

**Jeffrey Epstein v. Bradley J. Edwards, et al.**  
**Case No.: 50 2009 CA 040800XXXXMBAG**

**Attachments to Statement of Undisputed Facts**

1. Deposition of Jeffrey Epstein taken March 17, 2010
2. Deposition of Jane Doe taken March 11, 2010 (Pages 379, 380, 527, 564-67, 568)
3. Deposition of L.M. taken September 24, 2009 (Pages 73, 74, 164, 141, 605, 416)
4. Deposition of E.W. taken May 6, 2010 (115, 116, 255, 205, 215-216)
5. Deposition of Jane Doe #4 (32-34, 136)
6. Deposition of Jeffrey Epstein taken April 14, 2010
7. Deposition of Jeffrey Epstein taken February 17, 2010
8. Deposition of Alfredo Rodriguez taken July 29, 2009 (242-44, 223-28, 230-31, 278-280)
9. Deposition of Nadia Marcinkova taken April 13, 2010 (11)
10. Deposition of Jeffrey Epstein dated March 8, 2010
11. Deposition of Jeffrey Epstein dated October 8, 2009
12. Deposition of Jeffrey Epstein dated May 1, 2009
13. Deposition of Jeffrey Epstein dated May 7, 2009
14. Deposition of Sarah Kellen dated March 24, 2010
15. Deposition of Adriana Mucinska Ross dated March 15, 2010
16. Deposition of Janusz Bansiak taken February 16, 2010 (14, 154-160, 172-175)
17. Deposition of Louella Rabuyo taken October 20, 2009 (9)
18. Deposition of Larry Eugene Morrison taken October 6, 2009 (102-103)
19. Deposition of Alfredo Rodriguez taken August 7, 2009 (302-306, 348)

20. Deposition of Mark Epstein taken September 21, 2009 (48-50)
21. Deposition of Larry Viscoski taken October 15, 2009
22. Deposition of Bradley J. Edwards taken March 23, 2010 (110-116)

*DEFENDANT BRADLEY J. EDWARDS'S STATEMENT OF UNDISPUTED FACTS*

*Epstein v. Edwards, et al.*

*Case No.: 50 2009 CA 040800XXXXMBAG*

# ATTACHMENT 22

IN THE CIRCUIT COURT OF THE FIFTEENTH JUDICIAL  
CIRCUIT IN AND FOR PALM BEACH COUNTY, FLORIDA  
CASE NO. 50 2009CA040800XXXXMB AG

Complex Litigation, Fla.R.Civ.Pro. 1201

JEFFREY EPSTEIN,

Plaintiff,

-vs-

VOLUME I OF II

SCOTT ROTHSTEIN, individually,  
BRADLEY J. EDWARDS,  
individually, and L.M. individually,

Defendants.

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VIDEOTAPED DEPOSITION OF BRADLEY J. EDWARDS, ESQUIRE

Tuesday, March 23, 20010  
10:00 - 5:07 p.m.

2139 Palm Beach Lakes, Boulevard  
West Palm Beach, Florida 33401

Reported By:  
Cynthia Hopkins, RPR, FPR  
Notary Public, State of Florida  
Prose Court Reporting  
Job No.: 1333

1 that you were aware of; that is, hard copies?

2 A. I don't know.

3 Q. Okay. Could have been more, could have  
4 been less; you just don't know?

5 A. Correct.

6 Q. If I understood your testimony,  
7 Mr. Rothstein, Mr. Rosenfeldt, any other attorney or  
8 investigator could have accessed those files  
9 depending on where they were within the firm, true?

10 A. I am not sure exactly who could have accessed  
11 it. You asked me if the attorneys could and the  
12 attorneys had swipe cards for various locked areas.  
13 Each attorney I believe had access to any area where  
14 those files were located. I believe so.

15 Q. Okay. Well, during the time you were  
16 there did an individual by the name of Ken Jenne  
17 work there?

18 A. Yes.

19 Q. Okay. Did an individual by the name of  
20 Mike Fisten work for the firm --

21 A. Yes.

22 Q. -- for RRA? Were they employees of the  
23 firm or were they independent contractors?

24 A. I don't know.

25 Q. Okay. During the time they were there,

1 did they also have swipe cards so that they could  
2 access different areas in the firm?

3 A. I believe so.

4 Q. With regard to when you joined RRA, did  
5 you ever have any further meetings with  
6 Mr. Rothstein; that is, from the day you started at  
7 RRA, did you ever meet Mr. Rothstein again?

8 A. By meet him again --

9 Q. Did you ever have a meeting with him again  
10 regarding your position in the firm?

11 A. No.

12 Q. Okay. Did you ever meet with him and a  
13 number of other individuals with regards to firm  
14 business?

15 A. No.

16 Q. Firm cases?

17 A. I don't believe so.

18 Q. Was Mr. Rothstein ever present in any  
19 meeting where any of your cases were discussed? Let  
20 me strike that. Was Mr. Rothstein ever present  
21 wherein at any meeting where any of the cases  
22 against Jeffrey Epstein were discussed? Don't tell  
23 me content; just was he ever present.

24 A. How would I know that? I don't know. He  
25 could, he could be in a meeting right now where the case

1 could be discussed for all I know.

2 Q. I'm sorry. Obviously, where you, where  
3 you were present. Where you ever present at a  
4 meeting where Mr. Rothstein was also present where  
5 the Epstein cases were discussed?

6 A. No.

7 Q. Did he ever call you to communicate with  
8 you, call you either by phone, video conference, in  
9 any fashion to discuss any act aspect of the cases  
10 that you had against Jeffrey Epstein?

11 MR. SCAROLA: You can answer that.

12 THE WITNESS: He has communicated about  
13 various, about legal issues related to the case  
14 as well as commented about the case to me on  
15 very few occasions but I would say less than  
16 three times.

17 BY MR. CRITTON:

18 Q. During the time that you, from April of  
19 '09 through late October of '09, correct?

20 A. In that time period, where, is that when  
21 these --

22 Q. Correct.

23 A. -- things happened?

24 Q. Well, that's the time you were there;  
25 that's what I am asking.

1           A.    When I was there.

2           Q.    And do you, can you remember the date, any  
3 specific date that you spoke with him?

4           A.    No.

5           Q.    Do you remember any specific month that  
6 you would have had one of the -- well, what did you  
7 say something less than five conversations? I don't  
8 want to misquote you.

9           A.    I said less than three conversations.

10          Q.    All right. So, something less than three  
11 conversations you had with Mr. Rothstein regarding  
12 Epstein cases, either legal issue or a comment, some  
13 comment about the case to you, correct?

14          A.    Yes.

15          Q.    All right. The first time that he ever  
16 spoke to you, did he call you or did you call him?

17          A.    I, I never called Scott Rothstein about  
18 anything. Oh, take that back. About anything related  
19 to Jeffrey Epstein.

20          Q.    The first conversation that you can recall  
21 where either a legal issue or a comment was made  
22 about Jeffrey Epstein by Mr. Rothstein to you, he  
23 obviously initiated the call?

24          A.    It wasn't a call.

25          Q.    What was it?



1           A.    A comment in passing.  And I believe I was  
2 sitting at a table in BOVA when he walked over to my  
3 table and commented about Jeffrey Epstein.

4           Q.    Okay.  Who were you there with at the  
5 time?

6           A.    I don't remember.

7           Q.    Were you with some friends?  Were you with  
8 other lawyers?

9           A.    All right.  I am jogging my memory.  I, I have  
10 no idea.

11          Q.    What did he say?

12               MR. SCAROLA:  To the extent that you can  
13 answer that question without disclosing any  
14 mental impressions with regard to the lawsuit  
15 or any attorney-client privileged  
16 communications, you can answer.

17               To the extent that it might invade  
18 either the work-product or attorney-client  
19 privilege, you should not respond.

20          THE WITNESS:  Can I talk to you?

21          MR. SCAROLA:  Sure.

22               (A brief recess was held.)

23          MR. SCAROLA:  Are we on?

24          THE VIDEOGRAPHER:  Yeah.

25          MR. SCAROLA:  The record should reflect

1           that we have had an opportunity to consult and  
2           I have advised Mr. Edwards that there is no  
3           privilege protection for the particular  
4           communications involved.

5           BY MR. CRITTON:

6           Q.     What did he say?

7           A.     He commented to me, I want you to get that  
8           pedophile.

9           Q.     And your response was what?

10          A.     I didn't respond.

11          Q.     All right.  Second conversation that you  
12          can remember, where were you?

13          A.     I had just come out of the conference room on  
14          the main floor after taking a deposition in another  
15          case.  And he walked by and said, did you get that F'ing  
16          pedophile yet.

17          Q.     And your response?

18          A.     Again.

19          Q.     No response.

20          A.     Didn't respond.

21          Q.     On the first occasion when he came over  
22          and if I understand correctly, all he said was the  
23          comment that you referenced and then he left.  You  
24          didn't respond and then he just made the comment and  
25          then left?

1           A.    Right.  He was walking by in his normal, loud,  
2           ostentatious kind of way, greeting everybody in the  
3           restaurant.  Came over to my table and he feels, at  
4           least my impression was obliged to say something to  
5           everyone.  And that's the comment he said to me.

6                        And if you've ever seen him, he is  
7           basically always just skipping around and he hoped  
8           on over somewhere else.  So, yes, it was in,  
9           literally in passing.

10           Q.    Okay.  How, how, how did he even know you  
11           had cases involving Mr. Epstein?

12           A.    I don't know.

13           Q.    Because I think you testified earlier that  
14           you had never discussed an Epstein case with  
15           Mr. Rothstein one-on-one, correct?

16           A.    Absolutely, true.

17           Q.    You never discussed an Epstein case or  
18           either of your three clients with Mr. Rothstein even  
19           with a group of people around, correct?

20           A.    Correct.

21           Q.    All right.  Do you remember a third  
22           occasion that he spoke to you regarding Epstein  
23           related occasion, cases?

24           A.    Anything else that he ever spoke with me about  
25           related to Epstein related issues is attorney-client and

*DEFENDANT BRADLEY J. EDWARDS'S STATEMENT OF UNDISPUTED FACTS*

*Epstein v. Edwards, et al.*

*Case No.: 50 2009 CA 040800XXXXMBAG*

# ATTACHMENT 21

IN THE CIRCUIT COURT OF THE FIFTEENTH JUDICIAL CIRCUIT  
 IN AND FOR PALM BEACH COUNTY, FLORIDA  
 CASE NO. 002000CA028051XNXXMB AD

L.M.,  
 Plaintiff,  
 -vs-  
 JEFFREY EPSTEIN,  
 Defendant.

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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, RFR, CRR, FPR  
 Notary Public, State of Florida  
 Esquire Deposition Services  
 West Palm Beach Office Job #127542

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 14 EXHIBITS  
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 16 NUMBER DESCRIPTION PAGE  
 17 PLAINTIFF'S EX. 1 FLIGHT LOG BOOK  
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 19 PLAINTIFF'S EX. 2 MESSAGE PAD 119  
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1 APPEARANCES:  
 2 On behalf of the Plaintiff.  
 3 BRADLEY J. EDWARDS, ESQUIRE  
 ROTHSTEIN, ROSENFELDT, ADLER  
 4 401 East Las Olas Boulevard  
 Suite 1950  
 5 Fort Lauderdale, Florida 33394  
 6  
 7 On behalf of the Defendant:  
 8 ROBERT D. CRITTON, JR., ESQUIRE  
 BURMAN, CRITTON & LUTTIER  
 9 303 Banyan Boulevard, Suite 400  
 West Palm Beach, Florida 33401  
 10  
 11 On behalf of the Witness:  
 12 BRUCE REINHART, ESQUIRE  
 250 South Australian Avenue  
 13 Suite 1400  
 West Palm Beach, Florida 33401  
 14  
 15 ALSO PRESENT:  
 16 CARA L. HOLMES, ESQUIRE  
 1220 N.W. 157th Avenue  
 17 Pembroke Pines, Florida 33028  
 18 ADAM D. HOROWITZ, ESQUIRE  
 MERMELSTEIN & HOROWITZ, P.A.  
 19 18205 Biscayne Boulevard, Suite 2218  
 Miami, Florida 33180  
 20  
 21 RICHARD H. WILLITS, ESQUIRE (VIA TELEPHONE)  
 RICHARD H. WILLITS, P.A.  
 22 2290 10th Avenue North, Suite 404  
 Lake Worth, Florida 33461  
 23  
 24  
 25

4

1 PROCEEDINGS  
 2 ---  
 3 Deposition taken before Wendy Beath Anderson,  
 4 Certified Realtime Reporter and Notary Public in and for  
 5 the State of Florida at Large, in the above cause.  
 6 ---  
 7 MR. EDWARDS: We're going to put something on  
 8 the record about -- well, we'll do it this way --  
 9 MR. REINHART: Do it at the end, after we get  
 10 him -- whatever you want. It's your show.  
 11 MR. EDWARDS: Okay. There were -- I don't  
 12 even think Mr. Willits is aware of this. There was  
 13 a subpoena duces tecum for this witness, as well as  
 14 the previous witness, which was another pilot, Dave  
 15 Rogers, and that duces tecum was to bring the  
 16 flight logs related from 1998 through 2005. What  
 17 was produced at the previous deposition were flight  
 18 logs from 2002 through 2005, and now Mr. Reinhart  
 19 has agreed to produce the remainder of the flight  
 20 logs requested, those going from 1998 through 2002.  
 21 MR. REINHART: Correct. They're pilot logs,  
 22 not flight logs. There are other records we  
 23 indicated are corporate records, and with those you  
 24 have to deal with Mr. Critton.  
 25 MR. CRITTON: However, with the proviso, too,

5

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.

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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

7

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. 1131 Pine Point Road, Riviera Beach, Florida  
 21 33404.  
 22 Q. How long have you lived there?  
 23 A. Approximately nine years.  
 24 Q. Okay. Who do you live there with?  
 25 A. My wife and one child at this time.

8

1 Q. All right. How many children do you have?  
 2 A. Two.  
 3 Q. How old are they?  
 4 A. Fifteen and eighteen.  
 5 Q. And is the 18-year-old, is not living with  
 6 you?  
 7 A. She's off in school.  
 8 Q. Okay. What school is that?  
 9 A. Syracuse.  
 10 Q. Who's your employer right now?  
 11 A. NES, LLC.  
 12 Q. How long has NES, LLC been your employer?  
 13 A. I'm guessing. I'd say back 1991. I have to  
 14 do the math, but 17, 18 years.  
 15 Q. Has that been your only employer since 1991?  
 16 A. Yes.  
 17 Q. And has that been your only source of income  
 18 since 1991?  
 19 A. Yes.  
 20 Q. And what is NES, LLC?  
 21 A. I don't really know. I mean, it's the company  
 22 that my check comes from.  
 23 Q. What do you do for NES, LLC that results in  
 24 them paying you?  
 25 A. I am chief pilot for the aircraft and

<p style="text-align: center;">9</p> <p>1 helicopters.</p> <p>2 Q. And do you have a specific boss or somebody</p> <p>3 you answer to at NES, LLC?</p> <p>4 A. Several people would call to schedule flights</p> <p>5 from the office, being it either Mr. Epstein or, you</p> <p>6 know, I would just get a phone call and they would</p> <p>7 schedule a trip.</p> <p>8 Q. Okay. Aside from Mr. Epstein, who else would</p> <p>9 there be that would call to schedule flights?</p> <p>10 A. Leslie.</p> <p>11 Q. Leslie who?</p> <p>12 A. Leslie Gruff.</p> <p>13 Q. When's the last time you talked to Leslie</p> <p>14 Gruff?</p> <p>15 A. Probably two weeks ago, three weeks ago.</p> <p>16 Q. And where is she currently?</p> <p>17 A. I believe in New York, is where I spoke to her</p> <p>18 on the phone last.</p> <p>19 Q. What's the telephone number you call to reach</p> <p>20 Leslie Gruff?</p> <p>21 A. (212)750-9895.</p> <p>22 Q. And what address is Leslie Gruff at?</p> <p>23 A. Do you mean where the office is located?</p> <p>24 Q. Correct.</p> <p>25 A. 301 East 66th Street.</p>	<p style="text-align: center;">11</p> <p>1 Q. What floor or suite number is NES, LLC in?</p> <p>2 A. I believe -- well, I don't know that NES, LLC</p> <p>3 has an office there. I know that's where Leslie has the</p> <p>4 phone number where I call. So I don't know for a fact</p> <p>5 if NES, LLC has an office there.</p> <p>6 Q. And what suite number, then, would Leslie</p> <p>7 Gruff sit in to answer that telephone number at</p> <p>8 750-9895?</p> <p>9 A. I think it's 10F.</p> <p>10 Q. And when you stay at 301 East 66th Street,</p> <p>11 what suite number or what apartment number do you stay</p> <p>12 in?</p> <p>13 A. 12C.</p> <p>14 Q. And how about Dave Rogers, where does he stay?</p> <p>15 A. I'm guessing, because it's been some time</p> <p>16 since we've been there, 10B, but don't quote me on it.</p> <p>17 Q. Who are the other people in that building that</p> <p>18 you know to stay there on a regular -- fairly regular</p> <p>19 basis?</p> <p>20 A. I've seen people in the elevator that, you</p> <p>21 know, have been on the airplane. Case in point, maybe</p> <p>22 Sarah Kellen, but I don't know for a fact that she lives</p> <p>23 there, or anybody else for that matter.</p> <p>24 Q. Okay. When you say you've seen Sarah Kellen</p> <p>25 on the elevator --</p>
<p style="text-align: center;">10</p> <p>1 Q. And it's my understanding from other</p> <p>2 depositions that there are also apartments in that 301</p> <p>3 East 66th Street building?</p> <p>4 A. Yes.</p> <p>5 Q. And Mr. Epstein either owns or leases or rents</p> <p>6 certain of those apartments. Is that your</p> <p>7 understanding?</p> <p>8 MR. CRITTON: Form; speculation.</p> <p>9 THE WITNESS: I'm only speculating. I</p> <p>10 don't -- to my understanding, I don't know.</p> <p>11 BY MR. EDWARDS:</p> <p>12 Q. Do you know other people that live in that</p> <p>13 building?</p> <p>14 A. Well, it would be myself, Dave Rogers -- well,</p> <p>15 when you say "live," explain.</p> <p>16 Q. When you're saying yourself and Dave Rogers --</p> <p>17 A. See, we don't live there. I mean, we have --</p> <p>18 we would stay there when we would have a trip.</p> <p>19 Q. Okay. When you would fly up to New York and</p> <p>20 land in New York, the place where you would stay, is</p> <p>21 that 301 East 66th Street?</p> <p>22 A. Yes, that's correct.</p> <p>23 Q. That's also a location you've indicated in</p> <p>24 this deposition that is the office for NES, LLC?</p> <p>25 A. Yes.</p>	<p style="text-align: center;">12</p> <p>1 A. I only assume she lives there. I don't know</p> <p>2 for a fact. I'm trying to be honest and factual for</p> <p>3 you. So I couldn't honestly say if I knew she lived</p> <p>4 there or not.</p> <p>5 Q. Where do you think Sarah Kellen lives?</p> <p>6 A. I would think she lives there.</p> <p>7 Q. You don't have a better location?</p> <p>8 A. I don't have another location.</p> <p>9 Q. Anybody else?</p> <p>10 A. Not to my knowledge. I mean, I'd only be</p> <p>11 guessing that people live in that building that -- you</p> <p>12 know, I don't have any facts to prove that they actually</p> <p>13 live there. I mean, I don't think you want me to guess.</p> <p>14 Q. Well, NES, LLC, would you say that the owner</p> <p>15 or controller of that company is Jeffrey Epstein?</p> <p>16 MR. CRITTON: Form.</p> <p>17 THE WITNESS: I don't know that for a fact.</p> <p>18 BY MR. EDWARDS:</p> <p>19 Q. Jeffrey Epstein is somebody you've indicated</p> <p>20 that you've worked for for 17 or 18 years, right?</p> <p>21 A. Yes.</p> <p>22 Q. And over the 17 or 18 years you've become</p> <p>23 personally close with him as well, correct?</p> <p>24 MR. CRITTON: Form.</p> <p>25 THE WITNESS: I don't understand how you mean</p>

13	15
<p>1 "close." Define that.</p> <p>2 BY MR. EDWARDS:</p> <p>3 Q. Well, more so than just a pilot that takes him</p> <p>4 from Point A to Point B?</p> <p>5 A. That is my job.</p> <p>6 Q. Right. But you know him on a personal level</p> <p>7 and that you've had personal conversations that don't</p> <p>8 necessarily deal with flying from Point A to Point B;</p> <p>9 isn't that right?</p> <p>10 MR. CRITTON: Form.</p> <p>11 THE WITNESS: More specific, meaning we talk</p> <p>12 about cars. I mean, does that make you a personal</p> <p>13 friend?</p> <p>14 BY MR. EDWARDS:</p> <p>15 Q. Have you ever gone to his house to eat?</p> <p>16 A. No.</p> <p>17 Q. Have you been to his New York home?</p> <p>18 A. Yes.</p> <p>19 Q. How many occasions have you been to his New</p> <p>20 York home?</p> <p>21 MR. CRITTON: Object to form.</p> <p>22 THE WITNESS: We normally pick up luggage in</p> <p>23 the lobby, so it would probably be quite often.</p> <p>24 Any time we depart out of New York, we stop by the</p> <p>25 house and pick up luggage and head to the aircraft.</p>	<p>1 you know, televisions and such.</p> <p>2 Q. Is that another hobby or job or something of</p> <p>3 yours?</p> <p>4 A. Both.</p> <p>5 Q. Does he pay you for that?</p> <p>6 A. Not any more than my salary.</p> <p>7 Q. What's your current salary?</p> <p>8 A. At this time, 180,000.</p> <p>9 Q. And what are you paid \$180,000 to do?</p> <p>10 A. To manage his aircraft.</p> <p>11 Q. What does that entail?</p> <p>12 A. Scheduling maintenance. Anything that has to</p> <p>13 do with any flight, whether it be weather, flight</p> <p>14 planning, time and distance to and from a location, any</p> <p>15 logistics involved in running an operation that has</p> <p>16 aircraft.</p> <p>17 Q. In addition to the 180,000, does he give you</p> <p>18 bonuses as well?</p> <p>19 A. There have been Christmas bonuses.</p> <p>20 Q. Over the years, you mean, there have been</p> <p>21 Christmas bonuses?</p> <p>22 A. Yes.</p> <p>23 Q. Is 180,000 the most he's ever paid you?</p> <p>24 A. No.</p> <p>25 Q. All right. Were you making -- when was the</p>
<p>14</p> <p>1 BY MR. EDWARDS:</p> <p>2 Q. Other than picking up luggage, have you been</p> <p>3 to his home to visit or socialize with him?</p> <p>4 A. Not to socialize, no.</p> <p>5 Q. Have you been to his Palm Beach home?</p> <p>6 A. To?</p> <p>7 Q. To Mr. Epstein's Palm Beach house?</p> <p>8 A. Right.</p> <p>9 Q. Have you been there?</p> <p>10 A. Yes.</p> <p>11 Q. Have you been inside?</p> <p>12 A. Yes.</p> <p>13 Q. And how many occasions have you been inside</p> <p>14 that home?</p> <p>15 A. The same, as far as picking up luggage, and</p> <p>16 that would be on a regular basis, you know, for a</p> <p>17 departure. We wouldn't always go to the house to pick</p> <p>18 up luggage, but it made it easier for loading the</p> <p>19 aircraft, getting it done prior to departure.</p> <p>20 Q. Is that the only reason that you have ever</p> <p>21 gone to the Palm Beach home over the last 18 years, is</p> <p>22 to pick up luggage?</p> <p>23 A. No.</p> <p>24 Q. What other reasons have you gone there?</p> <p>25 A. I've set up several home theater equipments,</p>	<p>16</p> <p>1 last time that you were making an amount different than</p> <p>2 180,000?</p> <p>3 A. Last year.</p> <p>4 Q. That would be 2008?</p> <p>5 A. That would be correct. Yeah, we all took a</p> <p>6 salary cut, I don't know the exact date. It might have</p> <p>7 been 2008, last year. It was last Christmas we all took</p> <p>8 a 10 percent salary cut.</p> <p>9 Q. Do you know why?</p> <p>10 A. Economic reasons.</p> <p>11 Q. And who told you that you were going to have</p> <p>12 to take the salary cut?</p> <p>13 A. Darren Indyke.</p> <p>14 Q. And did you ask for an explanation?</p> <p>15 A. He explained it was due to economic reasons</p> <p>16 throughout the country.</p> <p>17 Q. Okay. So in 2008, how much was -- were you</p> <p>18 being paid by NES, LLC?</p> <p>19 A. 200,000.</p> <p>20 Q. And is 200,000 the most that you've ever made</p> <p>21 from NES, LLC?</p> <p>22 A. Yes, sir.</p> <p>23 Q. And on top of that \$200,000, did you get a</p> <p>24 bonus that year as well?</p> <p>25 MR. REINHART: Which year are you talking</p>



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<p>1 about?</p> <p>2 MR. EDWARDS: 2008.</p> <p>3 THE WITNESS: That year, I think we skipped</p> <p>4 Christmas bonuses that year. The last bonus might</p> <p>5 have been 2007.</p> <p>6 BY MR. EDWARDS:</p> <p>7 Q. If you ever got a bonus from Mr. Epstein --</p> <p>8 and I'm only deriving this from you using the term</p> <p>9 "Christmas bonus."</p> <p>10 A. Holiday bonus.</p> <p>11 Q. -- am I correct to assume -- sorry. Am I</p> <p>12 correct to assume that if you got a bonus, there was</p> <p>13 only one and it was at the end of the year, around the</p> <p>14 holidays?</p> <p>15 A. Yes.</p> <p>16 Q. Okay. And how much was the 2007 holiday</p> <p>17 bonus?</p> <p>18 A. I'd have to ask my wife, to be honest. I</p> <p>19 haven't seen my paycheck in 27 years, so I believe it</p> <p>20 was \$10,000.</p> <p>21 Q. And in 2007 you also made \$200,000?</p> <p>22 A. Yes.</p> <p>23 Q. Okay.</p> <p>24 A. With a question mark. I'm trying to be as</p> <p>25 accurate as I can, but yes.</p>	<p>1 my paycheck. So I don't even know what's written on the</p> <p>2 top of it.</p> <p>3 Q. That would be something that only your wife</p> <p>4 would see, I'm assuming?</p> <p>5 A. You're right, since she probably wouldn't know</p> <p>6 the answer either, because she's looking at the right</p> <p>7 column and not the top column.</p> <p>8 Q. Right. When is the first time that you had</p> <p>9 heard the name NES, LLC, that company?</p> <p>10 A. Five, six years, and even questioned what it</p> <p>11 stood for. And I think to this day I couldn't answer</p> <p>12 that honestly, what it stands for.</p> <p>13 Q. Okay. But it's your understanding that the</p> <p>14 NES, LLC is paying you for the work that you do as a</p> <p>15 pilot or maintain the planes for Jeffrey Epstein?</p> <p>16 A. To my understanding, yes.</p> <p>17 Q. And back in 1991, do you know if it was a</p> <p>18 different company that was paying you or if it was</p> <p>19 Jeffrey Epstein directly paying you?</p> <p>20 A. I don't remember. I mean, I don't.</p> <p>21 Q. Okay. Throughout your career with -- as a</p> <p>22 pilot for Jeffrey Epstein, since 1991, has there ever</p> <p>23 been a time when you believe you were paid directly from</p> <p>24 Jeffrey Epstein personally versus some company?</p> <p>25 A. Not to my knowledge, no.</p>
<p>18</p> <p>1 Q. Something pretty close to that?</p> <p>2 A. Yes, sir.</p> <p>3 Q. Okay. So with the bonus it was 210,000,</p> <p>4 roughly?</p> <p>5 A. Right.</p> <p>6 Q. Okay. And how long were you making that</p> <p>7 salary?</p> <p>8 A. Probably -- he was very religious about giving</p> <p>9 annual increases, so I would probably say 2006, you</p> <p>10 know, it was -- we would get increment -- increases of</p> <p>11 five or \$10,000 each year. So I would say 2006. So it</p> <p>12 graduated, you know, progressive.</p> <p>13 Q. Okay. Do you remember the progression if we</p> <p>14 start at 1991? Do you remember roughly what the</p> <p>15 progression was up through 2007/2008, when you were</p> <p>16 making \$200,000?</p> <p>17 A. No, I wouldn't know the progression.</p> <p>18 Q. Okay. Do you remember what you were making</p> <p>19 from -- and was NES, LLC the company paying you back in</p> <p>20 1991?</p> <p>21 A. I don't know. I don't remember. Let me say</p> <p>22 it that way. I don't remember.</p> <p>23 Q. Okay. When -- how long do you remember NES,</p> <p>24 LLC being the payer of your check?</p> <p>25 A. Personally, two years, because I've never seen</p>	<p>20</p> <p>1 Q. Okay. So whether it was NES, LLC or some</p> <p>2 other company, it was all of a sudden a company name, to</p> <p>3 the best of your knowledge?</p> <p>4 A. Exactly, yes.</p> <p>5 Q. And back in 1991, do you remember</p> <p>6 approximately how much you were being paid that year?</p> <p>7 A. Fifty-five or 60,000, is maybe what I started.</p> <p>8 Q. Okay.</p> <p>9 A. You're going back a long ways.</p> <p>10 Q. Yes.</p> <p>11 A. I'm trying.</p> <p>12 Q. Your relationship goes back that far. That's</p> <p>13 why I chose that year.</p> <p>14 A. Right.</p> <p>15 Q. Okay. Did you get bonuses even back that far?</p> <p>16 A. Yes, sir.</p> <p>17 Q. And do you remember what your bonuses were</p> <p>18 approximately?</p> <p>19 A. 5,000. I mean, that was kind of the -- the</p> <p>20 starting point.</p> <p>21 Q. Okay. In addition to monetary bonuses, were</p> <p>22 there ever gifts or any other type of compensation that</p> <p>23 NES, LLC or Jeffrey Epstein provided you?</p> <p>24 A. Yes.</p> <p>25 Q. And is that over the span of the 18 years?</p>

