

IN THE CIRCUIT COURT OF THE FIFTEENTH JUDICIAL CIRCUIT
IN AND FOR PALM BEACH COUNTY, FLORIDA
CASE NO. 502008CA028051XXXXMB AD



Plaintiff,

-vs-

JEFFREY EPSTEIN,

Defendant.

DEPOSITION OF LARRY VISOSKI

Thursday, October 15, 2009
10:18 - 3:37 p.m.

515 N. Flagler Drive
Suite P200
West Palm Beach, Florida 33401

Reported By:
Wendy Beath Anderson, RPR, CRR, FPR
Notary Public, State of Florida
Esquire Deposition Services
West Palm Beach Office Job #127542

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8 On behalf of the Defendant:

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12 West Palm Beach, Florida 33401

13 On behalf of the Witness:

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17 West Palm Beach, Florida 33401

18 ALSO PRESENT:

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I N D E X
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WITNESS:	DIRECT	CROSS	REDIRECT	REXCROSS
LARRY VISOSKI				
BY MR. EDWARDS:	6			
BY MR. CRITTON:		214		
BY MR. EDWARDS:			220	
BY MR. CRITTON:				221

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SUBJECT TO PROTECTIVE ORDER PARAGRAPHS 7, 8, 9, 10, 15, and 17

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P R O C E E D I N G S

- - -

Deposition taken before Wendy Beath Anderson,
Certified Realtime Reporter and Notary Public in and for
the State of Florida at Large, in the above cause.

- - -

MR. EDWARDS: We're going to put something on
the record about -- well, we'll do it this way --

MR. REINHART: Do it at the end, after we get
him -- whatever you want. It's your show.

MR. EDWARDS: Okay. There were -- I don't
even think Mr. Willits is aware of this. There was
a subpoena duces tecum for this witness, as well as
the previous witness, which was another pilot, Dave
Rogers, and that duces tecum was to bring the
flight logs related from 1998 through 2005. What
was produced at the previous deposition were flight
logs from 2002 through 2005, and now Mr. Reinhart
has agreed to produce the remainder of the flight
logs requested, those going from 1998 through 2002.

MR. REINHART: Correct. They're pilot logs,
not flight logs. There are other records we
indicated are corporate records, and with those you
have to deal with Mr. Critton.

MR. CRITTON: However, with the proviso, too,

1 that we're going to work out that these records are
2 to be used within the confines of this litigation
3 and not to be spread to the press or anyone else,
4 because they do contain confidential information as
5 to who may have been on the plane and other records
6 of Mr. Rogers, which but for the subpoena would
7 have been only available to the FAA or some other
8 law enforcement agencies.

9 MR. EDWARDS: Okay. Is that all you want to
10 put on?

11 MR. CRITTON: Yes.

12 MR. EDWARDS: I'm not saying I necessarily
13 agree or disagree with you. That's something that
14 we'll deal with some other day.

15 MR. CRITTON: Bruce, you'd better produce
16 these records, but there has to be some sort of
17 understanding before --

18 MR. REINHART: Correct.

19 MR. EDWARDS: I won't do anything until you
20 file whatever you -- until we work whatever it is
21 out in court. I'll say that on the record, that
22 I'm not doing anything with the records outside of
23 my office until some judge deals with it.

24 MR. REINHART: And for the record, I'll adopt
25 what Mr. Critton said on this one limited occasion.

1 MR. EDWARDS: All right.

2 Thereupon,

3 (LARRY VISOSKI)

4 having been first duly sworn or affirmed, was examined
5 and testified as follows:

6 THE WITNESS: Yes, I do.

7 DIRECT EXAMINATION

8 BY MR. EDWARDS:

9 Q. Can you tell us your name for the record.

10 A. Lawrence Visoski, Jr.

11 Q. And Mr. Visoski, have you ever had your
12 deposition taken before?

13 A. No.

14 Q. Okay. Here's the process: I'm going to ask
15 you questions. You're going to give us answers. Try to
16 give us answers that we all understand and that the
17 court reporter can take down, such as yes, no, or some
18 other verbal answer that we can understand. It's easy
19 when we get in a casual conversation to nod or shake
20 your head, and the court reporter is not writing
21 pictures or anything else.

22 A. I understand.

23 Q. The other thing is, and I've been accused of
24 this in other depositions -- I don't know if it's true
25 or not -- but I need to wait until you finish answering

1 the question and you need to wait until I finish asking
2 the question.

3 A. So you're not allowed to interrupt me?

4 Q. And you're not allowed to interrupt me.

5 A. Like I just did?

6 Q. Right.

7 MR. CRITTON: Cara just snickered when you
8 said you've been accused because she recognizes
9 it's true.

10 MR. EDWARDS: I don't know what the meaning of
11 her snickering was.

12 BY MR. EDWARDS:

13 Q. But for what it's worth, if you don't
14 understand the question or I've asked a bad question, I
15 don't want you to guess. Give me the best answer to the
16 best of your knowledge and if you need me to rephrase
17 it, I will.

18 A. Okay.

19 Q. Okay. Tell me your current address.

20 A. [REDACTED]
[REDACTED]

22 Q. How long have you lived there?

23 A. Approximately nine years.

24 Q. Okay. Who do you live there with?

25 A. [REDACTED].

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Q. [REDACTED]

A. [REDACTED]

Q. [REDACTED]

A. [REDACTED]

Q. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Q. Who's your employer right now?

A. NES, LLC.

Q. How long has NES, LLC been your employer?

A. I'm guessing. I'd say back 1991. I have to do the math, but 17, 18 years.

Q. Has that been your only employer since 1991?

A. Yes.

Q. And has that been your only source of income since 1991?

A. Yes.

Q. And what is NES, LLC?

A. I don't really know. I mean, it's the company that my check comes from.

Q. What do you do for NES, LLC that results in them paying you?

A. I am chief pilot for the aircraft and

SUBJECT TO PROTECTIVE ORDER PARAGRAPHS 7, 8, 9, 10, 15, and 17

1 helicopters.

2 Q. And do you have a specific boss or somebody
3 you answer to at NES, LLC?

4 A. Several people would call to schedule flights
5 from the office, being it either Mr. Epstein or, you
6 know, I would just get a phone call and they would
7 schedule a trip.

8 Q. Okay. Aside from Mr. Epstein, who else would
9 there be that would call to schedule flights?

10 A. Leslie.

11 Q. Leslie who?

12 A. Leslie Gruff.

13 Q. When's the last time you talked to Leslie
14 Gruff?

15 A. Probably two weeks ago, three weeks ago.

16 Q. And where is she currently?

17 A. I believe in New York, is where I spoke to her
18 on the phone last.

19 Q. What's the telephone number you call to reach
20 Leslie Gruff?

21 A. (██████████).

22 Q. And what address is Leslie Gruff at?

23 A. Do you mean where the office is located?

24 Q. Correct.

25 A. (██████████████████████).

1 Q. And it's my understanding from other
2 depositions that there are also apartments in that [REDACTED]
3 [REDACTED] building?

4 A. Yes.

5 Q. And Mr. Epstein either owns or leases or rents
6 certain of those apartments. Is that your
7 understanding?

8 MR. CRITTON: Form; speculation.

9 THE WITNESS: I'm only speculating. I
10 don't -- to my understanding, I don't know.

11 BY MR. EDWARDS:

12 Q. Do you know other people that live in that
13 building?

14 A. Well, it would be myself, Dave Rogers -- well,
15 when you say "live," explain.

16 Q. When you're saying yourself and Dave Rogers --

17 A. See, we don't live there. I mean, we have --
18 we would stay there when we would have a trip.

19 Q. Okay. When you would fly up to New York and
20 land in New York, the place where you would stay, is
21 that [REDACTED]?

22 A. Yes, that's correct.

23 Q. That's also a location you've indicated in
24 this deposition that is the office for NES, LLC?

25 A. Yes.

1 Q. What floor or suite number is NES, LLC in?

2 A. I believe -- well, I don't know that NES, LLC
3 has an office there. I know that's where Leslie has the
4 phone number where I call. So I don't know for a fact
5 if NES, LLC has an office there.

6 Q. And what suite number, then, would Leslie
7 Gruff sit in to answer that telephone number at
8 [REDACTED]?

9 A. I think it's [REDACTED].

10 Q. And when you stay at [REDACTED],
11 what suite number or what apartment number do you stay
12 in?

13 A. [REDACTED].

14 Q. And how about Dave Rogers, where does he stay?

15 A. I'm guessing, because it's been some time
16 since we've been there, 10B, but don't quote me on it.

17 Q. Who are the other people in that building that
18 you know to stay there on a regular -- fairly regular
19 basis?

20 A. I've seen people in the elevator that, you
21 know, have been on the airplane. Case in point, maybe
22 [REDACTED], but I don't know for a fact that she lives
23 there, or anybody else for that matter.

24 Q. Okay. When you say you've seen [REDACTED]
25 on the elevator --

1 A. I only assume she lives there. I don't know
2 for a fact. I'm trying to be honest and factual for
3 you. So I couldn't honestly say if I knew she lived
4 there or not.

5 Q. Where do you think [REDACTED] lives?

6 A. I would think she lives there.

7 Q. You don't have a better location?

8 A. I don't have another location.

9 Q. Anybody else?

10 A. Not to my knowledge. I mean, I'd only be
11 guessing that people live in that building that -- you
12 know, I don't have any facts to prove that they actually
13 live there. I mean, I don't think you want me to guess.

14 Q. Well, NES, LLC, would you say that the owner
15 or controller of that company is Jeffrey Epstein?

16 MR. CRITTON: Form.

17 THE WITNESS: I don't know that for a fact.

18 BY MR. EDWARDS:

19 Q. Jeffrey Epstein is somebody you've indicated
20 that you've worked for for 17 or 18 years, right?

21 A. Yes.

22 Q. And over the 17 or 18 years you've become
23 personally close with him as well, correct?

24 MR. CRITTON: Form.

25 THE WITNESS: I don't understand how you mean

1 "close." Define that.

2 BY MR. EDWARDS:

3 Q. Well, more so than just a pilot that takes him
4 from Point A to Point B?

5 A. That is my job.

6 Q. Right. But you know him on a personal level
7 and that you've had personal conversations that don't
8 necessarily deal with flying from Point A to Point B;
9 isn't that right?

10 MR. CRITTON: Form.

11 THE WITNESS: More specific, meaning we talk
12 about cars. I mean, does that make you a personal
13 friends?

14 BY MR. EDWARDS:

15 Q. Have you ever gone to his house to eat?

16 A. No.

17 Q. Have you been to his New York home?

18 A. Yes.

19 Q. How many occasions have you been to his New
20 York home?

21 MR. CRITTON: Object to form.

22 THE WITNESS: We normally pick up luggage in
23 the lobby, so it would probably be quite often.
24 Any time we depart out of New York, we stop by the
25 house and pick up luggage and head to the aircraft.

1 BY MR. EDWARDS:

2 Q. Other than picking up luggage, have you been
3 to his home to visit or socialize with him?

4 A. Not to socialize, no.

5 Q. Have you been to his Palm Beach home?

6 A. To?

7 Q. To Mr. Epstein's Palm Beach house?

8 A. Right.

9 Q. Have you been there?

10 A. Yes.

11 Q. Have you been inside?

12 A. Yes.

13 Q. And how many occasions have you been inside
14 that home?

15 A. The same, as far as picking up luggage, and
16 that would be on a regular basis, you know, for a
17 departure. We wouldn't always go to the house to pick
18 up luggage, but it made it easier for loading the
19 aircraft, getting it done prior to departure.

20 Q. Is that the only reason that you have ever
21 gone to the Palm Beach home over the last 18 years, is
22 to pick up luggage?

23 A. No.

24 Q. What other reasons have you gone there?

25 A. I've set up several home theater equipments,

1 you know, televisions and such.

2 Q. Is that another hobby or job or something of
3 yours?

4 A. Both.

5 Q. Does he pay you for that?

6 A. Not any more than my salary.

7 Q. What's your current salary?

8 A. At this time, 180,000.

9 Q. And what are you paid \$180,000 to do?

10 A. To manage his aircraft.

11 Q. What does that entail?

12 A. Scheduling maintenance. Anything that has to
13 do with any flight, whether it be weather, flight
14 planning, time and distance to and from a location, any
15 logistics involved in running an operation that has
16 aircraft.

17 Q. In addition to the 180,000, does he give you
18 bonuses as well?

19 A. There have been Christmas bonuses.

20 Q. Over the years, you mean, there have been
21 Christmas bonuses?

22 A. Yes.

23 Q. Is 180,000 the most he's ever paid you?

24 A. No.

25 Q. All right. Were you making -- when was the

1 last time that you were making an amount different than
2 180,000?

3 A. Last year.

4 Q. That would be 2008?

5 A. That would be correct. Yeah, we all took a
6 salary cut, I don't know the exact date. It might have
7 been 2008, last year. It was last Christmas we all took
8 a 10 percent salary cut.

9 Q. Do you know why?

10 A. Economic reasons.

11 Q. And who told you that you were going to have
12 to take the salary cut?

13 A. Darren Indyke.

14 Q. And did you ask for an explanation?

15 A. He explained it was due to economic reasons
16 throughout the country.

17 Q. Okay. So in 2008, how much was -- were you
18 being paid by NES, LLC?

19 A. 200,000.

20 Q. And is 200,000 the most that you've ever made
21 from NES, LLC?

22 A. Yes, sir.

23 Q. And on top of that \$200,000, did you get a
24 bonus that year as well?

25 MR. REINHART: Which year are you talking

1 about?

2 MR. EDWARDS: 2008.

3 THE WITNESS: That year, I think we skipped
4 Christmas bonuses that year. The last bonus might
5 have been 2007.

6 BY MR. EDWARDS:

7 Q. If you ever got a bonus from Mr. Epstein --
8 and I'm only deriving this from you using the term
9 "Christmas bonus."

10 A. Holiday bonus.

11 Q. -- am I correct to assume -- sorry. Am I
12 correct to assume that if you got a bonus, there was
13 only one and it was at the end of the year, around the
14 holidays?

15 A. Yes.

16 Q. Okay. And how much was the 2007 holiday
17 bonus?

18 A. I'd have to ask my wife, to be honest. I
19 haven't seen my paycheck in 27 years, so I believe it
20 was \$10,000.

21 Q. And in 2007 you also made \$200,000?

22 A. Yes.

23 Q. Okay.

24 A. With a question mark. I'm trying to be as
25 accurate as I can, but yes.

1 Q. Something pretty close to that?

2 A. Yes, sir.

3 Q. Okay. So with the bonus it was 210,000,
4 roughly?

5 A. Right.

6 Q. Okay. And how long were you making that
7 salary?

8 A. Probably -- he was very religious about giving
9 annual increases, so I would probably say 2006, you
10 know, it was -- we would get increment -- increases of
11 five or \$10,000 each year. So I would say 2006. So it
12 graduated, you know, progressive.

13 Q. Okay. Do you remember the progression if we
14 start at 1991? Do you remember roughly what the
15 progression was up through 2007/2008, when you were
16 making \$200,000?

17 A. No, I wouldn't know the progression.

18 Q. Okay. Do you remember what you were making
19 from -- and was NES, LLC the company paying you back in
20 1991?

21 A. I don't know. I don't remember. Let me say
22 it that way. I don't remember.

23 Q. Okay. When -- how long do you remember NES,
24 LLC being the payer of your check?

25 A. Personally, two years, because I've never seen

1 my paycheck. So I don't even know what's written on the
2 top of it.

3 Q. That would be something that only your wife
4 would see, I'm assuming?

5 A. You're right, since she probably wouldn't know
6 the answer either, because she's looking at the right
7 column and not the top column.

8 Q. Right. When is the first time that you had
9 heard the name NES, LLC, that company?

10 A. Five, six years, and even questioned what it
11 stood for. And I think to this day I couldn't answer
12 that honestly, what it stands for.

13 Q. Okay. But it's your understanding that the
14 NES, LLC is paying you for the work that you do as a
15 pilot or maintain the planes for Jeffrey Epstein?

16 A. To my understanding, yes.

17 Q. And back in 1991, do you know if it was a
18 different company that was paying you or if it was
19 Jeffrey Epstein directly paying you?

20 A. I don't remember. I mean, I don't.

21 Q. Okay. Throughout your career with -- as a
22 pilot for Jeffrey Epstein, since 1991, has there ever
23 been a time when you believe you were paid directly from
24 Jeffrey Epstein personally versus some company?

25 A. Not to my knowledge, no.

1 Q. Okay. So whether it was NES, LLC or some
2 other company, it was all of a sudden a company name, to
3 the best of your knowledge?

4 A. Exactly, yes.

5 Q. And back in 1991, do you remember
6 approximately how much you were being paid that year?

7 A. Fifty-five or 60,000, is maybe what I started.

8 Q. Okay.

9 A. You're going back a long ways.

10 Q. Yes.

11 A. I'm trying.

12 Q. Your relationship goes back that far. That's
13 why I chose that year.

14 A. Right.

15 Q. Okay. Did you get bonuses even back that far?

16 A. Yes, sir.

17 Q. And do you remember what your bonuses were
18 approximately?

19 A. 5,000. I mean, that was kind of the -- the
20 starting point.

21 Q. Okay. In addition to monetary bonuses, were
22 there ever gifts or any other type of compensation that
23 NES, LLC or Jeffrey Epstein provided you?

24 A. Yes.

25 Q. And is that over the span of the 18 years?

1 A. Yes.

2 Q. Okay. Tell me what some of those items are.

3 A. I remember one specifically was a pool heater.

4 Q. Excuse me?

5 A. A pool heater.

6 Q. When was that?

7 A. 1995-ish.

8 Q. Okay. Why did you get that?

9 A. I had built a pool and I didn't have a heater
10 and he kind of laughed at me saying, "How can you have a
11 pool without a heater?" So he says, "You ought to get a
12 heater."

13 Q. Where were you when you had that conversation?

14 A. In the airplane.

15 Q. How did he know that you had built a pool?

16 A. Just in general conversation.

17 Q. You were having a conversation with Jeffrey
18 Epstein?

19 A. Yes.

20 Q. And this is something that was happening on
21 the airplane, this conversation?

22 A. During the flight. Yeah, it would have been
23 like on cruise or something.

24 Q. Okay. When you say "during the flight," does
25 that --

1 A. Again, you're going back a long ways.
2 Q. I understand. We're talking about 1995 right
3 now.
4 A. Yes.
5 Q. You're having a conversation with Jeffrey
6 Epstein. Who is flying the airplane?
7 A. The auto pilot and there's two crew.
8 Q. Okay. So are you back in the back portion or
9 is he up in the cockpit?
10 A. Up in the cockpit.
11 Q. Okay. Jeffrey Epstein sometimes comes up
12 there?
13 A. Just, yeah, in between the two pilot seats.
14 Q. All right. Is that something that was
15 typical, to have conversations like that?
16 A. Mm-hmm.
17 Q. Yes?
18 A. Yes. No nodding.
19 Q. And would those conversations be directed
20 mainly with you or with the other pilots as well?
21 A. Mainly with me.
22 Q. I mean, you've kind of been described as the
23 main guy or the main pilot. Wouldn't you consider that
24 pretty much your role, right?
25 A. Well, that's chief pilot.

1 Q. But more so than that, if there's going to be
2 a casual conversation about a pool or a pool heater or
3 whatever, it's going to be with you most likely if he's
4 going to be talking to pilots, right?

5 MR. CRITTON: Form.

6 THE WITNESS: Right.

7 BY MR. EDWARDS:

8 Q. Okay. And you feel like over the years your
9 relationship with Jeffrey Epstein has been pretty good?

10 A. Yes.

11 Q. And you have been closer to him over the years
12 as you've grown to know him?

13 MR. CRITTON: Form.

14 THE WITNESS: The same throughout the same
15 year. We never got any closer than 1991 than I am
16 with him now. I'm very professional at what I do
17 and know the line between being professional and
18 thinking you're somebody's buddy.

19 BY MR. EDWARDS:

20 Q. Okay. So that's not something that you think
21 you are? You don't think you're his buddy?

22 A. No, sir.

23 Q. Do you consider yourself his friend?

24 A. I believe so.

25 Q. Do you think he considers you his friend?

1 A. I think so.

2 Q. All right. What makes you think that?

3 MR. CRITTON: Speculation.

4 THE WITNESS: He's always been kind and
5 respectful.

6 BY MR. EDWARDS:

7 Q. Ever invited you to dinner?

8 A. No, sir.

9 Q. Have you ever associated or socialized with
10 him during the day at any of his homes?

11 A. Only during a business reason.

12 Q. Okay. What are the other -- are the places
13 that you believe that Mr. Epstein owns? I know we've
14 talked about this Manhattan -- the Manhattan house.
15 I've read the articles about it, the Palm Beach mansion.
16 But what other places are you familiar with that
17 Mr. Epstein owns?

18 MR. CRITTON: Form; predicate, speculation.

19 THE WITNESS: To answer it honestly, I don't
20 know specifically that he owns any of the
21 residences, to be honest. I would only assume that
22 he owns. So if you want me to answer honestly, I
23 don't know that he owns any of the other.

24 BY MR. EDWARDS:

25 Q. Okay. Well, what would be the basis for your

1 assumption that he owns the home in Palm Beach?

2 A. He goes there, but I don't assume -- you don't
3 have to own a house to go to it.

4 Q. And not only does he go there, you're aware
5 that he spends the night there; he resides there
6 sometimes, correct?

7 A. Yes.

8 Q. When he's in Palm Beach, that's where he --

9 A. He sleeps.

10 Q. -- sleeps? Right. When he's in New York, do
11 you know where he sleeps?

12 A. No.

13 Q. But you've been to a particular house in New
14 York that's a very large house that we've all read about
15 that you picked up luggage at, right?

16 A. Yes, sir.

17 MR. CRITTON: Form.

18 BY MR. EDWARDS:

19 Q. And that home, do you know that -- I know that
20 you're saying that you haven't done a public record
21 search to make sure that Jeffrey Epstein owns it.

22 A. Yeah.

23 Q. But you assume that he does?

24 A. Assuming.

25 Q. That's where he sleeps when he's in New York?

1 MR. CRITTON: Form.

2 THE WITNESS: I assume.

3 BY MR. EDWARDS:

4 Q. That's where his luggage is when you pick it
5 up?

6 A. Doesn't mean he owns it.

7 Q. Right. But that's where it is?

8 A. Yes, sir.

9 Q. Do you know of anybody else who owns that home
10 in New York?

11 A. No.

12 Q. Okay. Have you been to his ranch in New
13 Mexico?

14 A. Yes.

15 MR. CRITTON: Form.

16 BY MR. EDWARDS:

17 Q. How many times have you been to his ranch in
18 New Mexico?

19 MR. CRITTON: Form; predicate.

20 THE WITNESS: A guesstimate, fifty times, only
21 due to the fact that we would fly there.

22 BY MR. EDWARDS:

23 Q. And where would you land?

24 A. Depending upon the aircraft, either
25 Albuquerque or Santa Fe.

1 Q. Are those private airports?

2 A. Public.

3 Q. Public, okay. Are there any private landing
4 places where you would land any airplanes in New Mexico?

5 A. There are.

6 Q. That you have landed --

7 A. That I have.

8 Q. -- his airplane?

9 A. Yes.

10 Q. Where?

11 A. We have a 4500-foot strip on the ranch.

12 Q. When you say "we," yourself and somebody?

13 A. The company.

14 Q. What company?

15 A. Well, I should say -- I see where you're going
16 with that. The ranch owns -- whoever owns the ranch.
17 The ranch has a runway on it.

18 Q. Okay. And you've landed an airplane on that
19 runway?

20 A. That ranch, yes.

21 Q. How many times do you think you've landed
22 there?

23 A. Ten.

24 Q. All right. And have you been inside his
25 ranch?

1 A. Yes.

2 MR. CRITTON: Form to the last question.

3 MR. REINHART: Can you clarify, the physical
4 ranch or the residences or the structures on the
5 ranch?

6 MR. EDWARDS: I don't have a good visual
7 appreciation for it.

8 BY MR. EDWARDS:

9 Q. Why don't you describe it in your words what
10 this ranch that we are talking about looks like. And
11 I've heard it referred to as the Zorro Ranch. Have you
12 heard that?

13 A. I've heard that.

14 Q. That's the ranch we're all familiar with,
15 we're talking about where the runway is and everything
16 else?

17 A. Yes.

18 Q. Describe it in your own words, the landscaping
19 of this ranch. What do we have on it?

20 A. There is a house up on the hill, a large
21 house.

22 Q. How big?

23 A. Big. I've read 40,000 square feet in the
24 paper.

25 Q. Have you been to it?

1 A. Yes.

2 Q. Does that seem like it's feasible,
3 approximately 40,000 --

4 A. I think so, yes.

5 Q. What else do we have on it?

6 A. There is a compound that has kind of motel
7 room type -- they call it bunkhouse.

8 Q. Where's the bunkhouse located?

9 A. At the entrance to the ranch.

10 Q. Okay. And what is that primarily used for?

11 A. For the people that work on the ranch, they
12 reside there. It's also a place where anybody that
13 traveled on the airplane would stay. It's kind of like,
14 you know, a hotel room.

15 Q. And how far is that from the first house that
16 you described, the 40,000 square foot house?

17 A. It's probably 4 miles.

18 Q. Okay. So the Zorro Ranch is a rather large
19 area of property?

20 A. Yes.

21 Q. And how many times -- I know we just talked
22 about how many times you've been in the house, but how
23 many times have you been on that ranch in New Mexico,
24 the Zorro Ranch?

25 A. Thirty to fifty times over the years. That's

1 a guesstimate.

2 Q. Is that over -- when was the first time that
3 you went to that ranch?

4 A. A guess, I don't know when it was, actually,
5 our first trip, but 1995/'94.

6 Q. Okay. And do you believe Jeffrey Epstein
7 and/or a corporation owned or controlled by him to be
8 the sole owner of that ranch?

9 A. I don't know any of those details.

10 Q. Have you ever talked to Jeffrey Epstein about
11 who owns that ranch?

12 A. No.

13 Q. Do you know of anybody else who may own that
14 ranch?

15 A. Not to my knowledge.

16 Q. Other than Jeffrey Epstein, do you know of
17 anybody else who regularly stays there when they're in
18 New Mexico?

19 A. Not to my knowledge.

20 Q. Does Jeffrey Epstein stay there when you're in
21 New Mexico?

22 A. He has.

23 Q. And he has a key to the place?

24 A. I don't know if there's a key.

25 Q. One way or another, he gets in, right?

1 A. Yes, sir.

2 Q. And he sleeps there?

3 A. Yes.

4 Q. Okay.

5 A. I assume he does.

6 Q. You assume he sleeps?

7 A. I do. I think.

8 Q. Okay.

9 MR. CRITTON: This is really --

10 BY MR. EDWARDS:

11 Q. Other than the pool heater in 1995, have you
12 ever received any other gifts on top of the compensation
13 from Mr. Epstein?

