I finish my question,</p> <p>7 because if we talk over one another, then the court</p> <p>8 reporter can't get it down.</p> <p>9 A Okay. Yes, sir.</p> <p>10 Q All right. So if you don't understand the</p> <p>11 question, tell me you don't understand and I'll try to</p> <p>12 ask a better question.</p> <p>13 A Yes.</p> <p>14 Q Okay. So you were hired in November of 2004</p> <p>15 to be the housekeeper for Mr. Epstein?</p> <p>16 A Yes.</p> <p>17 Q And when you were hired, who exactly hired</p> <p>18 you, who -- let me strike that.</p> <p>19 When you were hired to be the housekeeper for</p> <p>20 Mr. Epstein, who did you interview with?</p> <p>21 A Ms. Maxwell.</p> <p>22 Q Is that Ghislaine Maxwell or just</p> <p>23 Laine Maxwell?</p> <p>24 A Ghislaine Maxwell.</p> <p>25 Q And where did the interview take place?</p>                                                                                                   | <p style="text-align: center;">11</p> <p>1 that it's clean and appropriately, what's this..</p> <p>2 Q And as I understand this property, there is a</p> <p>3 main house and then there's also a staff house on the</p> <p>4 property; is that right?</p> <p>5 A Yes, sir.</p> <p>6 Q And when the guests would come over, would you</p> <p>7 stay in the main house, or would you go to the staff</p> <p>8 house?</p> <p>9 MR. REINHART: Can we get a time frame to the</p> <p>10 question?</p> <p>11 BY MR. EDWARDS:</p> <p>12 Q Over the last five years while you worked</p> <p>13 there.</p> <p>14 A I usually stay in the staff house and do the</p> <p>15 laundry, then I go to the kitchen and then tidy the</p> <p>16 kitchen.</p> <p>17 Q You were hired in November of 2004, and what</p> <p>18 were your hours that you worked there back in November</p> <p>19 of 2004 when you were hired?</p> <p>20 A Eight to five.</p> <p>21 Q How many days a week?</p> <p>22 A Depends.</p> <p>23 Q How would the schedule be relayed to you?</p> <p>24 A When Mr. Epstein is there, then I'm supposed</p> <p>25 to report, but usually it's five days a week.</p>                                                                                     |
| <p style="text-align: center;">10</p> <p>1 A At 358 El Brillo Way.</p> <p>2 Q And what did Ms. Maxwell and you speak about</p> <p>3 prior to your being hired as the housekeeper?</p> <p>4 A My duties.</p> <p>5 Q And what did she tell you your duties would</p> <p>6 be?</p> <p>7 A To tidy, to make beds, do laundry.</p> <p>8 Q Did she tell you what would take place in the</p> <p>9 house on a day-to-day basis?</p> <p>10 A No.</p> <p>11 Q So going into that position, you had no idea</p> <p>12 who the guests would be or who the people coming in the</p> <p>13 house would be, or what would generally go on?</p> <p>14 A Can you simplify the question?</p> <p>15 Q Sure. When you talked about with</p> <p>16 Ghislaine Maxwell at this interview, your duties being</p> <p>17 you would make the bed and tidy up, did she also tel</p> <p>18 you that there would be a lot of guests, there would be</p> <p>19 a few guests, did she talk to you about that at all?</p> <p>20 A She mentioned that if there are guests, we</p> <p>21 have to, like, you know, prepare the room, and, what's</p> <p>22 this, attend to the guests.</p> <p>23 Q And what did you understand that to mean that</p> <p>24 you have to attend to the guests?</p> <p>25 A You have to prepare the room and see to it</p> | <p style="text-align: center;">12</p> <p>1 Q So am I correct in understanding that there</p> <p>2 was one schedule when Mr. Epstein was in town, and the</p> <p>3 schedule may be a little bit different if Mr. Epstein</p> <p>4 was out of town?</p> <p>5 A Yes, sir.</p> <p>6 Q All right. Tell me the differences when</p> <p>7 Mr. Epstein is in town versus when Mr. Epstein was not</p> <p>8 in town.</p> <p>9 A If he stays like three or four days, then I'm</p> <p>10 supposed to be there, and then the house is to be</p> <p>11 cleaned. And then when they do not come, then I can</p> <p>12 either go there, or I'm given free days off.</p> <p>13 Q Three days off?</p> <p>14 A No. A free day.</p> <p>15 Q Oh, okay. But typically back in 2004 when you</p> <p>16 were hired, you worked an average of about five days a</p> <p>17 week; is that correct?</p> <p>18 A Yes.</p> <p>19 Q All right. And I guess by the way that you're</p> <p>20 explaining it, if Mr. Epstein was in town for a longer</p> <p>21 period of time, you may work more than five days, and if</p> <p>22 Mr. Epstein was not in town, you may work less than five</p> <p>23 days?</p> <p>24 A Yes.</p> <p>25 Q Okay. Did you ever talk to Mr. Epstein prior</p> |



