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1 UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

2 -----x
3 UNITED STATES OF AMERICA,

4 v.

20 CR 330 (AJN)

5 GHISLAINE MAXWELL,

6 Defendant.

Jury Trial

7 New York, N.Y.
December 3, 2021
8 8:48 a.m.

9 Before:

HON. ALISON J. NATHAN,

District Judge

11 APPEARANCES

12 DAMIAN WILLIAMS

United States Attorney for the
Southern District of New York

13 BY: MAURENE COMEY

14 ALISON MOE

LARA POMERANTZ

15 ANDREW ROHRBACH

Assistant United States Attorneys

16 HADDON MORGAN AND FOREMAN

Attorneys for Defendant

17 BY: JEFFREY S. PAGLIUCA

18 CHRISTIAN R. EVERDELL

LAURA A. MENNINGER

19 -and-

BOBBI C. STERNHEIM

20 -and-

RENATO STABILE

21 Also Present: Amanda Young, FBI

22 Paul Byrne, NYPD

Sunny Drescher,

23 Paralegal, U.S. Attorney's Office

24 Ann Lundberg,

Paralegal, Haddon Morgan and Foreman

LC3Cmax1

Alessi - cross

1 (Jury present)

2 THE COURT: Good morning, members of the jury. Right
3 on time, as always. Thank you very much. We will begin with
4 the cross examination of Mr. Alessi.

5 Mr. Alessi, I remind you that you are under oath.

6 Mr. Pagliuca, you may proceed.

7 MR. PAGLIUCA: Thank you, your Honor.

8 JUAN PATRICIO ALESSI,

9 CROSS-EXAMINATION

10 BY MR. PAGLIUCA:

11 Q. Mr. Alessi, let me start with, on direct examination, you
12 testified that although your name is Juan, Mr. Epstein and
13 Ms. Maxwell called you John; correct?

14 A. Yes, sir.

15 Q. Now, isn't it true that during that time period, everyone
16 called you John; right?

17 A. Yeah, basically. Yes.

18 Q. And you preferred to be called John; right?

19 A. Yes.

20 Q. Okay. And, in fact, during that time when people would say
21 to you, you're Juan, you would say, no, I'm not called Juan,
22 I'm called John; right?

23 A. If they call me Juan, yes, I answered to Juan.

24 Q. And John?

25 A. And John.

LC3Cmax1

Alessi - cross

1 Q. So there was no disrespect by anyone calling you John;
2 correct?

3 A. No. John is the translation for Juan.

4 Q. And Ms. Maxwell also speaks Spanish and would converse with
5 you in Spanish, as well; correct?

6 A. Yes, she does.

7 Q. So if she's speaking with you in Spanish, she would call
8 you Juan; if she's speaking with you in English, she would call
9 you John; correct?

10 A. Correct.

11 Q. And absolutely no disrespect intended to you by calling you
12 John or Juan; right?

13 A. No.

14 Q. And you didn't take it as a sign of disrespect; correct?

15 A. Absolutely not.

16 Q. Mr. Alessi, yesterday at the end of your testimony, you
17 told the jury that after you quit working for Mr. Epstein in
18 2002, you were having money problems.

19 Do you remember that?

20 A. Yes, sir.

21 Q. And you said that you made the biggest mistake of your
22 life, that you went into Jeffrey Epstein's house one time and
23 took a bundle of \$100 bills that amounted to \$6,300.

24 Do you remember that testimony?

25 A. Yes, sir.

LC3Cmax1

Alessi - cross

1 Q. And then you looked at the jury and you said, I will tell
2 the truth.

3 Do you remember that, telling the jury that yesterday?

4 A. Yes.

5 Q. But you didn't tell the jury the truth yesterday, did you,
6 Mr. Alessi?

7 A. I did tell the truth.

8 Q. Well, isn't it true, isn't it true that you went into
9 Mr. Epstein's house two times in 2003 and stole money twice
10 from Mr. Epstein?

11 A. No, it was one time.

12 Q. Isn't it true that the first time was in August or
13 September of 2003 and you went in to steal a gun, but you
14 couldn't find a gun?

15 A. That's not true.

16 Q. Isn't it true that the second time that you went into
17 Mr. Epstein's house -- well, when you couldn't find the gun,
18 isn't it true that you looked around and took \$1,900 in \$100
19 bills from a white envelope, isn't that true?

20 A. That's not true.

21 Q. Didn't you go back on October 5th, 2003 and steal \$5,600
22 from Mr. Epstein?

23 A. No, that's not true.

24 Q. And isn't it true that you stole the money to pay for your
25 girlfriend's immigration papers?

LC3Cmax1

Alessi - cross

1 A. It was not my girlfriend, sir.

2 Q. Mr. Alessi, I'd like you to take a look -- if we can
3 display for Mr. Alessi, please, 3504-6 -- 3501-080-001, page
4 11.

5 MS. COMEY: Your Honor, Ms. Drescher has explained the
6 issue to me. 3501 is the series for nontestifying witnesses,
7 so we did not print out copies of those. If I may ask the
8 defense for a copy of this, please.

9 MR. PAGLIUCA: Certainly, your Honor.

10 MS. COMEY: Thank you.

11 Q. Mr. Alessi, do you have that exhibit in front of you?

12 A. Yes, sir.

13 Q. I'd like you to go to page 11 of that exhibit.

14 A. I have only page 11 in front of me.

15 Q. Do you recall that you were contacted by Officer Michael
16 Dawson on October 15th, 2003?

17 A. I was not contacted by Michael Dawson. I went to the
18 police on my own.

19 Q. Do you remember when you went to the police, Mr. Dawson
20 asked you questions about going into Mr. Epstein's house and
21 you answered those questions?

22 A. I don't think he asked me questions. I did a statement to
23 him of what I remembered.

24 Q. And what you told him in 2003, first, was that you went in
25 to steal a gun; correct?

LC3Cmax1

Alessi - cross

1 A. I don't recall that.

2 Q. You don't recall or you didn't say that?

3 A. I didn't recall.

4 Q. So you might have said it, but now you just don't recall.

5 Is that what you're saying?

6 A. Yes.

7 Q. And do you remember telling him that you couldn't find the
8 gun?

9 A. No.

10 Q. Do you remember telling him that you went into
11 Mr. Epstein's house twice, and the first time when you couldn't
12 find the gun, you went into Mr. Epstein's briefcase and you
13 stole \$1,900 in \$100 bills in a white envelope?

14 Do you remember telling him that?

15 A. No, that's not true.

16 Q. Do you remember telling him that or not?

17 A. No.

18 Q. Do you remember telling him that you went back on October
19 5th, 2003 at 5:00 a.m. in order to once again steal money?

20 A. I recall making a statement to him in request from
21 Mr. Epstein that I should go to the police department and make
22 that statement of what happened and why the reasons that I did.
23 And I am trying to tell you that I did one time and that's what
24 I think I told the police what happened.

25 Q. My question simply, sir, is do you remember telling him

LC3Cmax1

Alessi - cross

1 that when you went back to the house on October 5th, 2003 at
2 5:00 a.m., that you went through the sliding glass door, opened
3 Mr. Epstein's briefcase, and stole \$5,600 in \$100 bills?

4 Do you remember telling him that?

5 A. I don't remember.

6 Q. Do you remember telling him that you stole the money to pay
7 for the girlfriend's immigration papers?

8 A. First of all, it was not my girlfriend. She was a friend.
9 She came to live with me in my apartment, but we were not
10 involved, and I was trying to help her with that.

11 Q. So is it true that you stole the money for the immigration
12 papers?

13 A. It's true that I stole \$6,300 that I paid Mr. Epstein back.

14 Q. That wasn't my question, sir. Is it true that you stole
15 the money to pay for the immigration papers? Yes or no.

16 A. Yes.

17 Q. Now, you also testified under oath about stealing the money
18 from Mr. Epstein. Do you recall that? Not before today, do
19 you recall testifying previously about stealing the money from
20 Mr. Epstein?

21 A. Yes.

22 Q. And do you recall testifying under oath, on September 8th,
23 2009, that you went to the house and got some money? Do you
24 remember testifying to that under oath?

25 A. No, I don't remember that.

LC3Cmax1

Alessi - cross

1 MR. PAGLIUCA: If we can show the witness, please,
2 3504-022. On this particular document, it's page 14. We're
3 going to be looking at deposition transcript pages 133 through
4 135.

5 THE WITNESS: I cannot read this page.

6 MR. PAGLIUCA: It will come up for you on the screen,
7 Mr. Alessi.

8 THE WITNESS: Is that my screen, because --

9 THE COURT: They'll make it bigger, Mr. Alessi.

10 MR. PAGLIUCA: If we can go in this document, which is
11 going to be page 14 of the document, and the page number I'd
12 like to start with, the deposition page number is 133. If we
13 can blow that up for the witness, please.

14 BY MR. PAGLIUCA:

15 Q. At line 12, Mr. Alessi, do you recall giving the following
16 testimony --

17 THE COURT: I can't hear you.

18 MR. PAGLIUCA: I'm sorry, your Honor.

19 Q. Do you recall giving the following testimony, Mr. Alessi:

20 "A. That incident is, I went to the house and I got some
21 money.

22 "Q. What time of day did you go to the house?

23 "A. Night.

24 "Q. Was anybody home?

25 "A. No.

LC3Cmax1

Alessi - cross

1 "Q. Where did you get the money?

2 "A. Out of his bag.

3 "Q. Out of his --

4 "A. Bag.

5 "Q. Bag, briefcase, bag?

6 "A. Briefcase.

7 "Q. Briefcase?

8 "A. Yeah."

9 Did you give that testimony, Mr. Alessi?

10 A. I think I did.

11 Q. Then at the bottom of page 134 on the same page, 14, line
12 25.

13 "Q. Now, is that the only time that you took money out?"

14 And we go to page 135, top of the page.

15 "A. No."

16 Do you see that, Mr. Alessi?

17 A. Yes.

18 Q. That was your testimony under oath on September 8th, 2009,
19 that you went back more than once to steal money from
20 Mr. Epstein; correct?

21 A. I guess it was.

22 "Q. Out of his briefcase?

23 "A. It was twice."

