

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

CASE NO. 15-CV-07433-RWS

-----x

VIRGINIA L. GIUFFRE,

Plaintiff,

v.

GHISLAINE MAXWELL,

Defendant.

-----x

June 1, 2016 9:12 a.m.

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

Reporter and Notary Public within and

CONFIDENTIAL

for the State of Florida.



Page 223

- 1 JOHN ALESSI
- 2 O. You never received emails from either of
- 3 them?
- 4 A. No, sir.
- 5 Q. So when there would be a message from one
- of them while they were out of town, they would call
- 7 you, call you on the telephone?
- 8 A. I haven't spoken to Ghislaine in 12 years.
- 9 Q. Sorry. I'm talking about when you worked
- 10 there and you would receive a message that they were
- 11 coming into town, would that be by way of telephone?
- 12 A. Telephone, and also, there was a system at
- 13 the house, that it was MindSpring, MindSpring I
- 14 think it's called, that it was like a message system
- 15 that would come from the office.
- 16 Q. What is MindSpring?
- 17 A. It was a server. I think it was -- the
- 18 office would have, like, a message system between
- 19 him, the houses, the employees, his friends. They
- 20 would write a message on the computer. There was no
- 21 email at that time.
- 22 Q. Okay. So what computer would you use?
- A. My computer in my office.
- 24 Q. And so was part of your daily routine to
- 25 go to your computer and check to see if you had

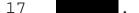


- 1 JOHN ALESSI
- 2 MindSpring messages?
- 3 A. No. That was at the end of my stay. That
- 4 was the very end of my stay. I didn't get involved
- 5 with that too much. But it was a message system
- 6 that Jeffrey received every two, three hours, with
- 7 all the messages that would have to go to the office
- 8 in New York, and they will print it and send it
- 9 faxed to the house, and I would hand it to him.
- 10 Q. Did it look like the message pads that
- 11 we've been looking at?
- 12 A. No, no, nothing like that.
- Q. Was it typed-out messages?
- 14 A. Yes, typed-out messages.
- 15 Q. Just explain one example of how it would
- 16 work. Let's say that Ghislaine wanted to send him a
- 17 message on MindSpring. How would that work?
- 18 A. An example?
- 19 O. Sure.
- 20 A. It got so ridiculous at the end of my
- 21 stay, okay? That Mr. Epstein, instead of talking to
- 22 me that he wants a cup of coffee, he will call the
- 23 office; the office would type it; they would send it
- 24 to me, Jeffrey wants a cup of coffee, or Jeffrey
- 25 wants an orange juice out by the pool.



Page 225

- 1 JOHN ALESSI
- O. He would call the office in New York.
- 3 They would then type it in MindSpring?
- 4 A. Send it to me.
- 5 Q. How would you know to check for it? How
- 6 would you know to look for this MindSpring?
- 7 A. Because I was in the office. I was there.
- 8 I was there. And we have a signal when it come on
- 9 and says, Hey, you've got mail.
- 10 Q. Okay.
- 11 A. Every day. Every day it was new things
- 12 put in. That's why I left, too.
- Q. Do you know who set up the mind spring
- 14 system?
- 15 A. It was a computer guy. It was a computer
- 16 guy who worked only for Jeffrey.



- 18 O. Was he local to Palm Beach?
- 19 A. No. He was in New York. Everything was
- 20 set up from New York. And , I remember
- 21 he came to Palm Beach to set up the system at the
- 22 house.
- 23 Q. Did you become aware at some point in time
- 24 that there was a bag or a briefcase of cash that was
- 25 in the house?



