

COMPOSITE
EXHIBIT 8
(File Under Seal)

1 UNITED STATES DISTRICT COURT
2 SOUTHERN DISTRICT OF FLORIDA

3 JANE DOE NO. 2, Case No: 08-CV-80119
4 Plaintiff,
5 Vs
6 JEFFREY EPSTEIN,
7 Defendant.

_____ /

8 JANE DOE NO. 3, Case NO: 08-CV-80232
9 Plaintiff,
10 Vs
11 JEFFREY EPSTEIN,
12 Defendant.

_____ /

13 JANE DOE NO. 4, Case No: 08-CV-80380
14 Plaintiff,
15 Vs.
16 JEFFREY EPSTEIN,
17 Defendant.

_____ /

18 JANE DOE NO. 5, Case No: 08-CV-80381
19 Plaintiff,
20 Vs
21 JEFFREY EPSTEIN,
22 Defendant.

_____ /

24
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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:

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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

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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 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

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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?

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1 APPEARANCES:

2

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

6

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

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12

13 ALSO PRESENT:

14 JOE LANGSAM, VIDEOGRAPHER

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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

3 WITNESS	DIRECT	CROSS	REDIRECT	RECROSS
4 ALFREDO RODRIGUEZ				
5 (By Ms. Ezell)	278		441, 467	
6 (By Mr. Willits)	334		453, 469	
7 (By Mr. Critton)		338		464
8 (By Mr. Edwards)			419, 454, 468	
9 (By Mr. Langino)			452	

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11

12 CONTINUED INDEX OF EXHIBITS

13 PLAINTIFF'S	PAGE
14 3 Drawing	315
15 4 Photograph	327
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19 8 Photograph	331
20 9 Report	446
21 (Exhibits 4, 5, 6, 7, and 8 were retained by Ms. Ezell.)	

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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?

3 (Pages 275 to 278)

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NON PARTY (VR) 000317

<p style="text-align: right;">Page 279</p> <p>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</p>	<p style="text-align: right;">Page 281</p> <p>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.</p>
<p style="text-align: right;">Page 280</p> <p>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.</p>	<p style="text-align: right;">Page 282</p> <p>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</p>

4 (Pages 279 to 282)

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1 York house?
 2 A. He will have massages.
 3 MR. CRITTON: Form.
 4 BY MR. EDWARDS:
 5 Q. And are we still talking about a habit of
 6 two a day?
 7 MR. CRITTON: Form.
 8 THE WITNESS: I don't know that.
 9 BY MR. EDWARDS:
 10 Q. Okay. So for the time period when you
 11 have been familiar with Mr. Epstein and known his
 12 habits, is it fair to say that he would have
 13 roughly two girls a day in that same age group
 14 wherever he was?
 15 A. Yes.
 16 MR. CRITTON: Form.
 17 BY MR. EDWARDS:
 18 Q. All right. And have you talked to
 19 anybody that has given you similar information
 20 from his Island home?
 21 A. No.
 22 Q. Do you know any of the girls that have
 23 been over to his Island?
 24 A. Yes.
 25 Q. And who are they?

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1 A. Nadia, the girls who used to stay at the
 2 home in El Brillo used to go over there to the
 3 Island.
 4 Q. When he would have these girls -- I guess
 5 we've kind of categorized them as the girls who
 6 would come over with him on an airplane and stay
 7 at the house.
 8 A. Yes.
 9 Q. When they would be staying at the house
 10 would he also have the local Palm Beach girls
 11 coming over that you were told to call masseuses?
 12 A. Yes.
 13 Q. So these girls that came on the airplane
 14 with him, were they also -- did they also have
 15 knowledge that these young girls were coming over
 16 to give massages?
 17 MR. CRITTON: Form.
 18 THE WITNESS: Yes, sir.
 19 BY MR. EDWARDS:
 20 Q. Okay. Who are the girls from the
 21 airplane other than [REDACTED] that you remember?
 22 A. Sarah. There were so many, sir, I don't
 23 recall right now. But Sarah is for sure, [REDACTED]
 24 was one of the main girlfriends, but I don't
 25 remember that.

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1 Q. And is your understanding that Mr.
 2 Epstein was intimate with any of those girls?
 3 MR. CRITTON: Form.
 4 THE WITNESS: Yes.
 5 BY MR. EDWARDS:
 6 Q. With all of them?
 7 MR. CRITTON: Form.
 8 THE WITNESS: Yes.
 9 BY MR. EDWARDS:
 10 Q. With Sarah as well?
 11 A. Yes.
 12 MR. CRITTON: Form.
 13 BY MR. EDWARDS:
 14 Q. With [REDACTED]?
 15 A. Yes.
 16 MR. CRITTON: Form.
 17 BY MR. EDWARDS:
 18 Q. And the girls who would come over on the
 19 airplane?
 20 MR. CRITTON: Form.
 21 THE WITNESS: Yes.
 22 BY MR. EDWARDS:
 23 Q. Did you ever have occasion to go into the
 24 bedroom and find the vibrators or back massagers
 25 out after Mr. Epstein was in the room with any of