24 Q. Do you see that testimony, Mr. Alessi?

25 A. Yes, I see it.

LC3Cmax1

Alessi - cross

1 Q. That's what you testified to under oath, September 8th,
2 2009; correct?

3 A. I guess I did.

4 "Q. When was the other time?

5 "A. Couple weeks before.

6 "Q. What time of day was that?

7 "A. At night.

8 "Q. How much did you take out the first time?

9 "A. It was a total of \$6,300.

10 "Q. That's for both times?

11 "A. Yeah.

12 "Q. Can you break them down?

13 "A. I think one time was \$1,500. Another time was the rest."

14 Q. That was your testimony under oath, correct, Mr. Alessi?

15 A. Guess so.

16 MR. PAGLIUCA: Your Honor, I move for the admission of
17 this testimony under Rule 801.

18 MS. COMEY: It's been read in already.

19 THE COURT: It's read in the record and admitted.

20 MR. PAGLIUCA: Thank you.

21 Q. Now, Mr. Alessi, yesterday you told the jury that you stole
22 the money because you were having --

23 THE COURT: Pull up the microphone, please.

24 Q. -- you stole the money because you were having financial
25 problems.

LC3Cmax1

Alessi - cross

1 Do you remember that testimony?

2 A. Yes.

3 Q. Isn't it true that in 2003 when you stole the money, you
4 owned a number of rental properties in Florida?

5 A. Yes.

6 Q. You owned 1515, number 1902 West Palm Beach. Do you recall
7 that?

8 A. Yes.

9 Q. And that was a rental property that you purchased in 2001
10 for \$105,000 for which Mr. Epstein gave you \$20,000 for the
11 down payment; correct?

12 A. That's correct.

13 Q. You also owned the apartment next door, 1515 South Flagler
14 Drive, number 1901, which is another property; correct?

15 A. That's correct.

16 Q. And you bought that in 2003 for \$159,000; correct?

17 A. That's correct.

18 Q. You also owned a multifamily residential property at
19 Yarmouth Drive in Wellington, Florida that you bought in 2001
20 for a total of \$310,000; correct?

21 A. That's correct.

22 Q. And when you left Mr. Epstein's employment in 2002, you
23 were given a severance package of \$50,000 for you and your
24 wife; correct?

25 A. That's correct.

LC3Cmax1

Alessi - cross

1 Q. So when you went into Mr. Epstein's house twice in 2003 and
2 stole at least \$6,300, you owned properties valued at over a
3 million dollars; correct?

4 A. I don't think it's correct.

5 Q. Well --

6 A. Because I sold the properties at Tower 1515 in order to buy
7 the property for the multifamily.

8 Q. Let's look the 3504-022, going to be deposition page 145.
9 Let's start at line 19.

10 Do you have that in front of you, Mr. Alessi?

11 A. I cannot read.

12 Q. 3500, page 17.

13 A. I cannot read it.

14 THE COURT: They'll make it bigger in a moment.

15 I'm sorry. Can you give me the cite again?

16 MR. PAGLIUCA: It's 3504-022, page 17 of 35,
17 deposition page 145, line 19.

18 Q. Do you have that, Mr. Alessi?

19 A. Yes.

20 Q. You were asked the question:

21 "Q. Now, do you recall in December of 1997, you and your wife
22 bought an apartment at 1902 115 South Flagler Drive; right?"

23 A. Yes.

24 "Q. Purchase price was \$105,000?"

25 You answered:

LC3Cmax1

Alessi - cross

1 "A. Yes, sir."

2 Do you see that?

3 A. Yes, sir.

4 Q. Then on the next page, 146, you were asked:

5 "Q. Now, do you recall that in November, you and your wife
6 bought apartment 1901?"

7 Do you see that?

8 A. Yes.

9 "Q. For a purchase price of \$159,000?"

10 Q. Do you see that?

11 A. Yes.

12 Q. And if we go down to line 18, after buying the lot, yes, we
13 bought the lot years, years back. Then it says:

14 "Q. Now in October 2001, do you remember buying a multifamily
15 residential property at Yarmouth Drive in Wellington?"

16 Answer at line 23:

17 "A. I still have it."

18 Do you see that?

19 A. Yes.

20 Q. Then the next question, line 24:

21 "Q. Do you remember the purchase price being \$310,000?"

22 Do you see that?

23 A. Yes.

24 Q. And then if we go down --

25 THE COURT: Mr. Alessi, could you reposition the mic

LC3Cmax1

Alessi - cross

1 as you're looking. Thank you.

2 Q. We go down to page 147, which is in the left side there, if
3 we go to line 9.

4 "Q. Now, do you recall that in September of 2002 --

5 Q. This is right at the same time that you were breaking into
6 Mr. -- shortly, a year, a year before you broke into
7 Mr. Epstein's house, September of 2002, you and your wife
8 purchased a multifamily residential property at Sequoia Drive
9 in West Palm Beach, that's correct, and the purchase price was
10 \$590,000.

11 Do you remember that?

12 A. Yes.

13 MS. COMEY: Your Honor, I'm going to object to this
14 because I don't think any of this is inconsistent.

15 THE COURT: Sustained. The answer earlier was that he
16 had sold one of these properties before you add up to the
17 amount you said, so it's not inconsistent. So I'm sustaining
18 the objection.

19 MR. PAGLIUCA: I'm getting there, your Honor, because
20 I don't think there was a sale of the property.

21 THE COURT: You can get to that, but otherwise, so
22 far, it's consistent.

23 BY MR. PAGLIUCA:

24 Q. Mr. Alessi, you owned all of these properties in 2003;
25 correct?

LC3Cmax1

Alessi - cross

1 A. No.

2 Q. With you one didn't you own?

3 A. I owned the house that I built in Royal Palm Beach and I
4 sold the apartments at Tower 1515. And in all my life, I work
5 very hard and save a lot of money, including the time that I
6 work for Mr. Epstein. I did a lot of savings, sir.

7 Q. The point is, Mr. Alessi, and you agree with me that you
8 weren't poor when you went into Mr. Epstein's house in 2003 and
9 stole the money; correct?

10 A. I was not poor, but it was -- the money was sequestered
11 because I was going through a divorce and I had no access to
12 the money.

13 Q. Okay.

14 A. Or to sell the properties.

15 Q. Now, Mr. Alessi, I'm going to turn to some testimony that
16 you gave yesterday about Jane.

17 Do you recall that?

18 A. Yes, sir.

19 Q. Isn't it true -- well, yesterday you testified that you met
20 Jane in 1994.

21 Do you recall that testimony?

22 A. I recall the testimony, but I'm not sure if it was '94,
23 '95, '93, '96. I cannot recall exactly the same date.

24 Q. Isn't it true that you met Jane in 1998 or 2000?

25 A. Can you repeat the question.

LC3Cmax1

Alessi - cross

1 Q. Isn't it true that you met Jane in 1998 or 2000?

2 A. No, that's not true.

3 MR. PAGLIUCA: If we can show the witness 3504-030,
4 page 20, deposition page 79, line 18.

5 THE COURT: Just caution about not stating the real
6 name of Jane.

7 MR. PAGLIUCA: I understand, your Honor. I completely
8 blacked it out on all of my copies.

9 (Continued on next page)

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LC3KMAX2

Alessi - Cross

1 THE COURT: For the witness, too.

2 MR. PAGLIUCA: Understood.

3 THE COURT: Thank you. What line am I looking at?

4 MR. PAGLIUCA: That's a good question, your Honor.

5 I'm having trouble seeing it here. We're at page 19 and 20 of
6 3504-030.

7 THE COURT: That's page 79 of the deposition?

8 MR. PAGLIUCA: Yes, your Honor, that's correct.

9 THE COURT: That's the single page on the screen.

10 BY MR. PAGLIUCA:

11 Q. If we go down to line 20, do you remember this question,

12 Mr. Alessi: Do you know the year Nadia met --

13 A. You mentioned the name, sir.

14 MR. PAGLIUCA: I'm sorry.

15 MS. MOE: Your Honor, I do have a concern about this.

16 MR. PAGLIUCA: I move to strike that, your Honor. I
17 withdraw it.

18 THE COURT: It will be struck. You are admonished to
19 carefully abide by my ruling.

20 MS. COMEY: Your Honor, may we approach?

21 THE COURT: You may.

22 (Continued on next page)

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25

1 (At the sidebar)

2 MR. PAGLIUCA: I apologize, your Honor. It was
3 completely unintentional. I apologize.

4 MS. COMEY: Your Honor, given that Mr. Pagliuca
5 represented that he had prepared to cross-examine this witness
6 on this testimony, I think we need to have a plan going forward
7 for how to make sure this does not happen again because,
8 clearly, Mr. Pagliuca had not prepared enough.

9 THE COURT: The witness herself did the same thing.
10 It happens. My perception was that it was an accident.

11 MR. PAGLIUCA: Completely.

12 THE COURT: I agree, we need a plan, but --

13 MS. COMEY: Your Honor, I would propose that to the
14 extent Mr. Pagliuca intends to use some sort of prior
15 inconsistent statement, that he can discuss it with me before
16 reading it into the record, and we can confer about how he
17 should read it.

18 MR. PAGLIUCA: I understand how to read, your Honor.
19 It won't happen again.

20 THE COURT: All right. It won't happen again.

21 MR. PAGLIUCA: It will not.

22 THE COURT: If it happens again, we're going to need a
23 different approach.

24 MR. PAGLIUCA: I understand. It will not happen
25 again.

LC3KMAX2

Alessi - Cross

1 (In open court)

2 MR. PAGLIUCA: May I resume, your Honor?

3 THE COURT: Just a moment.

4 (Pause)

5 THE COURT: You may.

6 MR. PAGLIUCA: Thank you.

7 BY MR. PAGLIUCA:

8 Q. You were asked the question:

9 "Q. Do you know what year Jane met Jeffrey Epstein and Glen
10 Maxwell?"

11 And your answer was: "I would say we left it in 2002.
12 I would say '99 or 2000 maybe."

13 Do you recall that question and answer?

14 A. I don't recall the question, but I imagine I made the
15 mistake between the two girls that I met, Jane and I made -- I
16 confuse the first girl with the second girl. The first girl
17 that I met, underage, was Jane. And I think it was 1994, sir.
18 The other girl that I met, it was 2002 or 2001, I'm not sure.