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| <p style="text-align: center;">13</p> <p>1 to being hired?</p> <p>2 A No, sir.</p> <p>3 Q Where did this meeting, within the house where</p> <p>4 did the meeting with Ghislaine Maxwell take place?</p> <p>5 A In the living room.</p> <p>6 Q Aside from telling you that you were going to</p> <p>7 be required to make the beds and just generally tidy up,</p> <p>8 did she specify anything else that you would be required</p> <p>9 to do?</p> <p>10 A No.</p> <p>11 Q Where had you worked prior to working for</p> <p>12 Mr. Epstein?</p> <p>13 A I work as a certified nursing assistant.</p> <p>14 Q Where?</p> <p>15 A At that time I was doing private duty.</p> <p>16 Q How long have you been a certified nursing</p> <p>17 assistant?</p> <p>18 A Since about ten years.</p> <p>19 Q And what made you change professions from</p> <p>20 being a certified nursing assistant to be a housekeeper</p> <p>21 for Mr. Epstein?</p> <p>22 A The agency called me that there is an</p> <p>23 interview; if I like, I go to, so that's how it started.</p> <p>24 Q And when you went to the interview, obviously</p> <p>25 you're going to this very big house and you talked to</p> | <p style="text-align: center;">15</p> <p>1 Q Did she tell what you would be paid at that</p> <p>2 time?</p> <p>3 A Not yet.</p> <p>4 Q Did you show up that Saturday? I guess that's</p> <p>5 November 17th of 2004?</p> <p>6 A No, that's not.</p> <p>7 Q No. Was it prior to November 17th of 2004, or</p> <p>8 after?</p> <p>9 A After.</p> <p>10 Q Okay. The interview that you first went to</p> <p>11 was November 17th, 2004 with Ms. Maxwell; is that the</p> <p>12 date that you gave us?</p> <p>13 A I cannot remember.</p> <p>14 Q The only reason I'm using that date is I</p> <p>15 believe the question I asked was when did you start</p> <p>16 working for Mr. Epstein, and I thought the date that you</p> <p>17 gave me was November 17th, 2004.</p> <p>18 A Yes.</p> <p>19 Q Okay. And in the course of this whole thing,</p> <p>20 it sounds like you interviewed with Ghislaine Maxwell,</p> <p>21 there were other interviewees, you received a call and</p> <p>22 you were asked to try out on a Saturday?</p> <p>23 A Yes.</p> <p>24 Q And where does that Saturday fall in related</p> <p>25 to November 17th, 2004?</p> |
| <p style="text-align: center;">14</p> <p>1 Ghislaine Maxwell, right?</p> <p>2 A Yes.</p> <p>3 Q And did you decide right then that you liked</p> <p>4 this and that you were going to change professions and</p> <p>5 you were going to be his housekeeper?</p> <p>6 A No.</p> <p>7 Q Okay. Then walk me through that, how did you</p> <p>8 go about eventually accepting the position?</p> <p>9 A I didn't expect to be hired, because there</p> <p>10 were other interviewers (sic), interview people that</p> <p>11 were to be interviewed.</p> <p>12 Q Okay.</p> <p>13 A And then I receive a call from Ms. Maxwell if</p> <p>14 I like, I can do a try-out.</p> <p>15 Q Okay. Did she tell you how long this try-out</p> <p>16 period would last?</p> <p>17 A No.</p> <p>18 Q And what did you tell her when she made that</p> <p>19 offer for you to try out?</p> <p>20 A I told her that I am still taking care of this</p> <p>21 patient, so she said if you like, you can come Saturday</p> <p>22 and try it.</p> <p>23 Q Okay. And what did you tell her, did you</p> <p>24 accept that?</p> <p>25 A Yes, I did.</p>                                                                | <p style="text-align: center;">16</p> <p>1 A When I accepted the job offer.</p> <p>2 Q Okay. And did they tell you at that time when</p> <p>3 you accepted the job offer how much you were going to be</p> <p>4 paid?</p> <p>5 A Yes.</p> <p>6 Q What was that?</p> <p>7 A It was 32,000 per annum.</p> <p>8 Q And has your salary increased over time?</p> <p>9 A Yes, sir.</p> <p>10 Q And can you walk us through the increments of</p> <p>11 increase in your salary?</p> <p>12 A It was promised yearly increase.</p> <p>13 Q By whom?</p> <p>14 A Ms. Maxwell.</p> <p>15 Q Was that at the time when you were</p> <p>16 interviewed, or took the job?</p> <p>17 A Yes, sir.</p> <p>18 Q Did she promise you what your yearly increase</p> <p>19 would be?</p> <p>20 A No.</p> <p>21 Q And have you received a yearly increase every</p> <p>22 year?</p> <p>23 A I did.</p> <p>24 Q And what has that yearly increase been?</p> <p>25 A Up to 42.</p>                                                                                                                                                                                        |