14 A. I did get land on the ranch to build a house.

15 Q. What do you mean you got land on the ranch?

16 A. He deeded me land to build a home.

17 Q. When was that?

18 A. Ten years ago at least.

19 Q. Do you know if he's ever deeded anyone else in
20 this world land on the ranch to build a home?

21 A. Not to my knowledge.

22 Q. Why did he do that?

23 A. We would vacation out there and my wife fell
24 in love with New Mexico and we were looking for
25 property.

1 Q. And did you talk to him about that?

2 A. Yes. He knew I -- he was aware I was looking
3 for a home and he says, "Well, I have so much land, I
4 could give you a spot to build a home on." So I built a
5 house.

6 Q. So how long has a home actually been on that
7 property?

8 A. Nine years.

9 Q. And that's a home that you own?

10 A. Yes, sir.

11 Q. And that's a home that was -- when I say "you
12 own it," is there a mortgage on it or did he give it to
13 you free and clear?

14 A. No, no, I paid for the house. I made payments
15 on it.

16 Q. All right. So what did he actually give you?

17 A. 40-acres of land.

18 Q. That you did not have to pay for?

19 A. You know, I'd have to go back and look. I
20 think it was -- I had to pay something for it. I don't
21 remember.

22 Q. How often have you visited that piece -- that
23 home that you own?

24 A. My wife would spend summers out there with the
25 kids.

1 Q. Okay. But that's on the Zorro Ranch?

2 A. Yes.

3 Q. So in addition to the 50 or so times you've
4 been to the Zorro Ranch, you've been to your property
5 that's on the Zorro Ranch?

6 A. Yes, which over the years, it's once-a-year
7 visits. So I mean, it is included in the 50 times that
8 I've been there.

9 Q. Okay. And did you have a conversation with
10 him that led to him giving you or gifting you 40-acres
11 of land?

12 A. We talked about it because he knew I was
13 looking for a home out there.

14 Q. Okay. In gifting you that land, did you
15 consider yourself at that point in time to be more than
16 just his pilot, as more of a friend?

17 A. No. You're using the word "gifting." I paid
18 for the land. I don't recall what it was. But you use
19 the word "friend." I don't know that a -- sure, he was
20 a friend. I mean...

21 Q. Well, did he give Dave Rogers any land out on
22 the New Mexico ranch?

23 A. No.

24 Q. Okay. When you say you paid for it, I thought
25 that I asked that question, "Did you pay for the

1 40-acres?" I thought your answer was, "I don't know,
2 I'd have to go back and look."

3 Are you saying now that you did pay for that
4 land?

5 A. I don't remember. If there was a sum of
6 money, it was just for, you know, the legal purpose of a
7 transfer of ownership of the land.

8 Q. Okay. If it was a substantial amount of
9 money, that's something that you would have remembered?

10 A. Oh, exactly. No, it was not a substantial
11 amount.

12 Q. Okay. Do you remember approximately how much
13 money you had to give Jeffrey Epstein for that land?

14 A. I would only be guessing. It might have been
15 five dollars. To my knowledge, I don't remember.

16 Q. Okay. So when I'm saying he gave you the
17 land, he may have actually given you the land?

18 A. Sure.

19 Q. Okay. And to the best of your knowledge, he's
20 never given anyone else land out there?

21 A. Not to my knowledge.

22 MR. CRITTON: Form.

23 BY MR. EDWARDS:

24 Q. All right. How big is this house that you
25 built on the ranch?

1 A. 1800 square feet.

2 Q. Were you ever at that house at the same time
3 when he's at his house that's on that Zorro Ranch?

4 A. Yes.

5 Q. All right. We started back in 1991 with you
6 making around \$55,000 a year and that has progressed
7 over time to a point where in 2007 you were making
8 \$200,000 a year. I don't want to go through every
9 single year; that would take a really long time. But
10 the progression, was that on a yearly basis normally or
11 after two years or three years?

12 A. Yearly basis.

13 Q. Okay. And would that normally be in
14 increments of?

15 A. \$5,000.

16 Q. Okay. You've talked about a couple other
17 gifts that have been given to you from Jeffrey Epstein
18 over the years; one is a pool heater in 1995 and now
19 some 40 acres of land on his New Mexico ranch. Any
20 other gifts you can think about?

21 A. No other gifts.

22 Q. Okay. I don't want to split hairs with you.
23 You obviously thought about that answer before giving
24 it. What other items are you thinking about that he's
25 given to you or cut you a discount on or otherwise that

1 you feel was compensation for you working for him?

2 A. I drive a company car. I mean...

3 Q. Okay. What kind of car?

4 A. A Hummer.

5 Q. You say "a company car." That's owned by NES,
6 LLC?

7 A. No, I think the registration has Zorro
8 Development on it.

9 Q. What is Zorro Development?

10 A. I believe that's the ranch, or at least it has
11 the name of the ranch. I don't know what the entity is.

12 Q. And it's your understanding that that's a
13 company vehicle?

14 A. Yes.

15 Q. And where is that vehicle primarily garaged?

16 A. At my home.

17 Q. In [REDACTED] or in the Zorro Ranch?

18 A. No, here in [REDACTED].

19 Q. All right. And is there only one company
20 vehicle that you're issued?

21 A. Yes, sir.

22 Q. And is that something that was -- that you did
23 not have to pay for?

24 A. No, it's just something I drive. I mean, it's
25 not titled to me or anything like that. It's just a car

1 that I drive.

2 Q. All right. You've worked for him for 18
3 years. I don't even know how long the Hummer would
4 last, but presumably, that's not the car you've had over
5 the entire 18 years. Have you always had a company car?

6 A. No, I haven't, no.

7 Q. When did you get the Hummer?

8 A. Probably three years ago.

9 Q. Do any other members of Mr. Epstein's piloting
10 team have company cars?

11 A. No.

12 Q. Only you?

13 A. Yes.

14 Q. And do you know how that decision was made to
15 get you a company vehicle?

16 A. No.

17 Q. What do you use that vehicle for?

18 A. To and from the airport.

19 Q. All right. Do you use it for personal reasons
20 also?

21 A. I guess, yes.

22 Q. I mean, that's your primary vehicle?

23 A. Yes, or I drive my wife's car.

24 Q. Which is?

25 A. Type of car?

1 Q. Yes.

2 A. A Mercedes.

3 Q. And is that something that was also a gift
4 from Mr. Epstein?

5 A. No, sir.

6 Q. What type of Mercedes is that?

7 A. A ML 430, ten years old.

8 Q. All right. Are there any other items --
9 company car, the land in New Mexico, the pool heater --
10 any other items that Mr. Epstein has given you over time
11 as compensation or reward or anything else?

12 A. No, sir.

13 Q. And your only income is from Mr. Epstein or
14 his companies?

15 A. Correct.

16 Q. Okay. And it's been that way since 1991?

17 A. Yes.

18 Q. How did you meet Mr. Epstein or become
19 involved with him in 1991?

20 A. We heard at the airport that Mr. Epstein was
21 purchasing an airplane when Dave Rogers and myself were
22 living in Columbus, and we had the opportunity to
23 interview with him, and we did and got the job.

24 Q. And this is before he owned the airplane?

25 A. Yes.

1 Q. And which airplane was that?

2 A. The Hawker.

3 Q. Does he still have the Hawker?

4 A. No.

5 Q. How long did he have that plane?

6 A. Five years, guesstimate; four or five years.

7 Q. So sometime in the mid '90s?

8 A. Yes.

9 Q. Did you keep any type of logs or documentation
10 as to who would have been flying on that airplane if you
11 transported any individuals?

12 A. The same logs as you possess now are the
13 flight logs.

14 Q. Okay.

15 A. That's the standard for the industry.

16 Q. So that's something that you kept, or that
17 Dave Rogers kept?

18 A. Dave Rogers.

19 Q. Okay. If there are any documents out there
20 with names of passengers on any of the flights involving
21 planes owned or controlled by Jeffrey Epstein and/or his
22 companies, those would be documents in the possession of
23 Dave Rogers and not yourself?

24 A. Oh, the corporation actually, they belong to.

25 Q. Okay.

1 MR. REINHART: That was a compound question.
2 You might want to split it in half.

3 MR. EDWARDS: Okay.

4 BY MR. EDWARDS:

5 Q. What documents do you believe exist that
6 indicate names of individuals that have been passengers
7 on Mr. Epstein's airplanes?

8 MR. REINHART: Are we going back all the way
9 from '91 to the present?

10 MR. EDWARDS: Sure.

11 THE WITNESS: You're talking about the Hawker?

12 BY MR. EDWARDS:

13 Q. Any airplanes. What documents would there be?

14 A. There would be the same: Flight logs and
15 passenger manifests would exist.

16 Q. And are either of those required?

17 A. The flight log is required for the aircraft to
18 track times and landings.

19 Q. And in the flight log, is it required that you
20 designate the names of the passengers?

21 A. No.

22 Q. That's just something that Dave Rogers did on
23 his own?

24 A. Everybody does that. It's more for Internal
25 Revenue.

1 Q. Okay. If something happens, they know who is
2 on the plane?

3 A. Exactly, weight and balance.

4 Q. Have you ever kept any flight logs that have
5 names of people on the airplane?

6 A. When you say "kept," I have filled out flight
7 logs or the passenger manifest, yes.

8 Q. By "kept" I meant maintained to where they're
9 in your possession either on paper or computer?

10 A. We keep --

11 MR. REINHART: Can you differentiate a flight
12 log from the pilot's log that we showed you
13 earlier?

14 MR. EDWARDS: Okay.

15 BY MR. EDWARDS:

16 Q. I'm talking about -- I don't know that it's
17 called a flight log, a pilot's log or any kind of log.

18 A. They are different, yes.

19 Q. Yeah. I'm asking about, have you kept or do
20 you have any documentation that would indicate the names
21 of passengers that have flown on any of Jeffrey
22 Epstein's planes?

23 A. No.

24 Q. Either in the form of paper or on a computer?

25 A. No.

1 Q. Makes that easy.

2 A. Okay.

3 Q. In 1991, were you the chief pilot?

4 A. No.

5 Q. Somebody else was the chief pilot?

6 A. Yes.

7 Q. Who's that?

8 A. Dave Rogers.

9 Q. All right. At what point in time did you
10 become chief pilot and switched with Dave Rogers?

11 A. Six years ago; five, six years ago.

12 Q. Why?

13 A. Professionalism, technique.

14 Q. What do you mean by that?

15 A. The way Dave would operate an aircraft,
16 Jeffrey knew the difference when I was flying and when
17 Dave was flying.

18 Q. How do you know he knew the difference?

19 A. Just --

20 Q. He told you?

21 A. Yes. He knew the difference that if he never
22 came up front, he knew who was flying, who landed.

23 Q. And what was the conversation that he had with
24 you that resulted in you becoming chief pilot, switching
25 positions with Dave Rogers?

1 A. Jeffrey would always critique Dave's flying
2 capabilities, and I tried to help Dave and explain to
3 him what Jeffrey likes and doesn't like. And Jeffrey's
4 also conveyed these likes and dislikes. And Dave
5 maintained continuing with certain piloting techniques
6 that were just not comfortable to passengers. And this
7 went on through the years, and Jeffrey just got tired of
8 it one day.

9 Q. What specifically were Jeffrey Epstein's likes
10 and dislikes with respect to the flight of the plane?

11 MR. CRITTON: Let me put in a form here. But
12 I don't know what this has to do with anything in
13 this case.

14 MR. EDWARDS: I understand that, Bob.

15 MR. CRITTON: I want to use this for some
16 other depositions where we -- we've gone beyond the
17 scope.

18 THE WITNESS: The case in point, the last
19 straw was there was a technique called quiet flying
20 where you would retard the throttles well short of
21 the runway and pretty much glide the airplane in.
22 Well, if you don't do that correctly, you have to
23 spool the engines up just prior to touching down
24 that -- because you're losing air speed and it's an
25 uncomfortable sound and feeling for the passengers

1 thinking that you're not going to make the runway.
2 And it was a continuous practice of Dave doing that
3 to be neighbor friendly as opposed to being
4 passenger-comfort friendly.

5 BY MR. EDWARDS:

6 Q. Okay.

7 A. Hence, the transfer of power.

8 Q. Has he ever discussed with you where he wants
9 you to be, whether that is "stay in the cockpit when I
10 have people on the airplane," or don't intermingle with
11 the passengers or anything else?

12 A. He's never stated that to us.

13 MR. REINHART: Could you clarify which "he"
14 you're talking about?

15 MR. EDWARDS: I'm talking about Jeffrey
16 Epstein.

17 MR. REINHART: Okay.

18 BY MR. EDWARDS:

19 Q. You understood that?

20 A. Yes.

21 Q. It's my understanding that in the -- well,
22 tell me other than the Hawker, what other airplanes have
23 you flown for Jeffrey Epstein?

24 A. A Gulfstream.

25 Q. Does he still have that plane?

1 A. Yes, sir.

2 Q. How big of a plane is that?

3 A. Large corporate jet.

4 Q. How long has he had it?

5 A. Fourteen years; 13, 14 years.

6 Q. And other than the Gulfstream, what other
7 airplanes does he have?

8 A. When you say "he," obviously, these are
9 company-owned --

10 Q. Jeffrey Epstein or his companies.

11 A. A Boeing 727.

12 Q. Well, I know that's a very large airplane. I
13 think that's been described by other people, so I'm not
14 going to have you do that. But there's partitions in
15 that airplane -- in the back rooms of that airplane,
16 right?

17 A. Yes.

18 Q. Several different partitions to where if the
19 pilot comes out of the cockpit, you don't necessarily
20 see all the passengers?

21 A. Yes.

22 Q. That's true?

23 A. Yes.

24 Q. Okay.

25 MR. REINHART: Keep your voice up so she can

1 hear you.

2 THE WITNESS: Oh.

3 MR. REINHART: And so Mr. Willits can hear
4 you.

5 BY MR. EDWARDS:

6 Q. Other than the Gulfstream and the Boeing and
7 the Hawker, what other airplanes has Jeffrey Epstein
8 owned over the years?

9 A. That is it.

10 Q. And currently still owns -- or the companies
11 associated with him own the Gulfstream and the Boeing?

12 A. Yes.

13 Q. And in the past two years, have you flown
14 those two airplanes?

15 A. Just for routine flights to keep them loose
16 or, you know -- you know what I mean.

17 Q. Have those two airplanes been flown by anyone
18 else in the last two years?

19 A. No.

20 Q. Have those two airplanes been flown in the
21 last two years for any reason other than routine
22 maintenance-type flights?

23 A. We've had one -- two flights I think in the
24 past two years.

25 Q. And what were the purposes of those flights

1 and who was on the flights?

2 A. One flight I believe we went to Sebring and
3 another flight we went to Nassau, Bahamas.

4 Q. And who did you go to Nassau, Bahamas with?

5 A. I'd have to look at the flight log, but I
6 think it was [REDACTED], I believe. I think
7 that was the three passengers, to the best of my
8 knowledge.

9 Q. And it's my understanding that little
10 St. James is an island that Jeffrey Epstein owns or
11 controls?

12 MR. CRITTON: Form.

13 THE WITNESS: I don't know that he owns it.

14 BY MR. EDWARDS:

15 Q. Has he ever been to an island called Little
16 St. James?

17 A. Yes.

18 Q. And have you been there with Jeffrey Epstein?

19 A. I've been there when he was there.

20 Q. Have you flown on an airplane with him to that
21 destination?

22 A. No.

23 Q. All right. When you say you've been there
24 when he was there, how did that come about?

25 A. We flew into St. Thomas and then we flew to

1 Little St. James in a helicopter.

2 Q. And do you fly the helicopter as well?

3 A. Yes.

4 Q. How many helicopters are owned or controlled
5 by Jeffrey Epstein and/or corporations associated with
6 him?

7 MR. CRITTON: Form.

8 THE WITNESS: At this time, one.

9 BY MR. EDWARDS:

10 Q. And has that helicopter been flown in the last
11 two years?

12 A. Just for routine maintenance.

13 Q. And when you and -- let's say when [REDACTED]
14 [REDACTED] and [REDACTED] and [REDACTED] flew to Nassau, do
15 you know the purpose of that trip?

16 A. No.

17 Q. How long did you stay?

18 A. Five hours.

19 Q. Did you pick anybody up there?

20 A. No. Meaning passengers?

21 Q. Yes.

22 A. No.

23 Q. What happened? You landed the airplane and
24 then what?

25 A. The passengers left. Dave and I went and had

1 lunch. The passengers showed up and we came back.

2 Q. Have you ever stayed at the home that is on
3 Little St. James?

4 A. No.

5 Q. Have you known Jeffrey Epstein to stay at that
6 home?

7 A. I don't know that for a fact.

8 Q. Okay. Do you believe that he is the owner or
9 controller or has some interest in the home or the
10 island of Little St. James?

11 MR. CRITTON: Form.

12 THE WITNESS: I have no knowledge of that
13 being a fact.

14 BY MR. EDWARDS:

15 Q. And you have no belief that that is a fact?

16 A. Exactly.

17 Q. When you say you've been there when he was
18 there, how many times has that occurred?

19 A. Estimating, a hundred times.

20 Q. Okay.

21 A. Trying to give an honest answer.

22 Q. Okay. And in the approximate -- I'm not going
23 to hold you to a hundred times, but in the approximately
24 hundred times --

25 A. Sure.

1 Q. -- for what period of time are we talking
2 about?

3 A. During what period of time?

4 Q. Right.

5 A. Let's see, when did all this happen? What,
6 2007? So eight years prior to whenever he stopped
7 flying. So...

8 Q. '98/'99?

9 A. Yeah, I guess, yes.

10 Q. I mean, that sounds like a right --

11 A. Sounds about right, yeah. Don't hold me to it
12 again.

13 Q. All right.

14 A. You're going back a long way.

15 Q. So from approximately the '98/'99 time frame
16 when Jeffrey Epstein would fly to Little St. James,
17 would you be the pilot?

18 A. Yes.

19 Q. Okay. And you say that you've been there -- I
20 thought that you just told me that you've been there the
21 same time he was there, but then I thought the
22 subsequent question was well, were you on the flight
23 with him, and I thought your answer was no. Maybe I
24 misunderstood that.

25 A. No, you said the question "Have you ever flown

1 to his island?" We never landed on his island. We
2 landed in St. Thomas.

3 Q. Got it.

4 A. I was just trying to be exact.

5 Q. Thank you.

6 A. It's a small island.

7 Q. Okay. So how is it that when Mr. Epstein
8 wants to go to Little St. James, what is the path that
9 you take to get actually to the island of Little
10 St. James?

11 A. I don't understand the question.

12 Q. Well, you just told me you fly the airplane to
13 St. Thomas?

14 A. Right.

15 Q. And then what?

16 A. Then sometimes I would go get the helicopter
17 or he could also take a boat to the island. But
18 normally the helicopter's located on St. Thomas. I'd
19 fire up the helicopter, come pick him up, drop him at
20 the island and I come back to St. Thomas.

21 Q. And when he stays on St. James, you drop him
22 off on St. James. I suppose you're going to tell me you
23 don't know if he stays there or not?

24 A. Exactly.

25 Q. But do you stay --

1 A. I don't. I mean --

2 Q. Well, he either stays there or someone else
3 picks him up in a helicopter or he swims away?

4 A. Correct.

5 Q. Okay. You stay on St. Thomas?

6 A. Yes.

7 Q. Okay. Is there a place that you've stayed on
8 St. James, ever?

9 A. No, I've never.

10 Q. So in the hundred or more times that you've
11 been to the island, is it my understanding that each of
12 those times you've been there to drop off Jeffrey
13 Epstein and/or any passengers and you've immediately
14 left and gone to St. Thomas?

15 A. Yes, sir.

16 Q. You never been inside that home that's located
17 on St. James?

18 A. Yes, I've been inside the home.

19 Q. How many times have you been inside the home?

20 A. I mean, ten, fifteen times.

21 Q. And for what occasion?

22 A. I've set up the theater system that's in the
23 living room.

24 Q. Okay.

25 A. So it would be there to work to hook up a TV

1 or a stereo.

2 Q. And do you know Les Wexler?

3 A. No, I don't.

4 Q. Have you ever met him before?

5 A. I have met him.

6 Q. Do you know of any relationship between Les
7 Wexler and Jeffrey Epstein?

8 A. I don't know what -- to what extent they have
9 a relationship, no.

10 Q. Do you know if they know one another?

11 A. I don't know that for a fact. They talk to
12 one another, so I would assume. But I don't know to --

13 Q. How do you know they talk to one another?

14 A. I've seen them speak to one another at the
15 foot of the airplane.

16 Q. All right. Have you ever flown the
17 airplane -- any of the airplanes with Les Wexler as a
18 passenger?

19 A. No.

20 Q. Have you ever flown the airplanes with [REDACTED]
21 [REDACTED] as a passenger?

22 A. Yes.

23 Q. And do you know [REDACTED] ?

24 A. Yes.

25 Q. And for how long have you known [REDACTED] ?

1 A. I'm guessing, six years. I mean, don't hold
2 me to it. I'm not the greatest on length of times, but
3 six, seven years, I think.

4 Q. How did you meet her?

5 A. I guess I was introduced. She was on a flight
6 of ours.

7 Q. You were introduced to her by whom?

8 A. She may have introduced herself. I mean,
9 you're going back a ways. I don't know the official
10 introduction, how it went.

11 Q. And to your knowledge, what is her -- is she
12 associated or affiliated in some way with Jeffrey
13 Epstein?

14 MR. CRITTON: Form.

15 THE WITNESS: I would assume so. I don't know
16 to what level or what actually her job description
17 is.

18 BY MR. EDWARDS:

19 Q. All right. Well, how many flights have you
20 flown where she and Jeffrey Epstein have been passengers
21 together on one of the airplanes that we've been
22 discussing?

23 A. I'd only be guessing again.

24 Q. We're talking hundreds of flights, though?

25 A. Sure, sure, a lot of flights.

1 Q. It seems to be -- I mean, you seem like
2 somebody who has common sense. It seems like somebody
3 that knows Jeffrey Epstein?

4 MR. CRITTON: Form.

5 BY MR. EDWARDS:

6 Q. Correct, [REDACTED]?

7 A. Yes.

8 Q. All right. And do you believe that there is a
9 business relationship there or a personal relationship
10 there, from your observations?

11 A. I'd only be speculating. When they get on the
12 airplane, my focus is forward and flying safely. So I
13 don't -- you know, I'd only be guessing at either one of
14 those two.

15 Q. Okay. Have you ever socialized with [REDACTED]
16 [REDACTED]?

17 A. No.

18 Q. Other than speaking with her on the airplane,
19 have you spoken with her elsewhere?

20 A. Over the phone, in passing, I mean, walking
21 down the street in New York. I mean, yes.

22 Q. Why would you call [REDACTED] or why would
23 she call you?

24 A. She would call me to schedule the aircraft for
25 a departure.

1 Q. And have you ever called her?
2 A. Yes.
3 Q. When's the last time you talked to [REDACTED]
4 [REDACTED]?
5 A. A week ago.
6 Q. What was the occasion?
7 A. We were discussing carpet for one of the
8 aircraft.
9 Q. And where was she when you were talking with
10 her?
11 A. I don't know. It was over the phone.
12 Q. Did she call you or you call her?
13 A. No, I called her on her cell.
14 Q. Okay. And that's a New York number?
15 A. I don't know. It's on speed dial.
16 Q. Do you have your phone with you?
17 A. Yes.
18 Q. Could you tell me what that number is?
19 A. Sure.
20 Q. Thanks.
21 A. Sure. ([REDACTED]).
22 Q. Which airplane were you discussing carpeting
23 for?
24 A. Was actually -- actually, it was for the
25 helicopter. Now that I'm thinking about it, the

1 helicopter.

2 Q. In the last two years, did you tell me the
3 helicopter has flown?

4 A. Yes.

5 Q. And where to?

6 A. I have flown the helicopter to Fort Lauderdale
7 on several occasions for maintenance. I've flown it to
8 Miami. And I try to fly the helicopter at least every
9 two weeks just either by myself to run it up to its --
10 it's important that it keeps moving.

11 Q. Other than maintenance-type flights, have you
12 flown the helicopter in the last couple of years?

13 A. Yes.

14 Q. And who was on the helicopter?

15 A. I flew to Miami with Mr. Epstein.

16 Q. When was that?

17 A. It was a couple weeks ago or a month ago, I
18 think.

19 Q. For what?

20 A. Sorry?

21 Q. For what occasion?

22 A. I think he had a meeting with his attorneys in
23 Miami.

24 Q. Today is October the 15th. Is this during the
25 month of October that you had this flight in the

1 helicopter with Mr. Epstein?

2 A. I'd have to look at the book to be exact for
3 you.

4 Q. Okay. But it's either the end of September or
5 the beginning of October?

6 A. Yeah.

7 Q. How do you know that he was meeting with his
8 attorneys?

9 A. I believe that he had mentioned that he was
10 meeting his attorneys.

11 Q. Did he tell you why?

12 A. No.

13 Q. Why did he tell you he was meeting with his
14 attorneys? Did you ask him?

15 A. No.

16 Q. Okay. That's just something that he said to
17 you in conversation?

18 A. Yes, sir.

19 Q. Was there anyone else on the airplane besides
20 you and Mr. Epstein?

21 A. Yes.

22 Q. Who was that?

23 A. [REDACTED].

24 Q. [REDACTED] who?

25 A. [REDACTED] [REDACTED].

1 Q. How long have you known [REDACTED] [REDACTED]?

2 A. I don't know, five years. A guess again,
3 four, five years.

4 Q. Do you know what her relationship is, if any,
5 with Jeffrey Epstein?

6 A. I do not know.

7 Q. Do you know if she knows Jeffrey Epstein?

8 A. I would assume so. They talk. I would
9 imagine she knows him.

10 Q. And how many times has she been on the
11 airplane or the helicopter on flights at the same time
12 as a passenger with Jeffrey Epstein?

13 A. Many. I'd have to look at the logs.

14 Q. Hundreds of times?

15 MR. CRITTON: Form.

16 THE WITNESS: Sure.

17 BY MR. EDWARDS:

18 Q. If you were going to, as somebody who has been
19 Jeffrey Epstein's pilot for 18 years, tell me today who
20 the five closest people are to Jeffrey Epstein, would
21 [REDACTED] be one of them?