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1 the girls that came over on the plane?
 2 MR. CRITTON: Form.
 3 THE WITNESS: Yes.
 4 BY MR. EDWARDS:
 5 Q. So that's something that would be out
 6 after the girls that came over on the plane or the
 7 girls that came over for the massages?
 8 A. Yes.
 9 MR. CRITTON: Form.
 10 BY MR. EDWARDS:
 11 Q. And at the time when you were house
 12 manager you had a 15-year old daughter?
 13 A. Yes.
 14 Q. Did she live down here?
 15 A. In New Jersey.
 16 Q. Okay. When Alan Dershowitz was at the
 17 house I understood you to say that these local
 18 Palm Beach girls would come over to the house
 19 while he was there but you're not sure if he had a
 20 massage from any of those girls.
 21 A. Exactly.
 22 Q. And what would he do while those girls
 23 were at the house?
 24 MR. CRITTON: Form.
 25 THE WITNESS: He will read a book with a

40 (Pages 423 to 426)

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1 glass of wine by the pool, stay inside.
 2 BY MR. EDWARDS:
 3 Q. Did he ever talk to any of the girls?
 4 A. I don't know, sir.
 5 Q. Certainly he knew that they were there?
 6 MR. CRITTON: Form.
 7 THE WITNESS: I don't know, sir.
 8 BY MR. EDWARDS:
 9 Q. Do you know how Sarah Kellen knows Mr.
 10 Epstein?
 11 A. No, sir.
 12 Q. Or how long she's known him?
 13 MR. CRITTON: Form.
 14 THE WITNESS: She was on board two years
 15 or a year and a half before I came on board.
 16 BY MR. EDWARDS:
 17 Q. Okay.
 18 A. So it's probably 2003 or 2.
 19 Q. All right. You mentioned this Citrix
 20 system.
 21 A. Yes.
 22 Q. Is that a system that was used to operate
 23 the phones and the computers?
 24 A. The computers mainly.
 25 Q. All right. But you then also described

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1 usually it's Yahoo dot com or at Bellsouth dot
 2 net.
 3 A. It was very uncommon. I don't remember,
 4 sir.
 5 Q. Did everybody in the -- I think you
 6 called it the organization, did everybody have
 7 e-mails?
 8 A. Yes.
 9 Q. Okay. Would that include Nadia?
 10 A. Yes.
 11 Q. All right. And did Mr. Epstein have an
 12 e-mail?
 13 A. Yes.
 14 Q. Did you ever correspond with Mr. Epstein
 15 by e-mail?
 16 A. Yes.
 17 MR. EDWARDS: You can go ahead.
 18 THE WITNESS: That's the only one that I
 19 remember.
 20 THE VIDEOGRAPHER: Okay, we're off the
 21 record.
 22 (Thereupon, a recess was had.)
 23 THE VIDEOGRAPHER: We're back on the
 24 record with tape number four.
 25 BY MR. EDWARDS:

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1 some system where someone would call on the
 2 telephone and that would be automatically
 3 downloaded to the computer?
 4 A. Yeah, you can retrieve who called in a
 5 transcript written who called, what's the message,
 6 the time so you have it on a piece of paper, you
 7 can print it out.
 8 Q. Is it your understanding that is also
 9 part of the Citrix system?
 10 A. Yes.
 11 Q. All right. Did you have an e-mail?
 12 A. Right now, yes.
 13 Q. No, when you were working at --
 14 A. Yes, I did.
 15 Q. -- Mr. Epstein?
 16 And did Sarah Kellen have an e-mail?
 17 A. Yes.
 18 Q. And did all of the e-mails end the same
 19 way such as Epstein's house dot com or something?
 20 A. Yes.
 21 Q. Okay. What was Sarah Kellen's e-mail?
 22 A. I don't remember.
 23 Q. What was your e-mail?
 24 A. Staff house -- I don't remember, sir.
 25 Q. Do you recall how it ended? I mean

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1 Q. Mr. Rodriguez, what was Mr. Epstein's
 2 e-mail?
 3 A. Jeep project at something -- Jeep
 4 project -- I can't remember it right now.
 5 Q. Okay. In the course of this next 10 or
 6 15 minutes --
 7 A. I can recall.
 8 Q. -- if it comes to you just tell me. So
 9 it was Jeep project --
 10 A. Like Jeep, the brand name Jeep, Jeep
 11 project at -- I can't remember.
 12 Q. Okay. Was that his only e-mail to your
 13 knowledge?
 14 A. No.
 15 Q. He had other e-mail addresses?
 16 A. Yes.
 17 Q. Do you know what any of his other e-mail
 18 addresses were?
 19 A. No, I don't remember.
 20 Q. Do you know who the carriers were for the
 21 other e-mail addresses owned by Jeffrey Epstein?
 22 A. No, sir.
 23 Q. Whether it was Yahoo or hot mail or --
 24 A. No, none of those.
 25 Q. Okay. Was this Jeep project e-mail run