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Louella Rabuyo - Volume I

October 20, 2009

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| <p>1 intentionally exposes the genitals in a lewd or<br/>2 lascivious manner, or intentionally commits any<br/>3 other sexual act that does not involve actual<br/>4 physical or sexual contact with the victim in the<br/>5 presence of a victim who is less than sixteen years<br/>6 of age commits lewd or lascivious exhibition. An<br/>7 offender eighteen years of age or older who<br/>8 commits a lewd or lascivious exhibition commits a<br/>9 felony of the second degree.<br/>10 Have you seen that crime committed in<br/>11 Mr. Epstein's house?<br/>12 A No, sir.<br/>13 MR. CRITTON: Form.<br/>14 BY MR. EDWARDS:<br/>15 Q Are you aware of the allegations by multiple<br/>16 female girls that allege that these are the crimes that<br/>17 were taking place behind closed doors when they were<br/>18 just minor females; are you aware of those allegations?<br/>19 MR. CRITTON: Form.<br/>20 MR. REINHART: Do you understand the question?<br/>21 MR. CRITTON: Asked and answered.<br/>22 MR. REINHART: Do you understand the question?<br/>23 MR. CRITTON: And argumentative.<br/>24 THE WITNESS: From the news, I heard that from<br/>25 the news.</p> | <p>1 BY MR. EDWARDS:<br/>2 Q Have you ever worked for anyone that had this<br/>3 many young females come over to his house every day?<br/>4 A No, sir.<br/>5 Q Have you ever heard anybody say that these<br/>6 girls are making this up or that this did not happen,<br/>7 these sexual acts did not happen in Mr. Epstein's<br/>8 bedroom?<br/>9 MR. CRITTON: Form, argumentative.<br/>10 BY MR. EDWARDS:<br/>11 Q By that I mean Mr. Epstein, Ghislaine Maxwell?<br/>12 A No, sir. No.<br/>13 Q Did Sarah Kellen ever say any of these girls<br/>14 were making this up?<br/>15 A No, sir.<br/>16 MR. CRITTON: Form.<br/>17 BY MR. EDWARDS:<br/>18 Q So these girls are making these allegations,<br/>19 you work in Mr. Epstein's house?<br/>20 A Yes.<br/>21 Q And you've never heard anybody deny these<br/>22 allegations, have you?<br/>23 MR. CRITTON: Form, argumentative.<br/>24 THE WITNESS: I do my job, we don't, like,<br/>25 talk.</p>                                                           |
| 58                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | 60                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
| <p>1 BY MR. EDWARDS:<br/>2 Q And are you also aware that many of these<br/>3 girls did not know one another that were these female<br/>4 masseuses, are you aware of that?<br/>5 MR. CRITTON: Form.<br/>6 THE WITNESS: I don't know.<br/>7 BY MR. EDWARDS:<br/>8 Q Okay. When these girls that would come --<br/>9 Where these females that would come over where<br/>10 you were told they were giving massages would come over,<br/>11 how many would come over at any time, meaning would they<br/>12 come over with twenty at time, or one at a time?<br/>13 MR. CRITTON: Form.<br/>14 THE WITNESS: Sometimes one at a time.<br/>15 BY MR. EDWARDS:<br/>16 Q And given the number of these females that are<br/>17 making these allegations, doesn't it cause you to<br/>18 believe the allegations that there are so many of them<br/>19 and their stories are so strikingly similar as to what's<br/>20 taking place in Mr. Epstein's bedroom?<br/>21 MR. CRITTON: Form, predicate, speculation,<br/>22 argumentative.<br/>23 THE WITNESS: I don't know what's happening in<br/>24 the bedroom, I did not see anything that cause me<br/>25 alarm.</p>                  | <p>1 BY MR. EDWARDS:<br/>2 Q So is that a no, you've never heard anybody<br/>3 deny that?<br/>4 MR. CRITTON: Form.<br/>5 THE WITNESS: No, sir.<br/>6 BY MR. EDWARDS:<br/>7 Q When was the last time you talked to<br/>8 Ghislaine Maxwell?<br/>9 A I answer the phone when she...<br/>10 Q Okay. When you first started working there<br/>11 back in November of 2004, she was the person who you<br/>12 interviewed with, right?<br/>13 A Yes, sir.<br/>14 Q Was she somebody who you would regularly see<br/>15 at the house during that period of time?<br/>16 A Not regular.<br/>17 Q How often would you see her in the house back<br/>18 in the late 2004, when you were hired, through 2005?<br/>19 A Three times.<br/>20 Q Three times a week?<br/>21 A No. During the period of that I was there.<br/>22 Q Okay. During the entire five-year period you<br/>23 were there you only saw Ghislaine Maxwell three times?<br/>24 A Not five years.<br/>25 Q Okay. From the end of 2004 through 2005 you</p> |