22 MR. CRITTON: Form.

23 THE WITNESS: I'd only be guessing and
24 speculating. I have no idea.

25

1 BY MR. EDWARDS:

2 Q. Okay. Well, as his pilot and the person who
3 travels with Jeffrey Epstein on the majority of his
4 flights, who are the people who travel most frequently
5 with Jeffrey Epstein?

6 A. I'd have to look at the logs.

7 MR. REINHART: Can we get a time period?

8 BY MR. EDWARDS:

9 Q. In the last ten years, which people travel
10 most frequently with him?

11 A. I'd have to look at the flight logs to give
12 you an accurate answer.

13 Q. You can't give me one single name of somebody
14 who you would say is a frequent flyer?

15 A. [REDACTED].

16 Q. [REDACTED]?

17 A. Yes.

18 Q. Anybody else?

19 A. [REDACTED].

20 Q. [REDACTED] [REDACTED]?

21 A. Yeah.

22 Q. Okay. Anybody else?

23 A. Just mainly those two.

24 Q. How about Ghislaine Maxwell?

25 A. Not for some time.

1 Q. What's your understanding between the
2 relationship of Ghislaine Maxwell and Jeffrey Epstein?

3 A. I don't really know.

4 Q. All right. So when you say you're guessing
5 that [REDACTED] [REDACTED] and [REDACTED] know or are
6 associated with Jeffrey Epstein, that guess is being
7 made on the -- with the observation that they have been
8 frequent flyers with Jeffrey Epstein on more than
9 hundreds of flights on his private plane?

10 A. Yes, that's what I'm basing it on.

11 Q. And do you know where [REDACTED] [REDACTED] is
12 staying these days?

13 A. No.

14 Q. Do you know what car she's driving these days?

15 A. No, I don't.

16 Q. Okay. Do you know if she's living with
17 Jeffrey Epstein these days?

18 A. I don't know that.

19 Q. Do you know how [REDACTED] [REDACTED] met Jeffrey
20 Epstein?

21 A. I don't.

22 Q. Were you on an international flight bringing
23 her into the country from some other country at any
24 time?

25 A. I don't know.

1 MR. REINHART: Can we clarify? You mean with
2 Mr. Epstein or --

3 MR. EDWARDS: No.

4 BY MR. EDWARDS:

5 Q. Did you ever bring [REDACTED] [REDACTED] from some
6 foreign country into the United States?

7 A. I'd have to look at the log books, honestly.

8 Q. That's not something you remember?

9 A. No. I mean, she -- I think she's been on
10 Europe trips with us, and I think she's returned from
11 Europe with us, but I could not say that honestly.

12 Q. On this recent helicopter flight with [REDACTED]
13 [REDACTED] and Jeffrey Epstein, did you talk with them
14 during that flight?

15 A. No.

16 Q. Where did the flight go from? And obviously,
17 it landed in Miami, but where did you leave from?

18 A. West Palm Beach.

19 Q. And did [REDACTED] and Jeffrey Epstein arrive
20 together?

21 A. You know, I don't remember. I was out at the
22 helicopter and I think they both started walking up. So
23 I don't know if they came separately or not. I was
24 already at the helicopter.

25 Q. How long is that flight from Palm Beach to

1 Miami?

2 A. Twenty-five minutes.

3 Q. And did they talk to one another during that
4 flight?

5 A. No.

6 Q. They were both completely silent during that
7 flight?

8 A. Yes.

9 Q. Okay. Is that typical when they are on
10 flights together, especially with the helicopter, where
11 you're in pretty close quarters, that they would abstain
12 from speaking to one another?

13 MR. CRITTON: Form.

14 THE WITNESS: Yeah, it would be typical. It's
15 very noisy and communicating in a helicopter is,
16 you know, not that comfortable.

17 BY MR. EDWARDS:

18 Q. Over the last five or six years that you have
19 known or been familiar with [REDACTED] [REDACTED], have you
20 heard her and Jeffrey Epstein conversing with one
21 another?

22 A. I've heard them conversing, but if you ask me
23 what they had said, I could say it -- I wouldn't even
24 know what they had said to each other. I've seen them
25 talking to each other.

1 Q. But you don't remember a single specific
2 conversation between Jeffrey Epstein and [REDACTED]
3 [REDACTED]?

4 A. An honest answer, no.

5 Q. Okay. And the same for [REDACTED]; have you
6 seen or -- have you seen Jeffrey Epstein speak with
7 [REDACTED]?

8 A. I've seen him speak with her, yes.

9 Q. Can you tell me a single specific conversation
10 that you have overheard between Jeffrey Epstein and
11 [REDACTED]?

12 A. One thing that comes to mind would be make
13 sure we have Oreo cookies on the airplane. It would be
14 something completely nonchalant.

15 Q. Okay. And do you know or have reason to know
16 of any employment relationship between [REDACTED] and
17 Jeffrey Epstein?

18 A. I have no knowledge of any of that.

19 Q. Do you know if [REDACTED] works for Jeffrey
20 Epstein?

21 A. I do not know.

22 Q. Do you know if [REDACTED] schedules massages
23 for Jeffrey Epstein?

24 A. I have no idea.

25 Q. Has Jeffrey Epstein ever indicated to you that

1 he is fascinated or infatuated or appreciates or loves
2 or likes massages?

3 A. I have no knowledge of that.

4 Q. All right. How about Ghislaine Maxwell, has
5 she ever talked to you about massage therapy or have you
6 ever overheard her talking about that?

7 A. No.

8 Q. You certainly read the papers over the last
9 couple of years, correct?

10 A. Not on my top ten list. I mean, I've read a
11 couple articles, but I'm not one to focus on that so
12 much as some people would.

13 Q. Okay. When the investigation about Jeffrey
14 Epstein came about, the criminal investigation -- you're
15 aware that's what I'm talking about, right?

16 A. That was last year?

17 Q. Well, it was a couple years ago.

18 A. Right, okay.

19 Q. Did you speak with Jeffrey Epstein about that
20 investigation?

21 A. No.

22 Q. Were you told not to speak with him about that
23 investigation?

24 A. I think we knew ourselves that we weren't --
25 it wouldn't be proper to even bring it up.

1 Q. All right. When you read in the newspapers
2 the allegations that Mr. Epstein was involved with
3 numerous underage girls for sexual reasons, were you
4 surprised?

5 A. I didn't believe it.

6 Q. Do you believe it today?

7 A. I don't believe it.

8 Q. You don't believe that Jeffrey Epstein was
9 involved with underage girls in a sexual way?

10 MR. CRITTON: Form.

11 THE WITNESS: You're asking for my opinion,
12 and I don't think my opinion is relevant in that
13 matter.

14 BY MR. EDWARDS:

15 Q. I think it's relevant. Can you just tell me
16 whether today you believe that Jeffrey Epstein has
17 engaged in sex with underage girls?

18 MR. CRITTON: Form; speculation, irrelevant,
19 always.

20 THE WITNESS: It's irrelevant.

21 BY MR. EDWARDS:

22 Q. I need an answer.

23 A. I don't believe he had sex with underage
24 women.

25 Q. Or engaged in any sexual acts with underage

1 women?

2 MR. CRITTON: Form.

3 THE WITNESS: No.

4 BY MR. EDWARDS:

5 Q. You think that this is just a story that a
6 bunch of underage women have made up?

7 A. Speculation.

8 MR. CRITTON: Objection. Now it's
9 argumentative. Who gives a darn what he thinks one
10 way or another? If he has personal knowledge --

11 MR. EDWARDS: You're objecting to the form?

12 MR. CRITTON: It's argumentative.

13 MR. EDWARDS: You're objecting to the form?

14 MR. CRITTON: Yes.

15 MR. EDWARDS: Okay.

16 BY MR. EDWARDS:

17 Q. Is that something that you believe that a
18 bunch of women -- some of which know each other, some
19 don't, some of which have been on the airplane and some
20 which haven't -- made this up, that Jeffrey Epstein
21 engaged in some sexual conduct with them?

22 MR. CRITTON: Form.

23 THE WITNESS: What I believe doesn't matter in
24 this case, does it?

25

1 BY MR. EDWARDS:

2 Q. I need an answer. Do you believe it? Do you
3 believe these girls made this up?

4 MR. CRITTON: Form.

5 MR. REINHART: I'm going to instruct him not
6 to answer. Move on.

7 MR. EDWARDS: Is there a privilege that we're
8 asserting?

9 MR. REINHART: No, it's irrelevant. It's
10 harassment and not likely to lead to discoverable
11 evidence.

12 MR. EDWARDS: I'm going to put on the record
13 right now that it is -- we are allowed discovery
14 into a RICO count. We are also allowed discovery
15 into the intent of Mr. Epstein in developing a
16 criminal enterprise designed to sexually exploit
17 and sexually abuse underage girls. We believe that
18 in doing so, he associated intentionally with
19 people of similar beliefs that sex with underage
20 girls is okay, and that there have been many
21 discussions with this witness, as well as many
22 other witnesses with -- to insure his protection
23 from law enforcement that they not answer these
24 specific questions. And thus, the opinions and
25 beliefs of all of these witnesses that we are

1 alleging associated with this criminal enterprise
2 are certainly reasonably calculated to lead to the
3 discovery of admissible evidence. And if you're
4 still instructing the witness, based on that
5 proffer, not to answer any of these questions, I'm
6 going to continue to ask the questions and you can
7 instruct him not to answer and we can go to the
8 Court.

9 MR. REINHART: My response is to his opinion
10 whether people making allegations in this case are
11 colluding or making up a story is irrelevant to
12 what you just said. So I am going to instruct him
13 not to answer any question that goes to his opinion
14 of someone else's motivation or the truth of facts
15 to which he has no knowledge.

16 So yes, I'm instructing him not to answer.

17 MR. CRITTON: Let me add in my part, is that I
18 think -- you're certainly not only capable to ask
19 questions with regard to what his personal
20 knowledge is, and if he knows something or he has
21 reasonable basis for it; certainly you are entitled
22 to that information. I think you've asked those
23 questions and he's given you straightforward
24 answers as to what he knew or what he didn't know
25 under those circumstances. And as to what his

1 thoughts are on something which he has no factual
2 basis or even an assumption to know one way or
3 another is irrelevant. That's ultimately for a
4 fact-finder in this case.

5 While it's interesting, it's argumentative and
6 I don't think he's -- I mean, do it on a
7 question-by-question basis. If he has knowledge,
8 that's great, but to argue your case with this
9 witness or any other witness doesn't serve a
10 purpose and I think is, you know -- I think it's
11 not a good use of our time, I'll put it that way.
12 But you know, you can go ahead and ask.

13 MR. EDWARDS: I can ask the question and if
14 the witness is being instructed not to answer,
15 we'll let a judge decide whether he needs to answer
16 the question and whether it's discoverable or not.

17 MR. REINHART: Absolutely. Make your record.

18 BY MR. EDWARDS:

19 Q. Do you have any reason to believe that Jeffrey
20 Epstein engaged in sexual activity with underage women?

21 A. I have no reason to believe.

22 Q. Okay. So as you sit here today, based on your
23 18 years of knowledge, experience and observation of
24 Jeffrey Epstein, is it your belief that he has not had
25 sex or engaged in sexual activity with underage women?

1 A. It's an opinion, and I believe that he has
2 not.

3 Q. Okay. Isn't it true that at some point in
4 time you learned that Jeffrey Epstein has -- strike
5 that.

6 MR. CRITTON: When you ultimately get to a
7 good place to break, will you let us know?

8 MR. EDWARDS: Let's break now.

9 (A break was had at 11:28 a.m.)

10 BY MR. EDWARDS:

11 Q. All right. Eighteen years of being a pilot
12 for Jeffrey Epstein and in terms of being able to name
13 somebody that you would say you've observed with Jeffrey
14 Epstein and would classify that person as Jeffrey
15 Epstein's friend, can you name anybody?

16 A. ██████, ██████; just people that we see
17 routinely on the airplane.

18 Q. That's people you see routinely in the last
19 five to ten years, right?

20 A. Yes.

21 Q. Prior to that time, anybody that you've
22 noticed as Jeffrey Epstein's friend may be Ghislaine
23 Maxwell?

24 A. What time frame?

25 Q. Is that a person that at some point in time

1 you would classify as Jeffrey Epstein's friend?

2 A. I would classify it. I don't know if it's
3 true.

4 Q. But that's only because they were on the
5 airplane together?

6 A. Yes.

7 Q. Do you know what Jeffrey Epstein does for a
8 living in your 18 years of observing and talking with
9 Jeffrey Epstein?

10 A. No.

11 Q. No idea?

12 A. No.

13 Q. Ever asked him?

14 A. No, actually.

15 Q. Ever been curious?

16 A. Sure.

17 Q. Ever done anything to satisfy that curiosity?

18 A. If you mean Google it, not really, actually.
19 I mean, I really have not.

20 Q. Okay. So in 18 years of traveling and being
21 the pilot and driving -- and taking this person, Jeffrey
22 Epstein, from one property in New York to New Mexico and
23 Florida and around the world, you have no idea what he
24 does in terms of how he makes money?

25 A. No, sir.

1 Q. I was produced this flight log -- tell me if
2 I'm using the wrong term. What is this called, this
3 book that I've been provided by Dave Rogers?

4 A. I've never seen that book.

5 Q. I'll let you see it. I don't know that it was
6 always in a book, so maybe that's why you haven't seen
7 it. Tell me what we're looking at.

8 A. Well, judging with the name at the bottom, I
9 believe this is Dave's flight log, log book.

10 Q. I didn't know if it was called a flight log.

11 A. Pilot log book, how's that? That's the
12 appropriate name.

13 Q. It was marked as Composite Exhibit 1 in
14 Roger's deposition, as indicated by the exhibit sticker.
15 We'll mark it the same in your deposition as well.

16 MR. CRITTON: Why don't you refer to it as
17 his?

18 MR. EDWARDS: Fine.

19 BY MR. EDWARDS:

20 Q. It's the pilot log book of Dave Rogers?

21 A. Yes.

22 Q. And the years provided in this book are 2002
23 through 2005; I can represent that to you. I'm going to
24 ask you about certain people that David Rogers wrote
25 down as being on the airplane and I want to ask you if

1 you know who they are. This person right here is [REDACTED]
2 [REDACTED]. It seems like she flew on numerous flights. Do
3 you know who that is?

4 A. No. I heard the name, but I don't know who
5 that is.

6 Q. All right. Is that somebody that you remember
7 seeing on any of the flights that you were on?

8 A. What year are we talking about here? I don't
9 remember.

10 Q. Well, this is January 2002. You'd probably
11 know how to read this book a little bit better than me,
12 so I don't know.

13 A. He keeps his a lot more current, so I know the
14 name. If she walked in here right now, I would probably
15 look right through her, to be honest.

16 Q. Do you know what affiliation or relationship
17 she had with Jeffrey Epstein?

18 A. No.

19 Q. Okay. There are various -- each row I'm told
20 by David Rogers is a different flight and it indicates
21 where it takes off from and where it lands, et cetera.
22 There's a lot of other information, especially over on
23 this side of the page that I'm not familiar with, nor do
24 I need to be.

25 A. Right.

1 Q. But it's evident that the plane is being used,
2 at least for this time period, January of 2002 through
3 2005, on a fairly regular basis. I mean, we're looking
4 at January 6th, 11th, 13th, 13th, 14th, right?

5 A. Uh-huh.

6 Q. I mean, is that something that you would say
7 accurately reflects the amount of use of Jeffrey
8 Epstein's planes?

9 A. Yes.

10 Q. So he travels quite frequently?

11 A. Yes.

12 Q. And he travels with many different people,
13 right?

14 MR. CRITTON: Form.

15 THE WITNESS: Yes.

16 MR. CRITTON: Can I ask one question? I was
17 wondering what happened, who has possession of now
18 what's the original Exhibit No. 1 of Mr. Rogers'
19 deposition? Did you retain it?

20 MR. REINHART: The actual book itself?

21 MR. EDWARDS: The court reporter took it,
22 right?

23 MR. CRITTON: The one marked as an exhibit,
24 did you keep that?

25 MR. REINHART: This is it.

1 MR. EDWARDS: This is it?

2 MR. CRITTON: Who took it from the deposition
3 the other day?

4 MR. EDWARDS: I have this one right now.

5 MR. REINHART: That's the only copy?

6 MR. EDWARDS: Okay.

7 MR. CRITTON: So you took the original?

8 MR. EDWARDS: Apparently. It has the original
9 sticker.

10 MR. CRITTON: When I say "the original," the
11 original copy. Would you have someone recreate
12 what you've got and send it to us so we have it?

13 MR. EDWARDS: Sure. In fact, why don't I wait
14 until I get the whole thing and I'll copy all the
15 pages and send it to you instead of piecemeal.

16 MR. HOROWITZ: You mean before the transcript
17 comes?

18 MR. EDWARDS: We can copy it.

19 MR. CRITTON: If you give it to me, I'll copy
20 it and send it back to you.

21 MR. REINHART: I have a copy. It just doesn't
22 have the exhibit sticker on.

23 MR. EDWARDS: That's what was told to me the
24 other day, that's why I took it.

25 MR. CRITTON: I want something -- I just don't

1 want to -- if you give me a copy, I'll put a
2 sticker on it.

3 MR. REINHART: Or just copy the page that has
4 the exhibit sticker on it.

5 MR. CRITTON: Sorry.

6 BY MR. EDWARDS:

7 Q. Like on this flight, we have "JE." I'm
8 assuming that's Jeffrey Epstein, correct?

9 A. Yes, I'll assume.

10 Q. "GM," Ghislaine Maxwell, right?

11 A. Yes.

12 Q. "█," █?

13 A. I would assume.

14 Q. I mean -- okay. And then this name, do you
15 recognize that person, █?

16 A. Never heard it.

17 Q. And then █?

18 A. Yes.

19 Q. You've heard that name?

20 A. I've heard the name.

21 Q. Not sure who that is, though?

22 A. No.

23 Q. There's only one, two, three, four, five, six
24 people on that flight?

25 A. Uh-huh.

1 Q. That's pretty typical of the amount of
2 passengers that you would have on a flight?

3 A. It varied, sure.

4 Q. Okay. But it varied between -- if we look a
5 few lines down, Jeffrey Epstein and Ghislaine Maxwell
6 were the only two passengers. Certainly there were
7 flights like that as well, right?

8 A. Mm-hmm.

9 Q. And so it varied from having one or two people
10 to six or seven people, right?

11 A. Yes.

12 Q. What's the most people that you remember
13 traveling on any of Jeffrey Epstein's airplanes?

14 A. Twenty-five.

15 Q. Okay. That would be a rarity, wouldn't you
16 say?

17 A. Oh, yeah.

18 Q. Because I've looked through this log. I
19 haven't seen any place where there were 25, but there
20 are lines that have maybe eight or nine people listed.

21 A. Right.

22 Q. Let's see. There's a flight from
23 January 15th -- sorry, January 17th, January 20th and
24 January 22nd of 2002 that all had [REDACTED]. That
25 doesn't serve to refresh your recollection as to who

1 that is, does it?

2 A. No.

3 Q. Okay. Do you know what the purpose of her
4 being on the airplane flight along with Jeffrey Epstein,
5 Ghislaine Maxwell and [REDACTED] would be?

6 A. No.

7 Q. Okay. Do you know how it comes about that
8 [REDACTED] gets on that flight? How does she even know
9 there's a flight available?

10 A. I don't know.

11 Q. All right. Well, let's go down to somebody
12 that we may all know a little bit better. February 9th,
13 2002, there's a flight that has Bill Clinton, four
14 Secret Service agents and then instead of listing names
15 or initials or anything else, it's just listed as two
16 males, one female, Jeffrey Epstein, Ghislaine Maxwell,
17 [REDACTED] and I forget who Dave Rogers told me "AP"
18 is. Do you remember who that is?

19 A. No.

20 Q. Okay. Either way, how is it that someone like
21 Bill Clinton gets on a Jeffrey Epstein flight?

22 MR. CRITTON: Form.

23 THE WITNESS: I don't know.

24 BY MR. EDWARDS:

25 Q. Do you know before the flight takes off that

1 Bill Clinton's going to be a passenger on the flight?

2 A. Yes.

3 Q. And how do you know? How do you get that
4 information?

5 A. The day before I'd get a phone call from, say,
6 [REDACTED] saying we're leaving tomorrow going to wherever,
7 and sometimes she'll say who's going, sometimes she
8 won't. On a case where President Clinton would be on
9 board, we would put a little extra catering on board or
10 do that little extra TLC to the aircraft.

11 Q. If it's leaving -- this says it's leaving from
12 MIA and where is it landing?

13 A. HPN I believe is White Plains.

14 Q. Okay. Do you remember that flight?

15 A. I remember being on it.

16 Q. Well, I mean, if you look through here,
17 obviously you had Bill Clinton on the airplane ten or
18 twenty times, right?

19 A. Yeah. He's my main focus. I remember him
20 being on the aircraft, sure.

21 Q. Do you remember him being on the airplane with
22 younger girls?

23 MR. CRITTON: Form.

24 THE WITNESS: No.

25

1 BY MR. EDWARDS:

2 Q. Okay. Do you know what his relationship was
3 with Jeffrey Epstein?

4 A. No.

5 Q. Do you know if they were friends?

6 A. Assuming.

7 Q. But you're assuming why? Just because he's on
8 his plane?

9 A. Yeah.

10 Q. Okay. So you assume that the people that are
11 listed on here are friends of Jeffrey Epstein's and
12 that's why they are riding on his plane?

13 A. I'm speculating.

14 Q. I'm just not familiar with the -- because I've
15 never been on a private flight -- with the manner in
16 which you go about getting on one of these flights. I
17 mean, you have to, I guess, know that Jeffrey Epstein
18 has a plane, that it's going from a destination that you
19 are at and want to go to, and that it's available and
20 those kind of things. Can you tell me, enlighten me --

21 A. Well, it's not publicly offered, no. It would
22 be no different than you jumping in your car and knowing
23 you're going to the mall. I mean, it's not public
24 information, you know, where planes are coming to and
25 from, and you don't put your name out there to get

1 onboard a flight.

2 Q. Does Jeffrey Epstein charge these people as
3 passengers?

4 A. I don't know.

5 Q. Okay. Are these people such as Bill Clinton,
6 does that mean that Bill Clinton called [REDACTED] or
7 somebody affiliated with Jeffrey Epstein to get on the
8 plane or that Jeffrey Epstein called Bill Clinton and
9 asked do you want a ride?

10 MR. CRITTON: Form; predicate.

11 THE WITNESS: I have no idea.

12 BY MR. EDWARDS:

13 Q. No idea?

14 A. No idea whatsoever.

15 Q. Joe Pagano, do you know who that is?

16 A. Yes.

17 Q. What's his relationship with Jeffrey Epstein,
18 or what was it back in February -- sorry, March 17th of
19 2002, when he and [REDACTED] and Jeffrey Epstein and
20 Todd and one female were on this flight?

21 A. I don't know to what extent or what his
22 relationship is. He just was a passenger on the
23 airplane.

24 Q. Okay. And the next day -- sorry, two days
25 later on the 19th of March, Bill Clinton flies again,

1 this time with Doug Band, three Secret Service agents,
2 Jeffrey Epstein, Ghislaine Maxwell and [REDACTED]. Do
3 you remember that flight?

4 A. Where did we go?

5 Q. Starts in JFK.

6 A. Right.

7 Q. Where is that?

8 MR. CRITTON: Do you have a date?

9 MR. EDWARDS: March 19th, 2002.

10 THE WITNESS: EGGW I believe is Luton,
11 England.

12 BY MR. EDWARDS:

13 Q. Okay. Do you remember flying to England?

14 A. I do remember flying to England. I just don't
15 remember that trip. What airplane were we in? We were
16 in the Boeing.

17 Q. Do you remember the purpose of the trip?

18 A. No.

19 Q. Do you know who Doug Band is?

20 A. I heard he's Clinton's, how would you say,
21 assistant. I mean, I've seen that in the newspaper,
22 seen it on CNN.

23 Q. Okay. Did you ever hear that Doug Band and
24 Ghislaine Maxwell were together, even for a day or a
25 night?

1 A. No.

2 Q. Did you ever hear that Doug Band and Ghislaine
3 Maxwell were the people attributed to introducing Bill
4 Clinton and Jeffrey Epstein?

5 MR. CRITTON: Form.

6 THE WITNESS: I don't know.

7 BY MR. EDWARDS:

8 Q. All right. There's another flight here on
9 January -- I can't read this upside down. Maybe it says
10 May --

11 A. Looks like.

12 Q. -- 22nd, 2002. Again, with President Bill
13 Clinton, [REDACTED], [REDACTED]. Can you tell me who [REDACTED]
14 and [REDACTED] are?

15 A. I don't remember.

16 Q. Would you know them if you saw them?

17 A. Probably not because the names don't even ring
18 a bell.

19 Q. All right. And then there are plenty of
20 flights, many of flights where Jeffrey Epstein,
21 Ghislaine Maxwell and [REDACTED] are the primary
22 passengers, or at least are some of the passengers on
23 the flights, correct?

24 A. Mm-hmm, yes.

25 Q. And still, as you sit here, you being the

1 pilot of these flights, you're not sure what their
2 relationship is or whether any of them were socially
3 connected in any real way?

4 MR. CRITTON: Form.

5 THE WITNESS: No. When you're flying the
6 airplane, there's a lot more going on than
7 passengers' relations.

8 BY MR. EDWARDS:

9 Q. All right. You remember this person, [REDACTED]
10 [REDACTED], are you familiar with her at all?

11 A. I remember the name, that's it.

12 Q. What do you think her relationship is to
13 Jeffrey Epstein?

14 A. No idea.

15 MR. CRITTON: What date are you on, Brad?

16 MR. EDWARDS: Oh, sorry. I am at June 21st,
17 2002.

18 BY MR. EDWARDS:

19 Q. That's not somebody that you specifically
20 remember?

21 A. Mm-mm, no.

22 Q. No? Is that somebody that you think was a
23 regular flyer for any period of time in Jeffrey
24 Epstein's life?

25 A. Not a regular.

1 Q. Okay. Jean Luc Brunel, is that a name that
2 you know?

3 A. Yes.

4 Q. How do you know that name?

5 A. Only because it's a unique name and his attire
6 is very unique. So you remember certain things. So I
7 know he who that is.

8 Q. Do you know what he does?

9 A. No.

10 Q. Do you know his association with Jeffrey
11 Epstein, if any?

12 A. No, I don't know what the relationship is.

13 Q. Have you ever heard of him owning or running
14 or managing a modeling company?

15 A. I have seen that in the paper a few years
16 back.

17 Q. Okay. Other than seeing it in the paper, have
18 you ever talked to Jean Luc Brunel or Jeffrey Epstein
19 about owning or running or managing a modeling company?

