

# **EXHIBIT E**

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

CASE NO. 15-CV-07433-RWS

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VIRGINIA L. GIUFFRE,

Plaintiff,

v.

GHISLAINE MAXWELL,

Defendant.

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June 1, 2016  
9:12 a.m.

C O N F I D E N T I A L

Deposition of JOHN ALESSI, pursuant to notice, taken by Plaintiff, at the offices of Boies Schiller & Flexner, 401 Las Olas Boulevard, Fort Lauderdale, Florida, before Kelli Ann Willis, a Registered Professional Reporter, Certified Realtime Reporter and Notary Public within and for the State of Florida.

1 JOHN ALESSI

2 at 358 El Brillo Way; is that correct?

3 A. Yes.

4 Q. Now, when counsel for the Plaintiff was  
5 asking you questions, he kept referring to females  
6 as girls, okay?

7 A. Yes.

8 Q. So is it fair to say that other than [REDACTED]  
9 [REDACTED], you understood at the time that any of the  
10 massage therapists that were being -- giving  
11 massages at 358 El Brillo Way were over the age of  
12 18; is that correct?

13 MR. EDWARDS: Objection, argumentative,  
14 counsel testifying.

15 THE WITNESS: Most of them.

16 BY MR. PAGLIUSCA:

17 Q. Okay. And you talked a little bit about  
18 paying for massages. Now, as I understand it,  
19 people who were getting massages at 358 El Brillo  
20 Way were paid \$100 per massage; is that right?

21 A. That was -- everybody got \$100 an hour.

22 Q. Okay. And you never paid more than \$100  
23 to anyone who gave a massage, correct?

24 A. Not for one, but I paid more if they were  
25 four massages; I would pay \$400, \$500.

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2 his equipment for yoga and exercising there. They  
3 have a treadmill, exercise equipment. They have a  
4 bathroom. And there was the pool.

5 And behind the pool was the lake, the  
6 Intracoastal lake, and we had a boat, a couple -- we  
7 had -- at one time we had those jet -- jet flows.

8 Q. Jet skis?

9 A. Jet skis. We had a couple of those. And  
10 that was it.

11 Q. Was the pool private?

12 A. Very much, yeah. It was no access to the  
13 street. There was no access -- no view from any  
14 neighbors or anything like that.

15 Q. Okay. You were asked some questions by  
16 Mr. Edwards about [REDACTED]; is that right?

17 A. Yes.

18 Q. To your knowledge, she was the only person  
19 at El Brillo that was under the age of 18?

20 A. To my knowledge, yes.

21 Q. Okay. And you recall seeing her with her  
22 mother at the house, correct?

23 A. The first couple of times, after, she came  
24 with her mother.

25 Q. And you don't ever recall her spending the

1 JOHN ALESSI

2 person; I recommend her to you?

3 A. Yes, he would give to me the number.

4 Q. And most of the people, I take it, were  
5 from these spas or clubs; is that right? Most of  
6 the massage people?

7 A. Yes.

8 Q. And do you know, did they have what I'll  
9 call regular day jobs at the spas, and then they  
10 would come into Mr. Epstein's after?

11 MR. EDWARDS: Objection, speculation.

12 THE WITNESS: I think so.

13 BY MR. PAGLIUSCA:

14 Q. Okay. And why do you think so?

15 A. Because they were working at the Breakers,  
16 and sometimes I have to get in touch with these  
17 people. I used to call -- have to call the Breakers  
18 or the Mar-a-Lago or the -- all the clubs. There be  
19 clubs, even in Boca Raton, the Boca Raton Resort and  
20 Hotel. They have a great spa. I had to call these  
21 people, Can you come in at 10:00 tonight?

22 Q. You would know they were working there  
23 because you would talk to them there?

24 A. Yes.

25 Q. I'm going to have you take a look at