19 Q. Okay. Well, let's continue, Mr. Alessi, because the
20 questioner was Mr. Edwards.

21 Do you recall Mr. Edwards being the person who
22 questioned you?

23 A. It was one of the lawyers.

24 THE COURT: Microphone.

25 Q. The person who was questioning you in this deposition was

LC3KMAX2

Alessi - Cross

1 Virginia Roberts' lawyer, Brad Edwards.

2 Do you recall that?

3 A. I don't recall him, but it was one of the lawyers, he asked
4 me questions.

5 Q. And you were in Fort Lauderdale at an office when you were
6 answering these questions?

7 A. Yes, sir.

8 Q. Okay.

9 And Mr. Edwards then says to you at line 22 --

10 THE COURT: And I will caution --

11 MR. PAGLIUCA: Right.

12 Q. -- "If Jane believes that the year was 1994 or 1995" -- and
13 then you say, no.

14 Do you see that?

15 A. Again, I think in this testimony, I mistake the two, I
16 confused the two girls.

17 Q. I understand that's what you're saying today, Mr. Alessi --

18 A. Yes.

19 Q. -- but in 2016, when you testified, you were specifically
20 directed to the name Jane and what Jane, according to this
21 lawyer, believed, and you answered no.

22 Do you see that?

23 A. Could have been.

24 Q. Okay.

25 And then the question from Mr. Edwards is: You don't

1 remember that way?

2 And then you say, at the next page, page 80, lines 1
3 and 2, you say: That is not true. I don't think it was that
4 early.

5 Do you remember giving that testimony under oath?

6 A. I don't remember, but I could have been confused again.

7 Q. And then the question is: Okay, but you remember going and
8 picking her up from the school?

9 And the answer is: Yes.

10 Correct?

11 A. Yes.

12 Q. And then you're asked another question, and then you say:
13 I would -- I would say it's 1999, '98 maybe.

14 Correct?

15 A. Yes, sir.

16 Q. And then you're asked some specific questions about Jane
17 and whether Jane is driving or not?

18 A. Yes, sir.

19 Q. And then you say: I never saw Jane driving a car.

20 Right?

21 A. Yes, sir.

22 Q. And those were all questions and answers about Jane,
23 correct?

24 A. I'm not sure those are all the questions about Jane.

25 Q. Yesterday you also testified that Jane would go to see

LC3KMAX2

Alessi - Cross

1 Epstein without her mother.

2 Do you recall that?

3 A. Yes, sir.

4 MR. PAGLIUCA: If we can go to 3304-22, which is a
5 different exhibit. 3504-22.

6 Your Honor, I neglected to move for the admission of
7 that prior inconsistent testimony. I will do so now.

8 THE COURT: It was read into the record and admitted.

9 MR. PAGLIUCA: Thank you.

10 THE COURT: If it's read into the record, it's
11 admitted.

12 MR. PAGLIUCA: No need to move for admission?

13 THE COURT: Correct.

14 MR. PAGLIUCA: Thank you.

15 BY MR. PAGLIUCA:

16 Q. Mr. Alessi, we're at 3504-22. Do you see that?

17 A. Yes. Not legible.

18 THE COURT: Needs to be bigger, please.

19 MR. PAGLIUCA: Can we enlarge, please.

20 Q. At page 26 of this exhibit, deposition page 183, lines 9
21 through 13 -- are you there, Mr. Alessi?

22 A. Yes, sir.

23 MS. COMEY: Your Honor, before Mr. Pagliuca reads this
24 into the record, I don't believe it's inconsistent with any
25 testimony that's been given.

1 THE COURT: I need to see earlier portions of the
2 transcript.

3 MR. PAGLIUCA: Your Honor, are you talking about
4 yesterday's testimony?

5 THE COURT: Well, I think it's two things. It's
6 yesterday's testimony -- and give me the line. And then I need
7 to have context for who is being spoken about in the depo.

8 MR. PAGLIUCA: Sure.

9 Yesterday's testimony, we're talking about page 835,
10 836, 837, which was where this was referenced. And for
11 purposes of this transcript, I think if the Court starts at
12 line 6, you will get the context of the question.

13 If you go to the page before, 182, you start at line
14 15, that will give you the complete context.

15 If we can blow up for the Court and the witness 182,
16 beginning at line 15.

17 THE COURT: Just a minute.

18 (Pause)

19 THE COURT: Transcript 835, line 19?

20 MR. PAGLIUCA: 19 through 20; 836, lines 1 and 2; and
21 836, I think, line 5.

22 THE COURT: Can you go back to the line in the
23 deposition, please? Now I have 182.

24 MR. PAGLIUCA: Yes, your Honor.

25 MS. COMEY: Your Honor, I just want to make sure that

LC3KMAX2

Alessi - Cross

1 your Honor has also reviewed page 835 --

2 THE COURT: Yes, I have the testimony in mind.

3 Now I need to see what you're contending is
4 inconsistent.

5 MR. PAGLIUCA: Right. I'm at lines 10 through 12,
6 your Honor.

7 THE COURT: Of what page? I have page 182.

8 MR. PAGLIUCA: It's 183, lines 9 through 12. 182 is
9 for context.

10 (Pause)

11 THE COURT: Sustained.

12 BY MR. PAGLIUCA:

13 Q. Mr. Alessi, do you recall that the lawyer for Jane, a
14 lawyer for Jane, contacted you in July of 2020, two thousand
15 twenty?

16 A. No.

17 Q. Do you recall that in July of 2020, you authored a
18 declaration, which is a sworn statement, under oath,
19 declaration of Juan P. Alessi?

20 A. I don't know. I don't know what you talking about. At
21 2020?

22 Q. Yes.

23 MR. PAGLIUCA: Can we show the witness Defendant's
24 Exhibit JA-1, please.

25 MS. COMEY: Your Honor, I do not have a copy of this.

LC3KMAX2

Alessi - Cross

1 THE COURT: You will be provided one before we show
2 the witness.

3 MS. COMEY: Thank you, your Honor.

4 MR. PAGLIUCA: Does the witness have JA-1?

5 THE COURT: Not yet.

6 Ms. Comey, are you ready?

7 MS. COMEY: Yes, thank you, your Honor.

8 THE COURT: Go ahead.

9 BY MR. PAGLIUCA:

10 Q. Do you see JA-1, Mr. Alessi?

11 THE COURT: Mr. Alessi, could you reposition the mic,
12 please. Thank you.

13 A. Yes, I am reading.

14 I can't remember where this was done. Where?

15 Q. Mr. Alessi, I'm just going to ask you a couple of
16 questions.

17 First, is that your signature?

18 A. Yes, it is.

19 Q. It's dated July 9, 2020; is that correct?

20 A. That's correct.

21 MS. COMEY: Your Honor, before this is read, I would
22 make the same objection. I don't believe this is inconsistent.

23 THE COURT: Which paragraph are you focused on?

24 MR. PAGLIUCA: Your Honor, I was going to move for the
25 introduction of the entire exhibit.

LC3KMAX2

Alessi - Cross

1 THE COURT: So paragraph 1, sustained.

2 Paragraph 2, sustained.

3 You want to focus me?

4 MR. PAGLIUCA: Paragraphs 3 and 4, your Honor, are the
5 inconsistencies.

6 THE COURT: Okay. Just a moment.

7 (Pause)

8 THE COURT: Sustained.

9 MR. PAGLIUCA: May we be heard on this, your Honor?

10 THE COURT: Yes.

11 (Continued on next page)

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LC3KMAX2

Alessi - Cross

1 (At the sidebar)

2 THE COURT: Let's just set the stage. The testimony
3 yesterday said "multiple occasions with her mother, some
4 occasions without the mother; in those instances, he would pick
5 her up and drive her."

6 MR. PAGLIUCA: Okay.

7 THE COURT: You agree that is the testimony?

8 MR. PAGLIUCA: Generally, yes.

9 On line 9, we have: "I personally observed Jane along
10 with her mother on three occasions, not multiple occasions."

11 THE COURT: "Three" is not "multiple"?

12 MR. PAGLIUCA: Not in my view, your Honor. It is
13 inconsistent with "multiple."

14 At Mr. Epstein's --

15 THE COURT: I don't understand --

16 MR. PAGLIUCA: It is more than one.

17 THE COURT: So is "multiple."

18 MR. PAGLIUCA: Yes, I understand.

19 THE COURT: I mean, unless we're speaking a different
20 language.

21 MR. PAGLIUCA: We may be, but this is quantifying the
22 number. It's not multiple, it's three.

23 "At Mr. Epstein's home in Palm Beach. I don't recall
24 the year," which is also inconsistent with his testimony
25 yesterday.

LC3KMAX2

Alessi - Cross

1 THE COURT: Well, he said he doesn't recall exactly
2 the year, and you impeached on the earlier one.

3 MR. PAGLIUCA: Yesterday, he said it was 1994, and
4 this is impeaching that testimony as well.

5 MS. COMEY: Your Honor, if I may on that point, I
6 believe the testimony was 1994 or 1995 yesterday, and then
7 today on cross-examination I think he expanded it to between
8 1993 and 1996. I think it's clear in the record that he's not
9 sure exactly what year it was.

10 THE COURT: Yes, I agree with that.

11 MR. PAGLIUCA: Respectfully, I disagree, your Honor.

12 "During those occasions, I observed Mr. Epstein and
13 Ms. Maxwell and her mother talking."

14 We're limiting it to those occasions, and it's not
15 expanding on any of those occasions. Yesterday he testified to
16 multiple occasions, more than three, many more than three.

17 Paragraph 4: "In addition to seeing Jane at
18 Mr. Epstein's home, I was also instructed on one occasion by
19 Mr. Epstein to pick Ms. Jane up from what I presume was her
20 home address in West Palm Beach."