<p style="text-align: center;">21</p> <p>1 A. Yes.</p> <p>2 Q. Okay. Tell me what some of those items are.</p> <p>3 A. I remember one specifically was a pool heater.</p> <p>4 Q. Excuse me?</p> <p>5 A. A pool heater.</p> <p>6 Q. When was that?</p> <p>7 A. 1995-ish.</p> <p>8 Q. Okay. Why did you get that?</p> <p>9 A. I had built a pool and I didn't have a heater</p> <p>10 and he kind of laughed at me saying, "How can you have a</p> <p>11 pool without a heater?" So he says, "You ought to get a</p> <p>12 heater."</p> <p>13 Q. Where were you when you had that conversation?</p> <p>14 A. In the airplane.</p> <p>15 Q. How did he know that you had built a pool?</p> <p>16 A. Just in general conversation.</p> <p>17 Q. You were having a conversation with Jeffrey</p> <p>18 Epstein?</p> <p>19 A. Yes.</p> <p>20 Q. And this is something that was happening on</p> <p>21 the airplane, this conversation?</p> <p>22 A. During the flight. Yeah, it would have been</p> <p>23 like on cruise or something.</p> <p>24 Q. Okay. When you say "during the flight," does</p> <p>25 that --</p>	<p style="text-align: center;">23</p> <p>1 Q. But more so than that, if there's going to be</p> <p>2 a casual conversation about a pool or a pool heater or</p> <p>3 whatever, it's going to be with you most likely if he's</p> <p>4 going to be talking to pilots, right?</p> <p>5 MR. CRITTON: Form.</p> <p>6 THE WITNESS: Right.</p> <p>7 BY MR. EDWARDS:</p> <p>8 Q. Okay. And you feel like over the years your</p> <p>9 relationship with Jeffrey Epstein has been pretty good?</p> <p>10 A. Yes.</p> <p>11 Q. And you have been closer to him over the years</p> <p>12 as you've grown to know him?</p> <p>13 MR. CRITTON: Form.</p> <p>14 THE WITNESS: The same throughout the same</p> <p>15 year. We never got any closer than 1991 than I am</p> <p>16 with him now. I'm very professional at what I do</p> <p>17 and know the line between being professional and</p> <p>18 thinking you're somebody's buddy.</p> <p>19 BY MR. EDWARDS:</p> <p>20 Q. Okay. So that's not something that you think</p> <p>21 you are? You don't think you're his buddy?</p> <p>22 A. No, sir.</p> <p>23 Q. Do you consider yourself his friend?</p> <p>24 A. I believe so.</p> <p>25 Q. Do you think he considers you his friend?</p>
<p style="text-align: center;">22</p> <p>1 A. Again, you're going back a long ways.</p> <p>2 Q. I understand. We're talking about 1995 right</p> <p>3 now.</p> <p>4 A. Yes.</p> <p>5 Q. You're having a conversation with Jeffrey</p> <p>6 Epstein. Who is flying the airplane?</p> <p>7 A. The auto pilot and there's two crew.</p> <p>8 Q. Okay. So are you back in the back portion or</p> <p>9 is he up in the cockpit?</p> <p>10 A. Up in the cockpit.</p> <p>11 Q. Okay. Jeffrey Epstein sometimes comes up</p> <p>12 there?</p> <p>13 A. Just, yeah, in between the two pilot seats.</p> <p>14 Q. All right. Is that something that was</p> <p>15 typical, to have conversations like that?</p> <p>16 A. Mm-hmm.</p> <p>17 Q. Yes?</p> <p>18 A. Yes. No nodding.</p> <p>19 Q. And would those conversations be directed</p> <p>20 mainly with you or with the other pilots as well?</p> <p>21 A. Mainly with me.</p> <p>22 Q. I mean, you've kind of been described as the</p> <p>23 main guy or the main pilot. Wouldn't you consider that</p> <p>24 pretty much your role, right?</p> <p>25 A. Well, that's chief pilot.</p>	<p style="text-align: center;">24</p> <p>1 A. I think so.</p> <p>2 Q. All right. What makes you think that?</p> <p>3 MR. CRITTON: Speculation.</p> <p>4 THE WITNESS: He's always been kind and</p> <p>5 respectful.</p> <p>6 BY MR. EDWARDS:</p> <p>7 Q. Ever invited you to dinner?</p> <p>8 A. No, sir.</p> <p>9 Q. Have you ever associated or socialized with</p> <p>10 him during the day at any of his homes?</p> <p>11 A. Only during a business reason.</p> <p>12 Q. Okay. What are the other -- are the places</p> <p>13 that you believe that Mr. Epstein owns? I know we've</p> <p>14 talked about this Manhattan -- the Manhattan house.</p> <p>15 I've read the articles about it, the Palm Beach mansion.</p> <p>16 But what other places are you familiar with that</p> <p>17 Mr. Epstein owns?</p> <p>18 MR. CRITTON: Form; predicate, speculation.</p> <p>19 THE WITNESS: To answer it honestly, I don't</p> <p>20 know specifically that he owns any of the</p> <p>21 residences, to be honest. I would only assume that</p> <p>22 he owns. So if you want me to answer honestly, I</p> <p>23 don't know that he owns any of the other.</p> <p>24 BY MR. EDWARDS:</p> <p>25 Q. Okay. Well, what would be the basis for your</p>

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<p>1 assumption that he owns the home in Palm Beach?</p> <p>2 A. He goes there, but I don't assume -- you don't</p> <p>3 have to own a house to go to it.</p> <p>4 Q. And not only does he go there, you're aware</p> <p>5 that he spends the night there; he resides there</p> <p>6 sometimes, correct?</p> <p>7 A. Yes.</p> <p>8 Q. When he's in Palm Beach, that's where he --</p> <p>9 A. He sleeps.</p> <p>10 Q. -- sleeps? Right. When he's in New York, do</p> <p>11 you know where he sleeps?</p> <p>12 A. No.</p> <p>13 Q. But you've been to a particular house in New</p> <p>14 York that's a very large house that we've all read about</p> <p>15 that you picked up luggage at, right?</p> <p>16 A. Yes, sir.</p> <p>17 MR. CRITTON: Form.</p> <p>18 BY MR. EDWARDS:</p> <p>19 Q. And that home, do you know that -- I know that</p> <p>20 you're saying that you haven't done a public record</p> <p>21 search to make sure that Jeffrey Epstein owns it.</p> <p>22 A. Yeah.</p> <p>23 Q. But you assume that he does?</p> <p>24 A. Assuming.</p> <p>25 Q. That's where he sleeps when he's in New York?</p>	<p>1 Q. Are those private airports?</p> <p>2 A. Public.</p> <p>3 Q. Public, okay. Are there any private landing</p> <p>4 places where you would land any airplanes in New Mexico?</p> <p>5 A. There are.</p> <p>6 Q. That you have landed --</p> <p>7 A. That I have.</p> <p>8 Q. -- his airplane?</p> <p>9 A. Yes.</p> <p>10 Q. Where?</p> <p>11 A. We have a 4500-foot strip on the ranch.</p> <p>12 Q. When you say "we," yourself and somebody?</p> <p>13 A. The company.</p> <p>14 Q. What company?</p> <p>15 A. Well, I should say -- I see where you're going</p> <p>16 with that. The ranch owns -- whoever owns the ranch.</p> <p>17 The ranch has a runway on it.</p> <p>18 Q. Okay. And you've landed an airplane on that</p> <p>19 runway?</p> <p>20 A. That ranch, yes.</p> <p>21 Q. How many times do you think you've landed</p> <p>22 there?</p> <p>23 A. Ten.</p> <p>24 Q. All right. And have you been inside his</p> <p>25 ranch?</p>
<p>26</p> <p>1 MR. CRITTON: Form.</p> <p>2 THE WITNESS: I assume.</p> <p>3 BY MR. EDWARDS:</p> <p>4 Q. That's where his luggage is when you pick it</p> <p>5 up?</p> <p>6 A. Doesn't mean he owns it.</p> <p>7 Q. Right. But that's where it is?</p> <p>8 A. Yes, sir.</p> <p>9 Q. Do you know of anybody else who owns that home</p> <p>10 in New York?</p> <p>11 A. No.</p> <p>12 Q. Okay. Have you been to his ranch in New</p> <p>13 Mexico?</p> <p>14 A. Yes.</p> <p>15 MR. CRITTON: Form.</p> <p>16 BY MR. EDWARDS:</p> <p>17 Q. How many times have you been to his ranch in</p> <p>18 New Mexico?</p> <p>19 MR. CRITTON: Form; predicate.</p> <p>20 THE WITNESS: A guesstimate, fifty times, only</p> <p>21 due to the fact that we would fly there.</p> <p>22 BY MR. EDWARDS:</p> <p>23 Q. And where would you land?</p> <p>24 A. Depending upon the aircraft, either</p> <p>25 Albuquerque or Santa Fe.</p>	<p>28</p> <p>1 A. Yes.</p> <p>2 MR. CRITTON: Form to the last question.</p> <p>3 MR. REINHART: Can you clarify, the physical</p> <p>4 ranch or the residences or the structures on the</p> <p>5 ranch?</p> <p>6 MR. EDWARDS: I don't have a good visual</p> <p>7 appreciation for it.</p> <p>8 BY MR. EDWARDS:</p> <p>9 Q. Why don't you describe it in your words what</p> <p>10 this ranch that we are talking about looks like. And</p> <p>11 I've heard it referred to as the Zorro Ranch. Have you</p> <p>12 heard that?</p> <p>13 A. I've heard that.</p> <p>14 Q. That's the ranch we're all familiar with,</p> <p>15 we're talking about where the runway is and everything</p> <p>16 else?</p> <p>17 A. Yes.</p> <p>18 Q. Describe it in your own words, the landscaping</p> <p>19 of this ranch. What do we have on it?</p> <p>20 A. There is a house up on the hill, a large</p> <p>21 house.</p> <p>22 Q. How big?</p> <p>23 A. Big. I've read 40,000 square feet in the</p> <p>24 paper.</p> <p>25 Q. Have you been to it?</p>

<p style="text-align: center;">29</p> <p>1 A. Yes.</p> <p>2 Q. Does that seem like it's feasible,</p> <p>3 approximately 40,000 --</p> <p>4 A. I think so, yes.</p> <p>5 Q. What else do we have on it?</p> <p>6 A. There is a compound that has kind of motel</p> <p>7 room type -- they call it bunkhouse.</p> <p>8 Q. Where's the bunkhouse located?</p> <p>9 A. At the entrance to the ranch.</p> <p>10 Q. Okay. And what is that primarily used for?</p> <p>11 A. For the people that work on the ranch, they</p> <p>12 reside there. It's also a place where anybody that</p> <p>13 traveled on the airplane would stay. It's kind of like,</p> <p>14 you know, a hotel room.</p> <p>15 Q. And how far is that from the first house that</p> <p>16 you described, the 40,000 square foot house?</p> <p>17 A. It's probably 4 miles.</p> <p>18 Q. Okay. So the Zorro Ranch is a rather large</p> <p>19 area of property?</p> <p>20 A. Yes.</p> <p>21 Q. And how many times -- I know we just talked</p> <p>22 about how many times you've been in the house, but how</p> <p>23 many times have you been on that ranch in New Mexico,</p> <p>24 the Zorro Ranch?</p> <p>25 A. Thirty to fifty times over the years. That's</p>	<p style="text-align: center;">31</p> <p>1 A. Yes, sir.</p> <p>2 Q. And he sleeps there?</p> <p>3 A. Yes.</p> <p>4 Q. Okay.</p> <p>5 A. I assume he does.</p> <p>6 Q. You assume he sleeps?</p> <p>7 A. I do. I think.</p> <p>8 Q. Okay.</p> <p>9 MR. CRITTON: This is really --</p> <p>10 BY MR. EDWARDS:</p> <p>11 Q. Other than the pool heater in 1995, have you</p> <p>12 ever received any other gifts on top of the compensation</p> <p>13 from Mr. Epstein?</p> <p>14 A. I did get land on the ranch to build a house.</p> <p>15 Q. What do you mean you got land on the ranch?</p> <p>16 A. He deeded me land to build a home.</p> <p>17 Q. When was that?</p> <p>18 A. Ten years ago at least.</p> <p>19 Q. Do you know if he's ever deeded anyone else in</p> <p>20 this world land on the ranch to build a home?</p> <p>21 A. Not to my knowledge.</p> <p>22 Q. Why did he do that?</p> <p>23 A. We would vacation out there and my wife fell</p> <p>24 in love with New Mexico and we were looking for</p> <p>25 property.</p>
<p style="text-align: center;">30</p> <p>1 a guesstimate.</p> <p>2 Q. Is that over -- when was the first time that</p> <p>3 you went to that ranch?</p> <p>4 A. A guess, I don't know when it was, actually,</p> <p>5 our first trip, but 1995/94.</p> <p>6 Q. Okay. And do you believe Jeffrey Epstein</p> <p>7 and/or a corporation owned or controlled by him to be</p> <p>8 the sole owner of that ranch?</p> <p>9 A. I don't know any of those details.</p> <p>10 Q. Have you ever talked to Jeffrey Epstein about</p> <p>11 who owns that ranch?</p> <p>12 A. No.</p> <p>13 Q. Do you know of anybody else who may own that</p> <p>14 ranch?</p> <p>15 A. Not to my knowledge.</p> <p>16 Q. Other than Jeffrey Epstein, do you know of</p> <p>17 anybody else who regularly stays there when they're in</p> <p>18 New Mexico?</p> <p>19 A. Not to my knowledge.</p> <p>20 Q. Does Jeffrey Epstein stay there when you're in</p> <p>21 New Mexico?</p> <p>22 A. He has.</p> <p>23 Q. And he has a key to the place?</p> <p>24 A. I don't know if there's a key.</p> <p>25 Q. One way or another, he gets in, right?</p>	<p style="text-align: center;">32</p> <p>1 Q. And did you talk to him about that?</p> <p>2 A. Yes. He knew I -- he was aware I was looking</p> <p>3 for a home and he says, "Well, I have so much land, I</p> <p>4 could give you a spot to build a home on." So I built a</p> <p>5 house.</p> <p>6 Q. So how long has a home actually been on that</p> <p>7 property?</p> <p>8 A. Nine years.</p> <p>9 Q. And that's a home that you own?</p> <p>10 A. Yes, sir.</p> <p>11 Q. And that's a home that was -- when I say "you</p> <p>12 own it," is there a mortgage on it or did he give it to</p> <p>13 you free and clear?</p> <p>14 A. No, no, I paid for the house. I made payments</p> <p>15 on it.</p> <p>16 Q. All right. So what did he actually give you?</p> <p>17 A. 40-acres of land.</p> <p>18 Q. That you did not have to pay for?</p> <p>19 A. You know, I'd have to go back and look. I</p> <p>20 think it was -- I had to pay something for it. I don't</p> <p>21 remember.</p> <p>22 Q. How often have you visited that piece -- that</p> <p>23 home that you own?</p> <p>24 A. My wife would spend summers out there with the</p> <p>25 kids.</p>

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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

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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?

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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

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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 West Palm Beach or in the Zorro Ranch?  
 18 A. No, here in West Palm Beach.  
 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

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<p>1 that I drive.</p> <p>2 Q. All right. You've worked for him for 18</p> <p>3 years. I don't even know how long the Hummer would</p> <p>4 last, but presumably, that's not the car you've had over</p> <p>5 the entire 18 years. Have you always had a company car?</p> <p>6 A. No, I haven't, no.</p> <p>7 Q. When did you get the Hummer?</p> <p>8 A. Probably three years ago.</p> <p>9 Q. Do any other members of Mr. Epstein's piloting</p> <p>10 team have company cars?</p> <p>11 A. No.</p> <p>12 Q. Only you?</p> <p>13 A. Yes.</p> <p>14 Q. And do you know how that decision was made to</p> <p>15 get you a company vehicle?</p> <p>16 A. No.</p> <p>17 Q. What do you use that vehicle for?</p> <p>18 A. To and from the airport.</p> <p>19 Q. All right. Do you use it for personal reasons</p> <p>20 also?</p> <p>21 A. I guess, yes.</p> <p>22 Q. I mean, that's your primary vehicle?</p> <p>23 A. Yes, or I drive my wife's car.</p> <p>24 Q. Which is?</p> <p>25 A. Type of car?</p>	<p>1 Q. And which airplane was that?</p> <p>2 A. The Hawker.</p> <p>3 Q. Does he still have the Hawker?</p> <p>4 A. No.</p> <p>5 Q. How long did he have that plane?</p> <p>6 A. Five years, guesstimate, four or five years.</p> <p>7 Q. So sometime in the mid '90s?</p> <p>8 A. Yes.</p> <p>9 Q. Did you keep any type of logs or documentation</p> <p>10 as to who would have been flying on that airplane if you</p> <p>11 transported any individuals?</p> <p>12 A. The same logs as you possess now are the</p> <p>13 flight logs.</p> <p>14 Q. Okay.</p> <p>15 A. That's the standard for the industry.</p> <p>16 Q. So that's something that you kept, or that</p> <p>17 Dave Rogers kept?</p> <p>18 A. Dave Rogers.</p> <p>19 Q. Okay. If there are any documents out there</p> <p>20 with names of passengers on any of the flights involving</p> <p>21 planes owned or controlled by Jeffrey Epstein and/or his</p> <p>22 companies, those would be documents in the possession of</p> <p>23 Dave Rogers and not yourself?</p> <p>24 A. Oh, the corporation actually, they belong to.</p> <p>25 Q. Okay.</p>
<p>38</p> <p>1 Q. Yes.</p> <p>2 A. A Mercedes.</p> <p>3 Q. And is that something that was also a gift</p> <p>4 from Mr. Epstein?</p> <p>5 A. No, sir.</p> <p>6 Q. What type of Mercedes is that?</p> <p>7 A. A ML 430, ten years old.</p> <p>8 Q. All right. Are there any other items --</p> <p>9 company car, the land in New Mexico, the pool heater --</p> <p>10 any other items that Mr. Epstein has given you over time</p> <p>11 as compensation or reward or anything else?</p> <p>12 A. No, sir.</p> <p>13 Q. And your only income is from Mr. Epstein or</p> <p>14 his companies?</p> <p>15 A. Correct.</p> <p>16 Q. Okay. And it's been that way since 1991?</p> <p>17 A. Yes.</p> <p>18 Q. How did you meet Mr. Epstein or become</p> <p>19 involved with him in 1991?</p> <p>20 A. We heard at the airport that Mr. Epstein was</p> <p>21 purchasing an airplane when Dave Rogers and myself were</p> <p>22 living in Columbus, and we had the opportunity to</p> <p>23 interview with him, and we did and got the job.</p> <p>24 Q. And this is before he owned the airplane?</p> <p>25 A. Yes.</p>	<p>40</p> <p>1 MR. REINHART: That was a compound question.</p> <p>2 You might want to split it in half.</p> <p>3 MR. EDWARDS: Okay.</p> <p>4 BY MR. EDWARDS:</p> <p>5 Q. What documents do you believe exist that</p> <p>6 indicate names of individuals that have been passengers</p> <p>7 on Mr. Epstein's airplanes?</p> <p>8 MR. REINHART: Are we going back all the way</p> <p>9 from '91 to the present?</p> <p>10 MR. EDWARDS: Sure.</p> <p>11 THE WITNESS: You're talking about the Hawker?</p> <p>12 BY MR. EDWARDS:</p> <p>13 Q. Any airplanes. What documents would there be?</p> <p>14 A. There would be the same: Flight logs and</p> <p>15 passenger manifests would exist.</p> <p>16 Q. And are either of those required?</p> <p>17 A. The flight log is required for the aircraft to</p> <p>18 track times and landings.</p> <p>19 Q. And in the flight log, is it required that you</p> <p>20 designate the names of the passengers?</p> <p>21 A. No.</p> <p>22 Q. That's just something that Dave Rogers did on</p> <p>23 his own?</p> <p>24 A. Everybody does that. It's more for Internal</p> <p>25 Revenue.</p>

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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.

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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?

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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

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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?

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<p>1 A. Yes, sir.</p> <p>2 Q. How big of a plane is that?</p> <p>3 A. Large corporate jet.</p> <p>4 Q. How long has he had it?</p> <p>5 A. Fourteen years; 13, 14 years.</p> <p>6 Q. And other than the Gulfstream, what other</p> <p>7 airplanes does he have?</p> <p>8 A. When you say "he," obviously, these are</p> <p>9 company-owned --</p> <p>10 Q. Jeffrey Epstein or his companies.</p> <p>11 A. A Boeing 727.</p> <p>12 Q. Well, I know that's a very large airplane. I</p> <p>13 think that's been described by other people, so I'm not</p> <p>14 going to have you do that. But there's partitions in</p> <p>15 that airplane -- in the back rooms of that airplane,</p> <p>16 right?</p> <p>17 A. Yes.</p> <p>18 Q. Several different partitions to where if the</p> <p>19 pilot comes out of the cockpit, you don't necessarily</p> <p>20 see all the passengers?</p> <p>21 A. Yes.</p> <p>22 Q. That's true?</p> <p>23 A. Yes.</p> <p>24 Q. Okay.</p> <p>25 MR. REINHART: Keep your voice up so she can</p>	<p>1 and who was on the flights?</p> <p>2 A. One flight I believe we went to Sebring and</p> <p>3 another flight we went to Nassau, Bahamas.</p> <p>4 Q. And who did you go to Nassau, Bahamas with?</p> <p>5 A. I'd have to look at the flight log, but I</p> <p>6 think it was Sarah, Story and Nadia, I believe. I think</p> <p>7 that was the three passengers, to the best of my</p> <p>8 knowledge.</p> <p>9 Q. And it's my understanding that little</p> <p>10 St. James is an island that Jeffrey Epstein owns or</p> <p>11 controls?</p> <p>12 MR. CRITTON: Form.</p> <p>13 THE WITNESS: I don't know that he owns it.</p> <p>14 BY MR. EDWARDS:</p> <p>15 Q. Has he ever been to an island called Little</p> <p>16 St. James?</p> <p>17 A. Yes.</p> <p>18 Q. And have you been there with Jeffrey Epstein?</p> <p>19 A. I've been there when he was there.</p> <p>20 Q. Have you flown on an airplane with him to that</p> <p>21 destination?</p> <p>22 A. No.</p> <p>23 Q. All right. When you say you've been there</p> <p>24 when he was there, how did that come about?</p> <p>25 A. We flew into St. Thomas and then we flew to</p>
<p>46</p> <p>1 hear you.</p> <p>2 THE WITNESS: Oh.</p> <p>3 MR. REINHART: And so Mr. Willits can hear</p> <p>4 you.</p> <p>5 BY MR. EDWARDS:</p> <p>6 Q. Other than the Gulfstream and the Boeing and</p> <p>7 the Hawker, what other airplanes has Jeffrey Epstein</p> <p>8 owned over the years?</p> <p>9 A. That is it.</p> <p>10 Q. And currently still owns -- or the companies</p> <p>11 associated with him own the Gulfstream and the Boeing?</p> <p>12 A. Yes.</p> <p>13 Q. And in the past two years, have you flown</p> <p>14 those two airplanes?</p> <p>15 A. Just for routine flights to keep them loose</p> <p>16 or, you know -- you know what I mean.</p> <p>17 Q. Have those two airplanes been flown by anyone</p> <p>18 else in the last two years?</p> <p>19 A. No.</p> <p>20 Q. Have those two airplanes been flown in the</p> <p>21 last two years for any reason other than routine</p> <p>22 maintenance-type flights?</p> <p>23 A. We've had one -- two flights I think in the</p> <p>24 past two years.</p> <p>25 Q. And what were the purposes of those flights</p>	<p>48</p> <p>1 Little St. James in a helicopter.</p> <p>2 Q. And do you fly the helicopter as well?</p> <p>3 A. Yes.</p> <p>4 Q. How many helicopters are owned or controlled</p> <p>5 by Jeffrey Epstein and/or corporations associated with</p> <p>6 him?</p> <p>7 MR. CRITTON: Form.</p> <p>8 THE WITNESS: At this time, one.</p> <p>9 BY MR. EDWARDS:</p> <p>10 Q. And has that helicopter been flown in the last</p> <p>11 two years?</p> <p>12 A. Just for routine maintenance.</p> <p>13 Q. And when you and -- let's say when Sarah</p> <p>14 Keilen and Story Cowells and Nadia flew to Nassau, do</p> <p>15 you know the purpose of that trip?</p> <p>16 A. No.</p> <p>17 Q. How long did you stay?</p> <p>18 A. Five hours.</p> <p>19 Q. Did you pick anybody up there?</p> <p>20 A. No. Meaning passengers?</p> <p>21 Q. Yes.</p> <p>22 A. No.</p> <p>23 Q. What happened? You landed the airplane and</p> <p>24 then what?</p> <p>25 A. The passengers left. Dave and I went and had</p>



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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.