20 A. No.

21 Q. Do you know if Jeffrey Epstein's affiliated
22 with the modeling company that's owned, run or managed
23 by Jean Luc Brunel?

24 A. No, I have no idea.

25 Q. And seeing that this is a flight now, that

1 we're referring to the same flight on June 21st of 2002,
2 that includes Jean Luc Brunel, [REDACTED] [REDACTED], Jeffrey
3 Epstein, Ghislaine Maxwell, [REDACTED], those are the
4 passengers of this flight, does that serve to jog your
5 memory as to who [REDACTED] [REDACTED] is?

6 A. No. I mean, you see how frequently we fly. I
7 mean, it's -- the passengers in the back are so far
8 removed from an operation of commanding an airplane like
9 that, it's nothing that sticks in your head.

10 Q. And you as the pilot, is there any way that
11 you would know what's going on in the back of the
12 airplane?

13 A. No. My concerns are all on the cockpit.

14 MR. CRITTON: Brad, the last one that you
15 mentioned, was that the same date, June 21st, '02?

16 MR. EDWARDS: Yes.

17 BY MR. EDWARDS:

18 Q. There's another name here that I was going to
19 ask you do you know. June 23rd, 2002, [REDACTED],
20 are you familiar with that name?

21 A. No.

22 Q. Also on the same flight with Jean Luc Brunel.
23 That doesn't help to jog your memory either, right?

24 A. No.

25 Q. That's somebody that you remember as a

1 frequent passenger?

2 A. Who are you referring to?

3 Q. [REDACTED]?

4 A. No.

5 Q. Dr. Jarecki, is that somebody that you
6 remember flying?

7 A. I know the name. He may have been on the
8 airplane once or twice. I'm guessing only.

9 Q. Do you remember meeting him?

10 A. Yes, I have met him.

11 Q. Do you remember his purpose for being on the
12 airplane?

13 A. No, sir.

14 Q. Amanda Venaro, do you remember her purpose for
15 being on the airplane?

16 A. No.

17 MR. REINHART: Can we get a date?

18 MR. EDWARDS: I was asking him if he
19 remembered Amanda Venaro. I wasn't referring to a
20 specific flight.

21 BY MR. EDWARDS:

22 Q. You don't remember her being on the flight?

23 A. I don't remember the name.

24 Q. Me showing you the flight isn't going to jog
25 the memory?

1 A. No. The name that would launch it first --

2 MR. CRITTON: Could I ask you a question? You
3 have the original exhibit marked at the deposition.
4 It looks like it's been highlighted.

5 MR. EDWARDS: I highlighted it.

6 MR. CRITTON: Oh, okay. So you've highlighted
7 the original exhibit that's marked for the
8 deposition? I just want the record to reflect
9 that.

10 MR. EDWARDS: Yeah.

11 MR. CRITTON: Okay. Thank you.

12 MR. EDWARDS: At the time I highlighted it I
13 didn't realize I was holding on to the original
14 exhibit. I didn't realize that until you just
15 pointed that out.

16 MR. CRITTON: I've noticed that.

17 MR. EDWARDS: So now when I give it to you,
18 I'm giving you my work product as well. I don't
19 see how this works against you, but anyway.

20 BY MR. EDWARDS:

21 Q. Melissa Stall, is that a name that you
22 remember?

23 A. No.

24 Q. Okay. And then Jean Luc Brunel is somebody
25 who I noticed flew relatively frequently, so is that why

1 you -- that name jogs your memory a little better than
2 some of these other people?

3 A. He dresses uniquely.

4 Q. In what way?

5 A. Just loud clothes, so something that you would
6 remember, that's all.

7 Q. Do you know his role in Jeffrey's life?

8 A. No.

9 Q. Ever heard that he is affiliated with Jeffrey
10 Epstein because they both have a sexual attraction to
11 underage girls?

12 MR. CRITTON: Form.

13 THE WITNESS: You're making an assumption on
14 that.

15 BY MR. EDWARDS:

16 Q. Have you ever heard that?

17 MR. REINHART: He's asked you if you ever
18 heard that.

19 BY MR. EDWARDS:

20 Q. If your answer is no, it's no.

21 A. I'm sorry, I thought you said they did. No, I
22 have not.

23 Q. Okay. I keep highlighting this name, [REDACTED]
24 [REDACTED], just because it looks like somebody that's
25 regularly flying on the airplane. But the more that you

1 see her name, that doesn't change your opinion as to
2 whether or not you remember her or what --

3 A. I remember the name, you know, that's all.

4 Q. Do you remember about what age she was when
5 she was flying on the airplane?

6 A. No.

7 Q. This could be somebody who is 50 years old or
8 ten years old, for all you know?

9 MR. CRITTON: Form.

10 THE WITNESS: Yes.

11 BY MR. EDWARDS:

12 Q. Okay.

13 A. I mean, I would only be guessing at an age.

14 Q. Yeah, but I mean, you don't remember her at
15 all. So you don't --

16 A. I remember the name, exactly.

17 Q. Other than the name?

18 A. Right, yes, sir.

19 Q. But you can't even come close to putting a
20 face with that name?

21 A. I mean, no. I mean, if you said draw her
22 picture with -- I couldn't come close to even getting
23 it.

24 Q. Okay. You remember this flight where
25 President Clinton, Kevin Spacey and Chris Tucker,

1 Jeffrey Epstein, Ghislaine Maxwell?

2 A. Yes.

3 Q. From JFK to what is this, LPAZ?

4 A. LPAZ, that is --

5 Q. South Africa or something?

6 A. No, it's the Azores Islands, Santa Maria.

7 Q. Do you know the purpose of that trip?

8 A. That was a fuel stop.

9 Q. Okay. And do you know why Chris Tucker and
10 Kevin Spacey were on that airplane?

11 A. No.

12 Q. Did you talk to them?

13 A. They came up in the cockpit and said hello.
14 So they conversed, nothing more.

15 Q. Another name that is on here a few times, I'm
16 specifically referring right now to the dates of
17 September 23rd and 24th of 2002, is Ron Burkle. Do you
18 know who that is, Ron Burkle?

19 A. I know what that is, yes. I didn't realize he
20 was on our airplane.

21 Q. Right now that is the first time that you
22 remember Ron Burkle being on your airplane?

23 A. Yeah.

24 Q. You don't know the purpose for him being on
25 that airplane?

1 A. No. Granted, I'm seeing this for the first
2 time, so I'm trying to --

3 Q. Let me ask you that. Because this was given
4 to me at a deposition of Dave Rogers, who I understand
5 was the chief pilot for Mr. Epstein, and now you're the
6 cheap pilot, but you always kind of worked in tandem,
7 correct?

8 A. Sure; we complemented each other.

9 Q. And you both worked for the same company that
10 flies Jeffrey Epstein's airplanes, right?

11 A. Yes.

12 Q. So I was of the presumption, which may have
13 been -- I may have been misled here, or I may have, you
14 know, misunderstood the purpose behind this book or how
15 it was created. I thought that you had probably seen
16 this before at some point in time?

17 A. Oh, no.

18 Q. Did you know that Dave Rogers was keeping this
19 book?

20 A. No. I know he keeps a pilot log book.

21 Q. Okay. But you didn't know he was keeping the
22 names of the people who were on the airplane?

23 A. No. It's not required, so I mean, it's...

24 Q. So today is the first time that you are
25 learning that the names of the people that are on the

1 airplane was kept by Dave Rogers?

2 A. Yes, in his log book.

3 Q. Okay. And it's my understanding when you fly
4 back into the country through Customs, you have to
5 report the people that are on the airplane, right?

6 A. Yes.

7 Q. And who would create that document or call
8 that information into Customs?

9 A. Whoever the captain was for the day.

10 Q. At times would that be you?

11 A. Yes.

12 Q. Okay. And at times when you would come into
13 the country with passengers -- well, not at times.
14 Didn't you also have to report their date of birth?

15 A. Sure.

16 Q. At times weren't there also people that you
17 would bring in from other countries into the United
18 States that were under the age of 18?

19 A. Yes.

20 Q. And at some times those were flights that
21 included Jean Luc Brunel and girls that were under the
22 age of 18, right?

23 MR. CRITTON: Form.

24 THE WITNESS: I don't remember those flights.

25

1 BY MR. EDWARDS:

2 Q. Okay. You don't remember which flights it
3 would have been where there would have been girls under
4 the age of 18?

5 MR. CRITTON: Form.

6 THE WITNESS: Well, I would have to look at
7 the flight logs.

8 BY MR. EDWARDS:

9 Q. It's not illegal to have somebody under the
10 age of 18 on a flight anyway, right?

11 A. No, not at all.

12 Q. Were you ever aware that you, as pilot, were
13 transporting girls under the age of 18 who were supposed
14 to be models?

15 MR. CRITTON: Form.

16 THE WITNESS: I had no knowledge.

17 BY MR. EDWARDS:

18 Q. Okay. You never knew who the people on the
19 airplane were, what their purpose was, their role with
20 Jeffrey Epstein or Jean Luc Brunel?

21 A. No.

22 Q. All right. Do you know [REDACTED] ?

23 A. No, I don't remember that name.

24 Q. [REDACTED] ?

25 A. I remember the name.

1 Q. She flew frequently at least for a period of
2 time. Do you remember that?

3 A. Yes.

4 Q. Is that somebody that you thought was familiar
5 with the modeling industry or related to the modeling
6 industry?

7 A. No.

8 Q. Okay. And these people, did Jeffrey Epstein
9 ever tell you how he was associated with any of them?

10 A. No.

11 Q. Did you ever wonder how he was associated with
12 any of them?

13 A. No, never interested.

14 Q. And on several of these -- on most of these,
15 the names or initials of the people that are on the
16 flight are listed. Do you know on the occasions where
17 it lists generically two females or three females or six
18 females, do you know why that was done?

19 A. Just because we didn't know our -- the
20 person's name. We tried to do the best we could to keep
21 the records.

22 Q. When you say "we tried to do the best that we
23 could" --

24 A. Dave and I.

25 Q. Okay. But the first time that you learned

1 that he kept anybody's names was today, right?

2 A. Well, I didn't know he kept them in his log
3 book. We would fill out the passenger manifest as
4 we're -- having passengers' names in your pilot log
5 book, he's probably the only person in the world that
6 does that.

7 Q. Okay.

8 A. So when you were mentioning putting the names
9 down, when you said female or male, you know, I was
10 referring to the passenger manifest.

11 Q. For each of these same flights, then, that
12 we're referring to out of this log book that was marked
13 as Composite Exhibit 1 in Dave Rogers' deposition, am I
14 understanding you correctly, then, there would also be a
15 passenger manifest for each of these flights?

16 A. Yes.

17 Q. Now, where would I find the passenger
18 manifest? Who keeps that documentation?

19 A. Corporate -- our corporate office.

20 Q. Which is whom?

21 A. Up in New York, Darren Indyke.

22 Q. At what corporation is that, though?

23 A. NES, LLC, I guess.

24 MR. REINHART: Do you know for sure?

25 THE WITNESS: I don't know for sure. I mean,

1 when you say -- we would just send them up to New
2 York.

3 BY MR. EDWARDS:

4 Q. Did you ever keep a copy of them?

5 A. No.

6 Q. Why did you keep a passenger manifest?

7 A. Just for tracking of -- to have the times on
8 there for --

9 MR. REINHART: Can I confer with him on one
10 thing before you ask a question?

11 MR. EDWARDS: Yeah, yeah.

12 (Off the record discussion.)

13 MR. REINHART: Mr. Edwards, let him amend his
14 prior answer. I think he misunderstood the
15 question.

16 MR. EDWARDS: I don't know what question we're
17 amounting the answer to.

18 MR. REINHART: Let me clarify this way: As
19 the passenger manifests, they are corporate
20 documents of either JEGE or Hyperion Air, whatever
21 company owns the plane. Mr. Visoski has physical
22 custody of them. He retains them but they're not
23 his documents. They're the corporate documents.
24 So they're not in New York.

25 THE WITNESS: Those are the ones that I have

1 at the airport office that I had turned into
2 counsel that has the passenger names on them.

3 BY MR. EDWARDS:

4 Q. Okay.

5 A. It's called a passenger manifest.

6 Q. Okay.

7 MR. REINHART: Right.

8 BY MR. EDWARDS:

9 Q. The passenger manifest, just so I understand
10 exactly what that is, tell me. Tell me in your own
11 words.

12 A. It's departure time, the city, the landing
13 time exactly and the passengers that would have been on
14 that flight.

15 Q. And at times on that passenger manifest would
16 you list also generically female or male?

17 A. Yes. That was the document I was referring to
18 stating that if we didn't know a person, we did not go
19 out of our way to find out a name. We just put in to
20 account for how many people were on the aircraft at that
21 time.

22 Q. Who is currently in the custody or control --
23 sorry. Who currently maintains or has possession of the
24 passenger manifest from 1998 through the present,
25 through today for those airplanes that you flew related

1 to Jeffrey Epstein?

2 A. I currently have, which counsel has now, 2005,
3 I believe, until the present time. And the records
4 previous to that I believe were turned into counsel with
5 the previous investigation with Jack Goldberger's
6 office, I believe. I believe they maintain those
7 records.

8 Q. When you say "turned into counsel," there are
9 a lot of counsel involved here.

10 A. Jack Goldberger's office, I believe.

11 Q. When you say "the previous investigation,"
12 you're talking about the criminal investigation?

13 A. Exactly, yes, sir.

14 Q. And you're aware in that criminal
15 investigation, obviously, that Jeffrey Epstein pled
16 guilty to certain charges, correct?

17 A. From what I read, yes.

18 Q. Well, you did visit him in jail, right?

19 A. Yes. We didn't talk about that.

20 Q. Okay. You know in order to go to jail,
21 though, you have to be convicted of some crime, right?

22 MR. CRITTON: Form; argumentative.

23 THE WITNESS: Yes.

24 BY MR. EDWARDS:

25 Q. It wasn't like he was visiting the jail and

1 you were visiting and you happened to bump into each
2 other. You actually went to see him while he was an
3 inmate in jail?

4 A. Right, yes.

5 Q. Okay. So when we're talking about the
6 criminal investigation, we're talking about the criminal
7 investigation revolving around the allegations of
8 Jeffrey Epstein engaging in sex acts with minors?

9 MR. CRITTON: Form.

10 BY MR. EDWARDS:

11 Q. That's the criminal investigation you're
12 talking about, right?

13 MR. CRITTON: Form.

14 THE WITNESS: I don't know the full definition
15 of really what happened there. I know that it was
16 something to do with solicitation of prostitution.
17 That's all I read.

18 BY MR. EDWARDS:

19 Q. Okay. Were you aware that the allegations
20 revolved around underage girls or girls under the age of
21 18?

22 MR. CRITTON: Form.

23 THE WITNESS: I was aware it revolved around
24 it, yes.

25

1 BY MR. EDWARDS:

2 Q. Who first made you aware of that?

3 A. The newspaper.

4 Q. Were you ever questioned by the police?

5 A. I don't know who questioned me, actually. I
6 did have a questioning session, but I don't even
7 remember who questioned me.

8 Q. Where did that take place?

9 A. I don't remember.

10 Q. At your house?

11 A. No. I'm thinking it was Jack Goldberger's
12 office, or it may have been downtown at the Palm Beach
13 County Courthouse or something in that area there.

14 Q. Okay. So it either happened at an attorney's
15 office that represented --

16 A. Exactly, yeah, I think so.

17 Q. -- Jeffrey Epstein or the other side?

18 A. Yeah.

19 Q. And during that questioning, is that when you
20 turned over the passenger manifest from prior to 2005?

21 A. Yes.

22 Q. And you turned those manifests directly over
23 to Jack Goldberger?

24 A. Yes. Actually, I believe Dave Rogers did
25 that. I wasn't in possession of those records.

1 Q. And for the passenger manifest prior to 2005,
2 how far do those passenger manifests go back in time?

3 A. They should go back, I guess, to 1991 or
4 whenever we started existence.

5 Q. And did you turn them over from 1991 all the
6 way through to 2005?

7 A. I don't know. I didn't turn them in. Dave
8 Rogers did.

9 Q. Are you in possession of a copy of any of
10 those materials?

11 A. No.

12 Q. I thought that, you know, ten minutes ago when
13 we were talking about this you said you had them back at
14 an office or --

15 A. That was the office, the airplane office,
16 which I've given to Bruce, which is the current log. He
17 is in possession of them now. I had possession of them.

18 Q. Okay. What he's in possession of -- just so I
19 know what documents are where, he's in possession of the
20 passenger manifests from 2005 through the present?

21 A. Correct.

22 Q. If I want to obtain the passenger manifests
23 from 1998 through 2005, that's something that I would
24 request from whom?

25 THE WITNESS: Help me out. That's --

1 MR. REINHART: If you know.

2 THE WITNESS: I don't know who possesses them
3 right now. They were turned into Jack Goldberger's
4 office a year and a half or two years ago.

5 BY MR. EDWARDS:

6 Q. You started out by indicating that you sent
7 these passenger manifests, or a copy thereof, to Darren
8 Indyke or someone at NES, LLC; is that correct?

9 A. Correct.

10 Q. If I requested them from NES, LLC, that's
11 somebody at some point in time was in possession of all
12 the passenger manifests?

13 A. Sure.

14 Q. And NES, LLC's address is the one you gave me
15 at [REDACTED]?

16 A. I believe so. I don't know what address
17 they're using for that. I know that --

18 Q. But Darren Indyke's the attorney that I would
19 call --

20 A. Yes, sir.

21 Q. -- and he could probably steer me in the right
22 direction?

23 A. Yes.

24 MR. CRITTON: Form.
25

1 BY MR. EDWARDS:
2 Q. Do you know [REDACTED] ?
3 A. Yes.
4 Q. How do you know her?
5 A. She was on the airplane.
6 Q. How old is she?
7 A. I have no idea.
8 Q. Age range?
9 A. Twenty-eight.
10 Q. Now?
11 A. Yeah, 28, or maybe if not older now. She was
12 probably 28 probably, I guess. She was somebody in her
13 late 20s.
14 Q. So we're talking about 2003? That's what I'm
15 trying to understand.
16 A. I'm guessing.
17 Q. We're talking 2009 now. We're saying 28. By
18 that do you mean in 2003 she was 23 or 24 years old?
19 A. You're having me guess on her age.
20 Q. Yeah.
21 A. I mean, I can't be accurate.
22 Q. Somebody between 18 and 25?
23 MR. CRITTON: Form.
24 BY MR. EDWARDS:
25 Q. At the time you were seeing her back in --

1 A. If you want me to guess --
2 Q. No, I don't want you to guess.
3 A. I don't know then.
4 Q. Well, if I say between ten and fifty?
5 A. That's a range.
6 Q. If I say between ten and fifty, you're not
7 guessing there anymore. You know she's in there, right?
8 A. She's in the middle there, yeah.
9 Q. Okay. How can we narrow that down? We're
10 talking about somebody in her 20s?
11 A. In her 20s.
12 Q. At least that's what you believed?
13 A. Yes.
14 Q. All right. Is that somebody that you know to
15 be associated or friendly with Ghislaine Maxwell?
16 A. I don't know.
17 Q. Do you know what her relationship was to
18 Jeffrey Epstein or Ghislaine Maxwell?
19 A. No.
20 Q. Do you know where she is now?
21 A. No idea.
22 Q. When's the last time you talked to her?
23 A. I don't know. What date do you have on there?
24 Q. February 2003.
25 A. So, probably that long ago. I may have said

1 hello.

2 Q. That's somebody who was on the airplane
3 multiple times?

4 A. More than once. I mean, I have no account for
5 how many times.

6 Q. Well, I've asked you about a bunch of names,
7 most of which you don't really remember, but that's one
8 name you do remember.

9 A. Yeah, I remember the name, yeah.

10 Q. Okay. And that's somebody who you actually --
11 you would remember the face too?

12 A. I might remember Amy's face.

13 Q. All right. Do you remember why she would have
14 ever been on your airplane?

15 A. No idea.

16 Q. President Andres Postrana, at the time I guess
17 that was the president of Colombia back in February --
18 sorry, March 20th of 2003. Do you know who that is?

19 A. I don't remember him being on the airplane,
20 but I know who that is.

21 Q. Okay. He's on the airplane with Jeffrey
22 Epstein, Ghislaine Maxwell, [REDACTED] and Jean Luc
23 Brunel?

24 A. Where did we go?

25 Q. I'll let you look at it. I'm talking about

1 this line, PBI, left out of Palm Beach?

2 A. Palm Beach to Nassau. I'm sorry, I don't
3 remember that one.

4 Q. When we're saying we're going down to Nassau,
5 is that a place that you frequently went to with the
6 airplane?

7 A. No, not at all.

8 Q. And is that a route that you would take for
9 the ultimate destination to be Little St. James?

10 A. No.

11 Q. If the ultimate destination was Little
12 St. James -- show me a flight where the ultimate
13 destination was Little St. James.

14 A. Yeah, right here. TIST, that's St. Thomas.

15 Q. Okay. So on that flight that you just pointed
16 to, March 27th, 2003, we have Jeffrey Epstein, [REDACTED]
17 [REDACTED], [REDACTED] again, Brent Tyndall -- do you know
18 who Brent Tyndall is?

19 A. Yes.

20 Q. And who is that?

21 A. I believe he was the chef.

22 Q. And [REDACTED] (phonetic), is that
23 somebody you know to be a model these days?

24 A. I have no idea.

25 Q. Do you remember that flight?

1 A. No.

2 Q. Do you remember Naomi Campbell, picking her up
3 from St. Thomas along with Jean Luc Brunel?

4 A. I remember her being on board. I don't
5 remember the flight.

6 Q. Do you know Joel Pashcow?

7 A. Yes.

8 Q. How do you know him?

9 A. He was on the airplane.

10 Q. And is that somebody you knew at one point in
11 time to be a friend of Jeffrey Epstein's?

12 A. He was on the airplane. I don't know what the
13 relationship was.

14 Q. Do you know what the relationship is today?

15 A. No idea.

16 Q. How about Todd Mister, do you know what that
17 relationship is or was today?

18 A. No.

19 Q. Do you remember him?

20 A. No.

21 Q. Not at all?

22 A. I mean, I know the name. I don't know.

23 Q. Paula Epstein, do you know who that is?

24 A. Yes.

25 Q. Who is that?

1 A. That's Jeffrey's mom.

2 Q. She's passed away?

3 A. Yes.

4 Q. At least that's your understanding, right?

5 A. That's what I heard, yes.

6 Q. Okay. [REDACTED], do you know her?

7 A. [REDACTED], I know the name.

8 Q. Somebody who flew on the airplane with some
9 regularity?

10 A. Yes.

11 Q. And do you know her to be friends of Ghislaine
12 Maxwell or [REDACTED] or Jeffrey Epstein?

13 MR. CRITTON: Form.

14 THE WITNESS: I have no idea who she was
15 friends with.

16 BY MR. EDWARDS:

17 Q. All right. Do you know what role she ever
18 played, if she played one, in Jeffrey Epstein's life?

19 A. No.

20 Q. All right. Glenn Dubin, are you familiar with
21 him?

22 A. Yes.

23 Q. How do you know Glenn Dubin?

24 A. I met him on the airplane.

25 Q. Outside of the airplane, have you ever seen

1 him around Jeffrey Epstein?

2 A. No.

3 Q. All right.

4 A. No.

5 Q. [REDACTED], do you know that name?

6 A. No.

7 Q. She was on several flights. You don't
8 remember seeing her?

9 A. No.

10 Q. All right. And how about Alan Dershowitz, I'm
11 sure you know who that is?

12 A. Sure. He's famous.

13 Q. What was your understanding of Alan
14 Dershowitz's relationship with Jeffrey Epstein?

15 A. Never talked about it.

16 Q. Forrest Sawyer, do you know why he was on your
17 airplane?

18 A. Never heard the name, actually.

19 Q. Really?

20 A. No.

21 Q. Larry Summers?

22 A. I know the name. I don't remember flying him.

23 Q. Have you ever talked to Joe Fontanela?

24 A. Yes.

25 Q. How do you know him?

1 A. He usually drops Jeffrey off at the airport.

2 Q. In fact, you've called him directly before,
3 right?

4 A. Yes.

5 Q. You still have his number?

6 A. I haven't -- yes, I think I still got it in my
7 memory.

8 Q. Okay. What is it?

9 A. It's been a few years. [REDACTED]. It's
10 kind of an easy one.

11 MR. CRITTON: 917 is the first --

12 THE WITNESS: Yes.

13 MR. CRITTON: Who was this for?

14 MR. REINHART: Joe, Joe Fontanela.

15 MR. EDWARDS: Fontanela.

16 BY MR. EDWARDS:

17 Q. Do you know his address, where he resides?

18 A. No, I don't.

19 Q. Do you know if he -- what his role is in
20 Jeffrey Epstein's life?

21 A. Not really. He just -- he drove the car.

22 Q. He drove what car?

23 A. The car up in New York.

24 Q. Okay. Do you know if he's a housekeeper up at
25 that house up in New York?

1 A. I don't know what his role is.

2 Q. Have you ever worked for a company called Air
3 Ghislaine? Do you know that company?

4 A. Yes.

5 Q. Do you know what that company does?

6 A. No.

7 Q. Have you ever been an employee of that
8 company?

9 A. No.

10 Q. Do you know who runs that company?

11 A. No.

12 Q. Is Jeffrey Epstein associated with that
13 company?

14 A. I don't know.

15 Q. How have you heard of that company?

16 A. It's the company name that our registration
17 for the helicopters is under, Air Ghislaine.

18 Q. Is that somebody who's ever paid you, a
19 company who's ever paid you?

20 A. No.

21 Q. Do you know Igor Zinoviev?

22 A. Yes.

23 Q. How do you know him?

24 A. Met him on the airplane.

25 Q. What is your understanding of his affiliation

1 with Jeffrey Epstein?

2 A. I don't know. He doesn't talk much.

3 Q. Okay. And Sandy Berger, do you know who that
4 is?

5 A. I don't know.

6 Q. Do you know any reason why you would have
7 flown him on the airplane?

8 A. I don't even know the name.

9 Q. [REDACTED]?

10 A. I know the name [REDACTED].

11 Q. Somebody who flew on the plane pretty
12 regularly?

13 A. I would have to look at the logs. I think
14 we've had that name on several -- it's a common first
15 name. I'm not familiar really on who that is.