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| <p style="text-align: center;">61</p> <p>1 saw her three times?</p> <p>2 A Yes, sir.</p> <p>3 Q During --</p> <p>4 A Maybe more or less three times.</p> <p>5 Q During 2006 how often did you see her?</p> <p>6 A 2006? He was in New York, so I saw her.</p> <p>7 Q You worked for Jeffrey Epstein but you worked</p> <p>8 in New York? I'm sorry.</p> <p>9 A I saw Ms. Maxwell in New York.</p> <p>10 Q I think I understand. Primarily, though, you</p> <p>11 were still working at the 358 El Brillo location?</p> <p>12 A Yes.</p> <p>13 Q However, at some point in time that year you</p> <p>14 took a trip to the New York house and you saw her there?</p> <p>15 A In her house.</p> <p>16 Q In Ghislaine Maxwell's house?</p> <p>17 A Yes.</p> <p>18 Q What was the occasion for you to go see her up</p> <p>19 there?</p> <p>20 A Lyn was having I think surgery.</p> <p>21 Q And when was that?</p> <p>22 A I cannot recall the month, but it's I think</p> <p>23 2006.</p> <p>24 Q So this is after the criminal investigation</p> <p>25 into Mr. Epstein, or before, if you remember?</p>                                                                                                                                 | <p style="text-align: center;">63</p> <p>1 MR. CRITTON: But if you just asked her, say</p> <p>2 did you ever have a discussion with her about it,</p> <p>3 if she says yes, then we'll find out what it is.</p> <p>4 If she didn't have one, why ask the question?</p> <p>5 Go ahead.</p> <p>6 THE WITNESS: There was no discussion.</p> <p>7 MR. REINHART: There's no question pending.</p> <p>8 Wait for Mr. Edwards to ask his question and answer</p> <p>9 the question if you understand it.</p> <p>10 BY MR. EDWARDS:</p> <p>11 Q How long were you at Ghislaine Maxwell's house</p> <p>12 this time that you visited her in 2006?</p> <p>13 MR. CRITTON: Form.</p> <p>14 THE WITNESS: I cannot remember, because I</p> <p>15 go...</p> <p>16 BY MR. EDWARDS:</p> <p>17 Q Back and forth?</p> <p>18 A Yes.</p> <p>19 Q From West Palm Beach to New York?</p> <p>20 A Yes.</p> <p>21 Q Why were you up in Ghislaine Maxwell's house</p> <p>22 in New York?</p> <p>23 A I help over there when she has a party.</p> <p>24 Q Okay. And then after the party you would</p> <p>25 return to West Palm Beach?</p>                                                                                                                                                                      |
| <p style="text-align: center;">62</p> <p>1 MR. CRITTON: Form, predicate.</p> <p>2 THE WITNESS: 2006? After.</p> <p>3 BY MR. EDWARDS:</p> <p>4 Q Okay. And while you were up there with</p> <p>5 Ghislaine Maxwell, did you talk to her about the</p> <p>6 criminal investigation of Mr. Epstein?</p> <p>7 A No, sir.</p> <p>8 Q At any point in time when you were up there,</p> <p>9 did she say to you or you overheard -- let me ask you</p> <p>10 this way: Did she say to you that the allegations are</p> <p>11 false --</p> <p>12 MR. CRITTON: Form.</p> <p>13 BY MR. EDWARDS:</p> <p>14 Q -- that are being made against him?</p> <p>15 MR. CRITTON: Form. There's no predicate that</p> <p>16 a discussion ever took place about anything.</p> <p>17 THE WITNESS: There was no discussion about</p> <p>18 that.</p> <p>19 MR. EDWARDS: Mr. Critton, if you could just</p> <p>20 object to the form. Obviously this witnesses just</p> <p>21 takes your words and she's going to recite them to</p> <p>22 me. If you want to say lack of predicate, okay,</p> <p>23 fine. But to say no discussion took place and then</p> <p>24 she says no discussion took place, we're leading</p> <p>25 the witness here, it's obvious.</p> | <p style="text-align: center;">64</p> <p>1 A Yes.</p> <p>2 Q While you were up there, during any of the</p> <p>3 times that you were up there, did you have any</p> <p>4 conversations with Ghislaine Maxwell?</p> <p>5 A I think once. But it was oh, and what's this,</p> <p>6 it was just oh, I'm sorry about the bad news. That's</p> <p>7 it.</p> <p>8 Q You said that?</p> <p>9 A Because we have only, like, short</p> <p>10 conversation, we just don't really, like, talk-talk.</p> <p>11 Q When you're saying that a statement was made</p> <p>12 I'm sorry about the bad news, who made the statement to</p> <p>13 whom; she made it to you, or you made it to her?</p> <p>14 A She made it. But that was -- I really cannot</p> <p>15 remember how it was how, but it was, like, I'm sorry</p> <p>16 about the news.</p> <p>17 Q Okay. What news was she referring to when she</p> <p>18 said to you I'm sorry to hear about the bad news?</p> <p>19 A She not say anything. I just -- I do not say</p> <p>20 anything about what the bad news is.</p> <p>21 Q Okay. I guess what I'm asking is did you have</p> <p>22 a death in the family or something happen to you</p> <p>23 personally? Or why would she say this to you, if you</p> <p>24 know?</p> <p>25 A No.</p> |



