

THE STATE OF FLORIDA,
COUNTY OF PALM BEACH.)

IN RE:

PALM BEACH INVESTIGATION.

SWORN STATEMENT OF [REDACTED]

Monday, November 21, 2005

12:25 p.m. - 1:05 p.m.

401 N. Dixie Highway
West Palm Beach, Florida 33401

ORIGINAL

Reported By:

Susan Shelling, RPR

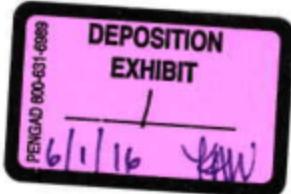
Notary Public, State of Florida

Consor & Associates Reporting and Transcription

Phone - 561.835.9738

J. CONSOR & ASSOCIATES REPORTING & TRANSCRIPTION
561.835.9738

NON PARTY (VR) 000529



EFTA00029390

1 APPEARANCES:

2 On behalf of the State:
3 DALIAH H. WEISS, Esquire
4 ASSISTANT STATE ATTORNEY
5 401 North Dixie Highway
6 West Palm Beach, Florida 33401
7 561.355.7100

8 On behalf of the Witness:
9 DONNIE MURRELL, Esquire
10 L.D. MURRELL, P.A.
11 400 Executive Center Drive
12 Suite 201
13 West Palm Beach, Florida 33409
14 561.686.2700

15 ALSO PRESENT:

16 DETECTIVE [REDACTED]
17 Palm Beach Police Department

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NON PARTY (VR) 000530

[REDACTED]

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1

I N D E X

2 WITNESS: [REDACTED]

PAGE:

3 EXAMINATION BY DET. [REDACTED]

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NO EXHIBITS MARKED

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NON PARTY (VR) 000531

[REDACTED]

EFTA00029392

1 Sworn statement taken before Susan
2 Shelling, Registered Professional Reporter and Notary
3 Public in and for the State of Florida at Large, in the
4 above cause.

- - -

6 Thereupon,
7

8 having been first duly sworn or affirmed, was examined
9 and stated as follows:

10 MR. MURRELL: I just want to repeat that
11 we're here under the State investigative subpoena
12 that was served on Mr. [REDACTED] although it was
13 dated for, I believe, Wednesday or something.
14 This is Monday the 21st, and we are here by
15 agreement.

16 EXAMINATION

17 BY DET.

18 Q. Mr. [REDACTED] I'm Detective [REDACTED] with
19 the Palm Beach P.D. As I explained to you on the
20 telephone, I am conducting an investigation on a former
21 employer of yours.

22 I just spoke with your wife and she told me
23 you guys worked for Mr. Epstein for eight years?

24 A. Yes, she did work for eight years. I
25 worked longer. I was there before my wife came.

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NON PARTY (VR) 000532

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1 Q. Before your wife came.

2 A. I started full-time with him on January 1,
3 1991, and we both left December 31, 2002. So I worked
4 eleven years exactly. Prior to that, prior to working
5 full-time for him, I worked part-time for him, on-and-off
6 basis.

7 Q. What were your responsibilities?

8 A. In the full-time basis, I started as a
9 houseman, and I became a major domo and butler and
10 everything else, driver, and did everything. We both did
11 all the chores in the house, but I was in charge of the
12 house. I was above my wife and above the cleaning crew,
13 the gardeners, pool people. So I was house manager, major
14 domo.

15 Q. You would have been the go-to guy for the
16 house?

17 A. Yes. And the one who would get the blame.

18 Q. We are talking about Jeffrey Epstein?

19 A. Of course.

20 Q. Do you remember the address of the house?

21 A. 558 El Brillo.

22 Q. Was it in the beginning of the street --

23 A. At the end of the street, on the left-hand
24 side.

25 Q. We're talking about the same house.

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NON PARTY (VR) 000533

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1 A. Yeah.

2 Q. Your wife said the same number you did.

3 A. 558? 358? 558?

4 Q. It was 358.

5 A. We left three years ago.

6 Q. And I understand it's been some time since

7 then. So the questions I'm going to ask you basically

8 is: During your time, did you deal directly with

9 Mr. Epstein?

10 A. Yes. And her -- and her -- girlfriend,

11 manager. She was the manager of all the households,

12 because he has homes all over the world.