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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

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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 --

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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

<p style="text-align: center;">53</p> <p>1 or a stereo.</p> <p>2 Q. And do you know Les Wexler?</p> <p>3 A. No, I don't.</p> <p>4 Q. Have you ever met him before?</p> <p>5 A. I have met him.</p> <p>6 Q. Do you know of any relationship between Les</p> <p>7 Wexler and Jeffrey Epstein?</p> <p>8 A. I don't know what -- to what extent they have</p> <p>9 a relationship, no.</p> <p>10 Q. Do you know if they know one another?</p> <p>11 A. I don't know that for a fact. They talk to</p> <p>12 one another, so I would assume. But I don't know to --</p> <p>13 Q. How do you know they talk to one another?</p> <p>14 A. I've seen them speak to one another at the</p> <p>15 foot of the airplane.</p> <p>16 Q. All right. Have you ever flown the</p> <p>17 airplane -- any of the airplanes with Les Wexler as a</p> <p>18 passenger?</p> <p>19 A. No.</p> <p>20 Q. Have you ever flown the airplanes with Sarah</p> <p>21 Kellen as a passenger?</p> <p>22 A. Yes.</p> <p>23 Q. And do you know Sarah Kellen?</p> <p>24 A. Yes.</p> <p>25 Q. And for how long have you known Sarah Kellen?</p>	<p style="text-align: center;">55</p> <p>1 Q. It seems to be -- I mean, you seem like</p> <p>2 somebody who has common sense. It seems like somebody</p> <p>3 that knows Jeffrey Epstein?</p> <p>4 MR. CRITTON: Form.</p> <p>5 BY MR. EDWARDS:</p> <p>6 Q. Correct, Sarah Kellen?</p> <p>7 A. Yes.</p> <p>8 Q. All right. And do you believe that there is a</p> <p>9 business relationship there or a personal relationship</p> <p>10 there, from your observations?</p> <p>11 A. I'd only be speculating. When they get on the</p> <p>12 airplane, my focus is forward and flying safely. So I</p> <p>13 don't -- you know, I'd only be guessing at either one of</p> <p>14 those two.</p> <p>15 Q. Okay. Have you ever socialized with Sarah</p> <p>16 Kellen?</p> <p>17 A. No.</p> <p>18 Q. Other than speaking with her on the airplane,</p> <p>19 have you spoken with her elsewhere?</p> <p>20 A. Over the phone, in passing, I mean, walking</p> <p>21 down the street in New York. I mean, yes.</p> <p>22 Q. Why would you call Sarah Kellen or why would</p> <p>23 she call you?</p> <p>24 A. She would call me to schedule the aircraft for</p> <p>25 a departure.</p>
<p style="text-align: center;">54</p> <p>1 A. I'm guessing, six years. I mean, don't hold</p> <p>2 me to it. I'm not the greatest on length of times, but</p> <p>3 six, seven years, I think.</p> <p>4 Q. How did you meet her?</p> <p>5 A. I guess I was introduced. She was on a flight</p> <p>6 of ours.</p> <p>7 Q. You were introduced to her by whom?</p> <p>8 A. She may have introduced herself. I mean,</p> <p>9 you're going back a ways. I don't know the official</p> <p>10 introduction, how it went.</p> <p>11 Q. And to your knowledge, what is her -- is she</p> <p>12 associated or affiliated in some way with Jeffrey</p> <p>13 Epstein?</p> <p>14 MR. CRITTON: Form.</p> <p>15 THE WITNESS: I would assume so. I don't know</p> <p>16 to what level or what actually her job description</p> <p>17 is.</p> <p>18 BY MR. EDWARDS:</p> <p>19 Q. All right. Well, how many flights have you</p> <p>20 flown where she and Jeffrey Epstein have been passengers</p> <p>21 together on one of the airplanes that we've been</p> <p>22 discussing?</p> <p>23 A. I'd only be guessing again.</p> <p>24 Q. We're talking hundreds of flights, though?</p> <p>25 A. Sure, sure, a lot of flights.</p>	<p style="text-align: center;">56</p> <p>1 Q. And have you ever called her?</p> <p>2 A. Yes.</p> <p>3 Q. When's the last time you talked to Sarah</p> <p>4 Kellen?</p> <p>5 A. A week ago.</p> <p>6 Q. What was the occasion?</p> <p>7 A. We were discussing carpet for one of the</p> <p>8 aircraft.</p> <p>9 Q. And where was she when you were talking with</p> <p>10 her?</p> <p>11 A. I don't know. It was over the phone.</p> <p>12 Q. Did she call you or you call her?</p> <p>13 A. No, I called her on her cell.</p> <p>14 Q. Okay. And that's a New York number?</p> <p>15 A. I don't know. It's on speed dial.</p> <p>16 Q. Do you have your phone with you?</p> <p>17 A. Yes.</p> <p>18 Q. Could you tell me what that number is?</p> <p>19 A. Sure.</p> <p>20 Q. Thanks.</p> <p>21 A. Sure. (917)855-3363.</p> <p>22 Q. Which airplane were you discussing carpeting</p> <p>23 for?</p> <p>24 A. Was actually -- actually, it was for the</p> <p>25 helicopter. Now that I'm thinking about it, the</p>

<p style="text-align: center;">57</p> <p>1 helicopter.</p> <p>2 Q. In the last two years, did you tell me the</p> <p>3 helicopter has flown?</p> <p>4 A. Yes.</p> <p>5 Q. And where to?</p> <p>6 A. I have flown the helicopter to Fort Lauderdale</p> <p>7 on several occasions for maintenance. I've flown it to</p> <p>8 Miami. And I try to fly the helicopter at least every</p> <p>9 two weeks just either by myself to run it up to its --</p> <p>10 it's important that it keeps moving.</p> <p>11 Q. Other than maintenance-type flights, have you</p> <p>12 flown the helicopter in the last couple of years?</p> <p>13 A. Yes.</p> <p>14 Q. And who was on the helicopter?</p> <p>15 A. I flew to Miami with Mr. Epstein.</p> <p>16 Q. When was that?</p> <p>17 A. It was a couple weeks ago or a month ago, I</p> <p>18 think.</p> <p>19 Q. For what?</p> <p>20 A. Sorry?</p> <p>21 Q. For what occasion?</p> <p>22 A. I think he had a meeting with his attorneys in</p> <p>23 Miami.</p> <p>24 Q. Today is October the 15th. Is this during the</p> <p>25 month of October that you had this flight in the</p>	<p style="text-align: center;">59</p> <p>1 Q. How long have you known Nadia Marcinkova?</p> <p>2 A. I don't know, five years. A guess again,</p> <p>3 four, five years.</p> <p>4 Q. Do you know what her relationship is, if any,</p> <p>5 with Jeffrey Epstein?</p> <p>6 A. I do not know.</p> <p>7 Q. Do you know if she knows Jeffrey Epstein?</p> <p>8 A. I would assume so. They talk. I would</p> <p>9 imagine she knows him.</p> <p>10 Q. And how many times has she been on the</p> <p>11 airplane or the helicopter on flights at the same time</p> <p>12 as a passenger with Jeffrey Epstein?</p> <p>13 A. Many. I'd have to look at the logs.</p> <p>14 Q. Hundreds of times?</p> <p>15 MR. CRITTON: Form.</p> <p>16 THE WITNESS: Sure.</p> <p>17 BY MR. EDWARDS:</p> <p>18 Q. If you were going to, as somebody who has been</p> <p>19 Jeffrey Epstein's pilot for 18 years, tell me today who</p> <p>20 the five closest people are to Jeffrey Epstein, would</p> <p>21 Nadia be one of them?</p> <p>22 MR. CRITTON: Form.</p> <p>23 THE WITNESS: I'd only be guessing and</p> <p>24 speculating. I have no idea.</p> <p>25</p>
<p style="text-align: center;">58</p> <p>1 helicopter with Mr. Epstein?</p> <p>2 A. I'd have to look at the book to be exact for</p> <p>3 you.</p> <p>4 Q. Okay. But it's either the end of September or</p> <p>5 the beginning of October?</p> <p>6 A. Yeah.</p> <p>7 Q. How do you know that he was meeting with his</p> <p>8 attorneys?</p> <p>9 A. I believe that he had mentioned that he was</p> <p>10 meeting his attorneys.</p> <p>11 Q. Did he tell you why?</p> <p>12 A. No.</p> <p>13 Q. Why did he tell you he was meeting with his</p> <p>14 attorneys? Did you ask him?</p> <p>15 A. No.</p> <p>16 Q. Okay. That's just something that he said to</p> <p>17 you in conversation?</p> <p>18 A. Yes, sir.</p> <p>19 Q. Was there anyone else on the airplane besides</p> <p>20 you and Mr. Epstein?</p> <p>21 A. Yes.</p> <p>22 Q. Who was that?</p> <p>23 A. Nadia.</p> <p>24 Q. Nadia who?</p> <p>25 A. Nadia Marcinkova.</p>	<p style="text-align: center;">60</p> <p>1 BY MR. EDWARDS:</p> <p>2 Q. Okay. Well, as his pilot and the person who</p> <p>3 travels with Jeffrey Epstein on the majority of his</p> <p>4 flights, who are the people who travel most frequently</p> <p>5 with Jeffrey Epstein?</p> <p>6 A. I'd have to look at the logs.</p> <p>7 MR. REINHART: Can we get a time period?</p> <p>8 BY MR. EDWARDS:</p> <p>9 Q. In the last ten years, which people travel</p> <p>10 most frequently with him?</p> <p>11 A. I'd have to look at the flight logs to give</p> <p>12 you an accurate answer.</p> <p>13 Q. You can't give me one single name of somebody</p> <p>14 who you would say is a frequent flyer?</p> <p>15 A. Sarah.</p> <p>16 Q. Sarah Kellen?</p> <p>17 A. Yes.</p> <p>18 Q. Anybody else?</p> <p>19 A. Nadia.</p> <p>20 Q. Nadia Marcinkova?</p> <p>21 A. Yeah.</p> <p>22 Q. Okay. Anybody else?</p> <p>23 A. Just mainly those two.</p> <p>24 Q. How about Ghislaine Maxwell?</p> <p>25 A. Not for some time.</p>

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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 Nadia Marcinkova and Sarah Kellen 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 Nadia Marcinkova 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 Nadia Marcinkova 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.

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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 Nadia Marcinkova 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 Nadia  
13 Marcinkova 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 Nadia 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

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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 Nadia Marcinkova, 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.

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1 Q. But you don't remember a single specific  
2 conversation between Jeffrey Epstein and Nadia  
3 Marcinkova?  
4 A. An honest answer, no.  
5 Q. Okay. And the same for Sarah Kellen; have you  
6 seen or -- have you seen Jeffrey Epstein speak with  
7 Sarah Kellen?  
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 Sarah Kellen?  
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 Sarah Kellen and  
17 Jeffrey Epstein?  
18 A. I have no knowledge of any of that.  
19 Q. Do you know if Sarah Kellen works for Jeffrey  
20 Epstein?  
21 A. I do not know.  
22 Q. Do you know if Sarah Kellen schedules massages  
23 for Jeffrey Epstein?  
24 A. I have no idea.  
25 Q. Has Jeffrey Epstein ever indicated to you that

<p style="text-align: center;">65</p> <p>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.</p>	<p style="text-align: center;">67</p> <p>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</p>
<p style="text-align: center;">66</p> <p>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</p>	<p style="text-align: center;">68</p> <p>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</p>

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<p>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.</p> <p>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.</p> <p>16 So yes, I'm instructing him not to answer.</p> <p>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</p>	<p>1 A. It's an opinion, and I believe that he has 2 not.</p> <p>3 Q. Okay. Isn't it true that at some point in 4 time you learned that Jeffrey Epstein has -- strike 5 that.</p> <p>6 MR. CRITTON: When you ultimately get to a 7 good place to break, will you let us know?</p> <p>8 MR. EDWARDS: Let's break now. (A break was had at 11:26 a.m.)</p> <p>9 BY MR. EDWARDS:</p> <p>10 Q. All right. Eighteen years of being a pilot 11 for Jeffrey Epstein and in terms of being able to name 12 somebody that you would say you've observed with Jeffrey 13 Epstein and would classify that person as Jeffrey 14 Epstein's friend, can you name anybody?</p> <p>15 A. Nadia, Sarah; just people that we see 16 routinely on the airplane.</p> <p>17 Q. That's people you see routinely in the last 18 five to ten years, right?</p> <p>19 A. Yes.</p> <p>20 Q. Prior to that time, anybody that you've 21 noticed as Jeffrey Epstein's friend may be Ghislaine 22 Maxwell?</p> <p>23 A. What time frame?</p> <p>24 Q. Is that a person that at some point in time</p>
<p>70</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>17 MR. REINHART: Absolutely. Make your record.</p> <p>18 BY MR. EDWARDS:</p> <p>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.</p> <p>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?</p>	<p>72</p> <p>1 you would classify as Jeffrey Epstein's friend?</p> <p>2 A. I would classify it. I don't know if it's 3 true.</p> <p>4 Q. But that's only because they were on the 5 airplane together?</p> <p>6 A. Yes.</p> <p>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?</p> <p>10 A. No.</p> <p>11 Q. No idea?</p> <p>12 A. No.</p> <p>13 Q. Ever asked him?</p> <p>14 A. No, actually.</p> <p>15 Q. Ever been curious?</p> <p>16 A. Sure.</p> <p>17 Q. Ever done anything to satisfy that curiosity?</p> <p>18 A. If you mean Google it, not really, actually. 19 I mean, I really have not.</p> <p>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?</p> <p>25 A. No, sir.</p>

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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

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1 you know who they are. This person right here is Cindy  
2 Lopez. 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.

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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.

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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

<p style="text-align: center;">77</p> <p>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. "SK," Sarah Kellen? 13 A. I would assume. 14 Q. I mean -- okay. And then this name, do you 15 recognize that person, Alexia? 16 A. Never heard it. 17 Q. And then Cindy Lopez? 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.</p>	<p style="text-align: center;">79</p> <p>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 Sarah Kellen would be? 6 A. No. 7 Q. Okay. Do you know how it comes about that 8 Cindy Lopez 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 Sarah Kellen 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</p>
<p style="text-align: center;">78</p> <p>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 Cindy Lopez. That 25 doesn't serve to refresh your recollection as to who</p>	<p style="text-align: center;">80</p> <p>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 Sarah 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</p>



<p style="text-align: center;">81</p> <p>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</p>	<p style="text-align: center;">83</p> <p>1 this time with Doug Band, three Secret Service agents,  2 Jeffrey Epstein, Ghislaine Maxwell and Sarah Kellen. 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?</p>
<p style="text-align: center;">82</p> <p>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 Sarah Kellen 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 Sarah Kellen 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,</p>	<p style="text-align: center;">84</p> <p>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, Janice, Jessica. Can you tell me who Janice  14 and Jessica 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 Sarah Kellen 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</p>

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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, Virginia  
10 Roberts, 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.

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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

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1 we're referring to the same flight on June 21st of 2002,  
2 that includes Jean Luc Brunel, Virginia Roberts, Jeffrey  
3 Epstein, Ghislaine Maxwell, Sarah Kellen, those are the  
4 passengers of this flight, does that serve to jog your  
5 memory as to who Virginia Roberts 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, Juliana Barbosa,  
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

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1 frequent passenger?  
2 A. Who are you referring to?  
3 Q. Juliana Barbosa?  
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?

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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

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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, Virginia  
 24 Roberts, just because it looks like somebody that's  
 25 regularly flying on the airplane. But the more that you

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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,

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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?

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<p>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</p>	<p>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 Juliette Bryant? 23 A. No, I don't remember that name. 24 Q. Andrea Metrovich? 25 A. I remember the name.</p>
<p>94</p> <p>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</p>	<p>96</p> <p>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</p>

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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,

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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

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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

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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

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<p>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</p>	<p>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 --</p>
<p>102</p> <p>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 if 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.</p>	<p>104</p> <p>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 301 East 66th Street? 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</p>

<p style="text-align: center;">105</p> <p>1 BY MR. EDWARDS:  2 Q. Do you know Amy Taylor?  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 --</p>	<p style="text-align: center;">107</p> <p>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, Sarah Kellen and Jean Luc  23 Brunel?  24 A. Where did we go?  25 Q. I'll let you look at it. I'm talking about</p>
<p style="text-align: center;">106</p> <p>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</p>	<p style="text-align: center;">108</p> <p>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, Sarah  17 Kellen, Cindy Lopez 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 Magale Blanchen (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?</p>

<p style="text-align: center;">109</p> <p>1 A. No.</p> <p>2 Q. Do you remember Naomi Campbell, picking her up</p> <p>3 from St. Thomas along with Jean Luc Brunel?</p> <p>4 A. I remember her being on board. I don't</p> <p>5 remember the flight.</p> <p>6 Q. Do you know Joel Pashcow?</p> <p>7 A. Yes.</p> <p>8 Q. How do you know him?</p> <p>9 A. He was on the airplane.</p> <p>10 Q. And is that somebody you knew at one point in</p> <p>11 time to be a friend of Jeffrey Epstein's?</p> <p>12 A. He was on the airplane. I don't know what the</p> <p>13 relationship was.</p> <p>14 Q. Do you know what the relationship is today?</p> <p>15 A. No idea.</p> <p>16 Q. How about Todd Mister, do you know what that</p> <p>17 relationship is or was today?</p> <p>18 A. No.</p> <p>19 Q. Do you remember him?</p> <p>20 A. No.</p> <p>21 Q. Not at all?</p> <p>22 A. I mean, I know the name. I don't know.</p> <p>23 Q. Paula Epstein, do you know who that is?</p> <p>24 A. Yes.</p> <p>25 Q. Who is that?</p>	<p style="text-align: center;">111</p> <p>1 him around Jeffrey Epstein?</p> <p>2 A. No.</p> <p>3 Q. All right.</p> <p>4 A. No.</p> <p>5 Q. Alina Webber, do you know that name?</p> <p>6 A. No.</p> <p>7 Q. She was on several flights. You don't</p> <p>8 remember seeing her?</p> <p>9 A. No.</p> <p>10 Q. All right. And how about Alan Dershowitz, I'm</p> <p>11 sure you know who that is?</p> <p>12 A. Sure. He's famous.</p> <p>13 Q. What was your understanding of Alan</p> <p>14 Dershowitz's relationship with Jeffrey Epstein?</p> <p>15 A. Never talked about it.</p> <p>16 Q. Forrest Sawyer, do you know why he was on your</p> <p>17 airplane?</p> <p>18 A. Never heard the name, actually.</p> <p>19 Q. Really?</p> <p>20 A. No.</p> <p>21 Q. Larry Summers?</p> <p>22 A. I know the name. I don't remember flying him.</p> <p>23 Q. Have you ever talked to Joe Fontanela?</p> <p>24 A. Yes.</p> <p>25 Q. How do you know him?</p>
<p style="text-align: center;">110</p> <p>1 A. That's Jeffrey's mom.</p> <p>2 Q. She's passed away?</p> <p>3 A. Yes.</p> <p>4 Q. At least that's your understanding, right?</p> <p>5 A. That's what I heard, yes.</p> <p>6 Q. Okay. Tila Davies, do you know her?</p> <p>7 A. Tila Davies, I know the name.</p> <p>8 Q. Somebody who flew on the airplane with some</p> <p>9 regularity?</p> <p>10 A. Yes.</p> <p>11 Q. And do you know her to be friends of Ghislaine</p> <p>12 Maxwell or Nadia Marcinkova or Jeffrey Epstein?</p> <p>13 MR. CRITTON: Form.</p> <p>14 THE WITNESS: I have no idea who she was</p> <p>15 friends with.</p> <p>16 BY MR. EDWARDS:</p> <p>17 Q. All right. Do you know what role she ever</p> <p>18 played, if she played one, in Jeffrey Epstein's life?</p> <p>19 A. No.</p> <p>20 Q. All right. Glenn Dubin, are you familiar with</p> <p>21 him?</p> <p>22 A. Yes.</p> <p>23 Q. How do you know Glenn Dubin?</p> <p>24 A. I met him on the airplane.</p> <p>25 Q. Outside of the airplane, have you ever seen</p>	<p style="text-align: center;">112</p> <p>1 A. He usually drops Jeffrey off at the airport.</p> <p>2 Q. In fact, you've called him directly before,</p> <p>3 right?</p> <p>4 A. Yes.</p> <p>5 Q. You still have his number?</p> <p>6 A. I haven't -- yes, I think I still got it in my</p> <p>7 memory.</p> <p>8 Q. Okay. What is it?</p> <p>9 A. It's been a few years. (917)945-7500. It's</p> <p>10 kind of an easy one.</p> <p>11 MR. CRITTON: 917 is the first --</p> <p>12 THE WITNESS: Yes.</p> <p>13 MR. CRITTON: Who was this for?</p> <p>14 MR. REINHART: Joe, Joe Fontanela.</p> <p>15 MR. EDWARDS: Fontanela.</p> <p>16 BY MR. EDWARDS:</p> <p>17 Q. Do you know his address, where he resides?</p> <p>18 A. No, I don't.</p> <p>19 Q. Do you know if he -- what his role is in</p> <p>20 Jeffrey Epstein's life?</p> <p>21 A. Not really. He just -- he drove the car.</p> <p>22 Q. He drove what car?</p> <p>23 A. The car up in New York.</p> <p>24 Q. Okay. Do you know if he's a housekeeper up at</p> <p>25 that house up in New York?</p>



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- 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

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- 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. Adrianna Muchinska?  
 10 A. I know the name Adrianna.  
 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 Bella, do you know who Bella 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 Bella 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.

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- 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..

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- 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 Sarah Kellen. That's  
 24 somebody you called before, right?  
 25 A. Sure.

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<p>1 Q. What would be a reason you called Sarah 2 Kellen? 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 --</p>	<p>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</p>
<p>118</p> <p>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 (917)868-6145? 5 MR. CRITTON: Could you say it slowly. 917? 6 MR. EDWARDS: 868-6145. 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</p>	<p>120</p> <p>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,</p>

<p style="text-align: center;">121</p> <p>1 I...</p> <p>2 Q. Okay. When you say "you help out with boat</p> <p>3 purchases," what do you mean?</p> <p>4 A. Give my opinion, whether or not whether to buy</p> <p>5 a certain boat. It's just a hobby. I have knowledge on</p> <p>6 boats. Not only just airplanes but, you know.</p> <p>7 Q. You give your opinion to whom?</p> <p>8 A. To Jeffrey.</p> <p>9 Q. Okay. And Jeffrey Epstein obviously, at least</p> <p>10 in your mind, you believe he wants your opinion?</p> <p>11 A. Yes.</p> <p>12 Q. Okay. So boats is another thing that the two</p> <p>13 of you have discussed?</p> <p>14 A. Yes.</p> <p>15 Q. All right. And so this a conversation or at</p> <p>16 least some evidence that a conversation existed between</p> <p>17 yourself and Jeffrey Epstein relative to a boat or a</p> <p>18 boat show?</p> <p>19 A. Correct.</p> <p>20 Q. Do you remember having that conversation?</p> <p>21 A. We've had many conversations about boats and</p> <p>22 different boat shows. If you're referring to this one</p> <p>23 in '05, I don't recall this one.</p> <p>24 Q. Okay. So aside from being a pilot -- which</p> <p>25 throughout this entire deposition I believe your</p>	<p style="text-align: center;">123</p> <p>1 Q. And has he consulted with you on each of those</p> <p>2 purchases?</p> <p>3 A. Not every one of them, no.</p> <p>4 Q. Does he own any boats now that you're aware</p> <p>5 of?</p> <p>6 A. I don't know if he owns them or not.</p> <p>7 Q. Okay. Do you know of any boats that he</p> <p>8 controls or maintains?</p> <p>9 A. Himself or?</p> <p>10 Q. How about this -- I'll ask you this way. I</p> <p>11 don't want to split hairs with you here: I know we've</p> <p>12 been talking about corporations and things like that.</p> <p>13 A. Yes he.</p> <p>14 Q. Do you know of any boats that he is the person</p> <p>15 with the most control over?</p> <p>16 A. Yes.</p> <p>17 Q. Okay. Where would those boats be located and</p> <p>18 what kind of boat are we talking about?</p> <p>19 A. St. Thomas is the location. It would be a</p> <p>20 34-foot inflatable boat. I know that one specifically.</p> <p>21 Q. Okay. Do you know when he made that purchase?</p> <p>22 A. Eight years ago, seven years ago. It was a</p> <p>23 while ago.</p> <p>24 Q. Is that something you had had input in?</p> <p>25 A. Not on that one specifically, no.</p>
<p style="text-align: center;">122</p> <p>1 testimony has been, you know, you're just the pilot for</p> <p>2 him -- it looks like there's some other role that you're</p> <p>3 playing here in his life. I'm not suggesting that you</p> <p>4 are or you are not. I'm just saying from the appearance</p> <p>5 of this, it looks that way. Is there anything else that</p> <p>6 you want to tell me or that you want to clarify in terms</p> <p>7 of the role that you play in Jeffrey Epstein's life</p> <p>8 outside of being just his pilot?</p> <p>9 MR. REINHART: Let me object to form. He also</p> <p>10 told you he installs the audio and video equipment</p> <p>11 before.</p> <p>12 MR. EDWARDS: Correct.</p> <p>13 THE WITNESS: I have an interest in boats.</p> <p>14 You know, with the island, I don't think I bought</p> <p>15 any boats, you know, for the company, but he</p> <p>16 appreciates my opinion on boat purchases.</p> <p>17 BY MR. EDWARDS:</p> <p>18 Q. Okay.</p> <p>19 A. Having the knowledge of aviation and things</p> <p>20 that move quite fast. So I have consulted with him on</p> <p>21 boat items.</p> <p>22 Q. How many boat purchases are you aware of</p> <p>23 Jeffrey Epstein making in the time period that you've</p> <p>24 known him?</p> <p>25 A. Two or three.</p>	<p style="text-align: center;">124</p> <p>1 Q. Is there any other boat that you know of</p> <p>2 Jeffrey Epstein being the primary user of or the primary</p> <p>3 controller of?</p> <p>4 A. I mean, there's boats in St. Thomas. I mean,</p> <p>5 it's not part of my job, you know, what goes on with the</p> <p>6 boats or who controlled them. It's more of an opinion</p> <p>7 of what horsepower should be on the back of the boat,</p> <p>8 hull designs. It's out of my area.</p> <p>9 Q. But your sole responsibility or your sole</p> <p>10 obligation that you have ever had with Jeffrey Epstein</p> <p>11 relative to boats is just giving some opinions about the</p> <p>12 boat?</p> <p>13 A. Mm-hmm.</p> <p>14 Q. Is that yes?</p> <p>15 A. Yes, yes.</p> <p>16 Q. Okay. All right. Has he ever given you his</p> <p>17 opinions about boats?</p> <p>18 A. Sure. We've discussed it back and forth.</p> <p>19 Q. Other than boat conversations, have you ever</p> <p>20 talked other conversations, such as --</p> <p>21 A. Cars.</p> <p>22 Q. Okay. How about such as -- have you ever</p> <p>23 known Jeffrey Epstein to have a girlfriend, somebody you</p> <p>24 consider a girlfriend?</p> <p>25 A. No.</p>

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<p>1 Q. In the 18 years and all the travels you had</p> <p>2 with him, do you know anything about Jeffrey Epstein's</p> <p>3 sex life?</p> <p>4 A. No.</p> <p>5 Q. Do you know who he has sex with?</p> <p>6 A. No.</p> <p>7 Q. Do you know if he has sex with anybody?</p> <p>8 A. I don't know.</p> <p>9 Q. Do you know if he's ever had sex on the</p> <p>10 airplane while you've been piloting it?</p> <p>11 A. I have no idea.</p> <p>12 Q. That's something that you just wouldn't know</p> <p>13 because you're up in the cockpit?</p> <p>14 A. That is correct.</p> <p>15 THE WITNESS: Could I take a two-minute</p> <p>16 bathroom break just to lose my coffee?</p> <p>17 MR. EDWARDS: Sure.</p> <p>18 (A break was had at 12:35 p.m.)</p> <p>19 BY MR. EDWARDS:</p> <p>20 Q. All right. We're back on the record. Over</p> <p>21 the years you've indicated that the -- any gifts or</p> <p>22 other items or things given to you by Jeffrey Epstein</p> <p>23 exclusively are the pool heater, the 40-acres of land</p> <p>24 and the --</p> <p>25 A. Use of a company --</p>	<p>1 Q. Did he ever fly anywhere else with you either</p> <p>2 by helicopter or airplane in the last two years?</p> <p>3 A. We flew one time to the Sikorsky plant.</p> <p>4 Q. What's the Sikorsky plant?</p> <p>5 A. That's where they build the Sikorsky</p> <p>6 helicopters. It's in Palm Beach County.</p> <p>7 Q. And when was that?</p> <p>8 A. Probably a month ago, I'm guessing.</p> <p>9 Q. For what purpose?</p> <p>10 A. They gave us a tour at a facility.</p> <p>11 Q. Who's they?</p> <p>12 A. Sikorsky.</p> <p>13 Q. And who requested the tour of the facility?</p> <p>14 A. They offered it to our flight department.</p> <p>15 Q. And who went?</p> <p>16 A. Jeffrey, myself, Nadia and Igor.</p> <p>17 Q. And if I wanted documentation of either of</p> <p>18 those trips, the trip to Miami or the trip to the</p> <p>19 Sikorsky plant, who would have that documentation?</p> <p>20 A. I would.</p> <p>21 Q. So I could request it from your attorney to</p> <p>22 get it from you?</p> <p>23 MR. REINHART: Let me just check.</p> <p>24 (Off the record discussion.)</p> <p>25 MR. REINHART: Okay. He has custody of it,</p>
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<p>1 Q. -- and the use of a company car?</p> <p>2 A. Yes.</p> <p>3 Q. That's it?</p> <p>4 A. (Nodding.)</p> <p>5 Q. Okay.</p> <p>6 A. Yes, I'm sorry, yes.</p> <p>7 Q. And the flight to Miami that was recently</p> <p>8 taken, other than Jeffrey Epstein and Nadia Marcinkova,</p> <p>9 was there anybody else on that flight?</p> <p>10 A. No.</p> <p>11 Q. How long -- did you also fly them back from</p> <p>12 Miami to Palm Beach?</p> <p>13 A. No. He drove back.</p> <p>14 Q. When you say "he drove back," who drove back?</p> <p>15 A. Well, I assume he drove back. I did not fly</p> <p>16 him back.</p> <p>17 Q. When's the next time you saw him again?</p> <p>18 A. I would only be guessing. A week later, I</p> <p>19 mean.</p> <p>20 Q. Okay. And was that in Palm Beach County when</p> <p>21 you saw him the next time?</p> <p>22 A. Yes, sir.</p> <p>23 Q. Do you know of him leaving Palm Beach County</p> <p>24 in the last two years on any other occasion?</p> <p>25 A. No.</p>	<p>1 but they're corporate documents. So you'd have to</p> <p>2 request it from Mr. Critton, who I understand</p> <p>3 represents all the corporations.</p> <p>4 THE WITNESS: Yes.</p> <p>5 BY MR. EDWARDS:</p> <p>6 Q. What's the corporation that the document was</p> <p>7 prepared for?</p> <p>8 A. Meaning who -- what, like Air Ghislaine, the</p> <p>9 owner of the helicopter? Yes, Air Ghislaine.</p> <p>10 Q. Air Ghislaine?</p> <p>11 A. That's the helicopter.</p> <p>12 Q. And the name Ghislaine is obviously not that</p> <p>13 typical of a name. Is that reference or related to</p> <p>14 Ghislaine Maxwell?</p> <p>15 A. I would assume. I have no knowledge.</p> <p>16 Q. Nobody's ever told you that?</p> <p>17 A. Nobody's brought it up.</p> <p>18 Q. Okay. And how long were you at the Sikorsky</p> <p>19 facility?</p> <p>20 A. Three hours, four hours.</p> <p>21 Q. And what time of day was this?</p> <p>22 A. Nine in the morning. Nine, I think, and we</p> <p>23 returned at one, something like that.</p> <p>24 Q. And was the purpose to buy or purchase</p> <p>25 anything?</p>

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- 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.

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- 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.

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- 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.

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- 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

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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

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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?

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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. Voltzan 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.

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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.