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| <p style="text-align: center;">65</p> <p>1 Q You have no idea why she said that statement?</p> <p>2 A I think that it was about the news that was</p> <p>3 going on about Mr. Epstein.</p> <p>4 MR. CRITTON: Move to strike as speculation.</p> <p>5 BY MR. EDWARDS:</p> <p>6 Q And did she elaborate on the news about</p> <p>7 Mr. Epstein?</p> <p>8 A No, sir.</p> <p>9 Q During that conversation where she makes a</p> <p>10 statement that she's sorry about the news, did she ever</p> <p>11 tell you that the allegations being made against him are</p> <p>12 false or unfounded or untrue?</p> <p>13 MR. CRITTON: Form.</p> <p>14 THE WITNESS: Our conversation was short.</p> <p>15 BY MR. EDWARDS:</p> <p>16 Q So the answer is no?</p> <p>17 A No.</p> <p>18 Q What is your understanding of</p> <p>19 Ghislaine Maxwell's role in Jeffrey Epstein's life back</p> <p>20 in 2004 and 2005 and 2006?</p> <p>21 MR. CRITTON: Form.</p> <p>22 THE WITNESS: She told me he was his boyfriend</p> <p>23 (sic).</p> <p>24 BY MR. EDWARDS:</p> <p>25 Q Ghislaine Maxwell told you that</p>                                                                                                           | <p style="text-align: center;">66</p> <p>1 Jeffrey Epstein was her boyfriend?</p> <p>2 A When I was hired.</p> <p>3 Q And then over the next year and a half when</p> <p>4 Jeffrey Epstein was in West Palm Beach, you only saw</p> <p>5 Ghislaine Maxwell at the house approximately three</p> <p>6 times?</p> <p>7 A Yes, sir.</p> <p>8 Q Did you still believe that Ghislaine Maxwell</p> <p>9 and Jeffrey Epstein were boyfriend and girlfriend?</p> <p>10 MR. CRITTON: Form.</p> <p>11 THE WITNESS: At that time or what time?</p> <p>12 BY MR. EDWARDS:</p> <p>13 Q Yeah. Back then in 2004, 2005.</p> <p>14 A Yes.</p> <p>15 Q All right. Is it your understanding that they</p> <p>16 are still boyfriend and girlfriend today?</p> <p>17 A I don't know.</p> <p>18 Q Ghislaine Maxwell and Jeffrey Epstein, do they</p> <p>19 still talk to one another today?</p> <p>20 A I do not know, sir.</p> <p>21 Q What is the last time that you talked to</p> <p>22 Ghislaine Maxwell?</p> <p>23 A She called the house and I answered the phone.</p> <p>24 Q How long ago?</p> <p>25 A About a month ago.</p>                                                                                                                |