21 He discussed yesterday more than one occasion being
22 instructed to pick her up at West Palm Beach.

23 THE COURT: You can ask him if he recalls saying one
24 occasion.

25 MS. COMEY: Your Honor, if I may, the fact that he

LC3KMAX2

Alessi - Cross

1 remembers one occasion does not preclude that there were other
2 occasions. He's just saying in the declaration --

3 THE COURT: I agree, and I presume that will be the
4 testimony.

5 MS. COMEY: But then, your Honor, it's not
6 inconsistent. I just don't see the basis to put this in front
7 of the jury if it's not inconsistent on its face. There's just
8 not a basis.

9 THE COURT: Well, on this one, I think he said
10 multiple occasions, this says one. He can explain the
11 difference, and the jury will decide.

12 So I'll permit you to ask about that one.

13 MR. PAGLIUCA: Thank you.

14 (Continued on next page)

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LC3KMAX2

Alessi - Cross

1 (In open court)

2 MR. PAGLIUCA: Thank you, your Honor.

3 THE COURT: Okay.

4 BY MR. PAGLIUCA:

5 Q. Mr. Alessi, do you recall in 2020, in this declaration,
6 saying, I was also instructed on one occasion by Mr. Epstein to
7 pick Ms. Jane up from what I presumed was her home address in
8 West Palm Beach, Florida and drive her to Mr. Epstein's home?
9 Do you recall that statement in your under-oath declaration?

10 A. First of all, I would like to know where this declaration
11 was taken place. I think this -- if I remember correctly, this
12 was sent to me by mail. By somebody. I don't recall making
13 this declaration with anybody.

14 Q. Well, Mr. Alessi, we've established that that's your
15 signature on July 9 --

16 A. Yeah, it is my signature, but I don't recall being in a
17 place and declare this.

18 Q. Okay. Are you denying making the declaration?

19 MS. COMEY: Your Honor, I think there may be some
20 confusion about terminology here.

21 THE COURT: Yes.

22 I think the question is not, were you deposed, but,
23 did you sign this statement?

24 THE WITNESS: Yes. It definitely is my signature.

25 Q. And is that what you said, you were instructed by

LC3KMAX2

Alessi - Cross

1 Mr. Epstein on one occasion to pick Ms. Jane up from what I
2 presume was her home address in West Palm Beach, Florida and
3 drive her to Mr. Epstein's house, is that correct?

4 A. That's correct. It might have been more than one occasion,
5 too.

6 Q. That's not what you said in this declaration, correct?

7 A. No, in this declaration it says once.

8 Q. Right.

9 Mr. Alessi, I want to talk a little bit now about the
10 renovations to the Palm Beach house, okay?

11 A. Yes.

12 MR. PAGLIUCA: If we can show the witness what's been
13 admitted as Government Exhibit 297, please.

14 MS. COMEY: Your Honor, could this be published to the
15 parties and the public as well?

16 THE COURT: It's admitted, so GX 297 may be published.

17 MR. PAGLIUCA: Thank you, your Honor.

18 BY MR. PAGLIUCA:

19 Q. Mr. Alessi, you talked about this exhibit yesterday.

20 Do you recall that?

21 A. Yes, sir.

22 MR. PAGLIUCA: First, I would like to zoom in on the
23 lower right corner of the exhibit, and highlight that, please.

24 Q. Do you see the date here 4/4/94, Mr. Alessi?

25 A. Yes, sir.

LC3KMAX2

Alessi - Cross

1 MR. PAGLIUCA: We can zoom out.

2 Q. These are architectural drawings of the El Brillo Way
3 house, correct?

4 A. Yes.

5 MR. PAGLIUCA: If we can go to Government Exhibit 298,
6 and also zoom in on the lower right corner.

7 Q. The date is a little hard to read here, but do you see that
8 there's a 24, and then a 94 is there as well, Mr. Alessi?

9 A. Yes.

10 MR. PAGLIUCA: If we can go to Government Exhibit 299,
11 and zoom in on the same section.

12 Q. We have a date 3/23/94.

13 Do you see that, Mr. Alessi?

14 A. Yes, sir.

15 MR. PAGLIUCA: We can zoom out.

16 Let's go back to 297, please. We can zoom in, please,
17 on the writing, the small writing, that you can't read, through
18 the lower right quarter of this document.

19 Right there. Go ahead, zoom in there.

20 Q. These are instructions for the contractor as part of the
21 renovation. Do you see that, Mr. Alessi?

22 A. Yes, sir.

23 Q. We're installing new doors and frames, in this note.

24 Do you see that?

25 A. Yes.

LC3KMAX2

Alessi - Cross

1 Q. And then we're giving instructions to the subcontractor
2 here as well.

3 Do you see that? In item 6.

4 A. AC subcontractor shall...

5 Yes, sir, I see it.

6 MR. PAGLIUCA: We can take that down and go back to
7 the notes to the left of that, please, and blow those up.

8 Q. Do you see that the bathrooms are being redone with marble
9 tile, the floors are being done, countertops are being done,
10 the baths are being done, we're installing new molding in the
11 guestrooms? Do you see those general notes, Mr. Alessi?

12 A. Yes.

13 MR. PAGLIUCA: If we can take that down and go back to
14 the notes to the left of those notes.

15 Q. We're removing windows, we're cutting masonry down to floor
16 level, installing new doors, modifying, replacing windows.

17 Do you see that, Mr. Alessi?

18 A. Yes, sir.

19 Q. So this was a major renovation, correct, Mr. Alessi?

20 A. Yes, sir.

21 Q. And the architects, if we can go to page 297, on the upper
22 right, look at who the architects were, you remember these
23 folks from New York, Mr. Alessi?

24 A. Yes, sir.

25 Q. And they would fly down to Palm Beach and supervise the

LC3KMAX2

Alessi - Cross

1 major construction, correct?

2 A. Yes, sir.

3 Q. And you were in the construction business years ago,
4 Mr. Alessi, right?

5 A. Yes.

6 Q. And you know that you need these kind of construction
7 drawings before you can begin construction, correct?

8 A. Of course.

9 Q. So the architects finish these construction drawings in
10 1994, and the construction begins sometime after they finish
11 these drawings, right?

12 A. I think so yes.

13 Q. So in 1994, when the construction starts, nobody's living
14 in this residence, correct?

15 A. No, sir. It was a large part -- during the construction,
16 Mr. Epstein and Ms. Maxwell live at the residence.

17 Q. You had, during your time on El Brillo Way, had regular
18 access to the house, meaning complete access, you could go
19 anywhere --

20 A. I live at the house.

21 Q. -- you want, correct?

22 A. Yes.

23 Q. And --

24 THE COURT: Could you pull up the microphone,
25 Mr. Alessi. Thank you.

LC3KMAX2

Alessi - Cross

1 THE WITNESS: Keep forgetting. I'm sorry.

2 BY MR. PAGLIUCA:

3 Q. There was no part of the house that you were denied access
4 to, correct?

5 A. There was no part, no.

6 Q. So you could go wherever you wanted, whenever you wanted,
7 in the house, correct?

8 A. Yes.

9 Q. And there was a difference between when Mr. Epstein was
10 going to be in the house and when he wasn't there, correct?

11 A. Can you repeat the question and also --

12 Q. Sure.

13 A. Difference? What you mean, difference?

14 Q. When Mr. Epstein was going to be in the residence --

15 A. Yes.

16 Q. -- he wanted you and your wife there, correct?

17 A. Only us. He didn't want -- no contractors at the house.

18 Q. Right. And so when he was there, you had to be there
19 pretty much 24 hours a day, correct?

20 A. Yes. It was slavery.

21 Q. And you needed to be there at 5:00 a.m. and work all day
22 and go to bed whenever you were able to; is that right?

23 A. That's correct.

24 Q. When Mr. Epstein wasn't there, you had the apartment on the
25 other side of the bridge that you and your wife would go to,

LC3KMAX2

Alessi - Cross

1 correct?

2 A. To sleep, yes.

3 Q. To sleep.

4 And then you would come back during the day and work
5 during the day when Mr. Epstein wasn't there, right?

6 A. Yes.

7 Q. And there were lots of other workers who came to the house
8 on a regular basis; is that right?

9 A. When Mr. Epstein was not at the residence, they will come
10 and I will be there.

11 Q. Right. And you would have different kinds of workers? You
12 would have -- the pest control people would come, correct, the
13 people that took care of bugs and things, they would come?

14 A. Yeah, there were all kinds of contractors, subcontractors.

15 Q. Landscaper kind of people, right?

16 A. Excuse me?

17 Q. Landscapers?

18 A. Yes. They were outside, not inside the house.

19 Q. And there were people inside as well, right? There were
20 people that dealt with air conditioning and heating and furnace
21 and cleaning, right?

22 A. Of course.

23 Q. And those people came and went under your supervision at
24 the time, correct?

25 A. Yes, sir.

LC3KMAX2

Alessi - Cross

1 Q. I think you testified that there were many properties that
2 Mr. Epstein owned, right?

3 A. Yes.

4 Q. And you had been to those properties, correct?

5 A. Briefly, yes.

6 Q. And all of those properties required substantial daily
7 maintenance and care, correct?

8 A. I imagine so.

9 Q. Okay, just like the Palm Beach property required, correct?

10 A. Of course.

11 Q. Okay.

12 So that was why there was a plan to do regular
13 scheduled checklists for maintenance and things, correct?

14 A. I guess so.

15 Q. Mr. Epstein was your boss, correct?

16 A. That's correct.

17 Q. When Mr. Epstein was in Palm Beach, you would go to
18 Mr. Epstein for direction, correct?

19 A. No. I will go directly to Ms. Maxwell. She was my
20 immediate superior. I will go to her first.

21 Q. Do you recall that -- let's talk about Mr. Epstein for a
22 little bit.

23 Mr. Epstein wanted his properties to be run like
24 five-star hotels, correct?

25 A. That's correct.

LC3KMAX2

Alessi - Cross

1 Q. And Mr. Epstein liked having guests, right?

2 A. That's correct.

3 Q. Mr. Epstein liked having people that he thought were
4 important in the house, correct?

5 MS. COMEY: Foundation.

6 THE COURT: Overruled.

7 A. I guess so.

8 Q. Well, he had pictures of famous people in the house that he
9 was meeting with, right?

10 A. Yes.

11 Q. And he brought famous people to the house, and you saw them
12 there, right?

13 A. Yes.

14 Q. And Mr. Epstein would have lots of meetings with lots of
15 famous people there, right?

16 A. Yes.

17 Q. And he liked to show off the properties, correct?

18 A. I don't know if he likes it or not, I don't know.

19 Q. But he did it, right?

20 A. To show off the properties?

21 Q. Yes. He had all the people there, and they were at the
22 pool, and they would --

23 A. Sir, I don't know anything about the other properties.

24 Q. No, your property, the Palm Beach property.

25 A. Yeah, they were there sometimes, they were a guest and they

LC3KMAX2

Alessi - Cross

1 stay there. So I don't know if he liked to show off that
2 property or not.