<p style="text-align: center;">137</p> <p>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</p>	<p style="text-align: center;">139</p> <p>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</p>
<p style="text-align: center;">138</p> <p>1 Sarah Kellen 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.)</p>	<p style="text-align: center;">140</p> <p>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</p>

<p style="text-align: center;">141</p> <p>1 years old?</p> <p>2 MR. CRITTON: Form.</p> <p>3 THE WITNESS: No.</p> <p>4 BY MR. EDWARDS:</p> <p>5 Q. Never?</p> <p>6 A. Never.</p> <p>7 Q. Have you ever seen any photographs in any of</p> <p>8 his homes depicting young-looking girls engaging in sex</p> <p>9 acts?</p> <p>10 A. No.</p> <p>11 Q. Or reading directly from the complaint,</p> <p>12 "engaged in lewd acts"?</p> <p>13 A. No, absolutely not.</p> <p>14 Q. Have you looked around the walls of his</p> <p>15 various homes when you're in there picking up luggage?</p> <p>16 A. I mean, not any more than I walked in here and</p> <p>17 not looking at the walls over there, I couldn't tell you</p> <p>18 what those are; so nothing specific.</p> <p>19 Q. Sometimes we're talking about a 50,000 square</p> <p>20 foot house?</p> <p>21 A. Exactly.</p> <p>22 Q. In Manhattan?</p> <p>23 A. It's pretty big.</p> <p>24 Q. Okay. Have you ever looked at any of his</p> <p>25 computers for any reason?</p>	<p style="text-align: center;">143</p> <p>1 about that?</p> <p>2 MR. REINHART: Hold on. The question is have</p> <p>3 you ever been told that fact that he just read to</p> <p>4 you?</p> <p>5 BY MR. EDWARDS:</p> <p>6 Q. Right.</p> <p>7 A. I have never been told that fact.</p> <p>8 Q. Has anybody ever questioned you about your</p> <p>9 possible involvement with helping to facilitate</p> <p>10 Mr. Epstein have sex with underage girls?</p> <p>11 A. No.</p> <p>12 Q. When you were questioned by either the police</p> <p>13 or the -- whoever the investigative resource that was</p> <p>14 being used at the time?</p> <p>15 A. Right.</p> <p>16 Q. Do you remember who that person was that was</p> <p>17 questioning you?</p> <p>18 A. No, I don't remember.</p> <p>19 Q. I know you don't know the location where it</p> <p>20 was, but do you remember who they were affiliated with?</p> <p>21 A. No.</p> <p>22 Q. Was it only one time?</p> <p>23 A. Yes.</p> <p>24 Q. Did you also have to testify before a grand</p> <p>25 jury proceeding?</p>
<p style="text-align: center;">142</p> <p>1 A. No.</p> <p>2 Q. I know that you helped set up some of the --</p> <p>3 A. Computers are not my expertise.</p> <p>4 Q. All right. Have you ever been told that</p> <p>5 Mr. Epstein committed sex acts against underage girls on</p> <p>6 a literal daily basis, that's what he does?</p> <p>7 A. I've never been told that.</p> <p>8 Q. Have you ever read the complaints against him</p> <p>9 that indicate that's what he does on a daily basis?</p> <p>10 MR. CRITTON: Form.</p> <p>11 THE WITNESS: No.</p> <p>12 BY MR. EDWARDS:</p> <p>13 Q. So in your mind, you never believed that you</p> <p>14 were transporting around somebody whose sole goal in</p> <p>15 life is to get -- have sex with little girls?</p> <p>16 MR. CRITTON: Form.</p> <p>17 THE WITNESS: I never believed that, no.</p> <p>18 BY MR. EDWARDS:</p> <p>19 Q. Okay. Have you ever been told that he</p> <p>20 conspired with others, including assistants and/or his</p> <p>21 drivers and/or pilots and his friend Ghislaine Maxwell,</p> <p>22 to further these sex acts and to avoid police detection?</p> <p>23 MR. CRITTON: Form.</p> <p>24 BY MR. EDWARDS:</p> <p>25 Q. Have you ever -- anybody ever questioned you</p>	<p style="text-align: center;">144</p> <p>1 A. No, I did not.</p> <p>2 Q. Have you ever known Mr. Epstein to get a</p> <p>3 massage while on an airplane?</p> <p>4 PHONE ATTORNEY: This is everybody in Boone,</p> <p>5 Charles and the witness is here and the court</p> <p>6 reporter and the videographer.</p> <p>7 MR. EDWARDS: Fantastic, but I think that you</p> <p>8 may have the wrong room.</p> <p>9 PHONE ATTORNEY: I was told to ask for 856.</p> <p>10 MR. EDWARDS: Let's go off the record.</p> <p>11 (Off the record discussion.)</p> <p>12 BY MR. EDWARDS:</p> <p>13 Q. All right. In the complaint, I'm going to</p> <p>14 tell you what it alleges and I'm going to ask if this</p> <p>15 helps to refresh your recollection about any of Jeffrey</p> <p>16 Epstein's activities. The defendant, Jeffrey Epstein,</p> <p>17 transported the plaintiff to another state in order to</p> <p>18 engage in sex acts with her. And this occurred when she</p> <p>19 was merely 15 years old.</p> <p>20 Do you remember transporting somebody that</p> <p>21 looked like they were 15 years old on your airplane?</p> <p>22 A. No, sir.</p> <p>23 Q. You never remember taking a 15-year-old, or</p> <p>24 somebody that looks around that approximate age, on your</p> <p>25 airplane?</p>



<p style="text-align: center;">145</p> <p>1 A. Can you be more specific?</p> <p>2 Q. Well, I know that you've indicated earlier in</p> <p>3 the deposition that you remember some girls under the</p> <p>4 age of 18 on the airplane. And so let me ask, before I</p> <p>5 get back into this, whether all those individuals you</p> <p>6 were talking about were accompanied by a parent or some</p> <p>7 of those people were on the airplane for some other</p> <p>8 purpose, modeling, or you don't know why they were</p> <p>9 there? I'm going to let you elaborate on who these</p> <p>10 people are that you believe may have been under the age</p> <p>11 of 18 and why you think they were on the airplane?</p> <p>12 MR. CRITTON: Form.</p> <p>13 THE WITNESS: We've had younger people on the</p> <p>14 airplane that have been, you know, with their</p> <p>15 family members, like you said. I don't remember</p> <p>16 transporting anybody that was of questionable age.</p> <p>17 I'm not -- I'd only be guessing at somebody's age</p> <p>18 if I didn't ID them at the foot of the airplane.</p> <p>19 So I can't guess to their age.</p> <p>20 BY MR. EDWARDS:</p> <p>21 Q. All right. "Mr. Epstein used his private jet</p> <p>22 to transport the minor plaintiff to Manhattan where he</p> <p>23 provided her spending money and accommodations with him</p> <p>24 at his mansion."</p> <p>25 Do you have any idea who that might be</p>	<p style="text-align: center;">147</p> <p>1 Q. To Santa Fe?</p> <p>2 A. Yes.</p> <p>3 Q. To Los Angeles?</p> <p>4 A. Yes.</p> <p>5 Q. To San Francisco?</p> <p>6 A. Yes.</p> <p>7 Q. To St. Louis?</p> <p>8 A. Yes.</p> <p>9 Q. All right. Continuing to international</p> <p>10 destinations, including Europe, have you ever flown it</p> <p>11 to Europe?</p> <p>12 A. Yes.</p> <p>13 Q. The Caribbean?</p> <p>14 A. Yes.</p> <p>15 Q. And Africa?</p> <p>16 A. Yes.</p> <p>17 Q. On those flights to those various places, is</p> <p>18 it your -- to the best of your knowledge, you were</p> <p>19 unaware of Jeffrey Epstein engaging in sex with underage</p> <p>20 girls on his airplane?</p> <p>21 MR. CRITTON: Form.</p> <p>22 THE WITNESS: I have no knowledge of any of</p> <p>23 that.</p> <p>24 BY MR. EDWARDS:</p> <p>25 Q. "He provided accommodations with him in order</p>
<p style="text-align: center;">146</p> <p>1 referring to?</p> <p>2 MR. CRITTON: Form.</p> <p>3 THE WITNESS: No, sir.</p> <p>4 BY MR. EDWARDS:</p> <p>5 Q. And you don't remember being a pilot of an</p> <p>6 airplane where he was transporting a 15-year-old to</p> <p>7 Manhattan from Miami or Palm Beach?</p> <p>8 A. No. I'd be guessing at somebody's age and I</p> <p>9 can't guess.</p> <p>10 Q. "Defendant transported plaintiff in his</p> <p>11 private jet to locations that included Palm Beach, New</p> <p>12 York City, Santa Fe, Los Angeles, San Francisco,</p> <p>13 St. Louis."</p> <p>14 Do you remember ever piloting his airplane to</p> <p>15 those destinations that I just mentioned?</p> <p>16 MR. REINHART: Can we break them down?</p> <p>17 Objection; compound.</p> <p>18 MR. EDWARDS: Okay.</p> <p>19 BY MR. EDWARDS:</p> <p>20 Q. Have you ever flown his airplane to Palm</p> <p>21 Beach?</p> <p>22 A. Yes, sir.</p> <p>23 Q. Okay. Have you ever flown it to New York</p> <p>24 City?</p> <p>25 A. Yes.</p>	<p style="text-align: center;">148</p> <p>1 to have her available to him at all times whenever he</p> <p>2 wanted, including while transporting the minor plaintiff</p> <p>3 on his private jet."</p> <p>4 That's something that you had no knowledge of?</p> <p>5 A. (Witness shakes head.)</p> <p>6 Q. You have to a yes or no.</p> <p>7 A. I'm sorry, no.</p> <p>8 Q. "Each time they would travel to one of these</p> <p>9 destinations, the same pattern of sexual abuse would</p> <p>10 occur, often with a vast array of aspiring models,</p> <p>11 actresses, celebrities, and/or other females, including</p> <p>12 minors from all over the world."</p> <p>13 Again, that's something you have no personal</p> <p>14 knowledge of?</p> <p>15 A. No.</p> <p>16 Q. Has anybody ever indicated that if you did</p> <p>17 have personal knowledge of some of these things, then</p> <p>18 you could also have been implicated in some form of a</p> <p>19 crime? Has any law enforcement or anybody ever</p> <p>20 indicated that to you?</p> <p>21 A. No.</p> <p>22 Q. Okay. Is that something you've ever worried</p> <p>23 about?</p> <p>24 A. No.</p> <p>25 Q. All right. "Upon information and belief,</p>

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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?

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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

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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.

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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

<p style="text-align: center;">153</p> <p>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.</p>	<p style="text-align: center;">155</p> <p>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</p>
<p style="text-align: center;">154</p> <p>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.</p>	<p style="text-align: center;">156</p> <p>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.</p>

<p style="text-align: center;">157</p> <p>1 A. Okay.</p> <p>2 Q. And I'm just asking you if you did have</p> <p>3 knowledge that Jeffrey Epstein was having sex with</p> <p>4 little girls either on the plane or at a place that you</p> <p>5 were taking him to or from on a daily basis, that's what</p> <p>6 he did, would you have continued to be his pilot?</p> <p>7 MR. CRITTON: Let me object. Object to the</p> <p>8 form. It's argumentative. It has no more value</p> <p>9 than assuming he was chopping up bodies or anybody</p> <p>10 was chopping up bodies in the plane you're flying.</p> <p>11 What difference does it make? Form.</p> <p>12 MR. EDWARDS: What difference does it make in</p> <p>13 a case about him having sex with little girls? I'm</p> <p>14 not going to argue with you about it. You've</p> <p>15 stated your objection.</p> <p>16 MR. CRITTON: Exactly. It's an argumentative</p> <p>17 question.</p> <p>18 MR. EDWARDS: I'm not going to argue with you</p> <p>19 about it.</p> <p>20 MR. CRITTON: You're arguing with him about</p> <p>21 now.</p> <p>22 MR. EDWARDS: No, I'm asking him the</p> <p>23 hypothetical.</p> <p>24 BY MR. EDWARDS:</p> <p>25 Q. Can you answer that? Would you have continued</p>	<p style="text-align: center;">159</p> <p>1 THE WITNESS: Never heard of such a thing.</p> <p>2 BY MR. EDWARDS:</p> <p>3 Q. Do you know of any friends that he has in</p> <p>4 France that would send him birthday -- a birthday</p> <p>5 present?</p> <p>6 A. No.</p> <p>7 Q. Do you know of him receiving any birthday</p> <p>8 gifts or birthday people from anyone?</p> <p>9 A. Never.</p> <p>10 Q. This particular person that filed this</p> <p>11 complaint, Jane Doe 102, indicates "Defendant and</p> <p>12 Ghislaine Maxwell acknowledged and celebrated</p> <p>13 plaintiff's 16th birthday."</p> <p>14 Do you remember them celebrating somebody who</p> <p>15 you flew on the airplane's 16th birthday?</p> <p>16 A. I don't recall.</p> <p>17 Q. Any of this jog your memory as to who Virginia</p> <p>18 Roberts is?</p> <p>19 A. No.</p> <p>20 Q. "From the age of 15, plaintiff" -- this Jane</p> <p>21 Doe 102 -- "was sexually exploited and abused by</p> <p>22 defendant on a daily basis and often multiple times each</p> <p>23 day."</p> <p>24 So going back, was there ever a day where you</p> <p>25 were with Jeffrey Epstein where you could observe him</p>
<p style="text-align: center;">158</p> <p>1 to be a pilot for somebody who's traveling to and from</p> <p>2 destinations with the goal of having sex with underage</p> <p>3 girls?</p> <p>4 MR. CRITTON: Form.</p> <p>5 THE WITNESS: It could be any person. It</p> <p>6 doesn't have to be Jeffrey Epstein, then, right?</p> <p>7 BY MR. EDWARDS:</p> <p>8 Q. True.</p> <p>9 A. No, I wouldn't pilot an airplane if there was</p> <p>10 wrongdoing going on.</p> <p>11 Q. That you knew about?</p> <p>12 A. That I knew you about, sure.</p> <p>13 Q. Me reading this complaint to you, is this the</p> <p>14 first time you've heard these allegations --</p> <p>15 A. Yes.</p> <p>16 Q. -- against Mr. Epstein?</p> <p>17 A. Yes.</p> <p>18 Q. It goes on to say, "On one of Epstein's</p> <p>19 birthdays, a friend of Epstein sent him three</p> <p>20 12-year-old girls from France who spoke no English for</p> <p>21 the purpose of -- for defendant to sexually exploit and</p> <p>22 abuse. After doing so, they were sent back to France</p> <p>23 the next day."</p> <p>24 Are you familiar with that occasion?</p> <p>25 MR. CRITTON: Form.</p>	<p style="text-align: center;">160</p> <p>1 and Virginia Roberts during an entire day?</p> <p>2 MR. CRITTON: Form.</p> <p>3 THE WITNESS: I don't remember Virginia</p> <p>4 Roberts, so I couldn't answer the question.</p> <p>5 BY MR. EDWARDS:</p> <p>6 Q. "In September 2002, Defendant Epstein</p> <p>7 purchased a commercial round-trip airline ticket and</p> <p>8 provided a passport, U.S. currency and accommodations</p> <p>9 for plaintiff to fly to Thailand."</p> <p>10 Do you remember him doing that for anybody</p> <p>11 around that time period?</p> <p>12 A. No, sir.</p> <p>13 MR. CRITTON: What was the date?</p> <p>14 MR. EDWARDS: September 2002.</p> <p>15 MR. CRITTON: Okay, thanks.</p> <p>16 MR. EDWARDS: I have here -- and this is</p> <p>17 actually my only copy, so I don't mind marking it</p> <p>18 as a composite exhibit, but we'll either have to</p> <p>19 copy this while thing or we'll have an agreement of</p> <p>20 counsel. It's the visitor inmate log from when</p> <p>21 Mr. Epstein was in jail in Palm Beach.</p> <p>22 MR. CRITTON: Well, before we get started, it</p> <p>23 is now 1:15. We started at 10:00.</p> <p>24 MR. EDWARDS: We didn't really start at 10:00.</p> <p>25 MR. CRITTON: Shortly thereafter. I was here</p>

161	<p>1 pretty much after 10. But we've been here since</p> <p>2 10:00. I want to take a lunch break.</p> <p>3 MR. EDWARDS: Let's do it.</p> <p>4 MR. CRITTON: For an hour?</p> <p>5 MR. EDWARDS: Sure.</p> <p>6 (A break was had at 1:15 p.m.)</p> <p>7 BY MR. EDWARDS:</p> <p>8 Q. All right. I looked through the inmate log of</p> <p>9 the visitors who visited Jeffrey Epstein and your name</p> <p>10 appears one, two, three, four, five, six, seven, eight</p> <p>11 times.</p> <p>12 A. Okay.</p> <p>13 Q. Seem to be accurate in terms of how many times</p> <p>14 you went to visit him?</p> <p>15 A. I thought six, but yes, that's...</p> <p>16 Q. I'll let you review the records and tell me if</p> <p>17 you dispute any of that record. And I'll go ahead and</p> <p>18 mark that as Composite Exhibit 5.</p> <p>19 (Plaintiff's Exhibit No. 5 was marked for</p> <p>20 identification.)</p> <p>21 MR. REINHART: It's two pages.</p> <p>22 MR. EDWARDS: Two pages.</p> <p>23 MR. REINHART: Okay.</p> <p>24 BY MR. EDWARDS:</p> <p>25 Q. Seem accurate?</p>	163	<p>1 just talked about general happenings that go on in</p> <p>2 there.</p> <p>3 Q. What did he say?</p> <p>4 A. It's terrible; it's cold; he can't sleep.</p> <p>5 They wake him up every two hours. You know, just items</p> <p>6 like that, uncomfortable things. We talked about the</p> <p>7 airplanes a great deal. You know, we got major</p> <p>8 maintenance on the big airplane, so we discussed that a</p> <p>9 little bit. And then it was really just how</p> <p>10 uncomfortable he was there.</p> <p>11 Q. How long did you visit with him on that first</p> <p>12 visit, July 3rd?</p> <p>13 A. I think we stayed the full hour.</p> <p>14 Q. All right. Is that what the time allotment</p> <p>15 was?</p> <p>16 A. I believe it is, yeah. I don't think you</p> <p>17 could leave early, or I'm not aware that you could leave</p> <p>18 early, until later on we found out you could stay for</p> <p>19 five minutes or longer. But I don't think any of us</p> <p>20 knew that was — once you got in there, you stayed there</p> <p>21 for the hour.</p> <p>22 Q. Okay. So you talked to him for an hour and</p> <p>23 for the most part it was just about the conditions and</p> <p>24 his disappointment with the conditions?</p> <p>25 A. Sure, yeah, absolutely.</p>
162	<p>1 A. Yes.</p> <p>2 Q. Okay. Jeffrey Epstein's plea, I believe, was</p> <p>3 June 30th, 2008. I think that's when he was taken in</p> <p>4 custody from there. Your first visit is July 3rd, 2008.</p> <p>5 And the other name on that visit is Igor Zinoviev. Did</p> <p>6 you go with Igor to visit Jeffrey Epstein?</p> <p>7 A. Yes.</p> <p>8 Q. Why did you go with Igor?</p> <p>9 A. It just happened he wanted to see us both at</p> <p>10 the same time. There was no apparent reason.</p> <p>11 Q. How did you know that Jeffrey wanted to see</p> <p>12 you?</p> <p>13 A. I don't recall who called and told me that he</p> <p>14 wanted to see me. I couldn't give you an accurate name,</p> <p>15 whether it was, you know, his attorney, Darren. And</p> <p>16 actually, I would put a lot weight to I think it was</p> <p>17 Darren, his attorney.</p> <p>18 Q. That would have made a phone call to you that</p> <p>19 said --</p> <p>20 A. Yeah, to go.</p> <p>21 Q. And what did you talk about with Jeffrey</p> <p>22 Epstein four days after he pled guilty to offenses that</p> <p>23 landed him in jail?</p> <p>24 A. I think the first visit was how disappointed</p> <p>25 or how scared he was, you know, being inside there. We</p>	164	<p>1 Q. And did Igor talk to him as well?</p> <p>2 A. Briefly. I mean, not that much. You're going</p> <p>3 back a little ways again to remember exactly what was</p> <p>4 discussed. You know, he asked how his family was doing.</p> <p>5 I guess Igor's got a son, I think he asked how his son</p> <p>6 was doing. You know, just general questions like that.</p> <p>7 Q. Did you ride to the jail that day with Igor?</p> <p>8 A. I believe we did. I believe I met Igor</p> <p>9 probably at Jeffrey's house and picked him up, or if</p> <p>10 not, we may have met at the airport and drove together.</p> <p>11 But we did drive together on that occasion.</p> <p>12 Q. In what vehicle did you drive?</p> <p>13 A. The Hummer.</p> <p>14 Q. That's the vehicle you described earlier as</p> <p>15 the company vehicle?</p> <p>16 A. Yes, sir.</p> <p>17 Q. Is that a vehicle paid for by Jeffrey Epstein?</p> <p>18 A. Meaning?</p> <p>19 Q. Well, is that a vehicle paid for by you?</p> <p>20 A. What do you mean "paid for"?</p> <p>21 Q. Did you purchase the vehicle with your money?</p> <p>22 A. I didn't purchase that one, no.</p> <p>23 Q. Do you know if it was purchased by Jeffrey</p> <p>24 Epstein or a corporation of Jeffrey Epstein's?</p> <p>25 A. Probably a corporation.</p>

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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

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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

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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

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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?

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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.

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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.

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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.

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1 BY MR. EDWARDS:  
2 Q. Okay. And then before you visited him again,  
3 the visitors are listed as Nadia Marcinkova or Sarah  
4 Kellen?  
5 A. Mm-hmm.  
6 Q. Mainly those two individuals. And they list  
7 as addresses, 301 East 86th Street 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 Nadia Marcinkova or Sarah Kellen?  
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 --

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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 Nadia Marcinkova or Sarah Kellen?  
 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 Nadia Marcinkova, Sarah Kellen and  
 15 Larry Visoski. Did you go to the jail with Sarah and  
 16 Nadia 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

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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 Sarah 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 Sarah and  
 19 Nadia?  
 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

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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 Sarah  
 23 Kellen drive or Nadia Marcinkova drive when they're down  
 24 here, if you know?  
 25 A. I mean, anybody has a choice to pick out a car

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1 or whatever there. I've seen Nadia 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?



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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 Nadia and Sarah 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 Nadia

20 Marcinkova 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.

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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,

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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

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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

<p style="text-align: center;">181</p> <p>1 which he pled guilty to --</p> <p>2 MR. CRITTON: Form.</p> <p>3 MR. REINHART: Can we -- for purposes of your</p> <p>4 hypothetical, what facts do you want him to assume</p> <p>5 are true? You said the facts to which he pled</p> <p>6 guilty, but the witness already said he doesn't</p> <p>7 know what he pled guilty to. He knows the charge</p> <p>8 he doesn't know the facts.</p> <p>9 BY MR. EDWARDS:</p> <p>10 Q. Solicitation of prostitution of a minor,</p> <p>11 somebody under the age of 18.</p> <p>12 MR. EDWARDS: That's the charge, right,</p> <p>13 solicitation of prostitution of a minor?</p> <p>14 MR. CRITTON: No. I think you've got it</p> <p>15 wrong. I'll object to the form.</p> <p>16 MR. EDWARDS: Okay.</p> <p>17 BY MR. EDWARDS:</p> <p>18 Q. Then we'll handle the question this way: If</p> <p>19 you were to believe based on information and evidence</p> <p>20 that Mr. Epstein engaged in sex or some form of sex acts</p> <p>21 with people of the age range of 12, 13, 14, 15 years</p> <p>22 old, would you continue your employment with</p> <p>23 Mr. Epstein?</p> <p>24 MR. CRITTON: Form; speculation.</p> <p>25 THE WITNESS: I would certainly be speculating</p>	<p style="text-align: center;">183</p> <p>1 against him and the allegations contained within many of</p> <p>2 these civil complaints on behalf of girls who were under</p> <p>3 the age of 18? Is there any reason why you haven't</p> <p>4 discussed that?</p> <p>5 MR. REINHART: If that's based on</p> <p>6 conversations you had with your lawyer, then don't</p> <p>7 disclose what you and your lawyer talked about.</p> <p>8 BY MR. EDWARDS:</p> <p>9 Q. Correct.</p> <p>10 A. I have not spoken to Jeffrey about any of</p> <p>11 this, and it was my understanding that is illegal to</p> <p>12 have conversation about this. So I've never presented</p> <p>13 any questions to him reference this case or any others.</p> <p>14 Q. It was your understanding that it was illegal</p> <p>15 to talk to Jeffrey Epstein about the allegations made</p> <p>16 against Jeffrey Epstein?</p> <p>17 A. Yes, or anything to do with the case. That's</p> <p>18 why we never discussed any portions of it.</p> <p>19 Q. Okay. So --</p> <p>20 A. I may be wrong in that assumption, but I</p> <p>21 don't --</p> <p>22 Q. So the reason why you haven't discussed this</p> <p>23 with Jeffrey Epstein is you believed it was illegal?</p> <p>24 A. Correct, yes.</p> <p>25 Q. Who led you to believe that it was illegal?</p>
<p style="text-align: center;">182</p> <p>1 and I have to discuss it with my wife long and</p> <p>2 hard. I don't think I could give you a correct and</p> <p>3 honest answer at this time.</p> <p>4 BY MR. EDWARDS:</p> <p>5 Q. Okay. Given the allegations that have been</p> <p>6 made in this case, is this something that you have</p> <p>7 discussed with anyone other than your attorney?</p> <p>8 A. No, not really. Only from the fact that</p> <p>9 they're allegations and there's still a lot more work,</p> <p>10 I'm sure, to be discovered.</p> <p>11 MR. CRITTON: Let me put on there, for the --</p> <p>12 if this deposition is not typed -- and we request</p> <p>13 it -- I'd like at least this portion where</p> <p>14 Mr. Edwards' last question back about five pages</p> <p>15 worth, so just if you could mark it from this</p> <p>16 page back about five pages.</p> <p>17 If nobody requests the deposition, I'd just</p> <p>18 like those five pages.</p> <p>19 MR. EDWARDS: I'm going to request the</p> <p>20 deposition, so...</p> <p>21 MR. CRITTON: Okay. We'll mark this then, so</p> <p>22 you could tell me where it is, approximately.</p> <p>23 BY MR. EDWARDS:</p> <p>24 Q. Is there a reason why you have not discussed</p> <p>25 with Jeffrey Epstein the allegations that have been made</p>	<p style="text-align: center;">184</p> <p>1 MR. REINHART: Again, if it was a discussion</p> <p>2 you had with any lawyer, then you can just give a</p> <p>3 name, don't give a discussion of the conversation</p> <p>4 you had.</p> <p>5 THE WITNESS: It was my own assumption. I</p> <p>6 mean, just basic criminal knowledge of knowing</p> <p>7 you're not supposed to -- you know, if somebody's</p> <p>8 in trial or in a deposition or whatever, I don't --</p> <p>9 I didn't think it was appropriate to discuss the</p> <p>10 matter with them.</p> <p>11 BY MR. EDWARDS:</p> <p>12 Q. Okay. So the next two visits and I think the</p> <p>13 last two visits we'll talk about are on 9/6/2008.</p> <p>14 Actually, it looks like you visited him twice in one</p> <p>15 day; is that right?</p> <p>16 A. I don't think that's possible. I mean, that</p> <p>17 will show how accurate the court record is. There's no</p> <p>18 way.</p> <p>19 Q. You wouldn't have visited him twice in one</p> <p>20 day?</p> <p>21 A. No. I think there's only one visitation per</p> <p>22 day.</p> <p>23 Q. Okay. And it looks like the same visitors</p> <p>24 each time, except that it says for period three and then</p> <p>25 the next one's for period four. So there are two</p>

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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 Sarah Kellen and Nadia  
 5 Marcinkova, 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 Sarah Kellen and Nadia  
 10 Marcinkova?  
 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?

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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

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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

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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.

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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.)

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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?

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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

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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. Sarah 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.