| <p style="text-align: center;">67</p> <p>1 Q What did she say when you answered the phone?</p> <p>2 A Oh, she was happy. I was happy to hear her</p> <p>3 voice. And then she said oh, she was also happy to --</p> <p>4 she was so nice on the phone.</p> <p>5 Q What did she say?</p> <p>6 A Oh, nice talking to you, Louella.</p> <p>7 Q Then did she ask to speak to somebody else?</p> <p>8 A To Mr. Epstein.</p> <p>9 Q Aside from the telephone call one month ago,</p> <p>10 how many times has she called the house in the last</p> <p>11 year?</p> <p>12 A That was my only, what's this, my -- the time</p> <p>13 that I was answer the phone and it was Ms. Maxwell.</p> <p>14 Q Do you know why she called Mr. Epstein?</p> <p>15 A I do not know, sir.</p> <p>16 Q Have you ever seen scheduling logs, either on</p> <p>17 a computer or on paper, with girls' names on it and</p> <p>18 numbers?</p> <p>19 A No. No, sir.</p> <p>20 Q Have you ever seen the names of these females</p> <p>21 that are alleged to have been masseuses written on</p> <p>22 anything?</p> <p>23 A Yes, sir.</p> <p>24 Q What have you seen them written on?</p> <p>25 A I just saw names, and that's it.</p> | <p style="text-align: center;">68</p> <p>1 Q Just the names, or the telephone numbers as</p> <p>2 well?</p> <p>3 MR. CRITTON: Form.</p> <p>4 THE WITNESS: I cannot remember.</p> <p>5 BY MR. EDWARDS:</p> <p>6 Q Where did you see this?</p> <p>7 A We have like butler's pantry and there's a</p> <p>8 telephone there.</p> <p>9 Q Is this in the staff house or the main house?</p> <p>10 A No. The main house.</p> <p>11 Q And do you know who wrote the names?</p> <p>12 A No, sir.</p> <p>13 Q How do you know that these were the names of</p> <p>14 the females that were alleged to have been masseuses?</p> <p>15 A Because there is time.</p> <p>16 Q What do you mean, there is time?</p> <p>17 A Sometimes name and then the time, that's it.</p> <p>18 Q What does the time indicate?</p> <p>19 A I cannot remember.</p> <p>20 Q The time to you -- you know, I'm watching what</p> <p>21 you're doing, but the court reporter is not able to draw</p> <p>22 a picture of it. So I guess what I'm asking is you're</p> <p>23 saying there is -- on the left-hand side there is a</p> <p>24 name, and on the right-hand side corresponding to that</p> <p>25 name there is a time written down? Is that what you</p> |