16 Q. What about [REDACTED], do you know who [REDACTED] is?
17 Is that a name you ever heard?

18 A. Yes.

19 Q. Works up in the New York office or something?

20 A. Yes.

21 Q. Have you ever spoken with [REDACTED] personally?

22 A. Yes.

23 Q. Do you know what she does for Jeffrey Epstein,
24 if anything?

25 A. I don't know exactly what her role is.

1 Q. Do you know -- did you tell me, do you know
2 what Leslie Gruff does for Jeffrey Epstein?

3 A. I don't know her exact title.

4 Q. You talked to all of these individuals at some
5 point in time, either on the phone or in person, right?

6 A. Yes.

7 Q. And you don't know whether they play a role in
8 Jeffrey Epstein's life, or if they do, what they do?

9 A. Exactly.

10 Q. And how do you decide who you're going to call
11 for what reason?

12 A. For example? Can you be more specific?

13 Q. If you're going to make a telephone call and
14 you're going to talk to let's say Leslie Gruff, why
15 would you choose to call her?

16 A. I don't know. You're having me make the phone
17 call. I don't know why I would call her.

18 Q. Have you ever called her?

19 A. I think, yes, I've called her, sure.

20 Q. Why? What would be the reason that you would
21 call her? Somebody told you to call her? Here, call
22 this number?

23 A. I may have called her maybe to find out if we
24 had a departure time for any specific trip. I mean,
25 that would be...

1 Q. Okay. So you're calling her related to
2 Jeffrey Epstein?

3 A. Sure.

4 Q. Okay. So you know that she plays some role in
5 some aspect of Jeffrey Epstein's life, whatever that is?

6 A. Right.

7 Q. Okay. So when I'm asking these questions
8 about these people, and I feel like I'm getting answers
9 that I'm not really not sure that these people have any
10 role in their life, that's not -- that's not completely
11 accurate, right?

12 MR. CRITTON: Form; argumentative.

13 BY MR. EDWARDS:

14 Q. I mean, you do know that these people are
15 somehow involved with him, whether socially or
16 business-wise or otherwise, and during the course of
17 your years, you've made telephone calls on his behalf or
18 to coordinate things with them right?

19 A. Right.

20 MR. CRITTON: Object to the form. You said
21 "these people."

22 BY MR. EDWARDS:

23 Q. I'm talking about [REDACTED]. That's
24 somebody you called before, right?

25 A. Sure.

1 Q. What would be a reason you called [REDACTED]
2 [REDACTED]?

3 MR. CRITTON: Object to form. Probably the
4 same reasons he said two hours ago, for scheduling
5 purposes. But you've covered that. Go ahead and
6 answer it again.

7 THE WITNESS: For scheduling purposes, would
8 be my only reason to call her.

9 BY MR. EDWARDS:

10 Q. That's funny that you used the exact same
11 words that Mr. Critton wants you to use.

12 MR. CRITTON: It's what he said two hours ago.

13 BY MR. EDWARDS:

14 Q. What would be the reason why you would call
15 Ms. Maxwell, Ghislaine Maxwell?

16 A. Same reason.

17 Q. That's not somebody you call these days,
18 though, right?

19 A. I haven't seen her in some time.

20 Q. What made you stop calling Ghislaine Maxwell
21 where you thought at one point in time you thought she
22 was a person to call related to your job?

23 A. Just was no reason to.

24 Q. Is that somebody who you think is still
25 affiliated or associated with Jeffrey Epstein or his --

1 whatever he does?

2 A. I'd only can speculating. I don't know.

3 Q. All right. Do you know the number

4 [REDACTED]

5 MR. CRITTON: Could you say it slowly. [REDACTED]?

6 MR. EDWARDS: [REDACTED]. Thank you. And just
7 in case you didn't get it, I'm going to mark these
8 as an exhibit so that we can read them later.

9 BY MR. EDWARDS:

10 Q. Do you know that number?

11 A. Yes.

12 Q. What is that number?

13 A. That's my cell phone.

14 Q. Okay. Is that still your cell phone?

15 A. Yes, sir.

16 Q. All right. I'm going to show you two
17 documents here or pieces of paper. We'll mark them as
18 Exhibit 2 and Exhibit 3. The first one is dated
19 March 5th, 2005. Do you remember making this telephone
20 call? And just for the record, this looks like a
21 message that's being taken relative to a phone call that
22 you made.

23 MR. REINHART: So the question is does he
24 remember making the phone call?

25

1 BY MR. EDWARDS:

2 Q. Do you remember making that phone call after
3 reading the message?

4 A. Let me look at the date here. Okay. March.

5 MR. REINHART: The question is, do you
6 remember making the call?

7 THE WITNESS: Okay, let me. "Person for the
8 car will be here in 15 minutes to drop off foam and
9 papers." I don't know.

10 BY MR. EDWARDS:

11 Q. That doesn't mean anything to you?

12 A. That doesn't -- I mean, you're talking four
13 years ago. I can't answer that accurately. I mean...

14 MR. REINHART: So the answer is you don't
15 recall?

16 THE WITNESS: Yeah, I don't recall.

17 BY MR. EDWARDS:

18 Q. If you don't remember, that's fine.

19 (Plaintiff's Exhibit Nos. 2 AND 3 were marked
20 for identification.)

21 BY MR. EDWARDS:

22 Q. So I'll show you Exhibit 3, the same type of
23 document, and I can make the representation that this
24 was message pads provided by the state attorney's office
25 relative to the criminal investigation revolving around

1 Jeffrey Epstein. So that's how I have these documents.
2 I'm not trying to pull out old documents.

3 MR. CRITTON: What's the date?

4 MR. EDWARDS: March 19th.

5 MR. REINHART: The question is, do you
6 remember the call?

7 THE WITNESS: "Tom from Midnight Express is
8 at" -- help me out -- "convention center with new
9 boat. They are two points -- two parts of this."

10 BY MR. EDWARDS:

11 Q. "Show"?

12 A. "Show up the water" --

13 MR. REINHART: "On the water."

14 THE WITNESS: "On the water and at the
15 center."

16 BY MR. EDWARDS:

17 Q. Do you remember making that call?

18 A. No. I mean, "Tom from Midnight Express is at
19 convention center with new boat. They are two parts
20 of" -- I mean --

21 Q. But as Jeffrey Epstein's pilot, why would you
22 be leaving such a message about Tom from Midnight
23 Express relative to boats and a boat show?

24 A. I help out with boat purchases or, you know,
25 anything to do with, you know, that moves. So I mean,

1 I...

2 Q. Okay. When you say "you help out with boat
3 purchases," what do you mean?

4 A. Give my opinion, whether or not whether to buy
5 a certain boat. It's just a hobby. I have knowledge on
6 boats. Not only just airplanes but, you know.

7 Q. You give your opinion to whom?

8 A. To Jeffrey.

9 Q. Okay. And Jeffrey Epstein obviously, at least
10 in your mind, you believe he wants your opinion?

11 A. Yes.

12 Q. Okay. So boats is another thing that the two
13 of you have discussed?

14 A. Yes.

15 Q. All right. And so this a conversation or at
16 least some evidence that a conversation existed between
17 yourself and Jeffrey Epstein relative to a boat or a
18 boat show?

19 A. Correct.

20 Q. Do you remember having that conversation?

21 A. We've had many conversations about boats and
22 different boat shows. If you're referring to this one
23 in '05, I don't recall this one.

24 Q. Okay. So aside from being a pilot -- which
25 throughout this entire deposition I believe your

1 testimony has been, you know, you're just the pilot for
2 him -- it looks like there's some other role that you're
3 playing here in his life. I'm not suggesting that you
4 are or you are not. I'm just saying from the appearance
5 of this, it looks that way. Is there anything else that
6 you want to tell me or that you want to clarify in terms
7 of the role that you play in Jeffrey Epstein's life
8 outside of being just his pilot?

9 MR. REINHART: Let me object to form. He also
10 told you he installs the audio and video equipment
11 before.

12 MR. EDWARDS: Correct.

13 THE WITNESS: I have an interest in boats.
14 You know, with the island, I don't think I bought
15 any boats, you know, for the company, but he
16 appreciates my opinion on boat purchases.

17 BY MR. EDWARDS:

18 Q. Okay.

19 A. Having the knowledge of aviation and things
20 that move quite fast. So I have consulted with him on
21 boat items.

22 Q. How many boat purchases are you aware of
23 Jeffrey Epstein making in the time period that you've
24 known him?

25 A. Two or three.

1 Q. And has he consulted with you on each of those
2 purchases?

3 A. Not every one of them, no.

4 Q. Does he own any boats now that you're aware
5 of?

6 A. I don't know if he owns them or not.

7 Q. Okay. Do you know of any boats that he
8 controls or maintains?

9 A. Himself or?

10 Q. How about this -- I'll ask you this way. I
11 don't want to split hairs with you here: I know we've
12 been talking about corporations and things like that.

13 A. Yes he.

14 Q. Do you know of any boats that he is the person
15 with the most control over?

16 A. Yes.

17 Q. Okay. Where would those boats be located and
18 what kind of boat are we talking about?

19 A. St. Thomas is the location. It would be a
20 34-foot inflatable boat. I know that one specifically.

21 Q. Okay. Do you know when he made that purchase?

22 A. Eight years ago, seven years ago. It was a
23 while ago.

24 Q. Is that something you had had input in?

25 A. Not on that one specifically, no.

1 Q. Is there any other boat that you know of
2 Jeffrey Epstein being the primary user of or the primary
3 controller of?

4 A. I mean, there's boats in St. Thomas. I mean,
5 it's not part of my job, you know, what goes on with the
6 boats or who controlled them. It's more of an opinion
7 of what horsepower should be on the back of the boat,
8 hull designs. It's out of my area.

9 Q. But your sole responsibility or your sole
10 obligation that you have ever had with Jeffrey Epstein
11 relative to boats is just giving some opinions about the
12 boat?

13 A. Mm-hmm.

14 Q. Is that yes?

15 A. Yes, yes.

16 Q. Okay. All right. Has he ever given you his
17 opinions about boats?

18 A. Sure. We've discussed it back and forth.

19 Q. Other than boat conversations, have you ever
20 talked other conversations, such as --

21 A. Cars.

22 Q. Okay. How about such as -- have you ever
23 known Jeffrey Epstein to have a girlfriend, somebody you
24 consider a girlfriend?

25 A. No.

1 Q. In the 18 years and all the travels you had
2 with him, do you know anything about Jeffrey Epstein's
3 sex life?

4 A. No.

5 Q. Do you know who he has sex with?

6 A. No.

7 Q. Do you know if he has sex with anybody?

8 A. I don't know.

9 Q. Do you know if he's ever had sex on the
10 airplane while you've been piloting it?

11 A. I have no idea.

12 Q. That's something that you just wouldn't know
13 because you're up in the cockpit?

14 A. That is correct.

15 THE WITNESS: Could I take a two-minute
16 bathroom break just to lose my coffee?

17 MR. EDWARDS: Sure.

18 (A break was had at 12:35 p.m.)

19 BY MR. EDWARDS:

20 Q. All right. We're back on the record. Over
21 the years you've indicated that the -- any gifts or
22 other items or things given to you by Jeffrey Epstein
23 exclusively are the pool heater, the 40-acres of land
24 and the --

25 A. Use of a company --

1 Q. -- and the use of a company car?

2 A. Yes.

3 Q. That's it?

4 A. (Nodding.)

5 Q. Okay.

6 A. Yes, I'm sorry, yes.

7 Q. And the flight to Miami that was recently
8 taken, other than Jeffrey Epstein and [REDACTED] [REDACTED],
9 was there anybody else on that flight?

10 A. No.

11 Q. How long -- did you also fly them back from
12 Miami to Palm Beach?

13 A. No. He drove back.

14 Q. When you say "he drove back," who drove back?

15 A. Well, I assume he drove back. I did not fly
16 him back.

17 Q. When's the next time you saw him again?

18 A. I would only be guessing. A week later, I
19 mean.

20 Q. Okay. And was that in Palm Beach County when
21 you saw him the next time?

22 A. Yes, sir.

23 Q. Do you know of him leaving Palm Beach County
24 in the last two years on any other occasion?

25 A. No.

1 Q. Did he ever fly anywhere else with you either
2 by helicopter or airplane in the last two years?

3 A. We flew one time to the Sikorsky plant.

4 Q. What's the Sikorsky plant?

5 A. That's where they build the Sikorsky
6 helicopters. It's in Palm Beach County.

7 Q. And when was that?

8 A. Probably a month ago, I'm guessing.

9 Q. For what purpose?

10 A. They gave us a tour at a facility.

11 Q. Who's they?

12 A. Sikorsky.

13 Q. And who requested the tour of the facility?

14 A. They offered it to our flight department.

15 Q. And who went?

16 A. Jeffrey, myself, [REDACTED] and Igor.

17 Q. And if I wanted documentation of either of
18 those trips, the trip to Miami or the trip to the
19 Sikorsky plant, who would have that documentation?

20 A. I would.

21 Q. So I could request it from your attorney to
22 get it from you?

23 MR. REINHART: Let me just check.

24 (Off the record discussion.)

25 MR. REINHART: Okay. He has custody of it,

1 but they're corporate documents. So you'd have to
2 request it from Mr. Critton, who I understand
3 represents all the corporations.

4 THE WITNESS: Yes.

5 BY MR. EDWARDS:

6 Q. What's the corporation that the document was
7 prepared for?

8 A. Meaning who -- what, like Air Ghislaine, the
9 owner of the helicopter? Yes, Air Ghislaine.

10 Q. Air Ghislaine?

11 A. That's the helicopter.

12 Q. And the name Ghislaine is obviously not that
13 typical of a name. Is that reference or related to
14 Ghislaine Maxwell?

15 A. I would assume. I have no knowledge.

16 Q. Nobody's ever told you that?

17 A. Nobody's brought it up.

18 Q. Okay. And how long were you at the Sikorsky
19 facility?

20 A. Three hours, four hours.

21 Q. And what time of day was this?

22 A. Nine in the morning. Nine, I think, and we
23 returned at one, something like that.

24 Q. And was the purpose to buy or purchase
25 anything?

1 A. They have a new helicopter being developed
2 there, so they're trying to look for investors in it.
3 So they were just kind of pushing their product.

4 Q. Do you know what Jeffrey Epstein does for a
5 living for business today, these days?

6 A. No.

7 Q. Do you know or have you ever been to the
8 Florida Science Foundation?

9 A. Yes, sir.

10 Q. And do you know what the Florida Science
11 Foundation does?

12 A. Not exactly.

13 Q. Well, generally?

14 A. No, I don't. I mean, really, I don't.

15 Q. Okay. Is it your understanding that Jeffrey
16 Epstein is somehow affiliated with the Florida Science
17 Foundation?

18 A. It's my understanding that, yes.

19 Q. I mean, did you just by happenstance stumble
20 into the Florida Science Foundation, or was it related
21 to your relationship with Jeffrey Epstein?

22 A. I've heard that's where his office was. I
23 mean, I have no other --

24 Q. Why did you go there?

25 A. Talk about airplanes.

1 Q. Talk to who?

2 A. Jeffrey.

3 Q. Jeffrey just happened to be at the Florida
4 Science Foundation?

5 A. Yes.

6 Q. How did you know that he was going to be at
7 the Florida Science Foundation?

8 A. He called me and told me.

9 Q. And he said come to the Florida Science
10 Foundation to talk to me about what?

11 A. Maintenance on the airplanes, upcoming. It's
12 an ongoing.

13 Q. And did he have an office there?

14 A. Yes.

15 Q. So this is -- when you walked in, this is the
16 place that's right next to Jack Goldberger's office?

17 MR. CRITTON: Form.

18 THE WITNESS: Yes.

19 BY MR. EDWARDS:

20 Q. And you walk in and there's a reception desk
21 right there?

22 A. Yes.

23 Q. Is that where you talked or did you talk
24 somewhere behind that reception desk?

25 A. Behind the reception area.

1 Q. Back in his office?

2 A. Yes, sir.

3 Q. What was that conversation?

4 A. Give me a time frame. I mean, I've been there
5 several times.

6 Q. Okay. How many times do you think you've been
7 to the Florida Science Foundation?

8 A. Twenty, thirty. I mean...

9 Q. Well, the Florida Science Foundation's only
10 been around since late 2007; is that right?

11 MR. CRITTON: Form.

12 BY MR. EDWARDS:

13 Q. Something around that?

14 A. I don't know exactly.

15 Q. All right. So in the last 20 years -- in the
16 last couple of years you've been there 20 or 30 times,
17 approximately?

18 A. Yes, sir.

19 Q. And during those times when you've been there,
20 without having to go through each conversation, did you
21 ever talk to him about the fact that he was on probation
22 or that he was --

23 A. No.

24 Q. -- any part of the criminal investigation?

25 A. No, not at all.

1 Q. What was the purpose of the conversation?

2 A. We were sometimes talking about TVs, you know,
3 the latest plasma that's out there, LCD, you know,
4 setting up a stereo systems, you know, in the Palm Beach
5 house. That's usually the main thrust of our
6 conversations these days.

7 Q. How would you know to go to the Florida
8 Science Foundation on each of those occasions? Would he
9 just call you?

10 A. Yeah, he would call me and say come on by or I
11 got a brochure on a new Samsung.

12 Q. With each time you were at the Florida Science
13 Foundation, how long would you stay typically?

14 A. Ten, fifteen minutes. Not much more than
15 that.

16 Q. You would go there for ten or fifteen minutes,
17 have a conversation about a TV and leave?

18 A. Yes, sir.

19 Q. Why couldn't you have that conversation over
20 the phone? What was it about?

21 MR. CRITTON: Form.

22 THE WITNESS: If it was pertaining to a TV and
23 I'd have a brochure, a picture of the TV -- one
24 particular TV we looked at it was the size of a --
25 like five foot diagonal, so I had a photo of myself

1 standing next to it or the salesperson. So I mean,
2 there's a reason to visually show him something
3 reference to that.

4 BY MR. EDWARDS:

5 Q. Did you ever communicate with Jeffrey
6 Epstein -- you can send him an e-mail, right? You could
7 have done that?

8 A. Yes.

9 Q. To send him the picture or something like
10 that, that was an option?

11 A. Right.

12 Q. And what's Jeffrey Epstein's e-mail address
13 that you use?

14 A. I have to do it on my computer, you know,
15 with -- I have to type in the prompts for it because
16 it's a long e-mail address.

17 Q. Okay. How long have you e-mail corresponded
18 with Jeffrey Epstein?

19 A. Probably two years. A year to two years. I
20 mean, it's fairly -- something we just started doing. I
21 mean, we'd never done that in the past.

22 Q. Well, in the past he was in jail or have some
23 restrictions?

24 A. The restrictions, yes.

25 Q. So you you'd see him on the airplane

1 frequently?

2 A. Exactly.

3 Q. So when you didn't see him on the airplane
4 frequently, then some of your correspondence was by
5 e-mail, other times by telephone?

6 A. Mm-hmm.

7 Q. And other times in person?

8 A. Yes.

9 Q. And what was your e-mail -- what was the
10 substance of the e-mail correspondence that you would
11 have with Jeffrey Epstein?

12 A. It would have to be related. I mean, you have
13 to give me a topic. I mean, whether it be a car --

14 Q. Never about the criminal investigation?

15 A. Oh, no, no, never.

16 Q. Do you know what his intention is or his plans
17 are for when he is off probation?

18 A. No idea.

19 Q. Or off community control?

20 A. I have no idea.

21 Q. Has he ever indicated to you he wants you to
22 fly him to some other location outside the United States
23 to live permanently?

24 A. Oh, no.

25 Q. Have you ever flown to his place in Paris?

1 A. We've landed in Paris.

2 Q. You're aware that he has some control over
3 another piece of property over there?

4 A. I know we've picked up luggage at a residence.
5 I don't know to what extent his ownership is, if any.

6 Q. All right.

7 A. Right.

8 Q. And are you aware that he has some employees
9 that listen to what he says that work in that house?

10 MR. CRITTON: Form.

11 THE WITNESS: In Paris, yes, there is one
12 person there.

13 BY MR. EDWARDS:

14 Q. What's his name?

15 A. Voltzan. Because I always thought there was
16 nobody there.

17 Q. Vultzán Cauldron (phonetic)?

18 A. I don't know exactly. I would have to look it
19 up.

20 Q. Have you talked to him before?

21 A. No.

22 Q. When you've been in Paris --

23 A. You're not going to ask why?

24 Q. Well, I'm assuming he doesn't speak English.

25 A. There you go, okay.

1 Q. So I thought there was no need for that?

2 A. Okay. I just wanted to see.

3 Q. Where do you stay when Jeffrey Epstein is in
4 Paris?

5 A. A hotel.

6 Q. Okay. And in New Mexico, when you land there,
7 you stay on the ranch somewhere, but at your place?

8 A. I stay at my place.

9 Q. And in New York, you have an apartment that he
10 sets you up at, right, the 301?

11 A. Yes, I have a place I could stay.

12 Q. And in St. Thomas?

13 A. Hotel.

14 Q. And in Paris you stay at a home?

15 A. (Nodding.)

16 Q. Are there any other properties such as what we
17 were talking about today -- I'm not saying Jeffrey
18 Epstein is the sole owner or direct owner, but any other
19 properties that you're familiar with that Jeffrey
20 Epstein is -- has direct access to and at least it gives
21 the appearance to you that he is the owner or controller
22 of that property?

23 MR. CRITTON: Form.

24 THE WITNESS: Name the list that you've
25 stated.

1 BY MR. EDWARDS:

2 Q. The Manhattan house.

3 A. Yes.

4 Q. Mansion or whatever we want to call it, the
5 Zorro Ranch, the island of St. James, the Palm Beach
6 house.

7 A. Mm-hmm.

8 Q. And the Paris place.

9 A. That's all I'm aware of.

10 Q. And have you ever at any of those five places
11 hung around him and stayed around him for -- during the
12 daytime for the course of an entire day?

13 A. No.

14 Q. All right. So do you know what he does during
15 his days while he's there?

16 A. No.

17 Q. Are you aware of a list of underage girls that
18 is kept to come over and service him each of those days?

19 MR. CRITTON: Form.

20 THE WITNESS: Absolutely not.

21 BY MR. EDWARDS:

22 Q. I'm the first person to ever even imply that
23 to you, right?

24 A. A list, yes, you are.

25 Q. Okay. Have you ever been made aware that

1 [REDACTED] keeps a list of underage girls to service
2 Jeffrey Epstein for sexual purposes?

3 A. I am not aware of them.

4 MR. CRITTON: Form to the last question.

5 BY MR. EDWARDS:

6 Q. Have you ever been made aware that Ghislaine
7 Maxwell keeps a list of girls in the nearby areas of
8 each of -- at Jeffrey Epstein's residences to service
9 him sexually?

10 A. No.

11 MR. CRITTON: Form.

12 BY MR. EDWARDS:

13 Q. Okay. Have you ever read some of the
14 complaints that have been filed against him in the
15 various courts, whether state court or federal court,
16 against Jeffrey Epstein?

17 A. No, I have not.

18 Q. All right. So this Jane Doe 102 versus
19 Jeffrey Epstein, you're not familiar with who that
20 person is?

21 A. No idea.

22 Q. Okay. I'm going to mark Jane Doe, one of the
23 22, versus Epstein as Exhibit No. 4 to this deposition.

24 (Plaintiff's Exhibit No. 4 was marked for
25 identification.)

1 BY MR. EDWARDS:

2 Q. And ask you about some of the allegations in
3 here and see if you know anything about them. It
4 indicates he owns a flight of aircraft that includes a
5 Gulfstream, a helicopter, and a Boeing 727. True?

6 MR. CRITTON: What's the question?

7 THE WITNESS: Please repeat.

8 BY MR. EDWARDS:

9 Q. Are you aware of him owning a Gulfstream IV
10 aircraft, a helicopter and a Boeing 727? I think we
11 talked about it, right?

12 A. Right.

13 Q. Okay. And it indicates a fleet of motor
14 vehicles?

15 MR. CRITTON: Wait a minute. He said right,
16 is that we talked about it, as distinct from him
17 knowing one way or another.

18 THE WITNESS: What's the question?

19 BY MR. EDWARDS:

20 Q. Do you know that he owns those things?

21 A. I do not know that he owns them.

22 Q. Do you believe that he owns those things?

23 MR. CRITTON: Form.

24 THE WITNESS: I would be guessing, so...
25

1 BY MR. EDWARDS:

2 Q. What does the company NES, LLC, do to your
3 knowledge?

4 A. I have no idea.

5 Q. How does that company generate profit, if you
6 know?

7 A. I have no idea.

8 Q. That's the company that pays your paycheck,
9 but you have absolutely no clue what they do to generate
10 money?

11 A. No, sir.

12 Q. If anything?

13 A. Correct.

14 Q. Have you ever heard that that company
15 generates money through sex trafficking of young girls?

16 MR. CRITTON: Form.

17 THE WITNESS: Absolutely not.

18 BY MR. EDWARDS:

19 Q. Never, okay. Have you ever heard that Jeffrey
20 Epstein has a sexual preference for underage girls?
21 Other than what you've read in the newspaper, have you
22 heard that from any other individuals before?

23 A. No.

24 Q. Ever heard that he has had sex or sexual
25 relationships with many minor girls, some as young as 12

1 years old?

2 MR. CRITTON: Form.

3 THE WITNESS: No.

4 BY MR. EDWARDS:

5 Q. Never?

6 A. Never.

7 Q. Have you ever seen any photographs in any of
8 his homes depicting young-looking girls engaging in sex
9 acts?

10 A. No.

11 Q. Or reading directly from the complaint,
12 "engaged in lewd acts"?

13 A. No, absolutely not.

14 Q. Have you looked around the walls of his
15 various homes when you're in there picking up luggage?

16 A. I mean, not any more than I walked in here and
17 not looking at the walls over there, I couldn't tell you
18 what those are; so nothing specific.

19 Q. Sometimes we're talking about a 50,000 square
20 foot house?

21 A. Exactly.

22 Q. In Manhattan?

23 A. It's pretty big.

24 Q. Okay. Have you ever looked at any of his
25 computers for any reason?

1 A. No.

2 Q. I know that you helped set up some of the --

3 A. Computers are not my expertise.

4 Q. All right. Have you ever been told that
5 Mr. Epstein committed sex acts against underage girls on
6 a literal daily basis, that's what he does?

7 A. I've never been told that.

8 Q. Have you ever read the complaints against him
9 that indicate that's what he does on a daily basis?

10 MR. CRITTON: Form.

11 THE WITNESS: No.

12 BY MR. EDWARDS:

13 Q. So in your mind, you never believed that you
14 were transporting around somebody whose sole goal in
15 life is to get -- have sex with little girls?

16 MR. CRITTON: Form.

17 THE WITNESS: I never believed that, no.

18 BY MR. EDWARDS:

19 Q. Okay. Have you ever been told that he
20 conspired with others, including assistants and/or his
21 drivers and/or pilots and his friend Ghislaine Maxwell,
22 to further these sex acts and to avoid police detection?