13 Q. Right.

14 A. So we have -- she was my boss, and I deal

15 directly with her.

16 Q. Who was --

17 A. Elaine Maxwell.

18 Q. Ms. Maxwell, that's his girlfriend,

19 correct?

20 A. Um-hum.

21 Q. During the eleven years, he would come

22 down, she would inform you that they were coming down?

23 A. Right.

24 Q. Make arrangements to have the house ready?

25 A. Right.

1 Q. During the time that he was here, you
2 prepared the house, did all the chores.

3 Did you do any of the cleaning?

4 A. Sometimes. Many times. I did -- last two
5 or three years the work was so much that we have to
6 hire -- we hire a clean-up crew that they came twice a
7 week or once a week, then it was twice a week. Depends
8 upon his schedule, because he did not allow anybody at
9 the house except us when he was in town. So when he was
10 in town, it was just us doing the cleaning and the
11 cooking, the driving, shopping, everything else.

12 Q. Did you stay on property in the guest
13 house?

14 A. Yes and no. We had an apartment right
15 across the bridge. We had an apartment in [REDACTED]
16 [REDACTED] and we had an apartment at the house.

17 Q. Why would you stay at the house, then?

18 A. We stay at the house mostly when he was
19 there. When he was not in town, we went home. We went
20 to our apartment. When he was there, it was -- the job
21 was just too much to go home 9 o'clock, 10 o'clock and
22 come back 5 o'clock in the morning. We would just stay
23 and sleep and get up and work.

24 Q. When he was in town, did he receive a lot
25 of guests at the house?

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[REDACTED]

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1 A. Yes. Many, many, many guests. It was
2 never with no guests.

3 Q. Did he have assistants with him?

4 A. Assistants? At the last year he had an
5 assistant just for him. They would travel with him all
6 the time. At the last -- in the last two years of my
7 stay there, he also have a chef, a gourmet chef that he
8 would travel with him. That's it.

9 Q. Do you remember the chef's name?

10 A. There were quite a few. The last one I
11 know is [REDACTED] I think. And he was from
12 New York.

13 And there was another French chef, [REDACTED]
14 (phonetic); I don't know his last name.

15 And there was another English chef. But
16 they went quickly.

17 Q. They would come and go, come and go.

18 What about the assistant that was his
19 personal assistant that would fly with him?

20 A. [REDACTED] It was an English girl that
21 would travel with him a lot, and became the personal
22 assistant. But most of the time it was Ms. Maxwell that
23 traveled with him all the time.

24 Q. She was basically like his --

25 A. Girlfriend, whatever it was. Boss,

1 girlfriend. She was our immediate superior.

2 Q. Did he have girls come over to give
3 massages?

4 A. Yes.

5 Q. How many massages would he have in a day?

6 A. Sometimes one, sometimes two, three.

7 Q. Was it the same girl that would come back
8 to do the massages?

9 A. Yeah, yeah. Not the same girl -- I mean
10 during eleven years, I probably saw a hundred, two
11 hundred different massage therapists.

12 Q. Did they seem young to you?

13 A. No, sir. Mostly no. We saw one or two
14 young ones in the last year. Before that, it was all
15 adults.

16 Q. During your last year when you were working
17 with him, what do you mean that they looked young? Did
18 they look like they were still in high school?

19 A. I remember one girl was young. We never
20 asked how old she was. It was not in my job.

21 Q. Right. I understand.

22 A. But I imagine she was 16, 17. In my
23 judgment, she was 16, 17.

24 Q. Where would these massages take place?

25 A. All the time it was in his room. Sometimes

1 it was in the balcony of his quarters. His room has a
2 wraparound balcony facing the pool. So the massages were
3 in the balcony outside in the sun, or inside in his
4 bathroom or her bathroom.