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1 A When I came back to report, that's how I  
 2 learned.  
 3 Q Elaborate on that for me. What do you mean,  
 4 when you came back to report that's how I learned?  
 5 A I reported in the afternoon, and then that's  
 6 how I learned that the police came.  
 7 Q All right. And when were you -- you're now  
 8 saying you came back to report and you learned that the  
 9 police had already come to the house, right?  
 10 A Yes, sir.  
 11 Q Prior to that occasion, when was the previous  
 12 time that you were at the house?  
 13 A The day before.  
 14 Q Okay. And the day before you left your shift  
 15 at roughly five o'clock?  
 16 A I cannot remember. I usually leave 5:00 or  
 17 5:30.  
 18 Q But sometime late in the afternoon?  
 19 A Yes.  
 20 Q And as of that time, the day before the search  
 21 warrant was issued, you had seen no police officers in  
 22 or around the house?  
 23 A No.  
 24 Q And then the next day you reported to the job  
 25 at what time?

82

1 A The next day?  
 2 Q The next day.  
 3 A I report in the afternoon.  
 4 Q Was there a reason why you reported in the  
 5 afternoon?  
 6 A Ms. Maxwell called me.  
 7 Q When did she call you?  
 8 A During that day, she said Louella, you can  
 9 report in the afternoon.  
 10 Q She called you early in the morning?  
 11 A Not early.  
 12 Q Normally you would report to the house between  
 13 eight and nine o'clock, right?  
 14 A Yes, sir.  
 15 Q So in order for you not to arrive at the  
 16 house, she had to have called you before eight or  
 17 nine o'clock, right?  
 18 A Yes.  
 19 Q Okay. So approximately what time does  
 20 Ms. Maxwell call you to tell you you can report to the  
 21 house later on that day?  
 22 A I cannot remember really the time.  
 23 Q Okay. What time did you actually report to  
 24 the house?  
 25 A After lunch, about -- maybe after lunch.

