

EXHIBIT 4

(File Under Seal)

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

CASE NO. 15-CV-07433-RWS

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VIRGINIA L. GIUFFRE,

Plaintiff,

v.

GHISLAINE MAXWELL,

Defendant.

-----X

June 1, 2016

9:12 a.m.

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

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

1 JOHN ALESSI

2 Q. You never received emails from either of
3 them?

4 A. No, sir.

5 Q. So when there would be a message from one
6 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?

23 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.

13 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 Q. 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.

1 JOHN ALESSI

2 Q. 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.

13 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. [REDACTED] [REDACTED]

17 [REDACTED]

18 Q. Was he local to Palm Beach?

19 A. No. He was in New York. Everything was
20 set up from New York. And [REDACTED], 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?