5 Q. Would you set up the room for the massages?

6 A. Many times. Yes, he will tell me, Set up
7 the room inside my bathroom or in the bedroom or in
8 Elaine's bathroom, or outside on the balcony. And I
9 would go and set up or my wife would go and set up the
10 table.

11 We had a table in every room of the house,
12 the massage tables, for the different guests. Because
13 not only he got massages, all the other guests got
14 massages too. So we have a table -- massage table in
15 basically every room, guest room.

16 Q. The girls that would come over to do
17 massages, they would massage him first or massage guests?

18 A. Different times. There were -- mostly they
19 was his massage. Mostly he would get massages.

20 Q. Would Ms. Maxwell be in the room with him
21 while he was getting the massage?

22 A. We don't know. Apparently we saw her going
23 upstairs, because it was -- when they went upstairs, they
24 closed -- his quarters, it had a double door, so it was a
25 door on top of the stairs -- I don't know if you've been

1 in the house -- and then there's another door going into
2 his room. So it was a long corridor. So everything was
3 closed and nobody saw anything.

4 Q. Would you clean up after?

5 A. Once in a while, yes, I did. Most of the
6 times I did. I did the cleanup.

7 Q. Did it appear as if there was going to be
8 more than one massage going on in the room?

9 A. More than one massage? I don't know. It
10 was massages. There was massages, because it was a hot
11 oil, and it was -- you know this vibrator, the neck
12 vibrators with the long handles. And towels, a lot of
13 towels. We used a lot of towels in the house. Used like
14 maybe 40, 50 towels a day, because every time he go in
15 into the pool, it was two or three towels. Everything
16 had to be cleaned up. I went most of the time to pick up
17 the room and get it ready.

18 Q. Did it ever appear to you that more went on
19 in the room other than a massage?

20 A. I just imagine. I never saw anything. But
21 I imagine there was more than -- I never saw anything
22 because it was closed doors. It was never done outside.

23 Q. Based on the cleanup?

24 A. Based on the cleanup -- at the end, I
25 cannot say there was. At the end, it was a few times

1 that the bed was undone. You know, we make the beds
2 three or four times a day. And sometimes we went to
3 clean up the massage to put it back, the massage table,
4 to pick up the towels, but the bed was undone again. So
5 either he took a nap or he went for a nap, I don't know.

6 Q. Or something else occurred?

7 A. Or something else. I cannot.

8 Q. Did the girls, would they bring their own
9 stuff or they would use his stuff?

10 A. No. We had everything. We had gallons of
11 stuff, different stuff.

12 Q. Different massage oils?

13 A. Different, all kinds.

14 Q. Different massagers?

15 A. Different stuff.

16 They would buy all over the world different
17 types of -- for different --

18 Q. Did any of these massagers look like sex
19 toys?

20 A. At the end, at the last year that we were
21 ~~there they had like sex toys, some of them. I can say~~
22 maybe three or four occasions that I saw in the sink,
23 they were left out on the sink, and just --

24 Q. Where would he keep these massagers?

25 A. When I was there, we keep all the stuff in

1 a basket inside Ms. Maxwell's closet. It was a big
2 basket, about this round (indicating), with a cover on
3 it. And we used to pick up from the towel and just dump
4 it in there. That's it. That's the standard we went
5 through.

6 Q. What sink would you find those massagers
7 in?

8 A. Mostly in his sink, in his bathroom sink.

9 Q. His bathroom sink?

10 Was Ms. Maxwell still his girlfriend at
11 that time?

12 A. Oh, yeah.

13 Q. Still his girlfriend that you know of right
14 now?

15 A. Yeah. We left, she was still his
16 girlfriend. I don't know now, but she was still there.

17 Q. Why did you leave at the end?

18 A. It was a hard job. It was an incredible
19 hard job. So demanding. Hours were terrible, from
20 5 o'clock in the morning to 10 o'clock at night.

21 Constantly on your feet.

22 I got very sick. My health went down the
23 drain. I was diagnosed with cancer, polycythemia, a kind
24 of blood cancer, and we had to leave. It was just too
25 much for me.

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1 Q. Sounds like a lot.