3 Q. Okay. He also liked to be in control of things, didn't he,
4 Mr. Epstein?

5 A. He had a very little contact with me in the later years.

6 Q. Well, isn't it true, Mr. Alessi, that if Mr. Epstein was at
7 the house, you would never go to Ms. Maxwell and you would go
8 directly to him, or he would come to you? Isn't that true?

9 A. That is not true.

10 MR. PAGLIUCA: If we can show the witness 3504-030.
11 At that transcript, page 6, deposition page 23.

12 Q. Do you have that, Mr. Alessi?

13 A. Page 23, yes, sir.

14 MS. COMEY: Your Honor, may I have a moment to review
15 this?

16 THE COURT: Yes. Can you give me the lines?

17 MR. PAGLIUCA: Yes, your Honor. Page 23, line 6
18 through 8.

19 MS. COMEY: Your Honor, I would object. This is not
20 inconsistent.

21 MR. PAGLIUCA: Excuse me?

22 THE COURT: Overruled.

23 You may read it.

24 BY MR. PAGLIUCA:

25 Q. The question was: Who was in charge of the Palm Beach

LC3KMAX2

Alessi - Cross

1 house?

2 Your answer was: I was.

3 And then the next question is: All right. Who was
4 your direct supervisor?

5 You said: Mr. Epstein. He would deal with me
6 directly or, if he was not available, Ms. Maxwell.

7 Do you see that?

8 A. Yes.

9 Q. Those were the questions and answers under oath that you
10 gave, correct?

11 A. Could have been, yes.

12 Q. Are you denying it, Mr. Alessi?

13 A. I am not denying it.

14 Q. Okay.

15 And then at line 18 of the same transcript --

16 THE COURT: Just a moment.

17 (Pause)

18 THE COURT: Okay.

19 BY MR. PAGLIUCA:

20 Q. You answered: But if Mr. Epstein was at the house, I would
21 never go to Ms. Maxwell, I would go to him directly or he would
22 come to me.

23 Do you see that, Mr. Alessi?

24 A. Yes, sir.

25 Q. And that was your testimony under oath about who the boss

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Alessi - Cross

1 was, correct?

2 A. Well, the boss of what I understand was Mr. Epstein he was
3 the owner.

4 Q. Mr. Alessi, the question I asked you was: That's what you
5 testified about who the boss was? Isn't that what I asked you?

6 THE COURT: I direct the witness: Can you give the
7 answer and then you can explain. Go ahead.

8 A. I could have said this statement at that time.

9 Q. Okay. Thank you, Mr. Alessi.

10 It's also true, isn't it, Mr. Alessi, that you
11 understood that whatever Ms. Maxwell was telling you, it was
12 coming from Mr. Epstein, correct?

13 A. I don't know the answer. I don't know if it was from him
14 or from herself.

15 Q. You're aware that this book that we talked about, the
16 household manual -- we talked about that yesterday, correct?

17 A. Yes, sir.

18 Q. Now, that was -- Mr. Epstein hired a countess.

19 Do you recall that?

20 A. Yes.

21 Q. And the countess put together the manual, correct?

22 A. I don't know if she got it or not. I don't know if she was
23 the author of the manual.

24 MR. PAGLIUCA: If we can go to 3504-030 page 6, line
25 24. 3504-030, 6, deposition page 23, lines -- page 24, lines 9

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Alessi - Cross

1 through 16.

2 MS. COMEY: Your Honor, I object. I don't believe
3 it's inconsistent.

4 THE COURT: Sustained.

5 BY MR. PAGLIUCA:

6 Q. You didn't agree with the manual, correct, Mr. Alessi?

7 A. Yes, I did not.

8 Q. And you didn't follow it?

9 A. I did not -- I did my chores, I did my work. I did not
10 follow the manual. I don't think I never did the checkmarks on
11 the manual.

12 Q. Okay.

13 But you knew that they hired the countess to write the
14 book and write the ideas of how the house should be, correct?

15 A. I don't know that, sir.

16 MR. PAGLIUCA: We can go to 3504-022.

17 Page 25 of that exhibit.

18 MS. COMEY: I'm sorry, I didn't hear you.

19 MR. PAGLIUCA: 3504-022, page 25.

20 MS. COMEY: Thank you.

21 THE COURT: Page and line?

22 MR. PAGLIUCA: Yes, I'm getting there, your Honor.

23 Page 179, lines 25 through 18 --

24 MS. COMEY: Your Honor, which lines is Mr. Pagliuca
25 proposing to read?

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Alessi - Cross

1 THE COURT: I think he said 25 through -- something.

2 MS. COMEY: I would ask the whole answer be read, the
3 whole question and the whole answer, if Mr. Pagliuca wants to
4 introduce this.

5 THE COURT: Okay.

6 Go ahead.

7 MS. COMEY: Just for the record, I believe the
8 question would begin on line 17 at page 179, and the answer
9 would end on line 6 of page 180. I think that's the full
10 question and answer.

11 THE COURT: Okay. Go ahead.

12 MR. PAGLIUCA: I'm sorry, your Honor, I'm on the wrong
13 page. I will come back to this.

14 BY MR. PAGLIUCA:

15 Q. Mr. Alessi, I want to now talk a little bit about --

16 MR. PAGLIUCA: Well, would this be a good time for a
17 break, your Honor?

18 THE COURT: Let me just check.

19 (Pause)

20 THE COURT: Okay, yes, we can break. We'll take our
21 mid-morning break.

22 About 15 minutes, members of the jury. Thank you.

23 (Continued on next page)

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LC3KMAX2

Alessi - Cross

1 (Jury not present)

2 THE COURT: Mr. Alessi, you may step down for the
3 break.

4 Everyone may be seated.

5 While we're waiting, I'll just note that Ms. Williams
6 has asked someone from A/V to come talk to the government
7 during the break, so hopefully we can figure that out.

8 MS. COMEY: Thank you, your Honor.

9 THE COURT: Matters to take up?

10 MS. COMEY: Not from the government, your Honor.

11 MR. PAGLIUCA: No, your Honor.

12 THE COURT: We'll meet again in ten. You'll let me
13 know if there are any issues. Thank you.

14 (Recess)

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Alessi - cross

1 THE COURT: Matters to take up?

2 MS. COMEY: Not from the government, your Honor.

3 THE COURT: Mr. Pagliuca, anything?

4 MR. PAGLIUCA: No, your Honor.

5 THE COURT: We can bring the witness back to the stand
6 and Ms. Williams will bring in the jury.

7 (Continued on next page)

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LC3Cmax3

Alessi - cross

1 (Jury present)

2 THE COURT: Thank you, everyone. Thank you, members
3 of the jury.

4 Mr. Pagliuca, you may continue with your cross
5 examination of Mr. Alessi.

6 Mr. Alessi, I remind you, you are under oath.

7 MR. PAGLIUCA: Thank you, your Honor.

8 BY MR. PAGLIUCA:

9 Q. Mr. Alessi I want to talk now about you meeting Virginia
10 Roberts. Okay?

11 A. Okay, sir.

12 Q. Do you recall that you met Ms. Roberts for the first time
13 at Mar-a-Lago; correct?

14 A. Yes.

15 Q. And you went, Ms. Maxwell, Ghislaine went into Mar-a-Lago
16 for a treatment.

17 Do you recall that?

18 A. I don't know if she was going to get a treatment, but if
19 that's why she went inside, yes.

20 Q. Let me just ask the question. Do you recall that she went
21 into Mar-a-Lago for some form of treatment?

22 Do you recall that?

23 A. I don't recall that.

24 MR. PAGLIUCA: If we can show the witness 3504-030,
25 page 48, deposition transcript page 190, lines 13 through 25,

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Alessi - cross

1 and page 191, lines 2 through 6.

2 Q. Have you had the opportunity to review that, Mr. Alessi?

3 A. Can you repeat the number.

4 Q. Sure. Page 190 beginning at line 15.

5 A. Okay. Sir, I cannot see the number of the page. Okay, now
6 I do. Yes, sir.

7 Q. Does that refresh your memory, Mr. Alessi, that, as you
8 understood it, Ms. Maxwell went into Mar-a-Lago for some form
9 of treatment?

10 A. No, I think she was looking for -- because we -- I don't
11 know if she went in for a treatment or not.

12 Q. Isn't it true that you testified, as I understand it,
13 Ms. Maxwell went into Mar-a-Lago for some form of treatment,
14 correct, and you said yes. Do you see that?

15 A. Yes, sir.

16 Q. And that was your testimony under oath; correct?

17 A. Yes.

18 Q. And then the question was:

19 "Q. So you were waiting outside for about an hour?"

20 Do you see that, line 22?

21 A. Yes.

22 Q. And you said, "Right."

23 Do you see that?

24 A. Yes.

25 Q. And that was your testimony under oath; correct?

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Alessi - cross

1 A. I guess so.

2 Q. And then the question was:

3 "Q. And then Ms. Maxwell came out after she had her
4 treatment?"

5 Do you see that?

6 A. Okay.

7 Q. And you said, "Right."

8 Do you see that?

9 A. Uh-huh.

10 Q. Is that a yes?

11 A. Yes.

12 Q. Okay. And that's when you saw her talking to a person who
13 you later came to find out was Virginia Roberts?

14 MS. COMEY: Objection, your Honor. It was misread.

15 THE COURT: I'm sorry?

16 MS. COMEY: I believe that counsel just inserted two
17 extra words in what he's reading from the deposition.

18 MR. PAGLIUCA: I will reread it, your Honor.

19 THE COURT: Okay.

20 "Q. You saw her talking to a person who you later came to find
21 out was Virginia Roberts?"