23 MR. CRITTON: Form.

24 BY MR. EDWARDS:

25 Q. Have you ever -- anybody ever questioned you

1 about that?

2 MR. REINHART: Hold on. The question is have
3 you ever been told that fact that he just read to
4 you?

5 BY MR. EDWARDS:

6 Q. Right.

7 A. I have never been told that fact.

8 Q. Has anybody ever questioned you about your
9 possible involvement with helping to facilitate
10 Mr. Epstein have sex with underage girls?

11 A. No.

12 Q. When you were questioned by either the police
13 or the -- whoever the investigative resource that was
14 being used at the time?

15 A. Right.

16 Q. Do you remember who that person was that was
17 questioning you?

18 A. No, I don't remember.

19 Q. I know you don't know the location where it
20 was, but do you remember who they were affiliated with?

21 A. No.

22 Q. Was it only one time?

23 A. Yes.

24 Q. Did you also have to testify before a grand
25 jury proceeding?

1 A. No, I did not.

2 Q. Have you ever known Mr. Epstein to get a
3 massage while on an airplane?

4 PHONE ATTORNEY: This is everybody in Boone,
5 Charles and the witness is here and the court
6 reporter and the videographer.

7 MR. EDWARDS: Fantastic, but I think that you
8 may have the wrong room.

9 PHONE ATTORNEY: I was told to ask for 856.

10 MR. EDWARDS: Let's go off the record.

11 (Off the record discussion.)

12 BY MR. EDWARDS:

13 Q. All right. In the complaint, I'm going to
14 tell you what it alleges and I'm going to ask if this
15 helps to refresh your recollection about any of Jeffrey
16 Epstein's activities. The defendant, Jeffrey Epstein,
17 transported the plaintiff to another state in order to
18 engage in sex acts with her. And this occurred when she
19 was merely 15 years old.

20 Do you remember transporting somebody that
21 looked like they were 15 years old on your airplane?

22 A. No, sir.

23 Q. You never remember taking a 15-year-old, or
24 somebody that looks around that approximate age, on your
25 airplane?

1 A. Can you be more specific?

2 Q. Well, I know that you've indicated earlier in
3 the deposition that you remember some girls under the
4 age of 18 on the airplane. And so let me ask, before I
5 get back into this, whether all those individuals you
6 were talking about were accompanied by a parent or some
7 of those people were on the airplane for some other
8 purpose, modeling, or you don't know why they were
9 there? I'm going to let you elaborate on who these
10 people are that you believe may have been under the age
11 of 18 and why you think they were on the airplane?

12 MR. CRITTON: Form.

13 THE WITNESS: We've had younger people on the
14 airplane that have been, you know, with their
15 family members, like you said. I don't remember
16 transporting anybody that was of questionable age.
17 I'm not -- I'd only be guessing at somebody's age
18 if I didn't ID them at the foot of the airplane.
19 So I can't guess to their age.

20 BY MR. EDWARDS:

21 Q. All right. "Mr. Epstein used his private jet
22 to transport the minor plaintiff to Manhattan where he
23 provided her spending money and accommodations with him
24 at his mansion."

25 Do you have any idea who that might be

1 referring to?

2 MR. CRITTON: Form.

3 THE WITNESS: No, sir.

4 BY MR. EDWARDS:

5 Q. And you don't remember being a pilot of an
6 airplane where he was transporting a 15-year-old to
7 Manhattan from Miami or Palm Beach?

8 A. No. I'd be guessing at somebody's age and I
9 can't guess.

10 Q. "Defendant transported plaintiff in his
11 private jet to locations that included Palm Beach, New
12 York City, Santa Fe, Los Angeles, San Francisco,
13 St. Louis."

14 Do you remember ever piloting his airplane to
15 those destinations that I just mentioned?

16 MR. REINHART: Can we break them down?

17 Objection; compound.

18 MR. EDWARDS: Okay.

19 BY MR. EDWARDS:

20 Q. Have you ever flown his airplane to Palm
21 Beach?

22 A. Yes, sir.

23 Q. Okay. Have you ever flown it to New York
24 City?

25 A. Yes.

1 Q. To Santa Fe?

2 A. Yes.

3 Q. To Los Angeles?

4 A. Yes.

5 Q. To San Francisco?

6 A. Yes.

7 Q. To St. Louis?

8 A. Yes.

9 Q. All right. Continuing to international
10 destinations, including Europe, have you ever flown it
11 to Europe?

12 A. Yes.

13 Q. The Caribbean?

14 A. Yes.

15 Q. And Africa?

16 A. Yes.

17 Q. On those flights to those various places, is
18 it your -- to the best of your knowledge, you were
19 unaware of Jeffrey Epstein engaging in sex with underage
20 girls on his airplane?

21 MR. CRITTON: Form.

22 THE WITNESS: I have no knowledge of any of
23 that.

24 BY MR. EDWARDS:

25 Q. "He provided accommodations with him in order

1 to have her available to him at all times whenever he
2 wanted, including while transporting the minor plaintiff
3 on his private jet."

4 That's something that you had no knowledge of?

5 A. (Witness shakes head.)

6 Q. You have to a yes or no.

7 A. I'm sorry, no.

8 Q. "Each time they would travel to one of these
9 destinations, the same pattern of sexual abuse would
10 occur, often with a vast array of aspiring models,
11 actresses, celebrities, and/or other females, including
12 minors from all over the world."

13 Again, that's something you have no personal
14 knowledge of?

15 A. No.

16 Q. Has anybody ever indicated that if you did
17 have personal knowledge of some of these things, then
18 you could also have been implicated in some form of a
19 crime? Has any law enforcement or anybody ever
20 indicated that to you?

21 A. No.

22 Q. Okay. Is that something you've ever worried
23 about?

24 A. No.

25 Q. All right. "Upon information and belief,

1 defendant transported minor girls from Turkey." Did you
2 ever leave in one of his airplanes out of Turkey?

3 A. I'd have to look at the records. I don't
4 recall Turkey.

5 Q. Do you ever remember taking any minor girls
6 out of Turkey?

7 A. No, I don't remember.

8 Q. What records would you have to look at to see
9 if you took people out or left out of Turkey?

10 A. I'd have to look at the flight logs, but I
11 personally don't remember flying into Turkey.

12 Q. And would the flight logs coming into the
13 United States from Turkey indicate the names of the
14 people on the plane?

15 A. They might.

16 Q. Okay. Where would I get those particular
17 flight logs that would have that information?

18 A. Depended upon what year you're talking.

19 Q. We're talking in this particular complaint
20 between 1998 and 2002.

21 A. I'm not -- I don't possess those passenger
22 manifests.

23 Q. Do you know who would possess those?

24 A. That would be I guess --

25 MR. REINHART: Do you know who has them today?

1 THE WITNESS: I do not know who has them
2 today.

3 BY MR. EDWARDS:

4 Q. Who did you give them to?

5 A. Actually, I didn't give them to anybody. Dave
6 Rogers was in possession of those logs. So I don't know
7 where they are right now.

8 Q. You're still thinking that the best evidence
9 of that, any flight that may have left out of Turkey,
10 would be in the flight logs that's marked as Composite
11 Exhibit 1, or are we talking about the manifests that
12 we've been referring to?

13 A. I don't know how accurate that log book is or
14 even how accurate the passenger manifest is.

15 Q. Okay. So there may be no actual documentation
16 indicating a flight leaving out of Turkey when, in fact,
17 a flight may have left out of Turkey?

18 A. Correct.

19 Q. Okay. The Czech Republic is the next place
20 listed. Is that a place you've flown to or from in a
21 Jeffrey Epstein airplane?

22 A. More specific, could you name the city?

23 Q. I can't name the city, at least the complaint
24 doesn't name the city. But I've been to the Czech
25 Republic before. Anywhere within that country, have you

1 ever flown to or from in a Jeffrey Epstein airplane?

2 A. We have flown to Prague.

3 Q. Okay. Have you picked people up in Prague and
4 flown out of Prague?

5 A. I don't remember.

6 Q. I'm not saying no, you didn't, but --

7 A. Best of my knowledge.

8 Q. -- you don't remember?

9 A. Exactly. Best of my knowledge, I don't
10 remember.

11 Q. Do you remember the reason for going to Turkey
12 or to Prague?

13 A. No.

14 Q. This also says Asia. Have you ever flown to
15 or from Asia with Jeffrey Epstein?

16 A. Yes.

17 Q. Or on a Jeffrey Epstein airplane?

18 A. Yes.

19 Q. Do you know the purpose of those flights to
20 and from Asia?

21 A. No.

22 Q. Did it ever occur to you that maybe it was to
23 pick up minor girls for him to have sex with on the back
24 of the airplane?

25 MR. CRITTON: Form.

1 THE WITNESS: Never occurred to me.

2 BY MR. EDWARDS:

3 Q. Did you ever hear that he maintained some of
4 these underage girls as sex slaves --

5 A. Never heard of such a thing.

6 Q. -- from the age of 12 through the age of 16?

7 MR. CRITTON: Form.

8 THE WITNESS: No knowledge of that.

9 BY MR. EDWARDS:

10 Q. Ever picked up girls that looked young, many
11 of whom who spoke no English? Do you ever remember
12 that?

13 A. Zero, do not.

14 Q. All right. The complaint goes on to say,
15 "Plaintiff was required to be sexually exploited by
16 defendant's adult male peers, including royalty." So
17 I'm going to talk, do you have any familiarity with
18 Prince Andrew?

19 A. I know who he is.

20 Q. Was he ever on the airplane?

21 A. He may have been on the airplane.

22 Q. Do you remember him on the airplane with young
23 girls?

24 A. No, I do not.

25 Q. Do you remember Jeffrey Epstein flying in to

1 meet with Prince Andrew?

2 A. I don't remember. I know that happened, but I
3 couldn't be accurate.

4 Q. Has Prince Andrew ever been on the airplane at
5 the same time as a young girl, to the best of your
6 memory and knowledge?

7 A. To the best of my knowledge, no.

8 Q. This also says politicians, talking about
9 local or U.S. politicians. Do you remember certain
10 politicians being on the airplane?

11 A. No -- I mean yes, I do.

12 Q. What politicians would that be?

13 A. President Clinton.

14 Q. Okay. Who else?

15 A. Former president of Israel -- help me out with
16 the name, Barak?

17 Q. Ehud Barak?

18 A. Yes, those are the two that I remember.

19 Q. How many times was Ehud Barak on the airplane
20 that you piloted for Mr. Epstein?

21 A. Maybe once.

22 Q. And where did that flight pick up and where
23 did it go to, to the best of your memory?

24 A. Best of my memory, it was Palm Beach to
25 Teterboro.

1 Q. Where is Teterboro?

2 A. In New Jersey.

3 Q. And what was the purpose of that flight, do
4 you know?

5 A. I don't know.

6 Q. Was Jeffrey Epstein on the flight?

7 A. I'd have to look at the flight logs to
8 guarantee.

9 Q. Anything about that flight stick out in your
10 mind?

11 A. None.

12 Q. Such as a fine needing to be paid because it
13 left after 10:00 p.m.?

14 A. For that was the flight, yes.

15 Q. You remember that?

16 A. It's coming back to me.

17 Q. And do you remember young girls being on that
18 flight?

19 A. No.

20 Q. All right.

21 A. I remember the fine.

22 Q. Do you remember who paid the fine?

23 MR. CRITTON: Hold on. Let me object to form
24 of the question. "Do you remember" it suggests
25 that there were. So form, predicate.

1 BY MR. EDWARDS:

2 Q. Okay. Do you remember who else was on that
3 flight that left after 10 p.m.?

4 A. No, I do not.

5 Q. Do you remember why it left after 10 p.m.?

6 A. No, I do not.

7 Q. Do you remember Jeffrey Epstein instructing
8 you to wait until after 10 p.m. to leave?

9 A. No.

10 Q. Would you have listened to him if he had told
11 you -- if he had instructed you to do that?

12 A. I don't understand the question.

13 Q. Well, if he told you wait until after 10 p.m.,
14 I realize there's going to be a fine, but wait until
15 after 10 p.m. to leave, intentionally leaving
16 after 10 p.m., do you remember that instruction ever --

17 A. No, I don't remember that instruction.

18 Q. Okay.

19 A. I mean, it just happened to be departing
20 after 10 and there is a penalty for leaving after 10 for
21 noise. So there was no intention to...

22 Q. All right. This also talks about this
23 particular person 15 years old being sexually exploited
24 by businessmen and/or other professional or personal
25 acquaintances. Are you aware of other personal or

1 professional acquaintances of Jeffrey Epstein also
2 sexually abusing or exploiting little kids or underage
3 girls on your airplane?

4 MR. CRITTON: Form.

5 THE WITNESS: No.

6 BY MR. EDWARDS:

7 Q. If you had been aware that Mr. Epstein was --
8 and by this -- this is more in the form of a
9 hypothetical, and that I'm not going to suggest to you
10 it's a fact that he was. But if you had been aware that
11 every single day Jeffrey Epstein's goal was to locate
12 underage girls for the purposes of sex, and either have
13 sex with them on the airplane or at some other
14 designation that you were destination that you were
15 traveling him to, would you have continued to pilot
16 those planes?

17 MR. CRITTON: Form.

18 THE WITNESS: You said it was hypothetical?

19 BY MR. EDWARDS:

20 Q. Right, it is a hypothetical.

21 A. Why would I want to answer that? Because
22 you're being hypothetical. I mean, it would obviously
23 be wrong.

24 Q. Sure. Well, a hypothetical question is a
25 legal question that I'm allowed to ask.

1 A. Okay.

2 Q. And I'm just asking you if you did have
3 knowledge that Jeffrey Epstein was having sex with
4 little girls either on the plane or at a place that you
5 were taking him to or from on a daily basis, that's what
6 he did, would you have continued to be his pilot?

7 MR. CRITTON: Let me object. Object to the
8 form. It's argumentative. It has no more value
9 than assuming he was chopping up bodies or anybody
10 was chopping up bodies in the plane you're flying.
11 What difference does it make? Form.

12 MR. EDWARDS: What difference does it make in
13 a case about him having sex with little girls? I'm
14 not going to argue with you about it. You've
15 stated your objection.

16 MR. CRITTON: Exactly. It's an argumentative
17 question.

18 MR. EDWARDS: I'm not going to argue with you
19 about it.

20 MR. CRITTON: You're arguing with him about
21 now.

22 MR. EDWARDS: No, I'm asking him the
23 hypothetical.

24 BY MR. EDWARDS:

25 Q. Can you answer that? Would you have continued

1 to be a pilot for somebody who's traveling to and from
2 destinations with the goal of having sex with underage
3 girls?

4 MR. CRITTON: Form.

5 THE WITNESS: It could be any person. It
6 doesn't have to be Jeffrey Epstein, then, right?

7 BY MR. EDWARDS:

8 Q. True.

9 A. No, I wouldn't pilot an airplane if there was
10 wrongdoing going on.

11 Q. That you knew about?

12 A. That I knew you about, sure.

13 Q. Me reading this complaint to you, is this the
14 first time you've heard these allegations --

15 A. Yes.

16 Q. -- against Mr. Epstein?

17 A. Yes.

18 Q. It goes on to say, "On one of Epstein's
19 birthdays, a friend of Epstein sent him three
20 12-year-old girls from France who spoke no English for
21 the purpose of -- for defendant to sexually exploit and
22 abuse. After doing so, they were sent back to France
23 the next day."

24 Are you familiar with that occasion?

25 MR. CRITTON: Form.

1 THE WITNESS: Never heard of such a thing.

2 BY MR. EDWARDS:

3 Q. Do you know of any friends that he has in
4 France that would send him birthday -- a birthday
5 present?

6 A. No.

7 Q. Do you know of him receiving any birthday
8 gifts or birthday people from anyone?

9 A. Never.

10 Q. This particular person that filed this
11 complaint, Jane Doe 102, indicates "Defendant and
12 Ghislaine Maxwell acknowledged and celebrated
13 plaintiff's 16th birthday."

14 Do you remember them celebrating somebody who
15 you flew on the airplane's 16th birthday?

16 A. I don't recall.

17 Q. Any of this jog your memory as to who [REDACTED]
18 [REDACTED] is?

19 A. No.

20 Q. "From the age of 15, plaintiff" -- this Jane
21 Doe 102 -- "was sexually exploited and abused by
22 defendant on a daily basis and often multiple times each
23 day."

24 So going back, was there ever a day where you
25 were with Jeffrey Epstein where you could observe him

1 and [REDACTED] [REDACTED] during an entire day?

2 MR. CRITTON: Form.

3 THE WITNESS: I don't remember [REDACTED]
4 [REDACTED], so I couldn't answer the question.

5 BY MR. EDWARDS:

6 Q. "In September 2002, Defendant Epstein
7 purchased a commercial round-trip airline ticket and
8 provided a passport, U.S. currency and accommodations
9 for plaintiff to fly to Thailand."

10 Do you remember him doing that for anybody
11 around that time period?

12 A. No, sir.

13 MR. CRITTON: What was the date?

14 MR. EDWARDS: September 2002.

15 MR. CRITTON: Okay, thanks.

16 MR. EDWARDS: I have here -- and this is
17 actually my only copy, so I don't mind marking it
18 as a composite exhibit, but we'll either have to
19 copy this while thing or we'll have an agreement of
20 counsel. It's the visitor inmate log from when
21 Mr. Epstein was in jail in Palm Beach.

22 MR. CRITTON: Well, before we get started, it
23 is now 1:15. We started at 10:00.

24 MR. EDWARDS: We didn't really start at 10:00.

25 MR. CRITTON: Shortly thereafter. I was here

1 pretty much after 10. But we've been here since
2 10:00. I want to take a lunch break.

3 MR. EDWARDS: Let's do it.

4 MR. CRITTON: For an hour?

5 MR. EDWARDS: Sure.

6 (A break was had at 1:15 p.m.)

7 BY MR. EDWARDS:

8 Q. All right. I looked through the inmate log of
9 the visitors who visited Jeffrey Epstein and your name
10 appears one, two, three, four, five, six, seven, eight
11 times.

12 A. Okay.

13 Q. Seem to be accurate in terms of how many times
14 you went to visit him?

15 A. I thought six, but yes, that's...

16 Q. I'll let you review the records and tell me if
17 you dispute any of that record. And I'll go ahead and
18 mark that as Composite Exhibit 5.

19 (Plaintiff's Exhibit No. 5 was marked for
20 identification.)

21 MR. REINHART: It's two pages.

22 MR. EDWARDS: Two pages.

23 MR. REINHART: Okay.

24 BY MR. EDWARDS:

25 Q. Seem accurate?

1 A. Yes.

2 Q. Okay. Jeffrey Epstein's plea, I believe, was
3 June 30th, 2008. I think that's when he was taken in
4 custody from there. Your first visit is July 3rd, 2008.
5 And the other name on that visit is Igor Zinoviev. Did
6 you go with Igor to visit Jeffrey Epstein?

7 A. Yes.

8 Q. Why did you go with Igor?

9 A. It just happened he wanted to see us both at
10 the same time. There was no apparent reason.

11 Q. How did you know that Jeffrey wanted to see
12 you?

13 A. I don't recall who called and told me that he
14 wanted to see me. I couldn't give you an accurate name,
15 whether it was, you know, his attorney, Darren. And
16 actually, I would put a lot weight to I think it was
17 Darren, his attorney.

18 Q. That would have made a phone call to you that
19 said --

20 A. Yeah, to go.

21 Q. And what did you talk about with Jeffrey
22 Epstein four days after he pled guilty to offenses that
23 landed him in jail?

24 A. I think the first visit was how disappointed
25 or how scared he was, you know, being inside there. We

1 just talked about general happenings that go on in
2 there.

3 Q. What did he say?

4 A. It's terrible; it's cold; he can't sleep.
5 They wake him up every two hours. You know, just items
6 like that, uncomfortable things. We talked about the
7 airplanes a great deal. You know, we got major
8 maintenance on the big airplane, so we discussed that a
9 little bit. And then it was really just how
10 uncomfortable he was there.

11 Q. How long did you visit with him on that first
12 visit, July 3rd?

13 A. I think we stayed the full hour.

14 Q. All right. Is that what the time allotment
15 was?

16 A. I believe it is, yeah. I don't think you
17 could leave early, or I'm not aware that you could leave
18 early, until later on we found out you could stay for
19 five minutes or longer. But I don't think any of us
20 knew that was -- once you got in there, you stayed there
21 for the hour.

22 Q. Okay. So you talked to him for an hour and
23 for the most part it was just about the conditions and
24 his disappointment with the conditions?

25 A. Sure, yeah, absolutely.

1 Q. And did Igor talk to him as well?

2 A. Briefly. I mean, not that much. You're going
3 back a little ways again to remember exactly what was
4 discussed. You know, he asked how his family was doing.
5 I guess Igor's got a son, I think he asked how his son
6 was doing. You know, just general questions like that.

7 Q. Did you ride to the jail that day with Igor?

8 A. I believe we did. I believe I met Igor
9 probably at Jeffrey's house and picked him up, or if
10 not, we may have met at the airport and drove together.
11 But we did drive together on that occasion.

12 Q. In what vehicle did you drive?

13 A. The Hummer.

14 Q. That's the vehicle you described earlier as
15 the company vehicle?

16 A. Yes, sir.

17 Q. Is that a vehicle paid for by Jeffrey Epstein?

18 A. Meaning?

19 Q. Well, is that a vehicle paid for by you?

20 A. What do you mean "paid for"?

21 Q. Did you purchase the vehicle with your money?

22 A. I didn't purchase that one, no.

23 Q. Do you know if it was purchased by Jeffrey
24 Epstein or a corporation of Jeffrey Epstein's?

25 A. Probably a corporation.

1 MR. CRITTON: Form; move to strike. Sounds
2 like a guess.

3 BY MR. EDWARDS:

4 Q. To the best of your knowledge, that's how most
5 of the items that you've discussed -- that being the
6 Boeing and the Gulfstream -- they were usually held in
7 corporate names, to your knowledge?

8 A. To my knowledge, exactly, yes.

9 Q. And so when you're saying the -- when you're
10 talking about the Hummer vehicle and you're stating that
11 it's likely a corporate entity, is that just something
12 that you're guessing about, or do you have knowledge?

13 A. No, I'm just guessing.

14 Q. Okay.

15 A. I have no proof --

16 Q. -- of ownership of who it's registered to or
17 anything like that?

18 A. Exactly.

19 Q. Is it registered to you?

20 A. No, no.

21 Q. So it's registered to somebody other than you?

22 A. Exactly.

23 Q. Okay.

24 A. I just drive it, I guess.

25 Q. Okay. So on July 5th, 2008, you go back to

1 see him in jail again, and again, Igor Zinoviev is
2 listed as a visitor. Did you go with him together on
3 that occasion?

4 A. I didn't even realize it was two days after
5 the first visit.

6 Q. Well, I mean, you see where this is going?

7 A. Yeah, I do. It gets further apart, yeah.

8 Q. Do you remember what the discussion was on
9 7/5/08?

10 A. No, because it's probably similar to the first
11 one. I mean, we talked -- actually, one of the visits
12 we talked about fishing and just trying to -- you know,
13 we were talking about things that would just occupy his
14 mind with intelligent conversation that he probably
15 wasn't getting there. So for that hour of the day, I
16 tried to give my best of intelligent conversation to
17 him.

18 Q. Okay. On his visitor log you were the first
19 one to go visit him. Did you know that?

20 A. I did not know that. I wasn't aware of that.

21 MR. CRITTON: Let me just object to form to
22 the last question.

23 BY MR. EDWARDS:

24 Q. Well, at least if these records are accurate,
25 which are the records that were provided to us by the

1 facility that was holding Jeffrey Epstein, they're
2 accurate, your name is the first one listed on the top
3 of the sheet?

4 A. Right. There may have been earlier dates. I
5 have no idea.

6 Q. Well, you know, the first date that he could
7 have been in there it looks like was 7/1/08 and then,
8 you know, so I guess somebody could have seen him 7/1 or
9 7/2, but those records were never provided to us. You
10 see we were provided a whole big stack.

11 A. I understand.

12 Q. The next date I'm going to talk to you about
13 is 7/12/08.

14 A. Uh-huh.

15 Q. It looks, again, like it's yourself and Igor
16 Zinoviev?

17 A. Mm-hmm.

18 Q. And that's something we talked about in this
19 deposition. I'm going to ask you again, I don't know
20 that you elaborated last time, what is your
21 understanding of his relationship with Jeffrey Epstein?
22 Is that a friend of his?

23 A. I don't know his job description. I mean,
24 he's somebody that's around a lot, but I don't know his
25 exact job description. His English is, to say, not

1 100 percent, so conversation with somebody that doesn't
2 fully understand you, you know, you get lost in
3 translation a little bit. So I don't --

4 Q. So on these three visits to the jail, the
5 first three that we're talking about that we've talked
6 about so far, each of those times you traveled to and
7 from the jail with Igor?

8 A. Mm-hmm.

9 Q. Yes?

10 A. Yes, yes.

11 Q. And each of those time, is it fair to say you
12 had some form of communication either on the way to the
13 jail or --

14 A. Sure.

15 Q. -- to the jail?

16 A. Yeah.

17 Q. Since you're going to see an inmate in the
18 jail, is it a safe assumption a portion of that
19 conversation was about the person that you're going to
20 see and possibly the crime that was committed?

21 A. Yes, that would be a good assumption.

22 Q. Okay. And what was the form -- what was the
23 substance of that conversation that you can remember
24 related to Jeffrey Epstein and the location you were
25 going to visit him?

1 A. I think Igor and I discussed on trying to be
2 upbeat and not look at the position that he's in sitting
3 across the table from us, to be upbeat and uplift his
4 spirits.

5 Q. Did you and Igor discuss whether or not you
6 were going to talk to him about his plea of guilty or
7 the fact that he's not registered as a sex offender?

8 A. No.

9 Q. Or whether you were going to stay away from
10 those topics?

11 MR. CRITTON: Form.

12 THE WITNESS: We never -- we don't discuss
13 that amongst ourselves and/or with Jeffrey in any
14 way, form.

15 BY MR. EDWARDS:

16 Q. Okay. But that's not -- I realize you didn't
17 discuss that. You've told me that.

18 A. Right, but we didn't discuss that even prior
19 to going in, as you asked.

20 Q. Okay. So your discussion was mainly hey,
21 let's be upbeat?

22 A. Yes.

23 Q. And that was to, in essence, maintain his
24 spirits or raise his spirits?

25 A. Exactly.

1 Q. Okay. And you were doing that as a friend of
2 his, not just his pilot, right?

3 A. I felt honored that he asked me to come and
4 give support like that, because prior to him going away,
5 it was known to us that there was going to be no
6 visitors, because I had offered to him that I would be
7 happy to come and visit him if he deemed it necessary,
8 and he says no, I'm not going to have anybody.