2 A. Yeah. For me and my wife, we both left.

3 Q. It was very demanding when he was here in
4 town?

5 A. It was terrible. Bad job. Pay was good,
6 but we had enough.

7 Q. I know you guys had a falling out a couple
8 of years ago; I guess you weren't working with him
9 anymore. This would have been in 2003. You guys had a
10 falling out, remember?

11 A. Yeah, we settled that.

12 Q. That was settled?

13 A. That was settled with him between us.

14 Q. Was that --

15 A. It was an amicable -- it was an agreement,
16 mutual agreement. It was a mistake on my part.

17 Q. Are there any questions you have of me?

18 A. No. I told you the truth.

19 We just imagined things that could have
20 happened. I used to talk to my wife all day, working and
21 under that environment. But we didn't know for sure what
22 was going on.

23 We never heard anything. We never heard a
24 complaint, or a girl crying.

25 Q. Would these massage girls, especially

1 towards the end, would they come alone or would they come
2 with other people?

3 A. Mostly they would come alone. It was one
4 girl, one of the young girls, the one I can't think of
5 it, she would bring somebody else. She'd bring other
6 girls. But I didn't even know the names.

7 Q. All of them would go downstairs?

8 A. Yes.

9 Q. Or would one stay downstairs?

10 A. Most of the times when that girl came, it
11 was at night. So after dinner -- after dinner, they went
12 to the movies. And by the time they went to the movies,
13 we clean up right away and tried to get out of there.

14 And that was about 8, 9 o'clock at night.

15 After, when they come back, I don't know
16 what happened. Our quarters were a different -- I don't
17 know if you've been in the house, but our quarters were
18 separate.

19 Q. It's separate.

20 A. Separate. Before -- that building is new.

21 ~~They build the building in 2001.~~

22 Q. The guest quarters?

23 A. Yeah, the guest quarters.

24 Before, we had an apartment upstairs.

25 Q. They have the laundry and a little office



1 and the bedroom?

2 A. Yes. That was 2001. Before that, we had
3 an apartment upstairs in their house, in the main house.

4 Q. In the little rooms upstairs across from
5 his master bedroom?

6 A. Right.

7 Q. Was there ever any photographs that you can
8 recall around the house?

9 A. Girls, girls' photographs and guests'
10 photographs, yes.

11 Q. Were they dressed or were they naked?

12 A. Most of them were dressed. It was a lot of
13 entertainment in the pool, around the pool area. But
14 most of them were dressed.

15 Q. When was the last time you spoke with
16 Mr. Epstein?

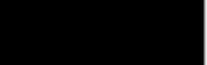
17 A. The last time I spoke with Mr. Epstein was
18 about a week ago, when you left me the card. I got
19 scared because of that fallout that we had, and I thought
20 it was a consequence of that. And I called and says,
21 ~~Jeffrey, what's going on, what's happening? Because I~~
22 thought it was an investigation against me on his part.

23 Q. I'm sorry if I gave you that impression.

24 A. That's why I called him. That's the only
25 reason that I called.

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NON PARTY (VR) 000544



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1 Before I even spoke to you.

2 Q. Just when you found the card?

3 A. When I find the card, I get scared. I
4 said, What's going on now? Why are you bothering me now
5 in my house?

6 That's why I called him.

7 He said, [REDACTED], there is an investigation
8 going on. I have nothing to talk to you. That's it.

9 I said, Okay.

10 Q. He didn't give you any information as to --

11 A. No, not a word.

12 Q. Has anybody else contacted you from
13 Mr. Epstein or his organization, his assistants, his
14 attorney?

15 A. No, no, no.

16 Q. Anyone that works for his attorney?

17 A. For his attorney? Yes. For his attorney,
18 the present attorney? Yes. That was an investigator
19 that it was investigated on his side, I can't remember
20 his name, but I understand it was from Roy Black's
21 office. That was his attorney. And he [REDACTED] this
22 investigator basically asked me the same questions,
23 exactly the same questions: What did I know, what did I
24 know.

25 Q. When did this happen?

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[REDACTED]

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1 A. This happened about ten days ago -- about a
2 week ago, ten days ago. I'm not sure what date.