22 MR. PAGLIUCA: Did I read that correctly?

23 MS. COMEY: I believe you did. Thank you.

24 A. Yes, sir.

25 Q. And you said, "That's right."

LC3Cmax3

Alessi - cross

1 Do you see that?

2 A. Yeah.

3 Q. And do you recall that it was very hot out, do you recall
4 that?

5 A. I recall that very much.

6 Q. And you met -- well, this event occurred in 2002. Do you
7 recall that, Mr. Alessi?

8 A. Excuse me? Can you repeat the question.

9 Q. What we're talking about here, going to Mar-a-Lago and
10 meeting Ms. Roberts occurred in 2002. Do you recall that?

11 A. I'm not sure if it was 2002 or 2001.

12 Q. Okay. If I could direct the witness's attention to
13 3504-030, page 24, let's just see if we can refresh your
14 memory, Mr. Alessi. Will you look at page 95, lines 17 through
15 21.

16 MS. COMEY: Your Honor, I would object to reading that
17 in isolation. I would ask that the whole series of questions
18 and answers before that be read.

19 THE COURT: Okay.

20 MR. PAGLIUCA: I'm happy to read it all, your Honor.

21 MS. COMEY: Your Honor, I would ask that it begin on
22 page 94 at line 19 is where I believe the exchange begins.

23 MR. PAGLIUCA: Your Honor, I think, appropriately, if
24 Ms. Comey wants to redirect this witness's attention on --

25 THE COURT: Well, then I'll sustain the objection or

LC3Cmax3

Alessi - cross

1 you could read the whole thing.

2 MR. PAGLIUCA: I guess it will save time if we read
3 the whole thing.

4 THE COURT: Okay.

5 BY MR. PAGLIUCA:

6 Q. So let's start at page 94 and I will read. You're being
7 asked a series of questions again by Mr. Edwards who is
8 Virginia Roberts' lawyer. Do you recall that?

9 A. I don't recall him, but I imagine so.

10 Q. Do you recall saying, beginning at line 21 on page 94 --

11 MS. COMEY: Your Honor, I ask that it begin on line 19
12 of page 94 with the question.

13 THE COURT: Okay. Go ahead.

14 MR. PAGLIUCA: Okay. 19, okay.

15 "Q. What year do you believe that you went to Mar-a-Lago to
16 pick Virginia up?

17 "A. I think it was 2000 and I think it was the summer of
18 2002."

19 Do you see that?

20 A. Yes, sir.

21 MS. COMEY: Your Honor, I believe that the
22 understanding was that the remainder of that exchange would
23 then be read.

24 MR. PAGLIUCA: I'm going to keep reading it. I'm just
25 asking questions along the way, your Honor.

LC3Cmax3

Alessi - cross

1 BY MR. PAGLIUCA:

2 Q. And you say, "Okay." Is that right, on line 23?

3 A. Yes, sir.

4 Q. And then the next question -- well, after that, it's okay,
5 and then you say summer, because I remember that day that I was
6 sweating like hell in the car waiting for Ms. Maxwell to come
7 out of the massage; right? Do you see that?

8 A. Yes, sir.

9 "Q. Okay. So what month of summer do you remember it being?

10 "A. I think it was June, July, maybe 2001.

11 "Q. 2000 and what?

12 "A. 2001.

13 "Q. June, July 2001, that's when you believe that it was?

14 "A. Yes.

15 "Q. Okay. And do you remember the month?

16 "A. No, sorry. Sorry. Not 2001. We left in December 31st.

17 It was 2000, the year that I was working for Jeffrey when I met
18 Virginia.

19 "Q. Your recollection as you sit here today?

20 "A. It was 2002."

21 Q. Did I read that correctly?

22 A. You were reading correctly.

23 Q. And that was your answer; right?

24 A. Yes, sir.

25 Q. And then the next question is:

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Alessi - cross

1 "Q. Is that it was June or July 2002?

2 "A. 2002.

3 "Q. When you met Virginia Roberts at Mar-a-Lago?

4 "A. My recollection."

5 Q. Correct?

6 A. Yes.

7 Q. And you thought that Virginia Roberts was a massage
8 therapist; correct?

9 A. I have -- I have no idea what she was.

10 Q. When you saw her for the first time, she had a white
11 uniform on. Do you remember that?

12 A. Yes.

13 Q. And she was at the spa; right?

14 A. No, she was coming from the front gate of Mar-a-Lago down
15 the ramp, and I was -- we were driving the car up the ramp with
16 Ms. Maxwell in the car and she says to me, stop. I stopped the
17 car, Ms. Maxwell walk across where she was coming to, she
18 talked to this girl that I didn't know her name or what she was
19 doing there, she talked to her and they went back to the spa.

20 Q. And that's when Ms. Maxwell had her treatment; right?

21 A. I don't know what she had. I don't -- I never see the
22 treatments.

23 Q. So if we can take a look at 3504-22, page 30, deposition
24 page 199.

25 THE COURT: What line?

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Alessi - cross

1 MR. PAGLIUCA: Line 22 through 25.

2 THE COURT: Okay.

3 Q. There was a question:

4 "Q. And did you consider her, at least from your viewpoint,
5 that she was one of the individuals that came to give massages?

6 "A. She was supposed to be a massage therapist."

7 Do you remember giving that testimony under oath?

8 A. I do not remember.

9 Q. Did you give that testimony under oath?

10 A. I think it was under oath, yes.

11 Q. Part of what -- one of the things that Mr. Epstein asked
12 you to do was to go to clubs and spas to hire licensed massage
13 therapists; is that correct?

14 A. That is incorrect.

15 MR. PAGLIUCA: If we can go to 3504-22, page 34,
16 deposition page 213, lines 7 through 19.

17 MS. COMEY: Your Honor, I would just ask that the full
18 question preceding this answer and the entire answer be read.

19 THE COURT: Okay. Go ahead.

20 MR. PAGLIUCA: I will, your Honor. I'm trying to
21 figure out exactly what Ms. Comey is requesting here.

22 MS. COMEY: From page 213, line 5, through page 213,
23 line 22, please. I think that is the full exchange.

24 MR. PAGLIUCA: Okay. That's fine. Line 2.

25 "Q. And one of those things that you had to do with her was

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Alessi - cross

1 take her to different spas?

2 "A. Yes.

3 "Q. And there she would recruit young women to come to
4 massage?

5 "A. Because she was English and she didn't know the area too
6 much as well as I know. So she says, John, make a list of all
7 the massage, the spas in the area from Jupiter to Boca Raton,
8 and we went to all this main spas. And then we went to the
9 schools for massage therapists and all the massage parlors and
10 massages, the small massage. So I make a list from the
11 telephone book and we would go from one to the other one. I
12 would wait in the car and she goes in. And sometimes it took a
13 couple of minutes and walk out with cards, business cards, and
14 that she did the recruiting."

15 Do you see these questions and answers?

16 A. Yes, sir.

17 MS. COMEY: Your Honor, I would ask that the remainder
18 of the answer be read, please.

19 THE COURT: Go ahead.

20 "A. From then she would pick up the girls and that was the end
21 of it. I never did any recruiting and I never really saw him
22 doing that. Him, right?"

23 A. Hold on. Can you repeat the question.

24 Q. There is no question. I was just reading your answer,
25 Mr. Alessi.

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Alessi - cross

1 A. Yes. Sometimes she took a couple minutes and walk out with
2 business cards and that she did, I imagine that she was doing
3 the recruiting.

4 THE COURT: Okay. He read it. Thank you. Next
5 question.

6 Q. And the business cards are from places like The Breakers;
7 right?

8 A. I don't know, sir. I never saw the business cards. They
9 were -- she come out with in her hands. I didn't ask it to
10 give it to me. I was never -- they were never given to me.
11 But we went to from the most exclusive spas and country clubs
12 from -- in the country of Palm Beach and I was the driver.

13 Q. Well, you kept a Rolodex, Mr. Alessi; correct?

14 A. True.

15 Q. And the Rolodex you had kept cards in it from the spas;
16 right?

17 A. No. It had cards from the names of the repeat woman who
18 came to the house and massage therapists.

19 MR. PAGLIUCA: If we can show the witness 3504-030,
20 page 8, deposition page 30, lines 5 through 7.

21 MS. COMEY: Your Honor, I don't believe this is
22 inconsistent.

23 THE COURT: Sustained.

24 Q. Do you recall, Mr. Alessi, that you got referrals from
25 other people for massage therapists?

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Alessi - cross

1 A. No, sir.

2 MR. PAGLIUCA: If we can look at 3504-030, page 47.

3 THE COURT: Page and line.

4 MR. PAGLIUCA: Yes. Let's start with page 187, line
5 10.

6 MS. COMEY: Your Honor, I'm not sure this is
7 inconsistent. It appears to refer to a different part of the
8 testimony.

9 THE COURT: Can I see the earlier testimony.

10 MR. PAGLIUCA: I'm referring to his testimony right
11 now, your Honor.

12 THE COURT: But what you want to read refers in the
13 line to earlier testimony. I need to see that.

14 MR. PAGLIUCA: I think we're talking about page 47 of
15 this document, at 88, lines 4 through 6.

16 THE COURT: Do you know what page number of the
17 transcript?

18 MR. PAGLIUCA: 188, lines 4 through 6.

19 MS. COMEY: Your Honor, that's after the portion.

20 THE COURT: Agreed. If you don't have it, move on and
21 come back to it.

22 MR. PAGLIUCA: Okay.

23 BY MR. PAGLIUCA:

24 Q. Mr. Alessi, you would call The Breakers or Mar-a-Lago or
25 Boca Raton resort and find someone to give Jeffrey Epstein a

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Alessi - cross

1 message; correct?

2 A. Can you repeat the question, sir.

3 Q. Yes. You would call The Breakers or Mar-a-Lago or Boca
4 Raton resort and find someone to give Jeffrey Epstein a
5 massage?