9 Q. So --

10 A. I guess it was so bad there, that he may have
11 changed his mind and wanted to have some visitors.

12 Q. When did you have this conversation with him
13 where he indicated he was not going to have visitors
14 while he was in jail?

15 A. I don't exactly remember. It may have been on
16 the trip heading to Palm Beach, the last flight.

17 Q. From his island, from St. Thomas I guess it
18 would be from?

19 A. I forgot where it started from. It might have
20 been New York or the island, one of the two. I don't
21 remember the last flight.

22 Q. And I mean, did at least the fact come up that
23 hey, this a person who you're -- is going to be in jail
24 for some time?

25 A. Mm-hmm, yes.

1 Q. And in the course of that conversation, again,
2 the allegations and the unusual I'll call it case
3 against him, that didn't come up between you and
4 Mr. Epstein?

5 A. I never talked about it with him.

6 Q. And at that point in time, what were you aware
7 of in terms of the number of girls that he was alleged
8 to have had sexual -- some sort of sexual relationship
9 with him at his Palm Beach house?

10 A. What was the question? How many girls?

11 Q. Yeah, how many girls were you --

12 A. Aware of?

13 Q. -- aware of?

14 A. None. I wasn't aware of any, to be honest.

15 Q. The next visit is on 7/17/08 and it's Igor
16 Zinoviev and somebody named Jean Rene and then yourself.
17 Do you know who Jean Rene is?

18 A. No.

19 Q. Do you think that that visit, that you visited
20 him at the same time that Jean Rene visited?

21 MR. CRITTON: What's the date?

22 MR. EDWARDS: It's 7/17/08.

23 THE WITNESS: No, I don't know a Jean Rene,
24 unless somebody came after. I mean, I don't -- I
25 don't know a Jean Rene.

1 BY MR. EDWARDS:

2 Q. Okay. And then before you visited him again,
3 the visitors are listed as [REDACTED] [REDACTED] or [REDACTED]
4 [REDACTED]?

5 A. Mm-hmm.

6 Q. Mainly those two individuals. And they list
7 as addresses, [REDACTED] as their residence?

8 A. Uh-huh.

9 Q. Given your previous testimony, does that
10 surprise you that they list those -- that address as
11 their residence?

12 MR. CRITTON: Form.

13 THE WITNESS: I've seen them there, so I mean,
14 I'm not surprised.

15 BY MR. EDWARDS:

16 Q. Okay. Did you know that they were visiting
17 him in jail?

18 A. No, I didn't know who was scheduled to see him
19 or whatever.

20 Q. Did Jeffrey talk to you at any point in time
21 about [REDACTED] [REDACTED] or [REDACTED]?

22 A. No, not at all.

23 MR. REINHART: Can we get a time frame for
24 that? Ever?

25 MR. EDWARDS: Oh, no, well, I was talking --

1 I'm sorry.

2 BY MR. EDWARDS:

3 Q. I was talking right now about in the
4 conversations that you had with him that we've discussed
5 with you and him in the jail facility. Did he discuss
6 with you [REDACTED] [REDACTED] or [REDACTED]?

7 A. No, no.

8 Q. Did he talk to you about whether or not you
9 should talk to anybody about his criminal investigation
10 or possible litigation?

11 A. No, not at all.

12 Q. The next time you see him is on August 9th,
13 2008, at the jail. In that occasion it mentions as his
14 visitors that day [REDACTED] [REDACTED], [REDACTED] and
15 Larry Viso[REDACTED]i. Did you go to the jail with [REDACTED] and
16 [REDACTED] that time?

17 A. No. Who was on there? Which one are you
18 referring to?

19 Q. The next one, I tried to highlight them just
20 so that --

21 A. Right, that one.

22 MR. REINHART: 8/9.

23 BY MR. EDWARDS:

24 Q. 8/9/08?

25 A. One of those two we all drove together. I

1 don't remember which one it was. It was either the 9 or
2 the 16, and then the other one I met everybody there.
3 So I can't be accurate on which time we all drove
4 together.

5 Q. How did you coordinate driving together?

6 A. I don't exactly remember now. I mean, I think
7 [REDACTED] and I may have conversed on the phone and said do
8 you want to meet at Jeffrey's house and we all drive
9 together? Does it make sense to get together and drive
10 one car.

11 Q. Is that jail visit the result of Jeffrey
12 Epstein requesting your presence there, or is that the
13 result of you wanting to go see him as a friend in jail?

14 A. A combination of both. I'm sure if I said,
15 Hey, I'd like to come to jail and visit you, that he
16 would either say yea or nay.

17 Q. Okay. And you said at least on one of those
18 occasions you rode to and from the jail with [REDACTED] and
19 [REDACTED]?

20 A. Yes.

21 Q. And during any of -- obviously, when you're in
22 the car together -- well, who's driving the car?

23 A. I was driving, I believe.

24 Q. And that's the Hummer again?

25 A. Actually, I think we take one of the suburbans

1 at the house.

2 Q. Those are cars that Jeffrey Epstein owns, to
3 your knowledge?

4 A. I don't know who owns them.

5 Q. What cars are there that -- I know with this
6 case we're dealing with a lot of corporations and it's
7 not like asking me, Hey, what car do you own? But what
8 cars are you aware that are -- that you believe are used
9 primarily by Jeffrey Epstein?

10 A. Used primarily by Jeffrey Epstein, a Mercedes
11 S500 sedan. I don't remember the year on that one.

12 Q. Okay.

13 A. There's a Cadillac Escalade.

14 Q. Okay.

15 A. Those are his two main cars that he would be
16 driven in or --

17 Q. What are the other cars that you regularly see
18 parked at his Palm Beach mansion, if there are any?

19 A. It would be a whole array. Half the time the
20 parking lot is full because of construction workers,
21 yards keepers.

22 Q. Okay. Fair enough. What vehicle does [REDACTED]
23 [REDACTED] drive or [REDACTED] [REDACTED] drive when they're down
24 here, if you know?

25 A. I mean, anybody has a choice to pick out a car

1 or whatever there. I've seen [REDACTED] driving a Mercedes
2 convertible.

3 Q. Is that different than the Mercedes S500
4 sedan?

5 A. Yes, I think it's different.

6 Q. When you say they have basically a choice of
7 cars to drive --

8 A. Well, there's cars in the lot there.

9 Q. Obviously, they can't get in one of the
10 construction workers' cars?

11 A. No.

12 MR. REINHART: Let him finish his question.

13 BY MR. EDWARDS:

14 Q. So that's kind of what I'm getting at. What
15 other cars do you think that Jeffrey Epstein has --
16 whether it's titled, I don't know --

17 A. Right.

18 Q. -- but he is the person in control of that
19 vehicle?

20 A. Right.

21 Q. What other vehicles do you think he's
22 controlling in Palm Beach?

23 A. In Palm Beach?

24 Q. We've named the Mercedes S500 sedan, Cadillac
25 Escalade?

1 A. Right.

2 Q. And I've identified a Mercedes convertible?

3 A. Right.

4 Q. In addition to that, are there any others that
5 you're aware of?

6 A. That he's in control of?

7 Q. Yes.

8 A. No.

9 Q. And does the conversation come up between
10 [REDACTED] and [REDACTED] and yourself about the reason why
11 Jeffrey Epstein is in jail?

12 MR. REINHART: Can we get a time frame?

13 MR. EDWARDS: At any time.

14 BY MR. EDWARDS:

15 Q. At any time have you ever had that exact
16 conversation ever come up?

17 A. No, we didn't talk about that among ourselves
18 really.

19 Q. And have you ever been told that [REDACTED]
20 [REDACTED] provides the role of a sex slave to Jeffrey
21 Epstein? That's just her role in life?

22 MR. CRITTON: Form.

23 MR. REINHART: That's just have you been told
24 that.

25 THE WITNESS: No.

1 BY MR. EDWARDS:

2 Q. Have you been led to believe that by anybody?

3 A. No.

4 MR. CRITTON: Form.

5 BY MR. EDWARDS:

6 Q. Do you have any -- based on your observations,
7 do you have any other opinion as to what role she plays
8 in Jeffrey Epstein's life, if any?

9 A. I don't have an opinion on what the role is.

10 Q. Do you agree with the criminal statutes that
11 are in place to protect young children from sexual
12 predators? Do you agree with those statutes?

13 MR. CRITTON: Form.

14 MR. REINHART: I'm going to direct him not to
15 answer the question. It's irrelevant and it's not
16 likely to lead to discoverable evidence what his
17 opinion is on a law that's been passed by the
18 legislature of Florida.

19 MR. EDWARDS: Just so the record is clear, I
20 don't know that we did this last time, but it's
21 been alleged in the complaint -- it has been
22 alleged in several complaints that Jeffrey Epstein
23 particularly prays on vulnerable disadvantaged
24 females, underage females, and that in order to
25 gain access to the multitude of underage females,

1 he utilizes various people, schedulers, pilots,
2 handlers and other associates and co-conspirators
3 that have a similar mentality; that is, people that
4 do not agree with laws related to sex abuse and
5 abuse of children. And that's why this line of
6 questioning regarding whether or not this witness
7 has a motive or a bias or was involved in
8 conversations related to his motive or bias, to
9 continue to work for Jeffrey Epstein or believed
10 the same beliefs of Jeffrey Epstein, is at least
11 reasonably calculated to the lead the discovery of
12 admissible evidence, and that is the argument at
13 least along those lines being made to the judge
14 regarding these questions.

15 MR. CRITTON: Can we talk for just one minute?
16 Because maybe -- can I talk with -- well, I know I
17 can talk with Bruce. Let's just take a break.

18 (A break was had at 2:45 p.m.)

19 MR. EDWARDS: We're back on the record. Do
20 you have the same position?

21 MR. REINHART: Let me say this: He previously
22 said he would have never allowed anything on the
23 plane to be done illegally. If you want to ask if
24 he agrees with the law applied by the
25 legislature -- do you agree the law passed by the

1 state of Florida should be complied with?

2 THE WITNESS: I don't know what the law is.

3 BY MR. EDWARDS:

4 Q. Okay. The laws in place to protect children
5 under the age of 18 from being sexually touched,
6 fondled, molested by people over the age of 24, do you
7 agree with those laws?

8 A. Yes.

9 Q. And you agree that persons who commit a
10 violation of those laws should be prosecuted?

11 A. Persons that do that.

12 MR. CRITTON: Form.

13 BY MR. EDWARDS:

14 Q. Yes, persons that do that.

15 A. Persons that do that, absolutely.

16 Q. And if you were to receive confirmed -- what
17 you would perceive as confirmed information that Jeffrey
18 Epstein was one of those persons, would you continue to
19 be employed by or alongside of Jeffrey Epstein?

20 MR. CRITTON: Form; speculation.

21 THE WITNESS: You're assuming that there's
22 guilt.

23 BY MR. EDWARDS:

24 Q. No. I'm saying, hypothetically, if you were
25 convinced that Jeffrey Epstein was guilty of those acts

1 which he pled guilty to --

2 MR. CRITTON: Form.

3 MR. REINHART: Can we -- for purposes of your
4 hypothetical, what facts do you want him to assume
5 are true? You said the facts to which he pled
6 guilty, but the witness already said he doesn't
7 know what he pled guilty to. He knows the charge
8 he doesn't know the facts.

9 BY MR. EDWARDS:

10 Q. Solicitation of prostitution of a minor,
11 somebody under the age of 18.

12 MR. EDWARDS: That's the charge, right,
13 solicitation of prostitution of a minor?

14 MR. CRITTON: No. I think you've got it
15 wrong. I'll object to the form.

16 MR. EDWARDS: Okay.

17 BY MR. EDWARDS:

18 Q. Then we'll handle the question this way: If
19 you were to believe based on information and evidence
20 that Mr. Epstein engaged in sex or some form of sex acts
21 with people of the age range of 12, 13, 14, 15 years
22 old, would you continue your employment with
23 Mr. Epstein?

24 MR. CRITTON: Form; speculation.

25 THE WITNESS: I would certainly be speculating

1 and I have to discuss it with my wife long and
2 hard. I don't think I could give you a correct and
3 honest answer at this time.

4 BY MR. EDWARDS:

5 Q. Okay. Given the allegations that have been
6 made in this case, is this something that you have
7 discussed with anyone other than your attorney?

8 A. No, not really. Only from the fact that
9 they're allegations and there's still a lot more work,
10 I'm sure, to be discovered.

11 MR. CRITTON: Let me put on there, for the --
12 if this deposition is not typed -- and we request
13 it -- I'd like at least this portion where
14 Mr. Edwards' last question back about five pages
15 worth, so just if you could mark it from this
16 page back about five pages.

17 If nobody requests the deposition, I'd just
18 like those five pages.

19 MR. EDWARDS: I'm going to request the
20 deposition, so...

21 MR. CRITTON: Okay. We'll mark this then, so
22 you could tell me where it is, approximately.

23 BY MR. EDWARDS:

24 Q. Is there a reason why you have not discussed
25 with Jeffrey Epstein the allegations that have been made

1 against him and the allegations contained within many of
2 these civil complaints on behalf of girls who were under
3 the age of 18? Is there any reason why you haven't
4 discussed that?

5 MR. REINHART: If that's based on
6 conversations you had with your lawyer, then don't
7 disclose what you and your lawyer talked about.

8 BY MR. EDWARDS:

9 Q. Correct.

10 A. I have not spoken to Jeffrey about any of
11 this, and it was my understanding that is illegal to
12 have conversation about this. So I've never presented
13 any questions to him reference this case or any others.

14 Q. It was your understanding that it was illegal
15 to talk to Jeffrey Epstein about the allegations made
16 against Jeffrey Epstein?

17 A. Yes, or anything to do with the case. That's
18 why we never discussed any portions of it.

19 Q. Okay. So --

20 A. I may be wrong in that assumption, but I
21 don't --

22 Q. So the reason why you haven't discussed this
23 with Jeffrey Epstein is you believed it was illegal?

24 A. Correct, yes.

25 Q. Who led you to believe that it was illegal?

1 MR. REINHART: Again, if it was a discussion
2 you had with any lawyer, then you can just give a
3 name, don't give a discussion of the conversation
4 you had.

5 THE WITNESS: It was my own assumption. I
6 mean, just basic criminal knowledge of knowing
7 you're not supposed to -- you know, if somebody's
8 in trial or in a deposition or whatever, I don't --
9 I didn't think it was appropriate to discuss the
10 matter with them.

11 BY MR. EDWARDS:

12 Q. Okay. So the next two visits and I think the
13 last two visits we'll talk about are on 9/6/2008.
14 Actually, it looks like you visited him twice in one
15 day; is that right?

16 A. I don't think that's possible. I mean, that
17 will show how accurate the court record is. There's no
18 way.

19 Q. You wouldn't have visited him twice in one
20 day?

21 A. No. I think there's only one visitation per
22 day.

23 Q. Okay. And it looks like the same visitors
24 each time, except that it says for period three and then
25 the next one's for period four. So there are two

1 different periods. Was there ever a time when they
2 allowed you to stay for more than an hour?

3 A. No, not to my knowledge.

4 Q. Okay. So again, it's [REDACTED] and [REDACTED]
5 [REDACTED], same questions: Did you ever ask them their
6 involvement with Jeffrey Epstein?

7 A. Absolutely not.

8 Q. And again, what was the discussion with
9 Jeffrey Epstein along with [REDACTED] and [REDACTED]
10 [REDACTED]?

11 A. On the last visits, it was mainly airplane
12 stuff and later on in the visitations, we were advised
13 that you could leave early, so I would only stay for
14 maybe 30 minutes and then, you know, Jeffrey would
15 continue his conversations with them and then I would
16 just wait outside.

17 Q. Okay.

18 A. So I would do my business with him talking
19 about airplanes or whatever I had coming up and then
20 exit.

21 Q. And then why did you stop visiting him in jail
22 after that September 6th, 2008, visit?

23 A. I was never called back to visit.

24 Q. Okay. Well, shortly after that then he was on
25 work release?

1 A. Well, that's true.

2 Q. Right?

3 A. Yeah.

4 Q. So the next times you would have gone to see
5 him would have been at the Florida Science Foundation,
6 where we talked about earlier?

7 A. I've seen him there, yes.

8 Q. Okay. And in fact, I think you said you saw
9 him 20 or 30 times --

10 A. Sure.

11 Q. -- over the last two years, last year and a
12 half or so?

13 A. Yes.

14 Q. And how long would you stay each time at the
15 Florida Science Foundation and talk to him?

16 A. Like my original answer, ten, fifteen minutes.

17 Q. Okay. And how frequently would you talk to
18 Jeffrey Epstein while he was at the Florida Science
19 Foundation?

20 MR. REINHART: I'm sorry, you're talking in
21 person or all conversations? Because he testified
22 he had phone conversations and personal visits.

23 BY MR. EDWARDS:

24 Q. I was actually talking about phone
25 conversations. So when you would call him on the

1 telephone, how frequently would you talk to him?

2 A. How frequently during a given week?

3 Q. Yeah.

4 A. More specific?

5 Q. Sure.

6 A. Depends upon what's going on that week.

7 Q. I mean, is it somebody you would talk to him
8 every day?

9 A. No.

10 Q. All right. Well, at that point in time, he's
11 going from the jail to the Florida Science Foundation
12 and back, and if you're not going to see him in person,
13 and you're not corresponding by e-mail, then would you
14 correspond by telephone, that either being you call him
15 or he called you?

16 A. Yes.

17 Q. And, you know, in any given week, what was the
18 typical week like? I mean --

19 A. How many times?

20 Q. Yes.

21 A. Maybe once in a week, sometimes twice in a
22 day. I mean, it would vary. There was no routine.

23 Q. And what would the conversation be?

24 A. Mostly we discussed audio and video, TVs, home
25 theaters. It's a niche of his and we're constantly

1 looking at new items that are out there, you know,
2 what's the biggest LCD flat screen out there.

3 Q. Okay. And since he's been out of jail and on
4 community control or house arrest or whatever it is,
5 where he's located at his home now, have you visited him
6 at his home?

7 A. I have been to the home. I haven't visited,
8 but I have had work to do there.

9 Q. And have you called him on the telephone
10 there?

11 A. Once I think I've called the house. Normally
12 he calls me because it's usually he needs me to do
13 something.

14 Q. And what have those conversations been about
15 since he's been out of jail?

16 A. Let's put a stereo in the gym, let's put a TV
17 in the living room, let's put a bigger stereo in the
18 gym, let's put a bigger, bigger stereo in the gym, let's
19 go redo what we've done. It's always audio. He's a
20 very audio file person.

21 Q. Do you know of any other modifications that
22 he's made to the house at 358 El Brillo since the time
23 that he went into jail?

24 MR. CRITTON: Form; predicate.

25 THE WITNESS: Meaning? Be more specific.

1 BY MR. EDWARDS:

2 Q. Structural modifications, architectural
3 modifications?

4 A. Starting what date?

5 Q. June 30th, 2008.

6 MR. REINHART: I think the question on the
7 table was have you observed any structural changes
8 to the house at El Brillo since Mr. Epstein went to
9 jail?

10 THE WITNESS: Structural changes?

11 BY MR. EDWARDS:

12 Q. Structural, architectural, anything like that,
13 changes to the house, to the interior of the house since
14 he went to jail?

15 A. No. I mean, if you could be more specific. I
16 mean, you're talking furniture or?

17 Q. I've never been in the house, so I can't be
18 much more specific. Have you noticed any changes from
19 before he went to jail to after he went to jail, the
20 inside of the house, that you could be specific about?

21 A. No, I can't be specific.

22 MR. REINHART: Can I talk to Mr. Visoski for a
23 second?

24 MR. EDWARDS: Sure.

25 (Off the record discussion.)

1 MR. REINHART: I think Mr. Visoski can expand
2 on his previous answer. Why don't you expand.

3 THE WITNESS: Can we go back to that one?

4 BY MR. EDWARDS:

5 Q. Sure. The question dealt with the structural
6 architectural changes you're aware of.

7 A. There has been a kitchen extension, but when
8 you asked the question, I was unaware of when that
9 actually took place. So to be accurately answering your
10 question, I know there's been a kitchen extension. I
11 don't exactly know when that transpired, but...

12 Q. How do you know about the extension? How do
13 you know this happened?

14 A. I knew what the kitchen looked like before and
15 after the extension and I don't -- I thought it was
16 during the hurricane season when they actually did that
17 extension.

18 Q. Who made you aware of it?

19 A. Nobody. I just walked in the kitchen and
20 noticed a bigger room than what it was.

21 Q. All right. Do you know who Martin Nowack is?

22 A. No.

23 Q. Do you ever remember him being on your
24 airplane, or that name of somebody being on your
25 airplane?

1 A. No, I don't. It's not my airplane.

2 Q. We still don't know whose airplane it is yet.
3 The time when you took Mr. Epstein to Miami in the last
4 month, do you know which attorney he was going to see?

5 A. No, I do not.

6 Q. And do you know whether it was related to
7 civil cases or criminal cases or anything else?

8 A. No idea.

9 Q. Do you know where the location was in Miami
10 that he was going to?

11 A. No, I do not.

12 Q. Other than yourself visiting Mr. Epstein at
13 the Florida Science Foundation, are you aware of any
14 other visitors, people that visited him?

15 A. No, I'm not. Just whoever was there during my
16 visit.

17 Q. Okay. Are you aware of a corporation named
18 the Zorro Trust?

19 A. I've heard the name.

20 Q. And is that something that you've heard
21 relative to your involvement with Jeffrey Epstein?

22 A. Yes. I mean, I don't even remember where I
23 heard Zorro Trust. I have no definition of it, but I
24 know the name is out there.

25 Q. Okay. Is that a company that you believe is

1 affiliated or related to Jeffrey Epstein in some way?

2 A. I have no definition. I don't know who it is.

3 Q. Do you know how you heard about it?

4 A. I don't remember. That's going back in the
5 early days of when Zorro existed.

6 Q. Who was at the Florida Science Foundation when
7 you would meet with Jeffrey Epstein on these meetings?

8 A. [REDACTED] would be there.

9 Q. Anybody else?

10 A. Story would be there on occasion. That's
11 pretty much it.

12 Q. And would they be in the same room with
13 yourself and Jeffrey Epstein when you had conversations
14 with him?

15 A. No, not really. Not particularly.

16 Q. They would just be at the location?

17 A. Sure, yes.

18 Q. Anybody else that worked there or was
19 affiliated with the Florida Science Foundation that you
20 know of?

21 A. Not to my knowledge. I mean, I do my business
22 and get in and get out.

23 Q. Can anybody other than Jeffrey Epstein have an
24 office at the Florida Science Foundation?

25 A. Not that I know of.

1 Q. All right. And were you deeded the property
2 that we spoke about earlier on the New Mexico ranch? Is
3 that deeded to you?

4 A. Yes.

5 Q. And has it been since back in, I think you
6 said 1998 or 1999 or whenever it was?

7 A. Yes.

8 Q. Okay. And do you know -- and did you build a
9 house on it then?

10 A. Yes, I did.

11 Q. Okay. And that's a property that I think you
12 said you have a mortgage on it, that's a property that
13 you pay -- you mortgaged that property?

14 A. Yes, sir.

15 Q. All right. And as well, the home you own
16 here, you have a mortgage on that property as well?

17 A. That is correct.

18 Q. All right. Are you familiar with a vehicle, a
19 Chevy Suburban 1500, year 1999?

20 A. Do you have a color?

21 Q. No. I can tell you the plate. I could tell
22 you the VIN. Chevy Suburban -- Chevy Suburban 1500,
23 registered to Larry Visoski?

24 A. That would be mine. That's a white one, then.

25 Q. Okay. When did you get it?

1 A. I'm guessing. It was probably two years old
2 when I got it. Maybe '99. Maybe '01, '02.

3 Q. Something you still drive?

4 A. Occasionally. It's kind of a beat up car now,
5 so it's kind of a knock around.

6 Q. Best of your knowledge, it stays parked at
7 your house?

8 A. Recently it's been in Jeffrey's driveway,
9 but...

10 Q. Why?

11 A. Just for an extra car to use.

12 Q. For Jeffrey to use?

13 A. No. I mean, for anybody that would come to
14 the house to help out. Igor I think has driven the car
15 before.

16 Q. How did it come about that you began to park
17 the Chevy Suburban, the 1999 car that we're talking
18 about, at Jeffrey's house?

19 A. When there was more activity here in West Palm
20 Beach. We were never usually coming here that often,
21 and now with all this going on, with Jeffrey being in
22 town longer, we needed more cars and transportation. So
23 my car was just sitting in the driveway at home while I
24 was driving the Hummer. So I decided to let them use
25 the Hummer at the house.

1 Q. Well, we've just described this wide array of
2 cars that Jeffrey had for people to use --

3 A. Well, you said for him to use.

4 MR. CRITTON: Hold it.

5 BY MR. EDWARDS:

6 Q. Is there a reason why?

7 MR. CRITTON: Wait. You guys are both talking
8 over one another. You need to let him wait and
9 finish his question because if I want to assert an
10 objection, neither one of you gives me a chance,
11 which may be the plan. Form.

12 MR. EDWARDS: Yeah, we have a conspiracy
13 against you.

14 MR. CRITTON: I knew it. I'll take that as an
15 admission.

16 BY MR. EDWARDS:

17 Q. Is there any reason -- did Jeffrey say that he
18 wanted that vehicle to use or to be parked at his house?

19 A. No.

20 Q. Then how did it come about that you started
21 parking that vehicle at his home?

22 A. I think the origination of that came when I
23 started using the Hummer, that the Suburban was parked
24 in my driveway and I wanted to get it out of my driveway
25 as an eyesore. So hence, I decided to let people at the

1 house drive it as a grocery shopping car or something,
2 or just as extra transportation.

3 Q. Okay. But when you go to park the car at
4 somebody else's house, you have to let them know, Hey,
5 I'm giving you the keys?

6 A. Mm-hmm.

7 Q. Who did you give the keys to?

8 A. I don't know if I gave the keys to anybody. I
9 may have just left them on the counter there and told
10 Yanush this is an extra car if you guys needed it to run
11 around because it was an eyesore at my driveway.