3 Q. Was his investigator's name --

4 A. It's the date after I contacted you.

5 Q. -- Paul, first name Paul?

6 A. Paul, Paul, yes.

7 You have the last name?

8 Q. No.

9 A. He asked me exactly the same questions.

10 Q. Did he offer you any money?

11 A. Absolutely not. I would not take it.

12 Q. Did he tell you not to speak to me?

13 A. No. He says -- no, he told me not to speak
14 to you. He didn't say that to me. He says, It's your
15 choice. You make that decision.

16 And he says, If you hire a lawyer, you make
17 that decision.

18 And we feel that was important for us. I
19 don't want to be involved with this thing. I'm out of
20 the job three years ago, and that's why we hired
21 Mr. Murrell. He suggested that.

22 Q. Did he ask you if anybody else has been
23 contacted?

24 A. No.

25 Q. Did he tell you that to call him back after

1 our meeting?

2 A. No, no.

3 Q. Were you to have any contact with him at
4 any time after our meeting?

5 A. If I will have a contact? I have no reason
6 for it. I have no reason to call Jeffrey or anybody
7 else. This is over, I hope.

8 Q. Well, Mr. [REDACTED], this is basically an
9 ongoing investigation, so obviously anything that we
10 discuss hopefully will stay between us. Because it is
11 still ongoing, I wouldn't want this out until the
12 investigation is complete.

13 A. It's not going anywhere. Even my kids
14 don't know it.

15 Q. He contacted you after you called
16 Mr. Epstein?

17 A. Yes.

18 When I call him and I said, Jeffrey, what's
19 going on?

20 He said, [REDACTED], I don't know what's going
21 on. There's an investigation against me.

22 So then I said, Whew, thank God. I don't
23 know what's happening.

24 And then he says, I have an investigator
25 that is investigating, the same thing the police

1 department is doing. He's going to contact you.

2 And that was the end of it.

3 I think his name was Paul. I only met him
4 for about fifteen minutes, ten minutes.

5 Q. You met at your house?

6 A. No, no. I don't want him at my house. We
7 met at Carrabas restaurant, but it was not open, so we
8 met outside Carrabas. It took about ten minutes.

9 Q. Going back to the items that were found in
10 the sink, can you describe any of those massagers?

11 A. I only saw two things: It was a big,
12 big -- I think a vibrator. Big (indicating). And it was
13 a long -- I hate to -- I'm sorry. It was a long dick, I
14 think. Rubber thing. And there was a thing you used it
15 in the back, the vibrator in the back.

16 Q. What color?

17 A. We always had those. Not those toys.

18 Vibrators, we have different types, one for the neck, one
19 for the back. You know the one that has a battery and
20 they move, with balls on it, vibrator. That's it.

21 ~~That's what I find there. I never find anything else.~~

22 Those two things.

23 Q. Do you remember any names of the girls that
24 might have come over for massages?

25 A. Yes. I remember some of them. From the

1 beginning? From the end?

2 Q. As many as you can remember.

3 A. As many as I can remember.

4 Q. I know it's been a while.

5 A. It was [REDACTED]. It was [REDACTED]. And it was --

6 it was [REDACTED] It was -- how many? [REDACTED] [REDACTED]

7 It was also a young girl, but she was not a
8 massage therapist. She came to the house as a friend, I
9 think. I don't think she was a massage therapist. Her
10 name was -- as a matter of fact, she's in a soap opera
11 now, she's a star. Just give me a minute.

12 [REDACTED]

13 There also were men masseuses.

14 Q. There were men too?

15 A. There were men. A few. Not that many. A
16 few. I can't remember.

17 [REDACTED] There was an [REDACTED] There was
18 a [REDACTED] I think every name -- girls' names. In
19 eleven years, I cannot remember.

20 Q. That's fine.

21 A. ~~There were girls coming and going. There~~
22 were girls traveling with him as massage therapists.
23 They would travel with him all over the world, because he
24 was in the plane, he got massages on the plane,
25 because -- I know because I used to supply the oils and

1 the towels for the plane.