6 A. Never.

7 MR. PAGLIUCA: If we can go to page 47 of the
8 transcript, deposition page 187.

9 May I inquire, your Honor?

10 THE COURT: I don't see it yet.

11 MS. COMEY: Can we get clarification on which lines,
12 please.

13 MR. PAGLIUCA: Starting 187, line 21 for context, and
14 going into the next page.

15 MS. COMEY: Your Honor, I don't believe this is
16 inconsistent.

17 THE COURT: Let me read it.

18 MR. PAGLIUCA: Through page 188, line 15, your Honor.

19 THE COURT: I have to admit, the difficulty is I don't
20 understand the grammar of the question you asked.

21 MR. PAGLIUCA: My question to Mr. Alessi is that he
22 would get phone numbers and call people for Mr. Epstein and he
23 said no.

24 THE COURT: That was the question?

25 MR. PAGLIUCA: Yes. Well, that is the question.

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Alessi - cross

1 THE COURT: You can ask that question, because the
2 question you asked was, you would call The Breakers, et cetera,
3 and find someone to give Epstein a massage.

4 MR. PAGLIUCA: Okay, your Honor.

5 THE COURT: So you can ask that question, your
6 question. Go ahead.

7 MR. PAGLIUCA: Thank you, your Honor.

8 BY MR. PAGLIUCA:

9 Q. Mr. Alessi, you got numbers for massage therapists to call
10 for Mr. Epstein; isn't that correct?

11 A. Yes, I had a list of massage therapists, repeat massage
12 therapists, and I never call anybody with that -- they told me
13 who to call. I never made a call suggesting to get a massage
14 therapist to come to the house, never.

15 MR. PAGLIUCA: May I, your Honor, from line 24 --

16 MS. COMEY: Your Honor, I don't believe any of the
17 testimony --

18 THE COURT: Just say objection.

19 MS. COMEY: Objection, your Honor.

20 THE COURT: I'll allow it.

21 MR. PAGLIUCA: Thank you.

22 MS. COMEY: Your Honor, may I just ask which lines
23 Mr. Pagliuca is going to read, because I just want to make sure
24 we have the full context.

25 THE COURT: Okay.

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1 MR. PAGLIUCA: I'm going to read from line 24, your
2 Honor.

3 THE COURT: Through?

4 MR. PAGLIUCA: 188, line 24.

5 THE COURT: Okay.

6 MR. PAGLIUCA: Thank you.

7 BY MR. PAGLIUCA:

8 Q. The question under oath, again, Mr. Alessi, was:

9 "Q. But, for example, one of Mr. Epstein's friends would say,
10 'I got a good message from this person, I recommend her to
11 you.'"

12 And then you said:

13 "A. Yes, he would give me the number."

14 Do you see that at page 188, line 3?

15 A. Who you talking about?

16 Q. I'm reading your answer, Mr. Alessi, to the question. In
17 answer to the question:

18 "Q. One of Mr. Epstein's friends would say to you, 'I got a
19 good message from this person. I recommend her to you.'"

20 And your answer was:

21 "A. Yes, he would give me the number."

22 Correct?

23 A. Can I answer the question?

24 Q. Did you say that, Mr. Alessi, did you answer that question
25 under oath in 2016 in that fashion?

1 A. I might have answered and I didn't understand the question.
2 I had never had the authority to call, myself, or to look for a
3 massage therapist. I always complaint with the questions from
4 Mr. Epstein and Ms. Maxwell or the office secretaries to get.
5 And they would call me, they says, John, get an appointment at
6 10 o'clock tonight for Jeffrey or get an appointment -- or
7 Ms. Maxwell come to me and says, get Jodi or whatever name to
8 come. That was my job, sir. I went to the phone, called that
9 person. I never call anybody for them.

10 MR. PAGLIUCA: May I continue, your Honor?

11 THE COURT: Yes, and I permitted it, so you just read.
12 We don't need to continue with the back and forth.

13 MR. PAGLIUCA: Yes, your Honor.

14 Q. Beginning again at line 4, Mr. Alessi:

15 "Q. And most of the people, I take it, were from these spas or
16 clubs, is that right, most of the massage people?"

17 Do you see that question, Mr. Alessi?

18 A. Yes.

19 Q. And your answer was, "Yes."

20 Correct?

21 A. Yes. And it's yes today.

22 "Q. Okay. And do you know, did they have what I'll call
23 regular day jobs at the spas and then they would come into
24 Mr. Epstein's after?"

25 And then your answer was:

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Alessi - cross

1 "A. I think so."

2 Right?

3 A. I think so, too.

4 Q. And then the next question was:

5 "Q. Okay. And why do you think so?

6 "A. Because they were working at The Breakers, and sometimes I
7 have to get in touch with these people. I used to call -- have
8 to call The Breakers or Mar-a-Lago, all the clubs. There be
9 clubs, even in Boca Raton, and Boca Raton Resort and Hotel,
10 they have a great spa. I had to call these people, can you
11 come in at 10:00 tonight.

12 "Q. You would know they were working there because you would
13 talk to them there?"

14 "A. Yes. Correct."

15 A. It might be correct, but I never did contact these people
16 like you says, I contact the person who I was told to call.

17 Q. Mr. Alessi, you answered those questions in 2016 under oath
18 the way I read them; correct?

19 A. I can't recall.

20 Q. Okay. Mr. Alessi, do you recall that there were times that
21 Mr. Epstein would come to the Palm Beach house without
22 Ms. Maxwell?

23 A. Yes, he did.

24 Q. And there were times that he would bring other women to the
25 house, to the Palm Beach house; correct?

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Alessi - cross

1 A. Yes, he did.

2 Q. And he would tell you before he got there to remove any of
3 the pictures of Ms. Maxwell in the house; correct?

4 A. Yes, he did sometimes.

5 Q. And you understood the reason for that, for removing the
6 pictures was Mr. Epstein was interested in the other women;
7 correct?

8 A. I have no idea about that answer, sir. I don't know if it
9 was interested, in love with her, or just going to be with
10 them. I have no idea or presentations.

11 Q. But you would remove the pictures; correct?

12 A. I did what he told me to do all the time.

13 Q. Which was remove the pictures; is that right?

14 A. Yes, sir.

15 Q. And that happened regularly, didn't it, Mr. Alessi?

16 A. No, sir. It might have happened maybe -- in the time I
17 worked for Mr. Epstein, probably three, four times.

18 Q. And you never told Ms. Maxwell about removing the pictures
19 for the other women to show up with Mr. Epstein; correct?

20 A. It was not necessary, sir.

21 Q. Well, Mr. Epstein told you not to tell her; correct?

22 A. No, sir.

23 Q. Well, you knew it was a secret between you and Mr. Epstein
24 you were taking pictures down?

25 A. It was not a secret, sir. It was a mandate.

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Alessi - cross

1 Q. A mandate from Mr. Epstein?

2 A. Absolutely.

3 Q. And a secret between you and Mr. Epstein about the other
4 women coming; correct?

5 A. A secret from me and Mr. Epstein? He have no secrets with
6 me, sir. He never share anything of his personal life with me.

7 Q. It was a secret between you and Mr. Epstein that was kept
8 from Ms. Maxwell; correct?

9 A. Sir, he never told me, this is a secret, don't tell
10 Ghislaine about this. He never suggest it, imply, or told me
11 about that.

12 Q. Why did you think you were taking her pictures down,
13 Mr. Alessi?

14 A. I have no idea, sir.

15 Q. Towards the end of your stay with Mr. Epstein, working for
16 Mr. Epstein, that was about the same time that you met Virginia
17 Roberts; correct?

18 A. I'm not clear about these dates. I have difficult to
19 remember exactly what years or what you're talking about, what
20 years or what timeframe. I left at the end of the year at
21 2002, sir.

22 Q. And that's the same time that you -- around the same time
23 that you recall meeting Ms. Roberts; is that right?

24 A. Probably was 2002, probably was 2001. I'm not sure.

25 Q. Okay. And that's around the same time that there were more

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Alessi - cross

1 messages happening, right around when you were leaving;
2 correct?

3 A. It gradually went from one message to around three messages
4 a day.

5 Q. Now, when you were working for Mr. Epstein between let's
6 say 1994 and 2002, there were a number of other foreign people
7 who came to Mr. Epstein's house; correct?

8 A. Another -- what is it?

9 Q. Foreign people.

10 A. Foreign. Yes. Yes.

11 Q. And there were many people that worked for Mr. Epstein that
12 had accents, do you recall that, different accents?

13 A. Yes, sir, there were Butler -- I mean chefs, friends with
14 English accents, French accents, Italian accents.

15 Q. Lots of different accents?

16 A. Lots of different accents.

17 Q. Okay. And do you remember, for example, any tailor who
18 worked for Mr. Epstein who had a British accent; correct?

19 A. Yes, I remember her very clearly, sir.

20 Q. And she would answer the phone in around 2002 timeframe
21 when you were there at the house; correct?

22 A. I not sure if she came at 2002, sir. I think it was a
23 little later. I'm not sure. I'm not sure if it was 2002.

24 Q. You're not sure, but you know that she came and you know
25 that she would answer the phones at the house; correct?

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Alessi - cross

- 1 A. Yes, sir.
- 2 Q. And she had a British accent; right?
- 3 A. Yes, she was English.
- 4 Q. Do you recall meeting Shelly Lewis?
- 5 A. I recall the name, sir. I don't recall the person.
- 6 Q. Do you recall Ms. Lewis was also a citizen of the United
7 Kingdom?
- 8 A. Could have been.
- 9 Q. And she had a British accent, as well; right?
- 10 A. I don't recall her, sir.
- 11 Q. Do you remember meeting Frances Hardinge?
- 12 A. Yes.
- 13 Q. And she was from --
- 14 A. South Africa.
- 15 Q. South Africa, and had a South African accent; correct?
- 16 A. Yes. She came a couple times.
- 17 Q. And that accent, to some people, can sound like a British
18 accent, as well; right?
- 19 A. It is, but it's different.
- 20 Q. A little bit.
- 21 A. A little bit.
- 22 Q. Do you remember Mandy Ellison from South Africa, also?
- 23 A. Yes, she was a lawyer for Mr. Epstein.
- 24 Q. And she had a South African accent?
- 25 A. Yes, sir.