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<p>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?</p>	<p>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</p>
<p>194</p> <p>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.</p>	<p>196</p> <p>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?</p>

<p style="text-align: center;">197</p> <p>1 A. Yes.</p> <p>2 Q. Registered in your name?</p> <p>3 A. Yes.</p> <p>4 Q. And whose car is that?</p> <p>5 A. That's another extra car for the household to</p> <p>6 use at Jeffrey's house.</p> <p>7 Q. And when was that car purchased?</p> <p>8 A. Last year.</p> <p>9 Q. And who purchased that car?</p> <p>10 A. It was purchased in my name.</p> <p>11 Q. By whom? Who purchased the car in your name?</p> <p>12 A. Well, I put the car in my name, but the funds</p> <p>13 came from -- they were wired to my account from New</p> <p>14 York.</p> <p>15 Q. From whom, though? A mysterious source just</p> <p>16 sent funds? We know that didn't happen, so I'm just</p> <p>17 trying to elaborate here.</p> <p>18 A. Jeffrey had paid for the car.</p> <p>19 Q. Okay. And why did Jeffrey pay for a car and</p> <p>20 put it in your name?</p> <p>21 A. I don't know.</p> <p>22 Q. I mean, you had to agree for this to happen.</p> <p>23 So what was the conversation between you and Jeffrey</p> <p>24 that resulted in Jeffrey paying for a Land Rover, a 2008</p> <p>25 Land Rover and putting it in your name?</p>	<p style="text-align: center;">199</p> <p>1 2005 registered in your name?</p> <p>2 A. Yes.</p> <p>3 Q. And whose car is that?</p> <p>4 A. That car also is a Palm Beach house car to be</p> <p>5 used at the house.</p> <p>6 Q. What does that mean, "a Palm Beach house car"?</p> <p>7 A. It's a car that we park in Jeffrey's driveway</p> <p>8 for people to use. Anybody that comes to the house can</p> <p>9 select a car to go anywhere. I mean, run errands, go</p> <p>10 shopping, do whatever they need to do. And that was</p> <p>11 purchased the same way. It was in my name.</p> <p>12 Q. And the funds came from Jeffrey Epstein?</p> <p>13 A. They were wired to my account. I don't know</p> <p>14 exactly what account they came from.</p> <p>15 Q. Again, that's a conversation that has to take</p> <p>16 place before -- that you have to agree to put a car in</p> <p>17 your name?</p> <p>18 A. Yes, yes.</p> <p>19 Q. And is that a conversation between yourself</p> <p>20 and Jeffrey Epstein that takes place?</p> <p>21 A. Yes.</p> <p>22 Q. And what is the substance of that conversation</p> <p>23 that results in a Mercedes-Benz 2005 being placed in</p> <p>24 your name?</p> <p>25 A. He just said we need a fun car for the house</p>
<p style="text-align: center;">198</p> <p>1 A. I don't recall exactly how the conversation</p> <p>2 came about. He just says we want to buy an '08 Land</p> <p>3 Rover and put it in my name. So we did. I didn't ask</p> <p>4 any further questions.</p> <p>5 Q. Did this conversation happen when he was in</p> <p>6 jail or after he was out?</p> <p>7 A. Meaning out on house arrest?</p> <p>8 Q. Right.</p> <p>9 A. When you say "out" I think of the Science</p> <p>10 Foundation. On work release, so you have to be more</p> <p>11 specific.</p> <p>12 Q. You tell me what happened, when the</p> <p>13 conversation happened relative to where Jeffrey was at</p> <p>14 the time.</p> <p>15 A. I'd only be guessing again. I would say this</p> <p>16 probably happened a year ago, maybe less than a year</p> <p>17 ago. I'd have to look. I don't remember exactly the --</p> <p>18 Q. So it was either at a time when he's at the</p> <p>19 Florida Science Foundation or possibly on house arrest?</p> <p>20 A. It was -- no, it was definitely before house</p> <p>21 arrest. It was probably during the time of the Florida</p> <p>22 Science Foundation, to be accurate.</p> <p>23 Q. Okay. Are you aware --</p> <p>24 A. About eight or nine months ago.</p> <p>25 Q. Okay. Are you aware of a Mercedes-Benz CLK</p>	<p style="text-align: center;">200</p> <p>1 in Palm Beach.</p> <p>2 Q. But why put it in your name?</p> <p>3 A. I don't know.</p> <p>4 Q. You didn't ask any questions about that?</p> <p>5 A. No, I didn't.</p> <p>6 Q. Okay. Are you aware of a Jaguar X-Type 2005</p> <p>7 registered in your name?</p> <p>8 A. I forgot about that one, yes.</p> <p>9 Q. Whose car is that?</p> <p>10 A. That's a Palm Beach car.</p> <p>11 Q. What do you mean "a Palm Beach car"?</p> <p>12 A. It's the Palm Beach house car, another run</p> <p>13 around for people to use.</p> <p>14 Q. And again, that's a conversation that has to</p> <p>15 take place that results in a car being placed --</p> <p>16 registered in your name?</p> <p>17 A. Yes.</p> <p>18 Q. Okay. Now we're talking about several cars</p> <p>19 here?</p> <p>20 A. Yes.</p> <p>21 Q. That are all being placed in your name?</p> <p>22 A. Yes.</p> <p>23 Q. You never at any time ask any questions to</p> <p>24 Jeffrey Epstein why are you placing these cars in my</p> <p>25 name?</p>

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<p>1 A. I did not.</p> <p>2 Q. So your suspicions were never -- your</p> <p>3 curiosity was never piqued at all as to why these cars</p> <p>4 are being placed in your name?</p> <p>5 A. My curiosity was piqued.</p> <p>6 Q. You never asked him the question, you just</p> <p>7 agreed to do it?</p> <p>8 A. That's correct.</p> <p>9 Q. That goes for the Jaguar X-Type?</p> <p>10 A. Yes.</p> <p>11 Q. Are you familiar with a motorcycle, Big Dog</p> <p>12 Chopper Motorcycle, 2003?</p> <p>13 A. That is mine.</p> <p>14 Q. Yours?</p> <p>15 A. Yes.</p> <p>16 Q. Registered in your name for a good purpose,</p> <p>17 right?</p> <p>18 A. Yes, it is.</p> <p>19 Q. At your house?</p> <p>20 A. Yes.</p> <p>21 Q. You use it?</p> <p>22 A. Absolutely.</p> <p>23 Q. All right. Ford F-250, 2008, registered in</p> <p>24 your name, are you familiar with that?</p> <p>25 A. It's not registered in my name.</p>	<p>1 Q. Who drives that car, Ford F-250?</p> <p>2 A. That was shipped to St. Thomas.</p> <p>3 Q. For who to use and for what purpose?</p> <p>4 A. Well, that car should have been put under LSJ,</p> <p>5 LLC.</p> <p>6 Q. What's LSJ, LLC?</p> <p>7 A. Little St. James.</p> <p>8 Q. And that's a corporation?</p> <p>9 A. Yes.</p> <p>10 Q. Your understanding is that's a corporation</p> <p>11 affiliated with Jeffrey Epstein?</p> <p>12 A. I know it's a corporation. I don't know its</p> <p>13 affiliation to Jeffrey.</p> <p>14 Q. At this point in time, the way that this car</p> <p>15 comes about is through a conversation with yourself and</p> <p>16 Jeffrey Epstein?</p> <p>17 A. Yes, yes.</p> <p>18 Q. So to make some representation that this --</p> <p>19 that this corporation LSJ, LLC, you're not sure if that</p> <p>20 has any affiliation with Jeffrey Epstein?</p> <p>21 A. I don't have any facts to tie the two</p> <p>22 together.</p> <p>23 Q. Common sense would dictate?</p> <p>24 A. Yes.</p> <p>25 Q. Okay.</p>
<p>202</p> <p>1 Q. Okay. So if that's registered in your name,</p> <p>2 that would be a shock to you? That would be a surprise</p> <p>3 to you?</p> <p>4 A. Yes, it would be.</p> <p>5 Q. There should be no documentation from you</p> <p>6 where you would be the registered owner of the Ford</p> <p>7 F-250?</p> <p>8 A. What year?</p> <p>9 Q. 2008.</p> <p>10 A. I remember buying that car. I just -- that</p> <p>11 shouldn't be in my name.</p> <p>12 Q. What do you mean you remember buying that car?</p> <p>13 A. I do a lot -- I do all the car purchases for</p> <p>14 Mr. Epstein. I'm a car fanatic, so for years I've been</p> <p>15 the car-shopper. I'm the car fanatic.</p> <p>16 Q. Okay. But these cars aren't classic vehicles.</p> <p>17 These are vehicles that are not being refurbished or</p> <p>18 anything, they're being driven around town?</p> <p>19 A. No, but they're fun. The new Range Rover is a</p> <p>20 nice car.</p> <p>21 Q. This Ford F250, that's a car also that's Palm</p> <p>22 Beach -- as you would say a Palm Beach car?</p> <p>23 A. No.</p> <p>24 Q. That's a car that stays at your house?</p> <p>25 A. No.</p>	<p>204</p> <p>1 MR. CRITTON: Form.</p> <p>2 BY MR. EDWARDS:</p> <p>3 Q. Again, that's not a car that you use, the Ford</p> <p>4 F-250?</p> <p>5 A. No, it's not even here.</p> <p>6 Q. And when you say on St. Thomas, is it on</p> <p>7 actual St. Thomas, or is it on Little St. James?</p> <p>8 A. No, it's on St. Thomas. It's a work vehicle.</p> <p>9 Q. For whom?</p> <p>10 A. For the workers, for the island.</p> <p>11 MR. REINHART: Be careful to answer his</p> <p>12 question. I think his question is, is it on</p> <p>13 St. Thomas or Little St. James island? Where</p> <p>14 physically is the car, if you know.</p> <p>15 THE WITNESS: I don't know for a fact.</p> <p>16 BY MR. EDWARDS:</p> <p>17 Q. It's your understanding it's on St. Thomas?</p> <p>18 A. Yes.</p> <p>19 Q. And when you say "the workers," what's going</p> <p>20 on on St. Thomas to where there's workers that need an</p> <p>21 F-250?</p> <p>22 A. Just moving sand. I don't know the exact</p> <p>23 detail for it.</p> <p>24 Q. What were you told about the need for this car</p> <p>25 to be on St. Thomas?</p>

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<p>1 A. They need a work truck.</p> <p>2 Q. To do what?</p> <p>3 A. I don't know what the detail or the -- you</p> <p>4 know, what the job detail was for the truck. They just</p> <p>5 needed a work truck.</p> <p>6 Q. So Jeffrey Epstein tells you they need a work</p> <p>7 truck on St. Thomas and that's the only description that</p> <p>8 you're given?</p> <p>9 A. Yes, to go purchase and get the best deal I</p> <p>10 can on a pickup truck, and that's what I did and for</p> <p>11 some reason it got put in my name.</p> <p>12 (Off the record discussion.)</p> <p>13 BY MR. EDWARDS:</p> <p>14 Q. Whose money was used to purchase the truck.</p> <p>15 You say you purchased the truck. I want the record to</p> <p>16 be clear whether you're purchasing it with your money?</p> <p>17 A. No, this was wire-transferred. It was a -- I</p> <p>18 don't remember how that -- I think it was a wire</p> <p>19 transfer or a check was FedExed from the New York office</p> <p>20 to pay for that. That should not be in my name, is what</p> <p>21 I'm getting at. I'll certainly change that, but I</p> <p>22 thought you were --</p> <p>23 Q. I understand that.</p> <p>24 A. No, I'm being -- yeah, I didn't.</p> <p>25 MR. REINHART: There's no question.</p>	<p>1 Q. Okay. And by "Jeffrey's boat," it was</p> <p>2 purchased with Jeffrey's money?</p> <p>3 A. That is correct.</p> <p>4 Q. Do you know how much that cost?</p> <p>5 A. I think it was 60,000.</p> <p>6 Q. Do you know how much the Ford F-250 cost?</p> <p>7 A. Twenty-five, I'm guessing, ballpark.</p> <p>8 Q. Do you know how much the Jaguar X-Type cost?</p> <p>9 A. 11,000.</p> <p>10 Q. Do you know how much the Mercedes-Benz CLK</p> <p>11 cost?</p> <p>12 A. 35,000.</p> <p>13 Q. Do you know how much the Land Rover cost?</p> <p>14 A. 68,000.</p> <p>15 Q. Do you know how much the Mercedes-Benz SUV</p> <p>16 cost, that's yours, right? The Chevy Suburban is yours</p> <p>17 as well?</p> <p>18 A. Yes, I remember how much those cost too.</p> <p>19 Q. Is there another boat, 35-foot Donzi</p> <p>20 powerboat, 1999?</p> <p>21 A. That's the one I thought you were talking</p> <p>22 about originally.</p> <p>23 Q. That's the same boat?</p> <p>24 A. That's the same boat.</p> <p>25 Q. Is there any other boat that's registered in</p>
<p>206</p> <p>1 BY MR. EDWARDS:</p> <p>2 Q. 34-foot JVC Powerboat, 2000, owner LSJ, LLC,</p> <p>3 registered to Larry Visoski. Do you know that?</p> <p>4 A. Yes.</p> <p>5 Q. You knew that that boat was registered in your</p> <p>6 name?</p> <p>7 A. It's registered to LSJ. It's Jeffrey's boat</p> <p>8 that we keep here in West Palm Beach.</p> <p>9 Q. And do you keep it at your home?</p> <p>10 A. No.</p> <p>11 Q. Do you know that the registration is to your</p> <p>12 home?</p> <p>13 A. It's used in my home address, yes.</p> <p>14 Q. Why was that done?</p> <p>15 A. We were eventually going to ship it out to</p> <p>16 St. Thomas for it to live, but since Jeffrey's here,</p> <p>17 we're keeping it in Florida, and when we ship the boat</p> <p>18 over, we will change title to the Little St. James</p> <p>19 address.</p> <p>20 Q. What do you mean "since Jeffrey's here we're</p> <p>21 keeping it in Florida"? What does Jeffrey being here</p> <p>22 have to do with keeping a boat that's registered in your</p> <p>23 name and to your address --</p> <p>24 A. Well, I have access to use the boat, you know,</p> <p>25 here in Florida, but it's Jeffrey's boat.</p>	<p>208</p> <p>1 your name?</p> <p>2 A. No.</p> <p>3 Q. Did you know that in -- let me ask you this:</p> <p>4 Do you have a 2003 Ferrari F75-M?</p> <p>5 A. No.</p> <p>6 Q. Any reason why the car is registered in your</p> <p>7 name and the asking price is \$159,000 being sold in New</p> <p>8 York?</p> <p>9 A. That car is not registered in my name.</p> <p>10 Q. If it's registered --</p> <p>11 A. The ad is in my name.</p> <p>12 Q. Why is the ad in your name?</p> <p>13 A. Because I was trying to sell it.</p> <p>14 Q. Why were you trying to sell it?</p> <p>15 A. It was Jeffrey's car and we didn't want it</p> <p>16 anymore.</p> <p>17 Q. Why would he put his pilot in charge of</p> <p>18 selling his Ferrari?</p> <p>19 A. Because I bought it.</p> <p>20 Q. How much did you buy it for?</p> <p>21 A. 179,000. Now, when I say "I bought it," it</p> <p>22 was his money. I was the one that negotiated it, to be</p> <p>23 clear. It was his car for use in New York.</p> <p>24 Q. Are you aware of the Zorro Trust winning an</p> <p>25 85 million-dollar Power Ball lottery in 2008?</p>



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<p>1 A. No.</p> <p>2 MR. CRITTON: Say that again.</p> <p>3 MR. EDWARDS: The Zorro Trust winning an</p> <p>4 85 million-dollar — claiming the ticket for</p> <p>5 85 million-dollar Power Ball ticket in 2008.</p> <p>6 THE WITNESS: No.</p> <p>7 BY MR. EDWARDS:</p> <p>8 Q. Have you ever listed your employer as</p> <p>9 Ghislaine Air in making political contributions?</p> <p>10 A. I may have.</p> <p>11 Q. Did you know that you had made political</p> <p>12 contributions --</p> <p>13 A. Yes, I have.</p> <p>14 Q. -- listing your --</p> <p>15 A. I needed a company name for that event, and I</p> <p>16 had put Air Ghislaine.</p> <p>17 Q. And NES, LLC wouldn't do?</p> <p>18 A. I didn't think of it at the time.</p> <p>19 Q. Did somebody tell you to use Air Ghislaine</p> <p>20 rather than the company that has been paying you?</p> <p>21 A. No.</p> <p>22 Q. You just chose to use an employer that isn't</p> <p>23 actually your employer, nor have they ever been?</p> <p>24 A. I represent Air Ghislaine, JEJE and Hyperion</p> <p>25 as chief pilot, so I consider those really the companies</p>	<p>1 MR. REINHART: Mr. Edwards, he needs to expand</p> <p>2 upon one earlier answer he gave when you asked him</p> <p>3 if he knew anybody else who worked at the Florida</p> <p>4 Science Foundation.</p> <p>5 BY MR. EDWARDS:</p> <p>6 Q. Okay.</p> <p>7 A. My wife worked there. When you used the words</p> <p>8 "worked there" -- or not referring to her as a past</p> <p>9 tense, but she worked there when it first opened</p> <p>10 answering the phones.</p> <p>11 Q. What's your wife's name?</p> <p>12 A. Eileen.</p> <p>13 Q. How does she spell that?</p> <p>14 A. E-I-L-E-E-N.</p> <p>15 Q. Same last name as you?</p> <p>16 A. Yes.</p> <p>17 Q. How long did she work there?</p> <p>18 A. A month, maybe.</p> <p>19 Q. And she was answering the phones for the</p> <p>20 Florida Science Foundation?</p> <p>21 A. Yes.</p> <p>22 Q. Do you have a good relationship with your</p> <p>23 wife?</p> <p>24 A. I think so.</p> <p>25 Q. You still don't know what the Florida Science</p>
<p>210</p> <p>1 that I work for and never really associated myself with</p> <p>2 NES, LLC as my realistic employer. So when I go to a</p> <p>3 convention, an aviation convention, and somebody says</p> <p>4 who do you work for, I use the name JEJE because that's</p> <p>5 the name of the Boeing company.</p> <p>6 Q. But when I sit here and ask you who you work</p> <p>7 for, you give me a different answer.</p> <p>8 A. You're asking for the absolute correct answer,</p> <p>9 which is where my paycheck comes from, which is NES,</p> <p>10 LLC. I probably have used that twice in 17 or 18 years</p> <p>11 as my employer.</p> <p>12 Q. Do you know Dana Burns?</p> <p>13 A. I know the name, yes.</p> <p>14 Q. How do you know her?</p> <p>15 A. I've seen her on the airplane a couple times.</p> <p>16 Q. Somebody that you know to be involved</p> <p>17 romantically or sexually with Jeffrey Epstein at any</p> <p>18 time?</p> <p>19 A. I don't know that.</p> <p>20 Q. Are there any other cars, vehicles, items,</p> <p>21 other things that are registered in your name that are</p> <p>22 actually Jeffrey Epstein's?</p> <p>23 A. No. You've actually covered them all and</p> <p>24 actually shed light on some that I did not realize, like</p> <p>25 that Ford.</p>	<p>212</p> <p>1 Foundation does?</p> <p>2 A. No, because she doesn't.</p> <p>3 Q. She doesn't know what it does either?</p> <p>4 A. We never talked about it.</p> <p>5 Q. You never talked to your wife about what she</p> <p>6 did?</p> <p>7 A. No.</p> <p>8 MR. CRITTON: He knew she was answering</p> <p>9 phones.</p> <p>10 BY MR. EDWARDS:</p> <p>11 Q. Do you know of any other employees, friends,</p> <p>12 agents, relatives of Jeffrey Epstein who he places his</p> <p>13 property in their names, registers them in his names or</p> <p>14 anybody else?</p> <p>15 A. Not to my knowledge. I don't know.</p> <p>16 Q. To your knowledge, you're the only person?</p> <p>17 A. I'm the only one I'm aware of.</p> <p>18 Q. And with respect to minor girls being on the</p> <p>19 airplane, that being under the age of 18, how many times</p> <p>20 would you say that you have flown girls into the</p> <p>21 country, into the United States where you have given a</p> <p>22 date of birth to Customs of somebody on the airplane</p> <p>23 that is under the age of 18?</p> <p>24 A. I'd have to look at flight records to verify</p> <p>25 or give you a correct answer. I don't know any to my</p>

<p style="text-align: center;">213</p> <p>1 knowledge at this point.</p> <p>2 Q. What flight records would you have to look at?</p> <p>3 A. The passenger manifests.</p> <p>4 Q. Passenger manifests would have the date of</p> <p>5 birth on it?</p> <p>6 A. No. It would have a name, but I don't have --</p> <p>7 Q. But at some point in time you remember people,</p> <p>8 minor date of births, coming into the country and that</p> <p>9 being turned over to Customs?</p> <p>10 MR. CRITTON: Form.</p> <p>11 THE WITNESS: I don't remember anybody</p> <p>12 transporting on the airplane from the country back</p> <p>13 into the U.S. that was a minor, to my knowledge.</p> <p>14 BY MR. EDWARDS:</p> <p>15 Q. Okay. Within the country, minors flying --</p> <p>16 A. I don't know.</p> <p>17 Q. -- on a plane?</p> <p>18 A. I don't know dates of birth.</p> <p>19 Q. And any people that you knew to be minors on</p> <p>20 the airplane, were they always accompanied by parents or</p> <p>21 were there minors on the airplane that you're aware of</p> <p>22 that were not accompanied by parents?</p> <p>23 A. I didn't know either way. I mean, people</p> <p>24 would get on the airplane and get off the airplane. I</p> <p>25 could tell you there were times people would get on that</p>	<p style="text-align: center;">215</p> <p>1 leave?</p> <p>2 A. Us as the crew.</p> <p>3 Q. Okay. So if a massage table had ever been</p> <p>4 used, it would have been you and the crew who would have</p> <p>5 been responsible for either taking towels or doing</p> <p>6 something with the massage table?</p> <p>7 A. Absolutely.</p> <p>8 Q. And if I understood your testimony, you never</p> <p>9 saw a circumstance where it appeared to you that the</p> <p>10 massage table had been used in any manner; is that</p> <p>11 correct?</p> <p>12 A. That is correct. It stayed in the same</p> <p>13 location since the day it was put on there.</p> <p>14 Q. You were asked a bunch -- a number of</p> <p>15 questions about Mr. Epstein, I'll use this --</p> <p>16 Mr. Epstein is the person who directed you generally</p> <p>17 unless one of -- someone else who worked on his behalf</p> <p>18 called you and asked you to, say, set up a time to leave</p> <p>19 or pick up luggage, et cetera. My question to you is</p> <p>20 this: Have you flown in the past for other private</p> <p>21 individuals like Mr. Epstein, i.e., as distinct from a</p> <p>22 commercial?</p> <p>23 A. Yes, I have.</p> <p>24 Q. And approximately have you flown for four,</p> <p>25 five, six other private individuals over the years?</p>
<p style="text-align: center;">214</p> <p>1 I didn't even know were on the airplane. Our focus is</p> <p>2 up front.</p> <p>3 Q. Was there a massage table on the airplane?</p> <p>4 A. Which aircraft?</p> <p>5 Q. On any of them?</p> <p>6 A. The Boeing used to have a table on there, but</p> <p>7 it stayed in the same spot and appeared to be never</p> <p>8 used.</p> <p>9 Q. Okay. So to the best of your knowledge, you</p> <p>10 have no knowledge of that massage table on the airplane</p> <p>11 ever being used?</p> <p>12 A. Correct.</p> <p>13 MR. EDWARDS: I don't have anything else.</p> <p>14 CROSS (LARRY VISOSKI)</p> <p>15 BY MR. CRITTON:</p> <p>16 Q. Mr. Visoski, I have just a few questions. You</p> <p>17 were just asked about a massage table on the -- any of</p> <p>18 Mr. Epstein's airplanes and you said there was a massage</p> <p>19 table on the Boeing?</p> <p>20 A. Yes.</p> <p>21 Q. Okay. Was there always a massage table on the</p> <p>22 Boeing or just for a period of time?</p> <p>23 A. Just for a period of time.</p> <p>24 Q. All right. And who's responsible for cleaning</p> <p>25 up the airplane after Mr. Epstein and/or the guests</p>	<p style="text-align: center;">216</p> <p>1 A. Three. I had a short career as far as</p> <p>2 transferring of owners.</p> <p>3 Q. In terms of transferring to the other owners,</p> <p>4 separate and apart from Mr. Epstein, again, every</p> <p>5 individual is different, but was your relationship</p> <p>6 really any different with any of those other</p> <p>7 individuals? That is, you were in essence -- you were</p> <p>8 hired to perform a specific task: Fly an airplane to</p> <p>9 get from Point A to Point B and get the people there</p> <p>10 safely?</p> <p>11 A. My first job, corporate-wise, was for an owner</p> <p>12 in Miami and I was hired as a pilot, but yet, I would go</p> <p>13 to his house and maintain a boat that was in the back of</p> <p>14 his house above and beyond my call of duty because I had</p> <p>15 an interest in boats. It's just something I like to do.</p> <p>16 But I always treated Mr. Epstein like any of the other</p> <p>17 prior clients that I had as owners. I knew that I was</p> <p>18 not afraid to work for a living, and they understood</p> <p>19 that.</p> <p>20 Q. And it sounds like at least the first owner</p> <p>21 that you worked for asked you to do similar things that</p> <p>22 you've done for Mr. Epstein, such as take care of a boat</p> <p>23 or purchase a boat or maintain the boat?</p> <p>24 A. Sure, absolutely.</p> <p>25 Q. So your relationship with Mr. Epstein with</p>

<p style="text-align: center;">217</p> <p>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</p>	<p style="text-align: center;">219</p> <p>1 L.M.? 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 L.M. that you can recall? 6 A. Not that I recall. 7 Q. Have you ever heard the name E.W.? Did you 8 ever know someone named E.W.? 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 E.W.? 13 A. No, he did not. 14 Q. In approximately the -- are you familiar with 15 an individual by the name of Jane Doe(S.R.)? 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(S.R.)? 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</p>
<p style="text-align: center;">218</p> <p>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 L.M.? 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</p>	<p style="text-align: center;">220</p> <p>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.</p>

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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?

222

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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223

1 CERTIFICATE OF OATH  
 2 THE STATE OF FLORIDA  
 3 COUNTY OF PALM BEACH  
 4  
 5  
 6 I, the undersigned authority, certify that  
 7 LARRY VISOSKI personally appeared before me and was duly  
 8 sworn on the 15th day of October, 2009.  
 9  
 10 Dated this 22nd day of October, 2009.  
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 15  
 16 Wendy Beath Anderson, RPR, CRR, FPR  
 17 Notary Public State of Florida  
 18 My Commission Expires: 9/20/2013  
 19 My Commission No.: DD 906647  
 20 Job #127542  
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224

1 CERTIFICATE  
 2 THE STATE OF FLORIDA  
 3 COUNTY OF PALM BEACH  
 4  
 5 I, Wendy Beath Anderson, Certified Realtime  
 6 Reporter and Notary Public in and for the State of  
 7 Florida at large, do hereby certify that I was  
 8 authorized to and did report said deposition in  
 9 stenotype; and that the foregoing pages are a true and  
 10 correct transcription of my shorthand notes of said  
 11 deposition.  
 12 I further certify that said deposition was  
 13 taken at the time and place hereinabove set forth and  
 14 that the taking of said deposition was commenced and  
 15 completed as hereinabove set out.  
 16  
 17 I further certify that I am not attorney or  
 18 counsel of any of the parties, nor am I a relative or  
 19 employee of any attorney or counsel of party connected  
 20 with the action, nor am I financially interested in the  
 21 action.  
 22  
 23 The foregoing certification of this transcript  
 24 does not apply to any reproduction of the same by any  
 25 means unless under the direct control and/or direction  
 of the certifying reporter.  
 Dated this 22nd day of October, 2009.  
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 22 Wendy Beath Anderson, RPR, CRR, FPR  
 23 Job #127542  
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225

1 DATE: October 22, 2009  
 2 TO: LARRY VISOSKI Job #127542  
 3 c/o Robert D. Critton, Jr.  
 4 via transcript  
 5 IN RE: L.M. vs. Epstein

6 Please take notice that on Thursday, the 15th  
 7 of October, 2009, you gave your deposition in the  
 8 above-referred matter. At that time, you did not waive  
 9 signature. It is now necessary that you sign your  
 10 deposition.  
 11 As previously agreed to, the transcript will  
 12 be furnished to you through your counsel. Please read  
 13 the following instructions carefully:  
 14 At the end of the transcript you will find an  
 15 errata sheet. As you read your deposition, any changes  
 16 or corrections that you wish to make should be noted on  
 17 the errata sheet, citing page and line number of said  
 18 change. DO NOT write on the transcript itself. Once  
 19 you have read the transcript and noted any changes, be  
 20 sure to sign and date the errata sheet and return these  
 21 pages to me.  
 22 If you do not read and sign the deposition  
 23 within a reasonable time (i.e., 30 days unless otherwise  
 24 directed) the original, which has already been forwarded  
 25 to the ordering attorney, may be filed with the Clerk of  
 the Court. If you wish to waive your signature, sign  
 your name in the blank at the bottom of this letter and  
 return it to us.

Very truly yours,

\_\_\_\_\_  
 Wendy Beath Anderson, RPR, CRR, FPR  
 ESQUIRE DEPOSITION SERVICES, INC.  
 515 North Flagler Drive, P-200  
 West Palm Beach, Florida 33401

I do hereby waive my signature.  
 \_\_\_\_\_  
 LARRY VISOSKI

227

1 ERRATA SHEET  
 2 IN RE: L.M. VS. EPSTEIN CR: WMB  
 3 DEPOSITION OF: LARRY VISOSKI  
 4 TAKEN: 10.15.09 JOB NO.: 127542  
 5 DO NOT WRITE ON TRANSCRIPT - ENTER CHANGES HERE  
 6 PAGE # LINE # CHANGE REASON  
 7 \_\_\_\_\_  
 8 \_\_\_\_\_  
 9 \_\_\_\_\_  
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 17 \_\_\_\_\_  
 18 Please forward the original signed errata sheet to this  
 office so that copies may be distributed to all parties.  
 19  
 20 Under penalty of perjury, I declare that I have read my  
 deposition and that it is true and correct subject to  
 any changes in form or substance entered here.  
 21  
 22 DATE: \_\_\_\_\_  
 23  
 24 SIGNATURE OF DEPONENT: \_\_\_\_\_  
 25

226

1 CERTIFICATE  
 2 \* \* \*  
 3 THE STATE OF FLORIDA  
 4 COUNTY OF PALM BEACH

5 I hereby certify that I have read the  
 6 foregoing deposition by me given, and that the  
 7 statements contained herein are true and correct to the  
 8 best of my knowledge and belief, with the exception of  
 9 any corrections or notations made on the errata sheet,  
 10 if one was executed.