2 Q. Would you clean his plane too?

3 A. No, no.

4 Q. Did you ever travel with him anywhere?

5 A. No, no.

6 Q. When he went to New York or Arizona or his
7 private island?

8 A. I've been on his island. I've been as a
9 guest, as a vacation. We just took vacations, and I went
10 to his island in the Caribbean. And I've been in New
11 Mexico. I've been at his house in London. But not as a
12 worker, just vacation.

13 Q. As a vacation?

14 A. Uh-huh.

15 We went to New Mexico for -- it was kind of
16 a symposium about how to clean homes. It was this lady
17 who make -- teach all the house people, housemen, and
18 they invited us to Santa Fe, New Mexico, to teach us how
19 to clean homes. That was kind of stupid.

20 Q. How he wanted it to be cleaned?

21 A. Yes. We didn't get that much.

22 Q. Can you think of anything that I haven't
23 asked you that might be relevant to this?

24 A. I can't think of anything. Basically it's
25 the same questions that the other investigator asked me.

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NON PARTY (VR) 000550

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1 Exactly the same.

2 I wish I could give you more names.

3 Allison --

4 Q. I'm not going to ask you to do that because
5 I know it's been a long time. I can't think of stuff I
6 did last week.

7 A. It's been a long time.

8 Q. If by any chance you are contacted again by
9 his investigator again for any more questions or anything
10 or any packages that he may deliver to you --

11 A. They have to go to Mr. Murrell.

12 Q. I was going to say, have him contact your
13 attorney.

14 MR. MURRELL: Packages? Are we expecting a
15 delivery of something?

16 DET. [REDACTED]: No. I'm just saying --

17 MR. MURRELL: Okay. Just making sure there
18 wasn't something I didn't know about.

19 DET. [REDACTED]: I.e., gifts, et cetera.

20 That kind of thing.

21 THE WITNESS: No.

22 DET. [REDACTED]: I would appreciate a phone
23 call just to give me a heads up.

24 THE WITNESS: I do not intend to contact
25 him at all.

1 DET. [REDACTED]: Okay. I appreciate it.

2 And that's it.

3 (Thereupon, the sworn statement was
4 concluded at 1:05 p.m.)

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NON PARTY (VR) 000552

[REDACTED]

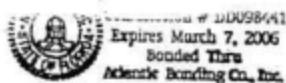
EFTA00029413

1 THE STATE OF FLORIDA,)
2 COUNTY OF PALM BEACH.)
3
4

5 I, the undersigned authority, certify that [REDACTED]
6 [REDACTED] personally appeared before me and was duly
7 sworn.

8
9 WITNESS my hand and official seal this 5th day
10 of December, 2005.

11
12
13
14 Susan Shelling, RPR
15 Notary Public - State of Florida
16 My Commission No. DD 098441
17 My Commission expires 3/7/2006



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NON PARTY (VR) 000553

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C E R T I F I C A T E

2 The State Of Florida,
3 County Of Palm Beach.

5 I, Susan Shelling, Registered Professional
6 Reporter and Notary Public in and for the State of
7 Florida at Large, do hereby certify that [REDACTED]
8 was by me first duly sworn to testify the whole truth;
9 that I was authorized to and did report said sworn
statement in stenotype; and that the foregoing pages,
numbered from 1 to 24, inclusive, are a true and correct
transcription of my shorthand notes of said sworn
statement.

10 I further certify that said sworn statement
11 was taken at the time and place hereinabove set forth and
that the taking of said sworn statement was commenced and
completed as hereinabove set out.

12 I further certify that I am not an attorney or
13 counsel of any of the parties, nor am I a relative or
14 employee of any attorney or counsel of party connected
with the action, nor am I financially interested in the
action.

18 IN WITNESS WHEREOF, I have hereunto set my hand
and seal this 5th day of December, 2005.

Susan Shelling, Notary Public
In and for the State of Florida
My Commission No. DD 098441
My Commission Expires 3/7/2006

J. CONSOR & ASSOCIATES REPORTING & TRANSCRIPTION
561-835-9738

NON PARTY (VR) 000554

EFTA00029415