83

1 Q So are we talking about the day the police  
 2 went to Jeffrey Epstein's house you did not go in the  
 3 morning, but you went after lunch and the police had  
 4 already left?  
 5 A Oh. No. When I went there nobody was there,  
 6 no policemen were around.  
 7 Q Who was at the house then?  
 8 A Janusz, and Douglas, the architect.  
 9 Q Schoettle?  
 10 A Yes.  
 11 Q And did you have a discussion with them?  
 12 A No.  
 13 Q How did you know the police had been to the  
 14 house?  
 15 A Janusz told me.  
 16 Q When?  
 17 A When I arrive.  
 18 Q That's what I was asking you when I said did  
 19 you have a discussion with them, meaning Janusz and  
 20 Douglas.  
 21 A Okay. Being because them -- with Janusz only.  
 22 Q What did he say?  
 23 A He said the police came and, what's this, took  
 24 away some stuff.  
 25 Q Did he say what they took?

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1 A He said pictures.  
 2 Q Did he tell you which pictures?  
 3 A No, sir.  
 4 Q Aside from pictures, what else did the police  
 5 take, as Janusz told you?  
 6 A He did not elaborate.  
 7 Q All right. Prior to the police going to the  
 8 house and taking pictures, do you remember seeing  
 9 pictures around Mr. Epstein's house?  
 10 A Yes.  
 11 Q Do you remember seeing pictures of naked or  
 12 nude females around Mr. Epstein's house?  
 13 A Not around, in his closet.  
 14 Q In Mr. Epstein's closet you would see --  
 15 describe what you would see related to females in  
 16 pictures.  
 17 A Some have topless.  
 18 Q Is this a big closet?  
 19 A No. Not really big, it's just this big, not  
 20 so big.  
 21 Q Okay. Were these pictures that could be seen  
 22 by -- strike that.  
 23 Do you know of any other pictures of females  
 24 that were confiscated by the police that did not come  
 25 from Mr. Epstein's closet?



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1 STATE OF FLORIDA  
 2 COUNTY OF PALM BEACH  
 3  
 4  
 5 I, the undersigned authority, certify that  
 6 LOUELLA RABUYO personally appeared before me on the 20th  
 7 of October, 2009, and was duly sworn.  
 8  
 9 Dated this 30th day of October, 2009.  
 10  
 11  
 12  
 13  
 14  
 15 Teresa Whalen, RPR, FPR  
 Notary Public - State of Florida  
 My Commission Expires: 4/25/11  
 My Commission No.: DD 644533  
 Job # 118991  
 16  
 17  
 18  
 19  
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 21  
 22  
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130

1 CERTIFICATE  
 2 STATE OF FLORIDA  
 3 COUNTY OF PALM BEACH  
 4  
 5 I, Teresa Whalen, Registered Professional  
 6 Reporter and Notary Public in and for the State of  
 Florida at Large, do hereby certify that the  
 7 aforementioned witness was by me first duly sworn to  
 testify the whole truth; that I was authorized to  
 8 and did report said deposition in stenotype; and  
 that the foregoing pages are a true and correct  
 9 transcription of my shorthand notes of said  
 deposition.  
 10 I further certify that said deposition was  
 taken at the time and place hereinabove set forth  
 11 and that the taking of said deposition was commenced  
 and completed as hereinabove set out.  
 12  
 13 I further certify that I am not attorney or  
 counsel of any of the parties, nor am I a relative or  
 14 employee of any attorney or counsel of party connected  
 with the action, nor am I financially interested in the  
 action.  
 15  
 16 The foregoing certification of this transcript  
 does not apply to any reproduction of the same by any  
 means unless under the direct control and/or direction  
 17 of the certifying reporter.  
 18  
 19 Dated this 30th day of October, 2009.  
 20  
 21  
 22 Teresa Whalen, RPR, FPR  
 Job # 118991  
 23  
 24  
 25



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