11  
 12 Dated this \_\_\_\_ day of \_\_\_\_\_  
 13 2009.  
 14  
 15  
 16  
 17  
 18 \_\_\_\_\_  
 19 LARRY VISOSKI  
 20 Job #127542  
 21  
 22  
 23  
 24  
 25

# ATTACHMENT 20

**Certified Copy**

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA**

JANE DOE,

Plaintiff,

vs.

Case No. 08-80893-  
CIV-MARRA/JOHNSON

JEFFREY EPSTEIN,

Defendant.

-----

**DEPOSITION OF**

**MARK EPSTEIN**

September 21, 2009  
11:30 a.m.

One Penn Plaza,  
New York, New York

Jacklyn Lisi



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M. Epstein

Maxwell and knowing your brother, would that surprise you to hear that?

MR. COHEN: Objection.

A. I don't know Ghislaine Maxwell. I mean I know her, but you can tell me anything, it's not going to surprise me.

Q. When you would see your brother and Ghislaine Maxwell, where would you be; at his house, at a function, out to dinner?

A. Probably at his house more than anything.

Q. Which house would that be?

A. More likely Florida.

Q. Do you know how he met her?

A. No.

Q. Do you know where she is now?

A. No.

Q. When is the last time you saw Ghislaine Maxwell?

A. Probably around when my mother died, that's five and a half years ago.

Q. Have you ever met Leslie Wexner?

A. No.

Q. Have you ever met Donald Trump?





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M. Epstein

A. Yes.

Q. Was that through your brother?

A. Yes.

Q. Where was that?

A. We flew up on my brother's plane from Florida together. Donald was on the plane.

Q. When?

A. Somewhere between 5 and 10 years ago.

Q. Okay. So we are talking about --

A. It's either late '90's early 2000. Probably more like late '90's.

Q. Was that the only time you've met Donald Trump?

A. Yes.

Q. Which plane was this of your brother's?

A. I don't remember.

Q. Was this one of the big planes, the 727?

A. No. It wasn't that one, no.

Q. Okay. How many people were on this airplane?

A. It was my brother, myself, Donald, the pilot the co-pilot. I don't remember -- I



1 M. Epstein

2 don't remember if anybody else was on the  
3 plane.

4 Q. What was the purpose of Donald Trump  
5 riding on your brother's airplane?

6 A. You'll have to ask Donald. I think  
7 he wanted a ride back to New York.

8 Q. What was your understanding of the  
9 relationship of Donald Trump and your brother?

10 A. They were friends.

11 Q. Do you know how they met?

12 A. No.

13 Q. When you say "friends," how  
14 frequently did they associate?

15 A. I have no idea.

16 Q. What was your understanding -- did  
17 you --

18 A. I had no understanding. They were  
19 friends. That was my understanding.

20 Q. When they were in the airplane  
21 together, they talked as if they were friends?

22 A. Yeah, I talked to him like he was my  
23 friend. I never met the guy. I am a friendly  
24 guy.

25 Q. Were there girls on the plane?



# ATTACHMENT 19

1 A. I don't remember, Ma'am. He came from  
2 New Albany, Ohio.  
3 Q. From New --  
4 A. New Albany, Ohio.  
5 Q. New Albany, Ohio. Did he have his own  
6 business?  
7 A. No, he worked for Mr. Epstein. He will  
8 maintain all the computers.  
9 Q. Was he there everyday?  
10 A. No, ma'am.  
11 Q. Do you know whether at that time Mr.  
12 Epstein had an office in Palm Beach?  
13 A. Not outside the house, no.  
14 Q. Do you have any knowledge of whether or  
15 not the video equipment was -- and I don't know  
16 the technical term, forgive me, but was it the  
17 kind of equipment that would record for a certain  
18 amount of time and then record over that film?  
19 A. I don't know.  
20 MR. CRITTON: Form.  
21 BY MS. EZELL:  
22 Q. You don't know?  
23 A. No, ma'am.  
24 MR. CRITTON: Just for clarification, I  
25 may have misunderstood, but I thought he

1 video, even phones.  
2 Q. Would he also repair the televisions if  
3 they needed work?  
4 A. No.  
5 Q. No. Did you have any kind of intercom  
6 system in the house?  
7 A. Yes, ma'am.  
8 Q. And what kind of system was that?  
9 A. It was standard office equipment, Lucid  
10 Technologies maybe, but it was an intercom like we  
11 using right now.  
12 MS. EZELL: Just let the record reflect  
13 that the witness pointed to the telephone on  
14 the table that has a speaker phone.  
15 THE WITNESS: Yes, ma'am.  
16 BY MS. EZELL:  
17 Q. And did you use that in your work?  
18 A. Yes, ma'am.  
19 Q. And what did you use it for?  
20 A. Mr. Epstein used to page me when he  
21 needed me.  
22 Q. Did you have one of those phones in the  
23 kitchen?  
24 A. Yes, ma'am.  
25 Q. And was there one out in the staff house

1 said he didn't even know the video equipment  
2 existed until he read the FBI report.  
3 MS. EZELL: He said he didn't know that  
4 it was upstairs and downstairs, I believe.  
5 MR. CRITTON: I thought he said he didn't  
6 know that it even existed.  
7 MS. EZELL: I may be wrong.  
8 BY MS. EZELL:  
9 Q. Did you know it existed before you read  
10 the FBI report?  
11 A. No, ma'am.  
12 Q. I'm sorry, then I was wrong.  
13 How did you know then that the young  
14 technician from Ohio maintained the computers and  
15 the video equipment?  
16 A. Because we used to request -- there were  
17 always problems with the computers so he came to  
18 the house and he was the programmer. It was very  
19 sophisticated.  
20 MR. CRITTON: Form to the last question,  
21 move to strike the answer as nonresponsive.  
22 BY MS. EZELL:  
23 Q. How did you know then that he maintained  
24 the video equipment as well?  
25 A. Because he was in charge of computers,

1 as well?  
2 A. Yes, ma'am.  
3 Q. Do you know where others were in the  
4 house?  
5 A. Probably have like 15 phones. We used to  
6 have three in the staff house, one in the cabana,  
7 two in the master bedroom, one in each room,  
8 kitchen, dining room, Mrs. Maxwell's office, the  
9 garage.  
10 Q. Where was Mrs. Maxwell's office?  
11 A. Under the stairs next to the kitchen.  
12 Q. Can you give me some idea of what size  
13 space that was?  
14 A. It was probably -- we change the floor.  
15 Twelve by five, something like that.  
16 Q. And was the computer equipment in that  
17 space?  
18 A. Yes, ma'am.  
19 Q. Do you know whether Ms. Maxwell kept the  
20 names and telephone numbers of the girls who came  
21 to do massages?  
22 A. Yes, ma'am.  
23 MR. CRITTON: Form.  
24 BY MS. EZELL:  
25 Q. Do you know that because you saw the

1 names and phone numbers?  
 2 MR. CRITTON: Form.  
 3 THE WITNESS: Yes, ma'am.  
 4 BY MS. EZELL:  
 5 Q. Do you know if she kept pictures of the  
 6 girls on the computer?  
 7 A. Yes, she did.  
 8 Q. And you know that as well because you  
 9 happen to see them?  
 10 A. Yes, ma'am.  
 11 MR. CRITTON: Form to the last two  
 12 questions.  
 13 BY MS. EZELL:  
 14 Q. Were they similar to the pictures that  
 15 Ms. Kellen had on her computer?  
 16 MR. CRITTON: Form.  
 17 THE WITNESS: Yes, ma'am.  
 18 BY MS. EZELL:  
 19 Q. Did the pictures that they kept there  
 20 look like pictures that were posed?  
 21 A. They were more casual.  
 22 Q. Did they look as though the person being  
 23 photographed knew that they were being  
 24 photographed?  
 25 MR. CRITTON: Form.

1 THE WITNESS: No, ma'am.  
 2 BY MS. EZELL:  
 3 Q. And what can you tell me about that, what  
 4 lead you to draw that conclusion?  
 5 A. They were probably taken in parties in  
 6 big reception or banquet.  
 7 MR. CRITTON: Let me offer as a  
 8 suggestion, not that you have to accept or  
 9 that you would, you're using the term young  
 10 girls generically, he has probably seen  
 11 many, many young girls, there was no --  
 12 you've used it interchangeably with just  
 13 young girls versus young girls who may have  
 14 come to -- purported to give a massage and,  
 15 therefore, that may be a different answer,  
 16 so that's part of my form objection.  
 17 MS. EZELL: Okay, thank you.  
 18 BY MS. EZELL:  
 19 Q. When I asked you about Ms. Kellen whether  
 20 she had a list of the girls and telephone numbers,  
 21 I think I asked about those girls that came to  
 22 give massages, but let me go back and just ask it  
 23 that way.  
 24 Did you notice that Ms. Kellen had a list  
 25 of the girls that came to give massages on her

1 computer?  
 2 MR. CRITTON: Form.  
 3 THE WITNESS: Yes, ma'am.  
 4 BY MS. EZELL:  
 5 Q. And did she generally have phone numbers  
 6 for those girls?  
 7 A. Yes, ma'am.  
 8 Q. And were they generally pictures of the  
 9 girls?  
 10 MR. CRITTON: Form.  
 11 THE WITNESS: No, ma'am.  
 12 BY MS. EZELL:  
 13 Q. And did Ms. Maxwell have a list of the  
 14 girls who came to give massages?  
 15 MR. CRITTON: Form.  
 16 THE WITNESS: Yes, ma'am.  
 17 BY MS. EZELL:  
 18 Q. Did she have telephone numbers generally?  
 19 A. Yes, ma'am.  
 20 MR. CRITTON: Form.  
 21 BY MS. EZELL:  
 22 Q. Were there pictures on her computer of  
 23 the girls who came to give massages?  
 24 MR. CRITTON: Form.  
 25 BY MS. EZELL:

1 Q. Ms. Maxwell I'm talking about.  
 2 A. Yes, ma'am.  
 3 Q. And were those pictures the more casual  
 4 ones that you described when I asked whether or  
 5 not the subject looked as though she knew she was  
 6 being photographed?  
 7 MR. CRITTON: Form.  
 8 THE WITNESS: I'm sorry, can you repeat?  
 9 BY MS. EZELL:  
 10 Q. Yeah. The pictures of the young girls  
 11 who came to the house to give massages that were  
 12 on Ms. Maxwell's computer, did they appear to have  
 13 been taken when the girls knew they were being  
 14 photographed?  
 15 MR. CRITTON: Form.  
 16 THE WITNESS: I don't think they knew  
 17 they were being photographed.  
 18 BY MS. EZELL:  
 19 Q. I believe you said they were more casual  
 20 pictures.  
 21 A. Yes, ma'am.  
 22 Q. Did you notice any nude photographs in  
 23 those pictures?  
 24 A. Yes, ma'am.  
 25 MR. CRITTON: Form for the last question.

1 F.E., and I think you told us that you had seen  
 2 her, you recognized her photograph.  
 3 A. Yes, I did.  
 4 Q. On how many occasions did you ever see  
 5 her at the Epstein home?  
 6 A. More than three times.  
 7 Q. More than three?  
 8 A. Yes, sir.  
 9 Q. That's as accurate as you can be?  
 10 A. Yes.  
 11 Q. More than three?  
 12 A. More than three.  
 13 Q. Whether it was four or five you don't  
 14 know, but more than three?  
 15 A. More than three, sir.  
 16 Q. In terms of F.E.'s age, did you ever ask  
 17 her what her age was?  
 18 A. No, sir.  
 19 Q. Did she appear to you to be someone at  
 20 least from seeing her and recalling her that she  
 21 appeared at least to you to be while a young woman  
 22 appeared to be someone who was 18 or older?  
 23 A. No, sir.  
 24 Q. Okay. Well, did you ever say anything to  
 25 the police or did you ever -- were you ever

1 concerned about that such that you told someone?  
 2 A. No, sir.  
 3 Q. Haven't you told the police, sir -- let  
 4 me strike that, let me ask it this way.  
 5 In your taped statement that you gave to  
 6 the police did you not tell them that all of the  
 7 girls appeared to you to be 18 or above?  
 8 A. Sir, as far as when all these actions  
 9 that were taking place I was under an environment  
 10 that I thought I was going to be -- in other  
 11 words, I was afraid of any reprisal Mr. Epstein  
 12 and Mrs. Maxwell if I say something that is any  
 13 idea of me because I have this confidentiality  
 14 agreement. What I saw that they were very young,  
 15 but I cannot say that they were 18 and old.  
 16 Q. Right. Let me just take you back to my  
 17 question again and see if you can answer my  
 18 question.  
 19 MR. CRITTON: Could you please read it  
 20 back?  
 21 (Thereupon, a portion of the record was  
 22 read by the reporter.)  
 23 THE WITNESS: I think I told the police  
 24 that.  
 25 BY MR. CRITTON:

1 Q. I'm sorry?  
 2 A. Yes, I did, I told the police.  
 3 Q. And at the time that you spoke with the  
 4 police and gave them a statement, isn't it true,  
 5 Mr. Rodriguez, that you were no longer employed by  
 6 Mr. Epstein?  
 7 A. Yes.  
 8 Q. And you understood that you were required  
 9 to tell the police officers the truth at that  
 10 time?  
 11 A. Yes.  
 12 Q. And if I understood your testimony I  
 13 believe from July 29th through today, you at no  
 14 time asked any of these girls how old they were.  
 15 True?  
 16 A. No.  
 17 Q. And as to whether the girls were under 18  
 18 or 18 or over 18, you really didn't know one way  
 19 or the other at the time. Would that be a fair  
 20 statement?  
 21 A. Yes.  
 22 MR. WILLITS: Object to the form of the  
 23 question.  
 24 BY MR. CRITTON:  
 25 Q. On Exhibit 6 there is a person who's

1 covered, the lady that Ms. Ezell asked you about I  
 2 believe was on the right-hand side of the  
 3 photograph. There is a young lady on the  
 4 left-hand side with a black hat on.  
 5 Do you recognize her at all?  
 6 A. No, I don't recognize her.  
 7 Q. Okay. Thank you. With regard to the  
 8 photograph four that you saw that you think  
 9 possibly might be A.H., I think you told us that  
 10 you recall seeing that woman in the sauna at Mr.  
 11 Epstein's house on one occasion and she was naked.  
 12 A. Yes.  
 13 Q. Was that near the end of your employment  
 14 or the middle or the front end?  
 15 A. I saw her on January 2005, sir, and I was  
 16 terminated in March, so that was two months prior.  
 17 Q. And did you ever tell anyone that you had  
 18 seen her naked in the sauna?  
 19 A. I told Louella.  
 20 Q. Okay. And what did Louella say?  
 21 A. She was surprised.  
 22 Q. Okay. Did you wake the young lady up in  
 23 the sauna?  
 24 A. No.  
 25 Q. And do you know how old the young lady

# ATTACHMENT 18

IN THE CIRCUIT COURT OF THE 15TH JUDICIAL CIRCUIT IN  
AND FOR PALM BEACH COUNTY, FLORIDA

L.M.,

Plaintiff,

vs.

Case No. 502008CA028051  
XXXXMB AD

JEFFREY EPSTEIN,

Defendant.  
~~~~~

**DEPOSITION OF**  
**LARRY EUGENE MORRISON**  
**TAKEN ON BEHALF OF THE PLAINTIFF**

**VOLUME I**  
**Pages 1 to 200**

October 6, 2009  
10:55 a.m.

515 N. Flagler Drive  
West Palm Beach, FL 33401-4321

Jennifer DiLorenzo, court reporter



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1 Q. Would any of those girls look extremely young 1  
2 to you? 2

3 MR. PIKE: Form. 3

4 A. Not -- Not that I thought. 4

5 Q. Not back in 2001, we're talking about? 5

6 A. Right, right. 6

7 Q. No. 7

8 What would Ghislaine Maxwell say to you, if 8  
9 anything? 9

10 MR. PIKE: Form. 10

11 A. She'd -- Mostly small talk, just -- She 11  
12 kind of did the business management part of it as far 12  
13 as, you know, arranging cell phone - I was having 13  
14 cell phone problems with the company cell phone, she 14  
15 would handle things like that, but she would have 15  
16 minor inputs on the interior work. 16

17 Q. What was your understanding back in 2001 still 17  
18 of the relationship between Ghislaine Maxwell and Jeffrey 18  
19 Epstein? 19

20 MR. PIKE: Form. 20

21 A. I really didn't understand it. I thought 21  
22 it was personal - personal and business. 22

23 Q. When you say "personal," did you think it was 23  
24 sexual? 24

25 A. I thought maybe they were dating and, you 25



1 know, business relationship too.

2 Q. Did you know who Ghislaine Maxwell was?

3 A. Not right away, no, no.

4 Q. Not right away?

5 A. Right.

6 Q. At some point in time you were curious enough  
7 to make an attempt to find out.

8 A. No, I --

9 MR. PIKE: Form.

10 A. -- heard about her and there was a book up  
11 in New York in the apartment that we stayed in that  
12 was -- You know, you're sitting there with nothing to  
13 do, I read that.

14 Q. Do you remember the name of the book?

15 A. It was just "Maxwell."

16 Q. Have anything to do with her father?

17 A. Yeah, it was about him, that's what it was  
18 about. I mostly just flipped through looking at  
19 pictures, boats, and airplanes and stuff.

20 Q. Back in 2001, the first time you had a real  
21 conversation with Ghislaine Maxwell --

22 MR. PIKE: Form.

23 A. Yes.

24 Q. -- what did that conversation consist of, if  
25 you remember?

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# ATTACHMENT 17

**Certified Copy**

**IN THE CIRCUIT COURT OF THE FIFTEENTH JUDICIAL CIRCUIT  
IN AND FOR PALM BEACH COUNTY, FLORIDA  
CIVIL DIVISION**

L.M.,

Plaintiff,

vs.

CASE No.  
502008CA028051XXXXMB AB

JEFFREY EPSTEIN,

Defendant.

~~~~~

**DEPOSITION OF  
LOUELLA RABUYO  
VOLUME I**

October, 20, 2009  
10:10 a.m.

515 N. Flagler Drive  
Suite 200-P  
West Palm Beach, Florida 33401

Reported By: Teresa Whalen, RPR, FPR, Notary Public, State of Florida



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no, you 1 head or shake your head, and she can't take that down.

2 A All right.

3 Q It's also very easy to say uh-huh or huh-uh,  
4 but it kind of looks the same on paper, so you can't do  
5 that either. I'm going to wait until you finish your  
mes, 6 answer, and you have to wait until I finish my question,  
7 because if we talk over one another, then the court  
her 8 reporter can't get it down.

9 A Okay. Yes, sir.

u said 10 Q All right. So if you don't understand the  
e she 11 question, tell me you don't understand and I'll try to  
12 ask a better question.

13 A Yes.

ion, 14 Q Okay. So you were hired in November of 2004  
15 to be the housekeeper for Mr. Epstein?

16 A Yes.

17 Q And when you were hired, who exactly hired  
to work 18 you, who -- let me strike that.

19 When you were hired to be the housekeeper for  
20 Mr. Epstein, who did you interview with?

on taken 21 A Ms. Maxwell.

22 Q Is that Ghislaine Maxwell or just  
23 Laine Maxwell?

reporter, 24 A Ghislaine Maxwell.

your 25 Q And where did the interview take place?



# ATTACHMENT 16

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

L.M.

Plaintiff,

-vs-

JEFFREY EPSTEIN  
AND SARAH KELLEN,

Defendants.

---

DEPOSITION OF JANUSZ BANASIAK

Tuesday, February 16, 2010  
10:09 - 2:30 p.m.

250 Australian Avenue South  
Suite 1500  
West Palm Beach, Florida 33401

Reported By:  
Cynthia Hopkins, RPR, FPR  
Notary Public, State of Florida  
Prose Court Reporting  
Job No.: 1317

1 Q. Okay. So, I assume then that your wife  
2 that you are separated from I guess at the time, she  
3 didn't come down to Palm Beach?

4 A. No, no.

5 Q. And this is somebody who still lives  
6 somewhere other than Florida?

7 A. Correct.

8 Q. So, you came down in February 2005 and  
9 began working. What did you, what did you first  
10 start doing for Jeffrey Epstein?

11 A. First I doing? I don't remember nothing  
12 special.

13 Q. Okay. Well, were you working -- I will  
14 rephrase it. Were you working only for Jeffrey  
15 Epstein or were you working also for Ghislaine  
16 Maxwell, the other person who interviewed you, or  
17 anybody else in the house?

18 A. I guess only for him because she was visiting  
19 a few times house, but I am employed by him.

20 Q. Okay. What was your understanding at that  
21 time as to the relationship between Ghislaine  
22 Maxwell and Jeffrey Epstein?

23 A. They were like partners in business.

24 Q. Okay. What business was that, if you  
25 know?



1 A. No.

2 MR. GOLDBERGER: Form.

3 BY MR. EDWARDS:

4 Q. And have you known, just based on your  
5 observations, Nadia to have girlfriends? And by  
6 girlfriends I mean girlfriends that she would be  
7 intimate with in addition to being the girlfriend of  
8 Jeffrey Epstein?

9 A. No.

10 Q. Do you know somebody by the name of Jean  
11 Luc Brunel?

12 A. Yes.

13 Q. How do you know him?

14 A. He was in the house like, I guess, a few  
15 times.

16 Q. When?

17 A. When?

18 Q. When was the last time you saw him there?

19 A. A week ago.

20 Q. Today is, what, February 16th, and this is  
21 a Tuesday. So, when we are saying a week ago, are  
22 you saying it was last Tuesday, Wednesday, Thursday,  
23 Friday, do you remember?

24 A. I don't remember the date but he stay maybe  
25 three days, I think, in the house.

1 Q. So, if he arrived on Tuesday, he stayed  
2 through Thursday or Friday and --

3 A. Yes.

4 Q. Do you know what the occasion was for him  
5 to come in town?

6 A. No.

7 Q. Where did he stay in the house last week?

8 A. One of the bedrooms upstairs.

9 Q. And was Mr. Epstein also staying in the  
10 house?

11 A. Yes.

12 Q. All right. Did Mr. Brunel bring any  
13 company with him?

14 A. No.

15 Q. It was him alone?

16 A. Yes.

17 Q. How did he get to the house?

18 A. I think he has been picked up by Igor at this  
19 point.

20 Q. And where did he -- I assume he flew in  
21 from somewhere?

22 A. Yes.

23 Q. Picked up from the airport, safe  
24 assumption? He didn't just drive to the airport.

25 (A discussion was held off the record.)

1 BY MR. EDWARDS:

2 Q. So, do you know where it was that  
3 Mr. Brunel flew in from?

4 A. No.

5 Q. Do you know where Mr. Brunel generally  
6 lives? I mean is it New York, is it --

7 A. I know that he spends some time in Florida, in  
8 Miami, but exactly where he is, I don't know.

9 Q. But obviously he wouldn't fly here to Palm  
10 Beach from Miami, right, so he had to be coming from  
11 somewhere else you would assume?

12 A. Yes, I assume.

13 Q. Were you told -- similar to the way that  
14 you have been describing throughout the deposition,  
15 you're told who is coming in town. Were you told he  
16 was going to be at the house?

17 A. Yeah. Usually he requires to be picked up, so  
18 I know that he is coming.

19 Q. Okay. We'll go through some other  
20 instances where you had occasion to pick him up or  
21 break plans, but talking specifically about last  
22 week: When were you first told that Mr. Brunel was  
23 going to be coming into town?

24 A. I think Igor told me that he has to go and  
25 pick him up.

1 Q. How did he --

2 A. It was my day off, I guess, because usually I  
3 am the one who pick up people. So, I guess it was my  
4 days off and Igor was working, so he went to pick him  
5 up.

6 Q. Okay. It wouldn't be Story Cowles picking  
7 him up?

8 A. No.

9 Q. So, to the best of your recollection Igor  
10 picked up Jean Luc Brunel sometime last week from  
11 the airport and took him to the house?

12 A. Right.

13 Q. Do you know what car he took to pick him  
14 up?

15 A. I think Cadillac Escalade.

16 Q. The black Escalade?

17 A. Yes.

18 Q. And what did Mr. Brunel and Mr. Epstein do  
19 for the three day stay when Mr. Brunel was staying  
20 at Mr. Epstein's house last week?

21 MR. GOLDBERGER: Form.

22 THE WITNESS: I don't know.

23 BY MR. EDWARDS:

24 Q. Did you interact, communicate with  
25 Mr. Brunel?

1 A. Yes.

2 Q. And what did he say as to why he was here?

3 MR. GOLDBERGER: Form.

4 THE WITNESS: Good morning. How are you?

5 Exchange handshake. And I saw him in the

6 kitchen and he was cooking something and that's

7 it.

8 BY MR. EDWARDS:

9 Q. When you say he was cooking something, he  
10 was personally cooking?

11 A. Yes.

12 Q. All right. So, this is a house that he is  
13 familiar enough with and he is a regular enough  
14 guest that he makes himself at home?

15 A. Yes.

16 Q. Okay. And last week do you remember  
17 anything in the three-day period that Mr. Brunel was  
18 staying at the house that Mr. Brunel did from the  
19 time he woke up to the time that he went to sleep?

20 MR. GOLDBERGER: Form.

21 BY MR. EDWARDS:

22 Q. I mean did go to the movies? Did he go to  
23 the beach? Did they just hang out around the house  
24 and walk?

25 A. Yeah. I think he walked outside to the beach.

1 He was swimming in the pool, talking on the phone just  
2 what I remember.

3 Q. Okay. During the three-day stay last  
4 week, how often were -- I mean, I assuming that he  
5 came in town to see Mr. Epstein; is that true?

6 A. Yes.

7 Q. And so the majority of his time during  
8 that three days was spent hanging around with  
9 Mr. Epstein?

10 A. Yes.

11 Q. All right. Did you see them talking with  
12 one another?

13 A. Yes.

14 Q. Where were they talking with one another?

15 A. In the cabana, outside sitting next to the  
16 pool.

17 Q. All right. And when you said that  
18 Mr. Brunel walked to the beach, did Mr. Epstein walk  
19 to the beach with him?

20 A. No.

21 Q. Mr. Brunel walked alone?

22 A. Yes.

23 Q. Who else was in the house last week while  
24 Mr. Brunel was in the house?

25 A. Nadia, Sarah, and Story, I think.

1 Q. Sarah Kellen?

2 A. Yes.

3 Q. And Story Cowles?

4 A. Yes.

5 Q. Okay. Who else, Igor?

6 A. Igor. I guess that's it.

7 Q. Did you overhear any of the substance of  
8 the conversations that Mr. Brunel was having with  
9 Mr. Epstein?

10 A. No.

11 Q. All right. What is your understanding as  
12 to the relationship between Mr. Brunel and  
13 Mr. Epstein?

14 A. I guess they are friends.

15 Q. Okay. In addition to being friends --  
16 well, let me ask this question first: Do you know  
17 when they became friends?

18 A. No.

19 Q. You don't know how long they have known  
20 each other?

21 A. No.

22 Q. You don't know who introduced them?

23 A. No.

24 Q. They could have met since they were five  
25 years old or they could have met five years ago for

1 to Miami.

2 Q. Okay.

3 A. But how long he stay in Miami, how long he  
4 stays outside of Miami, I have no idea.

5 Q. And when was that occasion where you know  
6 that Jean Luc Brunel was in Miami or spending time  
7 in Miami?

8 A. I think at one point I drove him to Miami.

9 Q. And when was that?

10 A. I think the time he was here in this month of  
11 January. I think I drove him back to Miami from, from  
12 the Palm Beach, Palm Beach house.

13 Q. Okay. So, that time in January he flies  
14 into the Palm Beach airport from some undisclosed or  
15 unknown location, you take him to the Palm Beach  
16 house, right?

17 A. Right.

18 Q. How long does he stay on that occasion?

19 A. Maybe three days.

20 Q. And during that three-day period were any  
21 other -- did any females accompany him to the Palm  
22 Beach house?

23 A. No. I don't remember. I don't recall.

24 Q. Well, maybe this will jog your memory:

25 When you drove him to Miami, did you drive him



1 alone --

2 A. Yes.

3 Q. -- or did you drive him with somebody  
4 else?

5 A. Alone.

6 Q. Okay. And where did you take him to in  
7 Miami?

8 A. I don't know. He left -- he told me his car,  
9 one of his friends somewhere in Miami Beach, so I  
10 dropped him over there and he pick up his car over  
11 there.