LC3Cmax3

Alessi - cross

- 1 Q. Do you remember Eva Andersson?
- 2 A. Yes, I do.
- 3 Q. And she was Mr. Epstein's girlfriend; right?
- 4 A. Yes, sir.
- 5 Q. And she stayed friends with Mr. Epstein for many years?
- 6 A. For many years, sir.
- 7 Q. And she came to the house regularly; correct?
- 8 A. Very regular with the husband and the kids.
- 9 Q. Right, Mr. Dubin and the children?
- 10 A. Yes, sir.
- 11 Q. And she had -- she was from Sweden. Do you recall that?
- 12 A. Yes, sir.
- 13 Q. And she had a Swedish accent; right?
- 14 A. Yes, sir.
- 15 Q. Do you remember a woman named Grace who had a British
- 16 accent?
- 17 A. Grace?
- 18 Q. Grace.
- 19 A. No, I don't remember Grace, sir.
- 20 Q. Do you remember a woman from Norway, Selena?
- 21 A. Yes, sir.
- 22 Q. And she had an accent, northern European accent; correct?
- 23 A. Yes, sir.
- 24 Q. And those people would be at the house and when they were
- 25 there, they would talk to people, guests, other people;

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Alessi - cross

1 correct?

2 A. They were guests, sir.

3 Q. Right. And you observed them talking to people; right?

4 A. I would say yes, I observe them, but not in the same room,
5 sir. I was not allowed to be in the same room where
6 Mr. Epstein and their guests were conversating.

7 Q. Mr. Alessi, on behalf of Mr. Epstein, you went looking for
8 people to give massages; correct?

9 A. Never, sir.

10 Q. You drove the car to Mar-a-Lago, to The Breakers?

11 A. I drove Ms. Maxwell to a different massage places.

12 Q. Okay. But you were there; correct?

13 A. I was the driver, sir.

14 Q. And you knew what was happening, that people were looking
15 for professional masseuses; correct?

16 A. They were people looking for professional -- I don't
17 understand your question, sir.

18 Q. Right. The point of being at The Breakers was to find a
19 professional masseuse for Mr. Epstein; correct?

20 A. I imagine so.

21 Q. Okay. Now, that doesn't make you guilty of sex
22 trafficking, does it, Mr. Alessi?

23 MS. COMEY: Objection.

24 THE COURT: Sustained.

25 Q. At Mr. Epstein's direction, you called people and scheduled

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Alessi - cross

1 messages; correct?

2 A. Yes, sir.

3 Q. And at Mr. Epstein's direction, you answered phones at the
4 house; correct?

5 A. It was one of my duties. If he didn't pick up the phone or
6 Ms. Maxwell didn't pick up the phone, it was one of my duties
7 if I was at the house at the moment.

8 Q. Right. So you answered the phones at the house at
9 Mr. Epstein's direction; correct?

10 A. Not all of it.

11 Q. And you would speak to females who you knew were going to
12 give Mr. Epstein massages; right?

13 A. When I would call these girls or these women to ask for a
14 massage at the time they was requested by Mr. Epstein or
15 Ms. Maxwell.

16 Q. Okay. And you would do that?

17 A. Of course.

18 Q. Okay. And you would sometimes arrange for transportation
19 for people to come to the house; correct?

20 A. I did not arrange. They arrange.

21 Q. Well, you would call cabs; right?

22 A. If they asked me to call a cab, I will call a cab.

23 Q. And you would set up the room for a massage; right?

24 A. If they told me in which room they want a massage or which
25 place they want a massage, I will set up the massage table.

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Alessi - cross

1 Q. You would pay the masseuses when they were done; correct?

2 A. Some of them, yes, sir.

3 Q. And the process that you went through for paying the
4 masseuses was, generally, you would pay them by check; is that
5 right?

6 A. Most of the times I would pay them by check. If they
7 request cash, I will go to my petty cash box and find if I had
8 enough. If I had \$100 or \$200, I will pay in cash, otherwise
9 it was a process of making them sign a piece of paper and make
10 a receipt, make the check, send a copy of the check back to the
11 office in New York, and that's how they kept the records.

12 Q. Okay. So the process would be someone would give a massage
13 and sometimes they would come down and say to you, okay, I was
14 there for an hour and you would pay them a check for \$100;
15 right?

16 A. Yes. The massage, when I was working with Mr. Epstein, it
17 was \$100 flat. I didn't have to tip or no tips. It was \$100.
18 And it was on repeat girls that came to the house and they will
19 have -- they didn't want to get paid that night and they -- I
20 just kept -- they kept a record on it for the amount of times
21 they were there. So if it was five massage, it was \$500 check,
22 \$600 check, \$200 checks.

23 Q. Let's just break it down so we're clear. You would either
24 pay them when they were leaving or they could run a tab; right?

25 A. Yes, sir.

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Alessi - cross

1 Q. And so they would come to you and say, I did five massages
2 last week, so I need \$500; right?

3 A. Yes, sir.

4 Q. And then you would write a check for \$500?

5 A. Exactly.

6 Q. And that was the process that you went through through 2002
7 when you worked for Mr. Epstein; is that right?

8 A. Yes, sir.

9 Q. And to your knowledge, you never observed -- first of all,
10 no one forced anyone to come to the house; correct?

11 A. No, they were not forced to come to the house.

12 Q. People came to the house because they wanted to come to the
13 house to give a massage; right?

14 MS. COMEY: Objection.

15 THE COURT: Sustained.

16 Q. No one complained to you about having to come to the house;
17 correct?

18 A. No, sir.

19 Q. And no one came into the house, that you observed, looked
20 afraid or hurt or screaming or anything that would show you
21 that they were in any kind of distress; correct?

22 A. No, sir, never.

23 Q. And during the entire time you were there, people would
24 come, they would give their massage, and then they would get
25 paid and leave, and no one complained to you about anything;

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Alessi - cross

1 correct?

2 A. That's correct.

3 Q. And the entire time that you were there, after people came,
4 gave massages, got paid and left, sometimes you would go clean
5 the room; correct?

6 A. Yes, sir.

7 Q. You never saw any signs that anyone was hurt or injured
8 during any of these massages; correct?

9 A. No, sir.

10 Q. And no one complained to you that they had ever been forced
11 to do anything against their will; correct?

12 A. No, they never did, but I wish they would have done because
13 I would have done something to stop it.

14 Q. But no one did; correct?

15 A. No one did.

16 Q. And you were asked some questions about photographs and
17 Ms. Maxwell taking photographs. Do you recall that?

18 A. Yes, Ms. Maxwell.

19 Q. Ms. Maxwell took a lot of photographs of many different
20 things; is that correct?

21 A. That's correct.

22 Q. And she was very artistic about the kinds of photographs
23 that she took; correct?

24 A. She was a good photographer and she had a fantastic setup
25 for cameras and lenses. I don't know anything about

LC3Cmax3

Alessi - cross

1 photography.

2 Q. But she would take pictures of her dog, for example?

3 A. She took pictures of everything.

4 Q. Everything. And that was a hobby of hers; correct?

5 A. I would say so.

6 Q. It's also true, Mr. Alessi, that during the time you were
7 there, it was your view that, other than Jane, you had no
8 knowledge of anyone at the house being under the age of
9 probably 20; correct?

10 A. I will answer that question, did I find out about those two
11 individuals being underage, Jane and Virginia, after they were
12 in the house for couple days. I don't recall anybody else. I
13 was not -- I was not asked for their age to any individuals
14 that came to the house.

15 Q. Let's break it down a little bit here, Mr. Alessi. There
16 are a number of women that were there that have been described
17 as European women. Do you recall that?

18 A. Yes.

19 Q. And in your view, they were over 20 years old --

20 A. In my view, yes.

21 Q. And you, during your time there, saw maybe between 50 and
22 100 people. So over the 10 years or the 11 years that you were
23 there, there were maybe 50 or 100 people that were hired to
24 give massages. Do you recall that?

25 A. Not all those people were massage therapists.

LC3Cmax3

Alessi - cross

1 Q. That wasn't my question, Mr. Alessi. You recall that
2 during your time there, there would be between about 50 and 100
3 people that were hired to give massages. Do you recall that?

4 A. Sir, I repeat it again, I don't know if they were called to
5 give massages. They were at the house as guests. That's all I
6 know.

7 Q. Okay. Between 50 and 100 people?

8 A. Probably more.

9 Q. And in your view, they all appeared to be over the age of
10 20; correct?

11 A. Yes, sir.

12 Q. In your view, they could have been 18, 19, 20, or 25;
13 right?

14 A. Yes, sir.

15 Q. Isn't it true that when you were working for Mr. Epstein,
16 you didn't have any doubt that the girls that provided him with
17 massages were not of the proper age; correct?

18 A. Can you repeat the question.

19 Q. When you were working for Mr. Epstein, you didn't have any
20 doubt that the girls who provided him with massages were not of
21 proper age; correct?

22 MS. COMEY: Your Honor, I'm going to object to form.

23 THE COURT: Sustained. Can you clarify.

24 MR. PAGLIUCA: I'm trying to be precise with this
25 question for impeachment purposes, your Honor. So I will ask a

LC3Cmax3

Alessi - cross

1 different question.

2 THE COURT: Still has to be clear.

3 MR. PAGLIUCA: Yes. I will ask a different question.

4 BY MR. PAGLIUCA:

5 Q. You believed, when you were working for Mr. Epstein, that
6 the people who provided Mr. Epstein with massages were of age;
7 correct?

8 A. I believe -- I believe so, yes.

9 MR. PAGLIUCA: If I could have a moment, your Honor.

10 THE COURT: You may.

11 Q. One final question, Mr. Alessi. When you were there, you
12 don't recall meeting anyone named Carolyn; correct?

13 A. Karen?

14 Q. Carolyn.

15 A. Carolyn. Probably.

16 Q. You do or you don't?

17 A. Sir, I saw hundreds of guests at the house. I don't recall
18 their name.

19 MR. PAGLIUCA: Thank you. No other questions, your
20 Honor.

21 MS. COMEY: No redirect, your Honor.

22 THE COURT: Okay. Mr. Alessi, you may step down. You
23 are excused. Thank you. You're finished, yes.

24 THE WITNESS: Thank you.

25 THE COURT: Government may call its next witness.