12 Q. Are you familiar with a Mercedes-Benz SUV
13 1999?

14 A. Say that again.

15 Q. Mercedes SUV, 1999 registered in your name?

16 A. Yes.

17 Q. And what car is that?

18 A. That's my car -- my wife's car.

19 Q. Does that stay at your house?

20 A. Yes.

21 Q. And that's the car that's parked at your house
22 now?

23 A. Yes.

24 Q. Are you familiar with a Land Rover, Range
25 Rover Sport 2008?

1 A. Yes.

2 Q. Registered in your name?

3 A. Yes.

4 Q. And whose car is that?

5 A. That's another extra car for the household to
6 use at Jeffrey's house.

7 Q. And when was that car purchased?

8 A. Last year.

9 Q. And who purchased that car?

10 A. It was purchased in my name.

11 Q. By whom? Who purchased the car in your name?

12 A. Well, I put the car in my name, but the funds
13 came from -- they were wired to my account from New
14 York.

15 Q. From whom, though? A mysterious source just
16 sent funds? We know that didn't happen, so I'm just
17 trying to elaborate here.

18 A. Jeffrey had paid for the car.

19 Q. Okay. And why did Jeffrey pay for a car and
20 put it in your name?

21 A. I don't know.

22 Q. I mean, you had to agree for this to happen.
23 So what was the conversation between you and Jeffrey
24 that resulted in Jeffrey paying for a Land Rover, a 2008
25 Land Rover and putting it in your name?

1 A. I don't recall exactly how the conversation
2 came about. He just says we want to buy an '08 Land
3 Rover and put it in my name. So we did. I didn't ask
4 any further questions.

5 Q. Did this conversation happen when he was in
6 jail or after he was out?

7 A. Meaning out on house arrest?

8 Q. Right.

9 A. When you say "out" I think of the Science
10 Foundation. On work release, so you have to be more
11 specific.

12 Q. You tell me what happened, when the
13 conversation happened relative to where Jeffrey was at
14 the time.

15 A. I'd only be guessing again. I would say this
16 probably happened a year ago, maybe less than a year
17 ago. I'd have to look. I don't remember exactly the --

18 Q. So it was either at a time when he's at the
19 Florida Science Foundation or possibly on house arrest?

20 A. It was -- no, it was definitely before house
21 arrest. It was probably during the time of the Florida
22 Science Foundation, to be accurate.

23 Q. Okay. Are you aware --

24 A. About eight or nine months ago.

25 Q. Okay. Are you aware of a Mercedes-Benz CLK

1 2005 registered in your name?

2 A. Yes.

3 Q. And whose car is that?

4 A. That car also is a Palm Beach house car to be
5 used at the house.

6 Q. What does that mean, "a Palm Beach house car"?

7 A. It's a car that we park in Jeffrey's driveway
8 for people to use. Anybody that comes to the house can
9 select a car to go anywhere. I mean, run errands, go
10 shopping, do whatever they need to do. And that was
11 purchased the same way. It was in my name.

12 Q. And the funds came from Jeffrey Epstein?

13 A. They were wired to my account. I don't know
14 exactly what account they came from.

15 Q. Again, that's a conversation that has to take
16 place before -- that you have to agree to put a car in
17 your name?

18 A. Yes, yes.

19 Q. And is that a conversation between yourself
20 and Jeffrey Epstein that takes place?

21 A. Yes.

22 Q. And what is the substance of that conversation
23 that results in a Mercedes-Benz 2005 being placed in
24 your name?

25 A. He just said we need a fun car for the house

1 in Palm Beach.

2 Q. But why put it in your name?

3 A. I don't know.

4 Q. You didn't ask any questions about that?

5 A. No, I didn't.

6 Q. Okay. Are you aware of a Jaguar X-Type 2005
7 registered in your name?

8 A. I forgot about that one, yes.

9 Q. Whose car is that?

10 A. That's a Palm Beach car.

11 Q. What do you mean "a Palm Beach car"?

12 A. It's the Palm Beach house car, another run
13 around for people to use.

14 Q. And again, that's a conversation that has to
15 take place that results in a car being placed --
16 registered in your name?

17 A. Yes.

18 Q. Okay. Now we're talking about several cars
19 here?

20 A. Yes.

21 Q. That are all being placed in your name?

22 A. Yes.

23 Q. You never at any time ask any questions to
24 Jeffrey Epstein why are you placing these cars in my
25 name?

1 A. I did not.

2 Q. So your suspicions were never -- your
3 curiosity was never piqued at all as to why these cars
4 are being placed in your name?

5 A. My curiosity was piqued.

6 Q. You never asked him the question, you just
7 agreed to do it?

8 A. That's correct.

9 Q. That goes for the Jaguar X-Type?

10 A. Yes.

11 Q. Are you familiar with a motorcycle, Big Dog
12 Chopper Motorcycle, 2003?

13 A. That is mine.

14 Q. Yours?

15 A. Yes.

16 Q. Registered in your name for a good purpose,
17 right?

18 A. Yes, it is.

19 Q. At your house?

20 A. Yes.

21 Q. You use it?

22 A. Absolutely.

23 Q. All right. Ford F-250, 2008, registered in
24 your name, are you familiar with that?

25 A. It's not registered in my name.

1 Q. Okay. So if that's registered in your name,
2 that would be a shock to you? That would be a surprise
3 to you?

4 A. Yes, it would be.

5 Q. There should be no documentation from you
6 where you would be the registered owner of the Ford
7 F-250?

8 A. What year?

9 Q. 2008.

10 A. I remember buying that car. I just -- that
11 shouldn't be in my name.

12 Q. What do you mean you remember buying that car?

13 A. I do a lot -- I do all the car purchases for
14 Mr. Epstein. I'm a car fanatic, so for years I've been
15 the car-shopper. I'm the car fanatic.

16 Q. Okay. But these cars aren't classic vehicles.
17 These are vehicles that are not being refurbished or
18 anything, they're being driven around town?

19 A. No, but they're fun. The new Range Rover is a
20 nice car.

21 Q. This Ford F250, that's a car also that's Palm
22 Beach -- as you would say a Palm Beach car?

23 A. No.

24 Q. That's a car that stays at your house?

25 A. No.

1 Q. Who drives that car, Ford F-250?

2 A. That was shipped to St. Thomas.

3 Q. For who to use and for what purpose?

4 A. Well, that car should have been put under LSJ,
5 LLC.

6 Q. What's LSJ, LLC?

7 A. Little St. James.

8 Q. And that's a corporation?

9 A. Yes.

10 Q. Your understanding is that's a corporation
11 affiliated with Jeffrey Epstein?

12 A. I know it's a corporation. I don't know its
13 affiliation to Jeffrey.

14 Q. At this point in time, the way that this car
15 comes about is through a conversation with yourself and
16 Jeffrey Epstein?

17 A. Yes, yes.

18 Q. So to make some representation that this --
19 that this corporation LSJ, LLC, you're not sure if that
20 has any affiliation with Jeffrey Epstein?

21 A. I don't have any facts to tie the two
22 together.

23 Q. Common sense would dictate?

24 A. Yes.

25 Q. Okay.

1 MR. CRITTON: Form.

2 BY MR. EDWARDS:

3 Q. Again, that's not a car that you use, the Ford
4 F-250?

5 A. No, it's not even here.

6 Q. And when you say on St. Thomas, is it on
7 actual St. Thomas, or is it on Little St. James?

8 A. No, it's on St. Thomas. It's a work vehicle.

9 Q. For whom?

10 A. For the workers, for the island.

11 MR. REINHART: Be careful to answer his
12 question. I think his question is, is it on
13 St. Thomas or Little St. James island? Where
14 physically is the car, if you know.

15 THE WITNESS: I don't know for a fact.

16 BY MR. EDWARDS:

17 Q. It's your understanding it's on St. Thomas?

18 A. Yes.

19 Q. And when you say "the workers," what's going
20 on on St. Thomas to where there's workers that need an
21 F-250?

22 A. Just moving sand. I don't know the exact
23 detail for it.

24 Q. What were you told about the need for this car
25 to be on St. Thomas?

1 A. They need a work truck.

2 Q. To do what?

3 A. I don't know what the detail or the -- you
4 know, what the job detail was for the truck. They just
5 needed a work truck.

6 Q. So Jeffrey Epstein tells you they need a work
7 truck on St. Thomas and that's the only description that
8 you're given?

9 A. Yes, to go purchase and get the best deal I
10 can on a pickup truck, and that's what I did and for
11 some reason it got put in my name.

12 (Off the record discussion.)

13 BY MR. EDWARDS:

14 Q. Whose money was used to purchase the truck.
15 You say you purchased the truck. I want the record to
16 be clear whether you're purchasing it with your money?

17 A. No, this was wire-transferred. It was a -- I
18 don't remember how that -- I think it was a wire
19 transfer or a check was FedExed from the New York office
20 to pay for that. That should not be in my name, is what
21 I'm getting at. I'll certainly change that, but I
22 thought you were --

23 Q. I understand that.

24 A. No, I'm being -- yeah, I didn't.

25 MR. REINHART: There's no question.

1 BY MR. EDWARDS:

2 Q. 34-foot JVC Powerboat, 2000, owner LSJ, LLC,
3 registered to Larry Visoski. Do you know that?

4 A. Yes.

5 Q. You knew that that boat was registered in your
6 name?

7 A. It's registered to LSJ. It's Jeffrey's boat
8 that we keep here in West Palm Beach.

9 Q. And do you keep it at your home?

10 A. No.

11 Q. Do you know that the registration is to your
12 home?

13 A. It's used in my home address, yes.

14 Q. Why was that done?

15 A. We were eventually going to ship it out to
16 St. Thomas for it to live, but since Jeffrey's here,
17 we're keeping it in Florida, and when we ship the boat
18 over, we will change title to the Little St. James
19 address.

20 Q. What do you mean "since Jeffrey's here we're
21 keeping it in Florida"? What does Jeffrey being here
22 have to do with keeping a boat that's registered in your
23 name and to your address --

24 A. Well, I have access to use the boat, you know,
25 here in Florida, but it's Jeffrey's boat.

1 Q. Okay. And by "Jeffrey's boat," it was
2 purchased with Jeffrey's money?

3 A. That is correct.

4 Q. Do you know how much that cost?

5 A. I think it was 60,000.

6 Q. Do you know how much the Ford F-250 cost?

7 A. Twenty-five, I'm guessing, ballpark.

8 Q. Do you know how much the Jaguar X-Type cost?

9 A. 11,000.

10 Q. Do you know how much the Mercedes-Benz CLK
11 cost?

12 A. 35,000.

13 Q. Do you know how much the Land Rover cost?

14 A. 68,000.

15 Q. Do you know how much the Mercedes-Benz SUV
16 cost, that's yours, right? The Chevy Suburban is yours
17 as well?

18 A. Yes, I remember how much those cost too.

19 Q. Is there another boat, 35-foot Donzi
20 powerboat, 1999?

21 A. That's the one I thought you were talking
22 about originally.

23 Q. That's the same boat?

24 A. That's the same boat.

25 Q. Is there any other boat that's registered in

1 your name?

2 A. No.

3 Q. Did you know that in -- let me ask you this:

4 Do you have a 2003 Ferrari F75-M?

5 A. No.

6 Q. Any reason why the car is registered in your
7 name and the asking price is \$159,000 being sold in New
8 York?

9 A. That car is not registered in my name.

10 Q. If it's registered --

11 A. The ad is in my name.

12 Q. Why is the ad in your name?

13 A. Because I was trying to sell it.

14 Q. Why were you trying to sell it?

15 A. It was Jeffrey's car and we didn't want it
16 anymore.

17 Q. Why would he put his pilot in charge of
18 selling his Ferrari?

19 A. Because I bought it.

20 Q. How much did you buy it for?

21 A. 179,000. Now, when I say "I bought it," it
22 was his money. I was the one that negotiated it, to be
23 clear. It was his car for use in New York.

24 Q. Are you aware of the Zorro Trust winning an
25 85 million-dollar Power Ball lottery in 2008?

1 A. No.

2 MR. CRITTON: Say that again.

3 MR. EDWARDS: The Zorro Trust winning an
4 85 million-dollar -- claiming the ticket for
5 85 million-dollar Power Ball ticket in 2008.

6 THE WITNESS: No.

7 BY MR. EDWARDS:

8 Q. Have you ever listed your employer as
9 Ghislaine Air in making political contributions?

10 A. I may have.

11 Q. Did you know that you had made political
12 contributions --

13 A. Yes, I have.

14 Q. -- listing your --

15 A. I needed a company name for that event, and I
16 had put Air Ghislaine.

17 Q. And NES, LLC wouldn't do?

18 A. I didn't think of it at the time.

19 Q. Did somebody tell you to use Air Ghislaine
20 rather than the company that has been paying you?

21 A. No.

22 Q. You just chose to use an employer that isn't
23 actually your employer, nor have they ever been?

24 A. I represent Air Ghislaine, JEGE and Hyperion
25 as chief pilot, so I consider those really the companies

1 that I work for and never really associated myself with
2 NES, LLC as my realistic employer. So when I go to a
3 convention, an aviation convention, and somebody says
4 who do you work for, I use the name JEGE because that's
5 the name of the Boeing company.

6 Q. But when I sit here and ask you who you work
7 for, you give me a different answer.

8 A. You're asking for the absolute correct answer,
9 which is where my paycheck comes from, which is NES,
10 LLC. I probably have used that twice in 17 or 18 years
11 as my employer.

12 Q. Do you know [REDACTED]?

13 A. I know the name, yes.

14 Q. How do you know her?

15 A. I've seen her on the airplane a couple times.

16 Q. Somebody that you know to be involved
17 romantically or sexually with Jeffrey Epstein at any
18 time?

19 A. I don't know that.

20 Q. Are there any other cars, vehicles, items,
21 other things that are registered in your name that are
22 actually Jeffrey Epstein's?

23 A. No. You've actually covered them all and
24 actually shed light on some that I did not realize, like
25 that Ford.

1 MR. REINHART: Mr. Edwards, he needs to expand
2 upon one earlier answer he gave when you asked him
3 if he knew anybody else who worked at the Florida
4 Science Foundation.

5 BY MR. EDWARDS:

6 Q. Okay.

7 A. My wife worked there. When you used the words
8 "worked there" -- or not referring to her as a past
9 tense, but she worked there when it first opened
10 answering the phones.

11 Q. What's your wife's name?

12 A. Eileen.

13 Q. How does she spell that?

14 A. E-I-L-E-E-N.

15 Q. Same last name as you?

16 A. Yes.

17 Q. How long did she work there?

18 A. A month, maybe.

19 Q. And she was answering the phones for the
20 Florida Science Foundation?

21 A. Yes.

22 Q. Do you have a good relationship with your
23 wife?

24 A. I think so.

25 Q. You still don't know what the Florida Science

1 Foundation does?

2 A. No, because she doesn't.

3 Q. She doesn't know what it does either?

4 A. We never talked about it.

5 Q. You never talked to your wife about what she
6 did?

7 A. No.

8 MR. CRITTON: He knew she was answering
9 phones.

10 BY MR. EDWARDS:

11 Q. Do you know of any other employees, friends,
12 agents, relatives of Jeffrey Epstein who he places his
13 property in their names, registers them in his names or
14 anybody else?

15 A. Not to my knowledge. I don't know.

16 Q. To your knowledge, you're the only person?

17 A. I'm the only one I'm aware of.

18 Q. And with respect to minor girls being on the
19 airplane, that being under the age of 18, how many times
20 would you say that you have flown girls into the
21 country, into the United States where you have given a
22 date of birth to Customs of somebody on the airplane
23 that is under the age of 18?

24 A. I'd have to look at flight records to verify
25 or give you a correct answer. I don't know any to my

1 knowledge at this point.

2 Q. What flight records would you have to look at?

3 A. The passenger manifests.

4 Q. Passenger manifests would have the date of
5 birth on it?

6 A. No. It would have a name, but I don't have --

7 Q. But at some point in time you remember people,
8 minor date of births, coming into the country and that
9 being turned over to Customs?

10 MR. CRITTON: Form.

11 THE WITNESS: I don't remember anybody
12 transporting on the airplane from the country back
13 into the U.S. that was a minor, to my knowledge.

14 BY MR. EDWARDS:

15 Q. Okay. Within the country, minors flying --

16 A. I don't know.

17 Q. -- on a plane?

18 A. I don't know dates of birth.

19 Q. And any people that you knew to be minors on
20 the airplane, were they always accompanied by parents or
21 were there minors on the airplane that you're aware of
22 that were not accompanied by parents?

23 A. I didn't know either way. I mean, people
24 would get on the airplane and get off the airplane. I
25 could tell you there were times people would get on that

1 I didn't even know were on the airplane. Our focus is
2 up front.

3 Q. Was there a massage table on the airplane?

4 A. Which aircraft?

5 Q. On any of them?

6 A. The Boeing used to have a table on there, but
7 it stayed in the same spot and appeared to be never
8 used.

9 Q. Okay. So to the best of your knowledge, you
10 have no knowledge of that massage table on the airplane
11 ever being used?

12 A. Correct.

13 MR. EDWARDS: I don't have anything else.

14 CROSS (LARRY VISOSKI)

15 BY MR. CRITTON:

16 Q. Mr. Visoski, I have just a few questions. You
17 were just asked about a massage table on the -- any of
18 Mr. Epstein's airplanes and you said there was a massage
19 table on the Boeing?

20 A. Yes.

21 Q. Okay. Was there always a massage table on the
22 Boeing or just for a period of time?

23 A. Just for a period of time.

24 Q. All right. And who's responsible for cleaning
25 up the airplane after Mr. Epstein and/or the guests

1 leave?

2 A. Us as the crew.

3 Q. Okay. So if a massage table had ever been
4 used, it would have been you and the crew who would have
5 been responsible for either taking towels or doing
6 something with the massage table?

7 A. Absolutely.

8 Q. And if I understood your testimony, you never
9 saw a circumstance where it appeared to you that the
10 massage table had been used in any manner; is that
11 correct?

12 A. That is correct. It stayed in the same
13 location since the day it was put on there.

14 Q. You were asked a bunch -- a number of
15 questions about Mr. Epstein, I'll use this --
16 Mr. Epstein is the person who directed you generally
17 unless one of -- someone else who worked on his behalf
18 called you and asked you to, say, set up a time to leave
19 or pick up luggage, et cetera. My question to you is
20 this: Have you flown in the past for other private
21 individuals like Mr. Epstein, i.e., as distinct from a
22 commercial?

23 A. Yes, I have.

24 Q. And approximately have you flown for four,
25 five, six other private individuals over the years?

1 A. Three. I had a short career as far as
2 transferring of owners.

3 Q. In terms of transferring to the other owners,
4 separate and apart from Mr. Epstein, again, every
5 individual is different, but was your relationship
6 really any different with any of those other
7 individuals? That is, you were in essence -- you were
8 hired to perform a specific task: Fly an airplane to
9 get from Point A to Point B and get the people there
10 safely?

11 A. My first job, corporate-wise, was for an owner
12 in Miami and I was hired as a pilot, but yet, I would go
13 to his house and maintain a boat that was in the back of
14 his house above and beyond my call of duty because I had
15 an interest in boats. It's just something I like to do.
16 But I always treated Mr. Epstein like any of the other
17 prior clients that I had as owners. I knew that I was
18 not afraid to work for a living, and they understood
19 that.

20 Q. And it sounds like at least the first owner
21 that you worked for asked you to do similar things that
22 you've done for Mr. Epstein, such as take care of a boat
23 or purchase a boat or maintain the boat?

24 A. Sure, absolutely.

25 Q. So your relationship with Mr. Epstein with

1 regard to if you bought boats or you bought cars on his
2 behalf, that's very similar to your prior experience
3 with working with another private individual?

4 A. That is correct.

5 Q. In terms of the records, the manner in which
6 you flew the plane or -- I don't want to say flew the
7 plane, but in which you operated and maintained the
8 plane for Mr. Epstein are substantially the same you've
9 done with other private individuals?

10 A. Right, exactly the same. We wouldn't treat
11 Mr. Epstein any different than any prior -- previous
12 jobs that I had. It's the same routine we carry over
13 and that's why we're good at what we do. We take care
14 of the airplanes to the best of our ability.

15 Q. Is your focus as the pilot, as the captain of
16 both of the airplanes when you took over that
17 responsibility a number of years ago, is it your
18 obligation to get the passengers there safely -- onboard
19 and safely to the destination and then return?

20 A. Yes, that was always job number one.

21 Q. And most of us have had I'd say a much more
22 substantial experience in flying commercial planes and I
23 rarely see -- in fact, I can't remember the last time
24 particularly after 2001 I saw the pilots coming back
25 into the cabin shaking hands and helping distribute the

1 snacks or liquids. Maybe I'm not on the same flights
2 that some of the other lawyers here are, but I assume
3 you fly commercial from time to time?

4 A. Sure.

5 Q. Do you ever see the pilots interacting with
6 the people who are in the back of the airplane?

7 A. No, not at all. They stay at their station up
8 front.

9 Q. You got -- as the captain of the planes, when
10 you're flying, you have substantial responsibilities not
11 only to the people on the plane, but as well to the air
12 space which you're flying?

13 A. Yes.

14 Q. Okay. By the way, we've been here about --
15 for about an hour and ten -- we started about ten. It's
16 now 3:30. Did you ever hear the name L.M.? Has
17 Mr. Edwards ever asked you one question about [REDACTED].?

18 MR. EDWARDS: Is the question have you ever
19 heard of her or did I ask any questions about her,
20 or did you ask both questions and give the same
21 answer?

22 MR. CRITTON: I'll break them down.

23 MR. EDWARDS: It doesn't matter to me.

24 BY MR. CRITTON:

25 Q. Did you ever meet an individual by the name of

1 [REDACTED]?

2 A. No, I have not.

3 Q. Did Mr. Edwards, in approximately four hours,
4 little over four hours of questioning, ever ask you one
5 question about [REDACTED] that you can recall?

6 A. Not that I recall.

7 Q. Have you ever heard the name [REDACTED].? Did you
8 ever know someone named [REDACTED]?

9 A. Never heard that name.

10 Q. In approximately four-and-a-half hours of
11 questioning by Mr. Edwards, did he ever ask you about
12 [REDACTED]?

13 A. No, he did not.

14 Q. In approximately the -- are you familiar with
15 an individual by the name of Jane Doe ([REDACTED])?

16 A. I never heard that name.

17 Q. In approximately four-and-a-half hours of
18 questioning by Mr. Edwards, did he ever ask you
19 questions about Jane Doe ([REDACTED])?

20 A. No, he did not.

21 MR. CRITTON: That's all I have.

22 MR. EDWARDS: I only have two questions based
23 on what your testimony just was to Mr. Critton.

24

25

1 REDIRECT (LARRY VISOSKI)

2 BY MR. EDWARDS:

3 Q. You said you had three other people that
4 you've flown for?

5 A. Three other previous jobs. I'm trying to be
6 as accurate.

7 Q. Those are private individuals?

8 A. That is correct.

9 Q. And who are those people?

10 A. Herb Glimpsure in Columbus, Ohio, and Edward
11 Seltzer in Miami. And then the other was Tom Boyd, and
12 that was more of a Learjet charter, but he was the owner
13 of five Learjets. Those are my only three jobs in my
14 life.

15 Q. Also wealthy individuals?

16 A. Big time.

17 Q. And did you know what they did for a living?

18 A. Those I did, yes.

19 Q. And did you ever go visit any of those people
20 in jail?

21 MR. CRITTON: Form.

22 THE WITNESS: I know my first individual had
23 trouble with the law after I had left. I don't
24 remember what it was pertaining to; but no, I never
25 visited any of them in jail, no, sir.

1 BY MR. EDWARDS:

2 Q. Even the one who had trouble with the law, you
3 didn't go visit him in jail?

4 A. No, I did not.

5 Q. And did any of them put vehicles or other
6 boats or anything else in your name?

7 A. No.

8 Q. Okay. Any of those people ever deed any
9 property or acres or anything like that to you?

10 A. No.

11 Q. Did any of those people ever hire your wife
12 for employment?

13 A. No.

14 Q. And your attorney, is that your attorney paid
15 for by you, or is this somebody that's hired by Jeffrey
16 Epstein?

17 A. It is somebody that is hired by Jeffrey
18 Epstein.

19 MR. EDWARDS: Okay.

20 MR. CRITTON: One follow-up to your question.

21 RE CROSS (LARRY VISOSKI)

22 BY MR. CRITTON:

23 Q. With regard to the private individuals that
24 you worked for prior to Mr. Epstein, what was the
25 longest period of time that you worked for those?

1 A. The longest period of time was five years and
2 the shortest being two years.

3 MR. CRITTON: Thank you.

4 MR. EDWARDS: We'll order.

5 MR. REINHART: We'll read.

6 MR. CRITTON: We'll take a copy, front page,
7 mini with index.

8 (Witness excused.)

9 (Deposition was concluded at 3:37 p.m.)

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CERTIFICATE OF OATH

THE STATE OF FLORIDA
COUNTY OF PALM BEACH

I, the undersigned authority, certify that
LARRY VISOSKI personally appeared before me and was duly
sworn on the 15th day of October, 2009.

Dated this 22nd day of October, 2009.

Wendy Beath Anderson, RPR, CRR, FPR
Notary Public State of Florida
My Commission Expires: 9/20/2013
My Commission No.: DD 906647
Job #127542

SUBJECT TO PROTECTIVE ORDER PARAGRAPHS 7, 8, 9, 10, 15, and 17

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C E R T I F I C A T E
THE STATE OF FLORIDA
COUNTY OF PALM BEACH

I, Wendy Beath Anderson, Certified Realtime Reporter and Notary Public in and for the State of Florida at large, do hereby certify that I was authorized to and did report said deposition in stenotype; and that the foregoing pages are a true and correct transcription of my shorthand notes of said deposition.

I further certify that said deposition was taken at the time and place hereinabove set forth and that the taking of said deposition was commenced and completed as hereinabove set out.

I further certify that I am not attorney or counsel of any of the parties, nor am I a relative or employee of any attorney or counsel of party connected with the action, nor am I financially interested in the action.

The foregoing certification of this transcript does not apply to any reproduction of the same by any means unless under the direct control and/or direction of the certifying reporter.

Dated this 22nd day of October, 2009.

Wendy Beath Anderson, RPR, CRR, FPR

Job #127542

SUBJECT TO PROTECTIVE ORDER PARAGRAPHS 7, 8, 9, 10, 15, and 17

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C E R T I F I C A T E

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THE STATE OF FLORIDA

COUNTY OF PALM BEACH

I hereby certify that I have read the foregoing deposition by me given, and that the statements contained herein are true and correct to the best of my knowledge and belief, with the exception of any corrections or notations made on the errata sheet, if one was executed.

Dated this ____ day of _____, 2009.

LARRY VISOSKI

Job #127542

SUBJECT TO PROTECTIVE ORDER PARAGRAPHS 7, 8, 9, 10, 15, and 17