12 Q. And who is his friend, do you know?

13 A. I don't know.

14 Q. So, his car was in Miami?

15 A. Yes.

16 Q. What kind of car was that?

17 A. Mercedes.

18 Q. All right. And do you remember where it  
19 was in Miami that his car was parked?

20 A. Some -- I don't remember the others, but  
21 somewhere in Miami Beach.

22 Q. All right. At a condo, at an apartment,  
23 on the side of the road, a house?

24 A. No. It was a private house.

25 Q. A private house on Miami Beach. Do you

1 know the name of the person that lived at that  
2 house?

3 A. No.

4 Q. All right. In talking about this person  
5 Jean Luc Brunel, would -- you said he came here last  
6 week. He came here in January. Stayed three or  
7 four days each time, two consecutive months. Since  
8 Mr. Epstein has been out on house arrest is Jean Luc  
9 Brunel one of the people that visits on a monthly  
10 basis?

11 A. No.

12 Q. Okay.

13 A. There was no regular visit. It's just  
14 occasionally I would say.

15 Q. Okay. So, prior to the January visit,  
16 when is the previous time that Jean Luc Brunel was  
17 at Mr. Epstein's house?

18 A. I don't remember. I don't remember.

19 Q. Is he one of the people who frequently  
20 calls Mr. Epstein?

21 A. Yes.

22 Q. And Mr. Epstein frequently calls him?

23 A. I don't know.

24 Q. Okay. Well, I guess you would only know  
25 the calls that come in and you take messages, right?

1           A.    Right.

2           Q.    How times would you estimate -- I know you  
3           told us two times in 2010.  Let me ask it this way:  
4           In 2010 were there only those two occasions where  
5           Mr. Brunel was staying at Mr. Epstein's house in  
6           Palm Beach?

7           A.    Yes, as far as I remember.

8           Q.    Okay.  How many occasions, in addition to  
9           those two, would you estimate that Mr. Brunel has  
10          stayed at the Palm Beach house since Mr. Epstein has  
11          been out on house arrest and also staying at that  
12          house?

13          A.    It's hard to tell.  I would say maybe three  
14          times.

15          Q.    Three times in addition to the two times  
16          this year, five times total?

17          A.    No, three times total.

18          Q.    Okay.  So, one time this month, one time  
19          last month, and then for the period of time from --  
20          I don't remember when he was on house arrest, maybe  
21          July.  So from July to December you think that there  
22          was only one other occasion when Mr. Brunel was at  
23          the house?

24          A.    You know, it's hard to remember but I think  
25          so.  He was maybe totally three times for the last few

# ATTACHMENT 15

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

Case No. 08-CV-80893-CIV-MARRA/JOHNSON

---

JANE DOE,

Plaintiff,

vs.

JEFFREY EPSTEIN, et al.,

Defendants.

---

DEPOSITION OF ADRIANA ROSS  
Volume 1 of 1  
Pages 1 through 138  
Videotaped

Monday, March 15, 2010  
10:13 a.m. - 12:42 p.m.  
U.S. Legal Support  
515 East Las Olas Boulevard, 3rd Floor  
Fort Lauderdale, Florida 33301

Stenographically Reported By:  
Janet L. McKinney, RPR, FPR, CLR  
Registered Professional Reporter  
Florida Professional Reporter  
Certified LiveNote Reporter

2	<p>APPEARANCES:</p> <p>ON BEHALF OF THE PLAINTIFF:  FARMER, JAFFE, WEISSING, EDWARDS,  FISTOS &amp; LEHRMAN  425 North Andrews Avenue  Suite 2  Fort Lauderdale, Florida 33301-3268  954.524.2820  Brad@pathjustice.com  BY: BRADLEY EDWARDS, ESQ.</p> <p>ON BEHALF OF THE DEFENDANT JEFFREY EPSTEIN:  BURMAN, CRITTON, LUTTIER &amp;  COLEMAN, LLP  303 Banyan Boulevard  Suite 400  West Palm Beach, Florida 33401  561.842.2820  Mpike@bclclaw.com  BY: MICHAEL J. PIKE, ESQ.</p> <p>ON BEHALF OF OTHER PLAINTIFFS IN RELATED CASES:  MERMELSTEIN &amp; HOROWITZ, P.A.  18205 Biscayne Boulevard  Suite 2218  Miami, Florida 33160  305.931.2200  Ssm@sexabuseattorney.com  BY: STUART S. MERMELSTEIN, ESQ.</p> <p>ON BEHALF OF THE WITNESS:</p> <p>ROBBINS, TUNKEY, ROSS, AMSEL,  RABEN &amp; WAXMAN, P.A.  2250 Southwest Third Avenue  4th Floor  Miami, Florida 33129  305.858.9550  Criminalawyer@aol.com  BY: ALAN S. ROSS, ESQ.  Also Present: Sean McGuire, Videographer  U.S. Legal Support</p>	4																																												
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	<p>Videotaped deposition taken before JANET L. McKINNEY, Registered Professional Reporter, Florida Professional Reporter, Certified LiveNote Reporter and Notary Public in and for the State of Florida at Large in the above cause.</p> <p>(Whereupon, Witness's Exhibit 1 was marked for identification.)</p> <p>VIDEOGRAPHER: We are now on the video record. Today is Monday, the 15th day of March, 2010. The time is 9:13 a.m. (sic). We are here at 515 East Las Olas Boulevard, 3rd Floor, Fort Lauderdale, Florida, for the purpose of taking the videotape deposition of Adriana Ross taken in Case Number 08-CIV-80893, Jane Doe v. Jeffrey Epstein, et al.</p> <p>The court reporter is Janet McKinney; the videographer is Sean McGuire, both of U.S. Legal Support.</p> <p>Will counsel and all present please introduce yourself and the court reporter will swear the witness.</p> <p>MR. EDWARDS: Brad Edwards. I represent the plaintiff, Jane Doe also "Jane Doe", EW, "EW"; LM, "LM".</p> <p>MR. MERMELSTEIN: Stuart Mermelstein. I represent Jane Doe Numbers 2 through 8.</p> <p>MR. PIKE: Michael Pike on behalf of Jeffrey Epstein.</p> <p>MR. ROSS: And good morning, my name is Alan Ross. I represent the witness, Adriana Ross.</p> <p>THE REPORTER: Would you raise your right hand, please.</p> <p>Do you solemnly swear or affirm the testimony you're about to give will be the truth, and nothing but the truth, so help you God?</p> <p>THE WITNESS: I do.</p> <p>MR. ROSS: Before the deposition begins and in an effort to streamline the process of getting through this deposition on behalf of the witness we have had marked as Witness Exhibit Number 1 an August 31, 2007 letter from the United States Attorney's Office addressed to Miss Ross through her then counsel, Bruce Lyons, which is called a target letter identifying her as a target of a federal Grand Jury investigation in the Southern District of Florida and outlining a number of offenses that were the subject matter of investigation.</p> <p>As a result of that, it is anticipated that some of the questions that may be asked during the course of this deposition she may invoke her Fifth</p>																																													

6

1 Amendment privilege against self-incrimination.  
 2 And in order to streamline this we've agreed prior  
 3 to beginning this that she will simply answer "I  
 4 refuse to answer." The parties will understand and  
 5 the record will reflect that she is invoking her  
 6 Fifth Amendment privilege against  
 7 self-incrimination.  
 8 If there is some other privilege,  
 9 attorney-client privilege or some other objection  
 10 that I may have to a question, I'll specifically  
 11 state it. But her answer "I refuse to answer" will  
 12 be on Fifth Amendment grounds if that's acceptable  
 13 to everyone.  
 14 MR. EDWARDS: It's acceptable.  
 15 MR. MERMELSTEIN: It's acceptable.  
 16 MR. PIKE: Acceptable.  
 17 MR. ROSS: Okay. Madam court reporter has  
 18 already marked the exhibit, and I'll leave that  
 19 with her.  
 20 MR. EDWARDS: Okay.  
 21  
 22  
 23  
 24  
 25

7

1 THEREUPON:  
 2 ADRIANA ROSS  
 3 having been first duly sworn or affirmed, was examined  
 4 and testified as follows:  
 5 DIRECT EXAMINATION  
 6 BY MR. EDWARDS:  
 7 Q. Can you tell us your full -- full name.  
 8 A. Adriana Ross.  
 9 Q. At some point in time you were known as  
 10 Adriana Mucinska; is that correct?  
 11 A. Correct.  
 12 Q. And when did that change?  
 13 A. Well, I got married and initially I stayed  
 14 with my name and then -- because immigration kind of  
 15 made a mistake of not changing my name when I first  
 16 came to this country. And at some point when I was  
 17 removing my conditional residency I made sure that this  
 18 mistake is corrected. I do not recall exact time when  
 19 that happened.  
 20 Q. When were you married?  
 21 A. July 12th, 2003.  
 22 Q. Okay. What's your date of birth?  
 23 A. 7 of October 1983.  
 24 Q. 10/7/83?  
 25 A. Yes.

8

1 Q. And who are you married to?  
 2 A. Duncan Ross.  
 3 Q. All right. And sometime after 2003 if I  
 4 understand you correctly you kept the name Mucinska  
 5 until you were able to formally change it to Ross?  
 6 A. Correct.  
 7 Q. Okay. Were you married in this country?  
 8 A. Correct.  
 9 Q. When did you come to the United States?  
 10 A. Fall of 2002. I do not recall exact month.  
 11 Q. And why?  
 12 A. I was invited by modeling agency on a business  
 13 visa.  
 14 Q. What modeling agency?  
 15 A. Elite Models.  
 16 Q. And who was the connection at Elite Models  
 17 that invited you?  
 18 A. Actually it was my husband. I met him in  
 19 Europe and at the time he -- he knew that agency and I  
 20 was modeling in Europe and he showed my pictures and  
 21 they invited me.  
 22 Q. How long have you been modeling?  
 23 A. Since about I was 16 years old.  
 24 Q. Since 16, so mid-90's? Late 90's?  
 25 A. Probably around '98, '99, I believe.

9

1 Q. Okay. And what agencies did you model for in  
 2 Europe?  
 3 A. I was with -- in Poland I was with Ricardo Guy  
 4 that eventually change the name to J and B Models. I  
 5 was also represented by Ricardo Guy in Milan. Then on  
 6 my second trip to Milan an agency called Women.  
 7 I was then represented in Japan by agency --  
 8 oh, that's -- you just mean Europe or --  
 9 Q. Well, you can continue.  
 10 A. Yeah. I was represented in Japan by agency  
 11 Zucca. I was in South Korea, I do not recall the name  
 12 of the agency. I was represented in Taiwan by Fashion  
 13 Management.  
 14 Q. Okay. And these were all agencies that you  
 15 worked for or worked with prior to coming to the United  
 16 States?  
 17 A. Not all of them. Some of them I worked --  
 18 already been United States and traveling.  
 19 Q. Okay. But sometime around 2002 you were  
 20 invited by Elite Models to come to the United States to  
 21 model?  
 22 A. Correct.  
 23 Q. And at the time -- well, where are you from?  
 24 A. I'm Polish.  
 25 Q. Okay. So at the time you were a Polish

10

1 citizen?

2 A. Yes.

3 Q. So in order to come to the United States you

4 needed to get a work visa?

5 A. I was invited actually just to kind of get a

6 feeling if I will be suitable. So I came on a business

7 tourist visa which is, I believe, B1/B2.

8 Q. Okay. And where did you first go when you

9 came to the United States, what state?

10 A. Florida.

11 Q. And what city in Florida?

12 A. Miami.

13 Q. And what did you do for your two weeks when

14 you first arrived in Miami, Florida?

15 A. I do not recall.

16 Q. Okay. But did you do any modeling?

17 A. Well, like I would see some photographers, the

18 agency would send me like on all calls to see

19 photographers to kind of introduce me as a model.

20 Q. And why did you make the decision to go with

21 Elite Models in the United States when you already were

22 modeling in --

23 A. Um-hum.

24 Q. -- Europe?

25 A. Well, you know, just to expand it was

11

1 something that I did. And I decided to take a year off

2 after I graduated from high school and -- you know,

3 just to expand the modeling -- the modeling

4 possibilities, opportunities.

5 Q. Where did you graduate from high school?

6 A. In Warsaw, Poland.

7 Q. What year?

8 A. 2002, I believe.

9 Q. And do you have any college? Have you gone to

10 college after that?

11 A. I have an associate degree from Miami Dade

12 College -- Miami Dade College, and I'm pursuing a

13 bachelor degree right now.

14 Q. When did you get your associate's degree from

15 Miami Dade?

16 A. 2008. Summer of 2008.

17 Q. And you're pursuing a bachelor's degree right

18 now?

19 A. Yes.

20 Q. From where?

21 A. Florida International University.

22 Q. In what?

23 A. Accounting.

24 Q. How long have you been in the accounting

25 program?

12

1 A. Since fall 2008.

2 Q. And when do you expect to graduate?

3 A. Fall 2010.

4 Q. Are you a full-time student or part-time?

5 A. I'm a full-time student at this time.

6 Q. When you first arrived in Miami, Florida in

7 fall of 2002 did you decide during that two weeks that

8 you were going to stay permanently?

9 A. No.

10 Q. Okay. Did you go back to Poland?

11 A. Yes, I have. I have -- I went back for

12 Christmas.

13 Q. Okay. Poor question. Going back to 2002 I'm

14 trying to just understand how it was that -- you came

15 over here on a two-week business visa, but eventually

16 you ended up staying for a longer period of time,

17 correct?

18 A. Right.

19 Q. Okay. And how did that come about, just tell

20 me?

21 A. Well, I got romantically involved with my

22 current husband and so when -- you know, we just

23 started dating, we got engaged, and that's how, you

24 know, our relation evolved -- evolved, and eventually,

25 you know, I got married and -- and stayed.

13

1 Q. Okay. And since coming to the United States

2 have you always lived in Miami, Florida?

3 A. No.

4 Q. All right. Where else have you lived in the

5 United States?

6 A. New York.

7 Q. Where in New York?

8 A. Manhattan.

9 Q. What was the address in Manhattan where you

10 lived?

11 MR. ROSS: I'm going to advise you to invoke

12 privilege.

13 A. I refuse to answer.

14 Q. Okay. Have you -- are you familiar with an

15 address at 301 East 66th Street in New York?

16 A. I refuse to answer.

17 MR. PIKE: May we take a break for a second?

18 May I speak with you?

19 MR. ROSS: Sure.

20 VIDEOGRAPHER: Off the record, 10:22 a.m.

21 (Recess taken at 10:22 a.m.)

22 (Deposition resumed at 10:23 a.m.)

23 VIDEOGRAPHER: On the record, 10:23 a.m.

24 MR. ROSS: Brad, let me just interrupt for a

25 moment.



1 MR. EDWARDS: No problem.  
2 MR. ROSS: Just to be sure, when the witness  
3 answers "I refuse to answer" to be clear the full  
4 statement that she's not saying for the sake of  
5 saving time is that she's invoking her Fifth  
6 Amendment right against self-incrimination. Just  
7 to be clear.

8 MR. EDWARDS: That's what I've understood all  
9 along.

10 MR. MERMELSTEIN: That's what I understood.

11 MR. ROSS: Okay, fine. Go ahead.

12 MR. EDWARDS: This is just for the sake of  
13 brevity --

14 MR. ROSS: Exactly.

15 MR. EDWARDS: -- and let's move it on.

16 BY MR. EDWARDS:

17 Q. All right. So I'm going to ask the question  
18 again, I don't remember whether you'd responded yet,  
19 but are you familiar with the address in Manhattan  
20 301 East 66th Street in New York?

21 A. I refuse to answer.

22 Q. Okay. How long did you live in -- well, what  
23 was the first address that you lived in in Miami?

24 A. 1040 South Shore Drive, Miami Beach, Florida.  
25 1040 South Shore Drive, Miami Beach, Florida.

1 Q. South Shore. Okay.

2 A. Um-hum.

3 Q. Have you ever had your deposition taken  
4 before?

5 A. No.

6 Q. Okay. You're doing very well so far. There's  
7 a couple rules I didn't explain but mainly because  
8 you're doing very well. I just have to wait for you to  
9 finish your answer; you have to wait for me to finish  
10 my question. We have one court reporter. She can only  
11 take down one of us. Give us an answer that we all  
12 understand. Nodding of the head or shaking the head  
13 are easy to do and I get what you're saying, but she  
14 doesn't. Ah-ha or un-ah are things that are commonly  
15 said. They look the same on paper.

16 If I ask a bad question which could happen, as  
17 already happened and probably will again, just tell me  
18 "I don't understand the question," I'll ask it again --

19 A. Okay.

20 Q. -- all right?

21 And I'm assuming that's the address, 1040  
22 South Shore Drive, where you began living in fall of  
23 2002?

24 A. Correct.

25 Q. How long did you live at that address?

1 A. I'm sorry, I don't understand your question.

2 Q. How long did you live at the 1040 South Shore  
3 Drive address that you moved into in the fall in 2002?

4 A. Well, since -- since I came I lived there, I  
5 always stayed there whether being in Miami traveling  
6 back and forth, and I live currently at this address.

7 Q. Okay. What was the first time that you moved  
8 from that address to live elsewhere?

9 A. I do not recall.

10 Q. Okay. I know that you told me you lived in  
11 New York City and we're not going to discuss -- I'm  
12 assuming you're not going to answer a lot of questions  
13 about New York City, but at what time period did you  
14 move there? Was it right after you got here two weeks,  
15 a year later? I'm just trying to get a year as to when  
16 you moved to New York?

17 MR. ROSS: I'm going to instruct you not to  
18 answer.

19 A. I refuse to answer.

20 Q. Okay. Do you know a guy by the name of Jean  
21 Luc Brunel?

22 A. I refuse to answer.

23 Q. Where are your parents?

24 A. They're in Warsaw, Poland.

25 Q. And since you've been in the United States

1 have they come to the United States?

2 A. Yes, they have visited me.

3 Q. Have they ever met Jeffrey Epstein?

4 A. I refuse to answer.

5 Q. Have they ever met Jean Luc Brunel?

6 A. I refuse to answer.

7 Q. Where are you currently employed?

8 A. I pursue -- I go to school full-time, I do not  
9 work.

10 Q. Are you also still in the modeling business  
11 though?

12 A. No, I'm not.

13 Q. And when was the last time you did any  
14 modeling?

15 A. It would be late spring, early summer of 2006  
16 I went on a trip to Taiwan.

17 Q. And why did you stop modeling at that time?

18 A. I wanted -- I always kind of knew that it's  
19 something that I'm going to be doing and I just decided  
20 to go and pursue a college degree.

21 Q. Okay. Is it something that you ever plan to  
22 go back to, modeling?

23 A. No.

24 Q. Are you involved at all with the modeling  
25 industry?

18

1 A. No.

2 Q. I mean, helping to recruit models, helping

3 others to recruit models, anything like that?

4 A. No.

5 Q. Do you ever -- do you currently talk to

6 Mr. Brunel?

7 A. I refuse to answer.

8 Q. When is the last time that you talked to

9 Jeffrey Epstein?

10 A. I refuse to answer.

11 Q. Do you know a woman by the name of Ghislaine

12 Maxwell?

13 A. I refuse to answer.

14 Q. Do you know someone by the name of Sarah

15 Kellen?

16 A. I refuse to answer.

17 Q. Do you know a person named Nadia Marcinkova?

18 A. I refuse to answer.

19 Q. Did Jeffrey Epstein have anything to do with

20 you moving to New York City?

21 A. I refuse to answer.

22 Q. Did you ever live in a place in New York City

23 owned or controlled by Jeffrey Epstein?

24 A. I refuse to answer.

25 Q. Are you familiar with the modeling agency MC

19

1 Squared?

2 A. I refuse to answer.

3 Q. Do you know of underage females being

4 transported into this country to work for the modeling

5 agency MC Squared?

6 A. I refuse to answer.

7 Q. Do you know of those underage females being

8 given work visas and staying at the 301 East 66th

9 Street address?

10 A. I refuse to answer.

11 Q. Can you say whether you have observed

12 Mr. Brunel or Mr. Epstein engaging in sex with underage

13 females?

14 A. I refuse to answer.

15 Q. Do you know where Mr. Brunel lives?

16 A. I refuse to answer.

17 Q. Is it true that Mr. Brunel stays in the 301

18 East 66th address frequently with underage females?

19 A. I refuse to answer.

20 Q. At what point were you hired to work for

21 Mr. Epstein?

22 MR. PIKE: Form.

23 MR. EDWARDS: You can still answer the

24 question. Mr. Pike is making a legal objection.

25 A. I refuse to answer.

20

1 Q. And how did -- how did it come about that you

2 began working with Jeffrey Epstein?

3 MR. PIKE: Form.

4 A. I refuse to answer.

5 Q. What did Jeffrey Epstein pay you in salary?

6 MR. PIKE: Form.

7 A. I refuse to answer.

8 Q. What was the time period that you worked for

9 him?

10 A. I refuse to answer.

11 Q. Why did you stop working for him?

12 MR. PIKE: Form.

13 A. I refuse to answer.

14 Q. What initially were you hired to do?

15 A. I refuse to answer.

16 MR. PIKE: Form.

17 Q. Has Jeffrey Epstein ever paid you to stay

18 quiet or keep quiet about what went on in his house?

19 MR. PIKE: Form.

20 A. I refuse to answer.

21 Q. Have you talked to Sarah Kellen or Nadia

22 Marcinkova about the things that went on in Jeffrey

23 Epstein's house?

24 MR. PIKE: Form.

25 A. I refuse to answer.

21

1 Q. Did you sign a confidentiality agreement with

2 Jeffrey Epstein?

3 A. I refuse to answer.

4 MR. PIKE: Form.

5 Q. Did that confidentiality agreement outline

6 what you should say to authorities should he be caught

7 with underage females?

8 MR. PIKE: Form.

9 A. I refuse to answer.

10 Q. Is there another book or manual or written

11 memorialization of what you, as an employee of Jeffrey

12 Epstein, should do if confronted by law enforcement?

13 MR. PIKE: Form.

14 A. I refuse to answer.

15 Q. Are you invoking your Fifth Amendment right

16 because you believe you could be prosecuted?

17 MR. ROSS: Invoke.

18 A. I refuse to answer.

19 Q. Are you also invoking because you're scared to

20 testify against Jeffrey Epstein?

21 MR. PIKE: Form.

22 A. I refuse to answer.

23 Q. When did you first learn that Jeffrey Epstein

24 had a sexual obsession for underage females?

25 A. I refuse to answer.

22

1 MR. PIKE: Form.

2 Q. Isn't it true that you have seen Jeffrey

3 Epstein sexually interacting with females as young as

4 12 years old?

5 A. I refuse to answer.

6 MR. PIKE: Form.

7 Q. Is it true that you have observed Jeffrey

8 Epstein's sexual obsession to include the age range 12

9 to 17?

10 MR. PIKE: Form.

11 A. I refuse to answer.

12 Q. Have you ever had sex with Jeffrey Epstein?

13 A. I refuse to answer.

14 MR. PIKE: Form.

15 Q. Have you ever been paid for sex with Jeffrey

16 Epstein?

17 MR. PIKE: Form.

18 A. I refuse to answer.

19 Q. Do you know if Nadia Marcinkova had sex with

20 Jeffrey Epstein when she was underage?

21 MR. PIKE: Form.

22 A. I refuse to answer.

23 Q. What have you been told about Jeffrey

24 Epstein's sexual obsession with underage minor

25 children?

23

1 MR. PIKE: Form.

2 A. I refuse to answer.

3 Q. Isn't it true that Jeffrey Epstein interacted

4 sexually with underage minors on an everyday basis?

5 MR. PIKE: Form.

6 A. I refuse to answer.

7 Q. And most of the time Mr. Epstein would

8 interact with underage minors at least two times a day;

9 is that true?

10 MR. PIKE: Form.

11 A. I refuse to answer.

12 Q. Can you explain to the jury how Mr. Epstein

13 would access new underage minor females for sex every

14 day?

15 MR. PIKE: Form.

16 A. I refuse to answer.

17 Q. How many assistants did Jeffrey Epstein hire

18 to bring him underage minor females for sex?

19 A. I refuse to answer.

20 MR. PIKE: Form.

21 Q. Were you one of those assistants that helped

22 to bring him underage minor females?

23 MR. PIKE: Form.

24 A. I refuse to answer.

25 Q. I know that the laws in Poland are probably

24

1 different than they are here, but are you familiar with

2 the Florida Statutes that protect children against

3 sexual offenders or sexual predators?

4 MR. ROSS: Invoke.

5 A. I refuse to answer.

6 Q. Let me just read you the lewd or lascivious

7 molestation statute and then I'm going to ask you some

8 questions about it.

9 It says: "A person who intentionally touches

10 in a lewd or lascivious manner the breasts, genitals,

11 genital area or buttocks or the clothing covering them

12 of a person less than 16 years of age or forces or

13 entices a person under 16 years of age to so touch the

14 perpetrator, commits lewd or lascivious molestation, a

15 second degree felony."

16 After hearing that statute isn't that

17 something -- isn't that a crime that you know

18 Mr. Epstein to have committed on an everyday basis

19 while you were working for him?

20 MR. PIKE: Form.

21 A. I refuse to answer.

22 Q. And that's a statute that he violated with

23 more than 100 underage females; is that true?

24 MR. PIKE: Form.

25 A. I refuse to answer.

25

1 Q. When did you become aware that Mr. Epstein was

2 a child molester?

3 MR. PIKE: Form.

4 A. I refuse to answer.

5 Q. Have you ever seen him with a female under the

6 age of 12?

7 MR. PIKE: Form.

8 A. I refuse to answer.

9 Q. Have you ever known Jeffrey Epstein to have

10 sex with an adult?

11 MR. PIKE: Form.

12 A. I refuse to answer.

13 Q. Does he -- is he sexually attracted to adults?

14 MR. PIKE: Form.

15 A. I refuse to answer.

16 Q. When was the first time you learned of

17 Mr. Epstein getting a massage from an underage minor

18 female?

19 MR. PIKE: Form.

20 A. I refuse to answer.

21 Q. I realize some of these questions may sound

22 repetitive but during this case we've learned of key

23 terms that different people on Mr. Epstein's let's say

24 payroll or inner circle recognize or talk about. So

25 when I talk about "massages", do you know what that

1 term means?  
 2 MR. PIKE: Form.  
 3 A. I refuse to answer.  
 4 Q. Isn't "massage" the word that was told by  
 5 Jeffrey Epstein to all of his employees to refer to  
 6 whatever acts he engages in with underage females in  
 7 his bedroom?  
 8 MR. PIKE: Form.  
 9 A. I refuse to answer.  
 10 Q. At this point -- were you -- were you ever in  
 11 the bedroom with him when he was engaging in sexual  
 12 acts with underage females and calling them "massages"?  
 13 MR. PIKE: Form.  
 14 A. I refuse to answer.  
 15 Q. Did you ever participate in any of the sexual  
 16 acts that Jeffrey Epstein was having with underage  
 17 females?  
 18 MR. PIKE: Form.  
 19 A. I refuse to answer.  
 20 Q. Now, just so that the record is clear there is  
 21 not a single piece of evidence that ever indicates that  
 22 you were involved with underage females, I'm not even  
 23 implying that and I realize that you invoking it may --  
 24 may give the wrong light and that's not -- that's not  
 25 my intention, so -- but were you ever aware of Nadia

1 Marcinkova participating in sex with underage females?  
 2 A. I refuse to answer.  
 3 Q. Have you read the police reports related to  
 4 the criminal investigation into Mr. Epstein?  
 5 A. I refuse to answer.  
 6 Q. And you're aware of this 87-page police report  
 7 that details numerous females that indicate that they  
 8 were involved sexually with Mr. Epstein when they were  
 9 minors?  
 10 A. I refuse to answer.  
 11 MR. PIKE: Form.  
 12 Q. Did anyone instruct you to use the code word  
 13 "massage"?  
 14 A. I refuse to answer.  
 15 Q. And when referring to these underage minor  
 16 females that would come over to Mr. Epstein's house did  
 17 anybody also tell you to use the term "work"?  
 18 A. I refuse to answer.  
 19 MR. PIKE: Form.  
 20 Q. Meaning when somebody would call to schedule  
 21 one of these underage females for a massage isn't it  
 22 true that they would say "It's time to come to work"  
 23 and schedule a specific appointment?  
 24 MR. PIKE: Form.  
 25 A. I refuse to answer.

1 Q. Is there a book or manual or is it written  
 2 anywhere that the -- that sex with underage minors is  
 3 to be referred to as a "massage"?  
 4 A. I refuse to answer.  
 5 MR. PIKE: Form.  
 6 Q. Were there ever team meetings, for lack of a  
 7 better word, where Jeffrey Epstein and possibly  
 8 Ghislaine Maxwell, Sarah Kellen, yourself, would talk  
 9 about this organization of obtaining underage girls for  
 10 Jeffrey Epstein for sex?  
 11 MR. PIKE: Form.  
 12 A. I refuse to answer.  
 13 Q. What methods does Jeffrey Epstein use to gain  
 14 access to underage minor females for sex?  
 15 MR. PIKE: Form.  
 16 A. I refuse to answer.  
 17 Q. What is your understanding of Jeffrey  
 18 Epstein's involvement with the modeling industry?  
 19 MR. PIKE: Form.  
 20 A. I refuse to answer.  
 21 Q. Have you ever modeled for MC Squared?  
 22 MR. PIKE: Form.  
 23 A. I refuse to answer.  
 24 Q. Has Jeffrey Epstein ever promised you anything  
 25 related to a modeling career?

1 MR. PIKE: Form.  
 2 A. I refuse to answer.  
 3 Q. Have you ever talked to Jean Luc Brunel about  
 4 modeling?  
 5 A. I refuse to answer.  
 6 Q. Have you ever talked to Jean Luc Brunel about  
 7 his desire to have sex with underage females?  
 8 A. I refuse to answer.  
 9 Q. Isn't it true that Jean Luc Brunel has been in  
 10 trouble for years for having sex with underage minors  
 11 in Europe?  
 12 A. I refuse to answer.  
 13 Q. Are you familiar with The McIntyre Reports?  
 14 A. I refuse to answer.  
 15 Q. Okay. Are you familiar with reports done on  
 16 modeling agencies back in the 80's and 90's related to  
 17 agency owners having sex with underage minors?  
 18 MR. ROSS: Answer the question.  
 19 A. No, I'm not.  
 20 Q. Okay. Did you ever hear of Jean Luc Brunel's  
 21 reputation for having sex with underage girls?  
 22 MR. ROSS: Invoke.  
 23 A. I refuse to answer.  
 24 Q. Do you know how Jean Luc Brunel knows Jeffrey  
 25 Epstein?

30

1 A. I refuse to answer.

2 MR. PIKE: Form.

3 Q. Isn't their connection the obsession for

4 underage minor females?

5 MR. PIKE: Form.

6 A. I refuse to answer.

7 Q. Based on your observations of Jeffrey Epstein

8 would you categorize his obsession for underage minor

9 females as an addiction?

10 MR. PIKE: Form.

11 A. I refuse to answer.

12 Q. Isn't it true that Ghislaine Maxwell delivers

13 underage minor females to Jeffrey Epstein?

14 MR. PIKE: Form.

15 A. I refuse to answer.

16 Q. Have you ever had a sexual relationship with

17 Ghislaine Maxwell?

18 A. I refuse to answer.

19 Q. Do you know what Ghislaine Maxwell does in

20 general for Jeffrey Epstein?

21 MR. PIKE: Form.

22 A. I refuse to answer.

23 Q. Have you seen photographs of underage minor

24 females in Jeffrey Epstein's patrol -- control or

25 possession?

31

1 MR. PIKE: Form.

2 A. I refuse to answer.

3 Q. Were there surveillance cameras, hidden

4 surveillance cameras inside Jeffrey Epstein's home?

5 MR. PIKE: Form.

6 A. I refuse to answer.

7 Q. Did those surveillance cameras capture

8 underage minor females naked?

9 MR. PIKE: Form.

10 A. I refuse to answer.

11 Q. And didn't Jeffrey Epstein and Ghislaine

12 Maxwell watch those surreptitiously obtained videos of

13 underage minor females?

14 MR. PIKE: Form.

15 A. I refuse to answer.

16 Q. And those videos and photographs of underage

17 minor females were saved on Jeffrey Epstein's computers

18 in his house, right?

19 MR. PIKE: Form.

20 A. I refuse to answer.

21 Q. Have you seen those photographs and videos on

22 Jeffrey Epstein's computers?

23 MR. PIKE: Form.

24 A. I refuse to answer.

25 Q. Who have you talked to related to the criminal

32

1 investigation into Jeffrey Epstein?

2 A. I refuse to answer.

3 MR. PIKE: Form.

4 MR. ROSS: In addition, attorney-client

5 privilege.

6 Q. And I certainly would -- do not want to know

7 anything you talked to your attorney about, I

8 apologize.

9 A. (Nods.)

10 Q. Why was it that you were named as a

11 co-conspirator of Jeffrey Epstein's in the

12 non-prosecution agreement?

13 MR. PIKE: Form.

14 A. I refuse to answer.

15 Q. Do you feel like a victim of Jeffrey

16 Epstein's?

17 MR. PIKE: Form.

18 A. I refuse to answer.

19 Q. Do you feel like Jeffrey Epstein brainwashed

20 you to some extent?

21 MR. PIKE: Form.

22 A. I refuse to answer.

23 Q. Do you feel any remorse for any role that you

24 may have played in having underage minor females at

25 Jeffrey Epstein's house for him to molest them?

33

1 MR. PIKE: Form.

2 A. I refuse to answer.

3 Q. Have you known Ghislaine Maxwell and Jeffrey

4 Epstein to keep sex slaves?

5 A. I refuse to answer.

6 Q. Do you know somebody named Virginia Roberts?

7 A. I refuse to answer.

8 Q. Have you met Virginia Roberts?

9 A. I refuse to answer.

10 MR. EDWARDS: All right. Let me go ahead and

11 mark as -- as Plaintiff's Exhibit 1 a lawsuit that

12 was filed by Bob Josephsberg on behalf of Jane Doe

13 102 v. Jeffrey Epstein just for the purposes of

14 asking the witness some questions.

15 MR. ROSS: I've seen it.

16 (Whereupon, Plaintiff's Exhibit 1 was marked

17 for identification.)

18 Q. Have you ever read the lawsuit Jane Doe 102 v.

19 Jeffrey Epstein?

20 A. I refuse to answer.

21 Q. In the lawsuit it indicates the plaintiff was

22 15 years old when Ghislaine Maxwell and Jeffrey Epstein

23 had a threesome with this underage minor female. Are

24 you aware of that?

25 MR. PIKE: Form.

1 A. I refuse to answer.

2 Q. And Jeffrey Epstein and/or Ghislaine Maxwell

3 obtained and purchased passports for 15-year-old Jane

4 Doe 102 to transport her to Palm Beach, New York City,

5 Santa Fe, Los Angeles, San Francisco, St. Louis, as

6 well as Europe, the Caribbean, and Africa; are you

7 aware of that?

8 A. I refuse to answer.

9 MR. PIKE: Form.

10 Q. It's also alleged that Jeffrey Epstein in

11 addition to molesting Jane Doe 102 along with Ghislaine

12 Maxwell forced her to have sex with other models,

13 actresses, and celebrities?

14 A. I refuse to answer.

15 MR. PIKE: Form.

16 Q. It also indicates that Jeffrey Epstein

17 transported other minor girls from Turkey, the Czech

18 Republic, Asia, and other countries. Are you aware of

19 that?

20 MR. PIKE: Form.

21 A. I refuse to answer.

22 Q. Is Jeffrey Epstein involved in the

23 international child sex trade?

24 MR. PIKE: Form.

25 A. I refuse to answer.

1 Q. Is Jean Luc Brunel his partner in that

2 international child sex trade?

3 MR. PIKE: Form.

4 A. I refuse to answer.

5 Q. Are you aware that after -- that Jeffrey

6 Epstein forced Jane Doe 102 to have sex with other

7 adult male peers including royalty, politicians,

8 academicians, businessmen and/or other professional and

9 personal acquaintances of Jeffrey Epstein's?

10 MR. PIKE: Form.

11 A. I refuse to answer.

12 Q. Is that something that he did with girls other

13 than Jane Doe 102?

14 MR. PIKE: Form.

15 A. I refuse to answer.

16 Q. Aren't you familiar with Jeffrey Epstein's

17 practice of pimping out underage minor females to other

18 people that have the same sexual obsession with

19 underage minors?

20 MR. PIKE: Form.

21 A. I refuse to answer.

22 Q. And doesn't he benefit financially from that

23 sex trade?

24 MR. PIKE: Form.

25 A. I refuse to answer.

1 Q. Jane Doe 102 ultimately escaped from him and

2 left to Australia, is that your understanding?

3 A. I refuse to answer.

4 MR. PIKE: Form.

5 Q. Have you ever spoken with Jane Doe 102?

6 A. I refuse to answer.

7 Q. On one of Epstein's birthdays a friend of

8 Jeffrey Epstein sent to him 12 -- three 12-year-old

9 girls from France who spoke no English for Epstein to

10 sexually exploit and abuse and after doing so he sent

11 them back to France the next day. Are you familiar

12 with that?

13 MR. PIKE: Form.

14 A. I refuse to answer.

15 Q. Isn't that something that is fairly common for

16 Mr. Epstein?

17 A. I refuse to answer.

18 MR. PIKE: Form.

19 Q. Who are the friends that send to Jeffrey

20 Epstein underage minor females for his birthday so that

21 he can abuse?

22 A. I refuse to answer.

23 MR. PIKE: Form.

24 Q. Is one of those friends Jean Luc Brunel?

25 A. I refuse to answer.

1 Q. Have you ever met Prince Andrew?

2 A. I refuse to answer.

3 Q. Has Prince Andrew been involved with underage

4 minor females to your knowledge?

5 A. I refuse to answer.

6 Q. Have you ever met Alan Dershowitz?

7 A. I refuse to answer.

8 Q. When Alan Dershowitz stays at Jeffrey

9 Epstein's house isn't it true that he has been at the

10 house when underage minor females have been in the

11 bedroom with Jeffrey Epstein?

12 A. I refuse to answer.

13 Q. Has -- are you familiar with the media

14 publication or online resource RadarOnline?

15 A. I refuse to answer.

16 Q. Is that something that you assisted

17 Mr. Epstein with when he purchased RadarOnline?

18 A. I refuse to answer.

19 Q. And do you know his business partner in that

20 endeavor?

21 A. I refuse to answer.

22 Q. Isn't it also true that he used RadarOnline as

23 another way to gain access to underage minor females

24 for sex?

25 MR. PIKE: Form.

1 A. I refuse to answer.  
 2 Q. Have you been to all of Jeffrey Epstein's  
 3 properties?  
 4 MR. PIKE: Form.  
 5 A. I refuse to answer.  
 6 Q. Certainly you've been to the property at 358  
 7 El Brillo Way, correct?  
 8 MR. PIKE: Form.  
 9 A. I refuse to answer.  
 10 Q. Have you been to his property in Manhattan?  
 11 A. I refuse to answer.  
 12 MR. PIKE: Form.  
 13 Q. And have you been to his island in -- it was  
 14 Little St. James, I believe he calls it Little  
 15 St. Jeff's now?  
 16 MR. PIKE: Form.  
 17 A. I refuse to answer.  
 18 Q. And have you witnessed underage child sex  
 19 orgies on that island?  
 20 MR. PIKE: Form.  
 21 A. I refuse to answer.  
 22 Q. Do you know a female named Jeletzia?  
 23 A. I refuse to answer.  
 24 Q. Do you know where Jeletzia lives these days?  
 25 A. I refuse to answer.

1 Q. What is your understanding of Sarah Kellen's  
 2 role in Jeffrey Epstein's life?  
 3 A. I refuse to answer.  
 4 MR. PIKE: Form.  
 5 Q. Isn't it true that she gets paid just to bring  
 6 him underage minor females for sex?  
 7 MR. PIKE: Form.  
 8 A. I refuse to answer.  
 9 Q. And additionally, she schedules the  
 10 appointments for underage minor females for him to  
 11 molest?  
 12 A. I refuse to answer.  
 13 MR. PIKE: Form.  
 14 Q. You know Dana Burns?  
 15 A. I refuse to answer.  
 16 Q. Does she still work for Ghislaine Maxwell?  
 17 A. I refuse to answer.  
 18 Q. Was she an underage minor child victim of  
 19 Jeffrey Epstein's?  
 20 A. I refuse to answer.  
 21 Q. Through discovery we've talked to numerous  
 22 witnesses about, you know, Jeffrey Epstein and people  
 23 that work for him. I don't know if you'll be able to  
 24 answer any of these questions but I'll ask them anyway  
 25 one at a time.

1 Is Sarah Kellen somebody who travels with  
 2 Jeffrey Epstein?  
 3 MR. PIKE: Form.  
 4 A. I refuse to answer.  
 5 Q. And when Jeffrey Epstein is coming to town  
 6 doesn't he call Sarah Kellen, his number one assistant?  
 7 MR. PIKE: Form.  
 8 A. I refuse to answer.  
 9 Q. And at some point in time, it looks like in  
 10 early 2005 or late 2004, you were also an assistant of  
 11 Jeffrey Epstein's, correct?  
 12 MR. PIKE: Form.  
 13 A. I refuse to answer.  
 14 Q. And how was it that you transitioned from  
 15 being involved in modeling to being an employee of  
 16 Jeffrey Epstein?  
 17 MR. PIKE: Form.  
 18 A. I refuse to answer.  
 19 Q. Other than arranging for underage minor  
 20 females to come to Jeffrey Epstein's house did you do  
 21 anything else for Jeffrey Epstein?  
 22 MR. PIKE: Form.  
 23 A. I refuse to answer.  
 24 Q. Did you ever fly on Jeffrey Epstein's  
 25 airplane?

1 A. I refuse to answer.  
 2 Q. Did you witness Jeffrey Epstein abuse --  
 3 sexually abusing underage minor females on his  
 4 airplane?  
 5 MR. PIKE: Form.  
 6 A. I refuse to answer.  
 7 Q. Did you know that it was illegal for Jeffrey  
 8 Epstein to interact sexually with underage minor  
 9 females?  
 10 MR. PIKE: Form.  
 11 A. I refuse to answer.  
 12 Q. Did you ever object to Jeffrey Epstein  
 13 interacting sexually with underage minor females?  
 14 MR. PIKE: Form.  
 15 A. I refuse to answer.  
 16 Q. Would Jeffrey Epstein get angry at you if you  
 17 did not have an appointment set for him with an  
 18 underage minor female?  
 19 MR. PIKE: Form.  
 20 A. I refuse to answer.  
 21 Q. Has Jeffrey Epstein contacted you in the last  
 22 year?  
 23 A. I refuse to answer.  
 24 MR. PIKE: Form.  
 25 Q. Has Sarah Kellen contacted you within the last

42

1 year?

2 A. I refuse to answer.

3 Q. Has anybody that is associated with Jeffrey

4 Epstein's party contacted you in the last year?

5 MR. PIKE: Form.

6 A. I refuse to answer.

7 Q. By that I mean to include Ghislaine Maxwell,

8 Lesley Groff, any of these people, have they contacted

9 you within the last year?

10 MR. PIKE: Form.

11 A. I refuse to answer.

12 Q. Are you familiar with the names of some of the

13 underage minor females?

14 A. I refuse to answer.

15 Q. Are you familiar with LM?

16 A. I refuse to answer.

17 Q. Do you remember what LM looked like?

18 A. I refuse to answer.

19 Q. Are you familiar with EW?

20 A. I refuse to answer.

21 Q. Do you remember what EW looked like?

22 A. I refuse to answer.

23 Q. Are you familiar with Jane Doe?

24 A. I refuse to answer.

25 Q. These are all females that were underage minor

43

1 females that Jeffrey Epstein interacted with sexually

2 during a time when you were working for him; isn't that

3 true?

4 A. I refuse to answer.

5 MR. PIKE: Form.

6 Q. And LM was somebody that went over to Jeffrey

7 Epstein's house and was molested at a young age by him

8 more than 100 times; is that true?

9 MR. PIKE: Form.

10 A. I refuse to answer.

11 Q. And EW was also somebody who went over to

12 Jeffrey Epstein's house when she was between 14 and

13 16 years old more than a hundred times; isn't that

14 true?

15 MR. PIKE: Form.

16 A. I refuse to answer.

17 Q. And Jane Doe was somebody that went to Jeffrey

18 Epstein's house more than 15 times to be molested by

19 Jeffrey Epstein when she was 14 and 15 years old; is

20 that true?

21 MR. PIKE: Form.

22 A. I refuse to answer.

23 Q. Is it also true that LM brought to Jeffrey

24 Epstein's house between 50 and 75 other underage minor

25 females for Jeffrey Epstein to molest?

44

1 A. I refuse to answer.

2 MR. ROSS: Form.

3 Q. Are you aware of Jeffrey Epstein's for lack of

4 a better word "ritual" with these underage minor

5 females in his bedroom?

6 MR. PIKE: Form.

7 A. I refuse to answer.

8 Q. Wouldn't it generally begin with Jeffrey

9 Epstein placing a call to Sarah Kellen or yourself and

10 telling you that he's going to be in town at the Palm

11 Beach mansion?

12 MR. PIKE: Form.

13 A. I refuse to answer.

14 Q. And then isn't there a list of underage minor

15 females stored in the computer system?

16 MR. PIKE: Form.

17 A. I refuse to answer.

18 Q. And that computer system is interconnected

19 from his New York home, his New Mexico home, his

20 island, his home in France, and West Palm Beach; is

21 that correct?

22 MR. PIKE: Form.

23 A. I refuse to answer.

24 Q. And have you seen that list of underage minor

25 females stored in the computer system?

45

1 MR. PIKE: Form.

2 A. I refuse to answer.

3 Q. And isn't it true there are over a thousand

4 girls at any given time between the age range of 12 and

5 17 all of which have been molested by Jeffrey Epstein?

6 MR. PIKE: Form.

7 A. I refuse to answer.

8 Q. And when Mr. Epstein would call and tell you

9 the time that he was going to be in town it would then

10 be your job to get an underage minor female to his

11 house and set a specific appointment for that person;

12 is that correct?

13 MR. PIKE: Form.

14 A. I refuse to answer.

15 Q. And he would tell you the exact time of day

16 that he wanted his two or three appointments to molest

17 underage minor females?

18 MR. PIKE: Form.

19 A. I refuse to answer.

20 Q. And you would go into the computer system and

21 call the person that he told you he wanted to see for

22 that day; is that correct?

23 MR. PIKE: Form.

24 A. I refuse to answer.

25 Q. And that may be Brittany or Tatum or Courtney



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1 or somebody local that you would call on the telephone  
2 and tell them to come work at a specific time?  
3 MR. PIKE: Form.  
4 A. I refuse to answer.  
5 Q. And didn't Mr. Epstein tell you that the way  
6 you need to tell these girls is that they are working  
7 so that they do not feel that they have the option to  
8 decline?  
9 MR. PIKE: Form.  
10 A. I refuse to answer.  
11 Q. I mean, the psychology of it all was explained  
12 in detail by Jeffrey Epstein; isn't that correct?  
13 MR. PIKE: Form.  
14 A. I refuse to answer.  
15 Q. And once the girls were inside the bedroom  
16 Jeffrey Epstein said that he can take care of the rest,  
17 correct?  
18 MR. PIKE: Form.  
19 A. I refuse to answer.  
20 Q. And the underage minor female would show up at  
21 the house and be greeted at the door by either  
22 yourself, the house manager, or Sarah Kellen, correct?  
23 MR. PIKE: Form.  
24 A. I refuse to answer.  
25 Q. Many of these underage minor females including

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1 my three clients, LM, EW, and Jane Doe you met  
2 personally, right?  
3 A. I refuse to answer.  
4 MR. PIKE: Form.  
5 Q. And then you would lead them upstairs to his  
6 bedroom and leave him alone in the bedroom, leave my  
7 client alone in the bedroom?  
8 MR. PIKE: Form.  
9 A. I refuse to answer.  
10 Q. And let's take LM, and she went there many  
11 times between the ages of 13 and 16. If she was taken  
12 up to his bedroom she would be left alone in the  
13 bedroom until Jeffrey Epstein arrived, correct?  
14 MR. PIKE: Form.  
15 A. I refuse to answer.  
16 Q. And Jeffrey Epstein would appear usually naked  
17 and order for her to take her clothes off?  
18 A. I refuse to answer.  
19 MR. PIKE: Form.  
20 Q. And then Mr. Epstein would lay face down on  
21 the massage table would usually be the next step,  
22 correct?  
23 MR. PIKE: Form.  
24 A. I refuse to answer.  
25 Q. And you know this ritual because at some point

48

1 in time Jeffrey Epstein showed you exactly what he does  
2 with each of these girls in the bedroom, correct?  
3 MR. PIKE: Form.  
4 A. I refuse to answer.  
5 Q. So after about -- he would order the underage  
6 minor female to begin massaging him, correct?  
7 MR. PIKE: Form.  
8 A. I refuse to answer.  
9 Q. And then he would roll over and begin to  
10 masturbate with his right hand, correct?  
11 A. I refuse to answer.  
12 Q. And then he would begin also grabbing the  
13 breasts, buttocks, and vagina area of these underage  
14 minor females, correct?  
15 A. I refuse to answer.  
16 MR. PIKE: Form.  
17 Q. And his ritual was so specific that with each  
18 of them he would demand that they pinch his nipples  
19 very hard, right?  
20 MR. PIKE: Form.  
21 A. I refuse to answer.  
22 Q. That's a fetish that you know that Jeffrey  
23 Epstein has, right, he likes his nipples pinched very  
24 hard?  
25 MR. PIKE: Form.

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1 A. I refuse to answer.  
2 Q. And as he's masturbating with one hand and has  
3 his other hand groping or inserting his fingers into  
4 the underage minor's vagina he's also telling them to  
5 pinch his nipples, correct?  
6 MR. PIKE: Form.  
7 A. I refuse to answer.  
8 Q. And this continues -- and sometimes this  
9 escalates to him using vibrators, correct?  
10 MR. PIKE: Form.  
11 A. I refuse to answer.  
12 Q. And have you seen vibrators in the Palm Beach  
13 mansion house?  
14 MR. PIKE: Form.  
15 A. I refuse to answer.  
16 Q. And other times he orders Nadia Marcinkova to  
17 participate in these encounters with underage minor  
18 females; is that correct?  
19 A. I refuse to answer.  
20 Q. Are you familiar with Nadia Marcinkova  
21 strapping on dildos to have sex with these underage  
22 minor females?  
23 MR. PIKE: Form.  
24 A. I refuse to answer.  
25 Q. And when Miss Marcinkova would have sex with

50

1 the underage minor females Jeffrey Epstein would watch  
2 and continue to ejac -- continue to masturbate,  
3 correct?  
4 MR. PIKE: Form.  
5 A. I refuse to answer.  
6 Q. Has he ever asked you to participate in these  
7 threesomes with underage minor females?  
8 A. I refuse to answer.  
9 MR. PIKE: Form.  
10 Q. Have you ever participated in sex with  
11 underage minor females at the direction of Jeffrey  
12 Epstein?  
13 MR. PIKE: Form.  
14 A. I refuse to answer.  
15 Q. The -- this whole experience that I am  
16 explaining right now is identical every single time  
17 with these underage minor females; isn't that your  
18 understanding?  
19 MR. PIKE: Form.  
20 A. I refuse to answer.  
21 Q. And this whole experience is what he has  
22 taught you and the other employees to call a "massage",  
23 correct?  
24 MR. PIKE: Form.  
25 A. I refuse to answer.

51

1 Q. And it always ends with him ejaculating?  
2 A. I refuse to answer.  
3 MR. PIKE: Form.  
4 Q. And then he offers 200 to \$300 cash to the  
5 underage minor female, correct?  
6 MR. PIKE: Form.  
7 A. I refuse to answer.  
8 Q. And then he also gives them another -- another  
9 option to make money which is each time you come to my  
10 house and we engage in this sexual interaction I will  
11 give you \$200, but each female you bring me like you,  
12 between the age range of 12 and 16, I will pay you \$200  
13 per person.  
14 MR. PIKE: Form.  
15 Q. Is that something you're familiar with?  
16 A. I refuse to answer.  
17 Q. And LM at that offer was one of the girls who  
18 brought him 75 plus underage minor females, correct?  
19 MR. PIKE: Form.  
20 A. I refuse to answer.  
21 Q. And so he's basically created a pyramid of  
22 underage minor females where the computer system has a  
23 thousand of these females ready to come over to work  
24 for him?  
25 MR. PIKE: Form.

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1 A. I refuse to answer.  
2 Q. Do you know what Jeffrey Epstein does for a  
3 living?  
4 A. I refuse to answer.  
5 Q. Does he do anything aside from interacting  
6 sexually with underage minor females?  
7 MR. PIKE: Form.  
8 A. I refuse to answer.  
9 Q. Do you know how it is that he made his money  
10 where he is purported to be a billionaire?  
11 A. I refuse to answer.  
12 MR. PIKE: Form.  
13 Q. Do you know David Copperfield?  
14 A. I refuse to answer.  
15 Q. Is David Copperfield somebody that would come  
16 into town and interact sexually with underage minor  
17 females?  
18 A. I refuse to answer.  
19 Q. Do you know Martin Nowak?  
20 A. I refuse to answer.  
21 Q. Is that also somebody that would interact  
22 sexually with underage minor females?  
23 A. I refuse to answer.  
24 Q. Do you know Leslie Wexner?  
25 A. I refuse to answer.

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1 Q. Is that somebody you've met before?  
2 A. I refuse to answer.  
3 Q. Has Mr. Epstein himself interacted sexually  
4 with Leslie Wexner?  
5 MR. PIKE: Form.  
6 A. I refuse to answer.  
7 Q. When Mr. Epstein was being investigated  
8 criminally how did you first learn about that?  
9 A. I refuse to answer.  
10 Q. At some point in time he was tipped off that  
11 his home -- that a search warrant was going to be  
12 executed on his home, correct?  
13 MR. PIKE: Form.  
14 A. I refuse to answer.  
15 Q. And just a month before the execution of that  
16 search warrant -- less than a month before the  
17 execution of that search warrant he ordered you to do  
18 something with certain evidence, didn't he?  
19 MR. PIKE: Form.  
20 A. I refuse to answer.  
21 Q. In fact, there were at least three very key  
22 computers that contained a lot of the information that  
23 I've been asking you about. You're familiar with these  
24 computers that were in his house, correct?  
25 MR. PIKE: Form.

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1 A. I refuse to answer.  
2 Q. And he ordered you to come over and take those  
3 computers out of his house, correct?  
4 A. I refuse to answer.  
5 MR. PIKE: Form.  
6 Q. And you could basically take the local  
7 database that exposed this criminal enterprise that  
8 I've been talking about dealing with sex with underage  
9 minor vehicles -- underage minor females and you could  
10 take the evidence from his home, correct?  
11 MR. PIKE: Form.  
12 A. I refuse to answer.  
13 Q. And you've seen the material that's on those  
14 computers, correct?  
15 MR. PIKE: Form.  
16 A. I refuse to answer.  
17 Q. And if I were to look at those computers it  
18 would display exactly what I've been describing to you  
19 today, right?  
20 MR. PIKE: Form.  
21 A. I refuse to answer.  
22 Q. And you went to his house with a male,  
23 correct?  
24 A. I refuse to answer.  
25 MR. PIKE: Form.

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1 Q. There was one other guy with you that helped  
2 that assisted you to take these computers from his  
3 home; is that right?  
4 MR. PIKE: Form.  
5 A. I refuse to answer.  
6 Q. Where did you take those?  
7 A. I refuse to answer.  
8 Q. Did you take those -- was it Bill Reilly that  
9 went to the home?  
10 A. I refuse to answer.  
11 Q. Do you know who Bill Reilly is?  
12 A. I refuse to answer.  
13 Q. He's one of the investigators hired by Roy  
14 Black to represent Jeffrey Epstein?  
15 A. I refuse to answer.  
16 Q. Did you take those computers ever to your  
17 house?  
18 A. I refuse to answer.  
19 Q. And I guess the house that I would be talking  
20 about is the 1040 South Shore Drive, have those  
21 computers ever been to that house?  
22 MR. PIKE: Form.  
23 A. I refuse to answer.  
24 Q. Were you nervous about the fact that you were  
25 taking these computers out of the home at a time when a

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1 search warrant was imminent?  
2 A. I refuse to answer.  
3 Q. Did you ever question when you were directed  
4 to take these computers from his home?  
5 A. I refuse to answer.  
6 Q. How much additional money or bonus were you  
7 paid to take the computers that we're talking about out  
8 of Jeffrey Epstein's house?  
9 MR. PIKE: Form.  
10 A. I refuse to answer.  
11 Q. Would those computers reveal criminal activity  
12 of only Jeffrey Epstein or of others?  
13 MR. PIKE: Form.  
14 A. I refuse to answer.  
15 Q. Did you talk with Sarah Kellen about the  
16 criminal investigation into Jeffrey Epstein and others?  
17 A. I refuse to answer.  
18 Q. Well, at some point in time what's been marked  
19 as Defense Exhibit 1, you received a Grand Jury  
20 investigation target letter, correct?  
21 A. I refuse to answer.  
22 Q. Well, we have it right here. I'm familiar  
23 with it. I know you got the letter and I know that,  
24 you know, the substance of it you're not going to tell  
25 me about. But this letter is dated August 31st, 2007,

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1 the search warrant was executed on his home back in  
2 October of 2005. So during those two years leading up  
3 to this target letter who did you talk to?  
4 A. I refuse to answer.  
5 Q. Did you --  
6 MR. ROSS: And privilege. Attorney-client  
7 privilege.  
8 Q. Okay. In addition to your attorney did you  
9 talk to anybody else about the criminal investigation?  
10 A. I refuse to answer.  
11 Q. And Bruce Lyons was your initial computer --  
12 computer -- was your initial attorney in this case,  
13 correct?  
14 MR. ROSS: You can answer yes or no.  
15 A. Yes.  
16 Q. Okay. And that was an attorney that was hired  
17 for you by Jeffrey Epstein?  
18 MR. ROSS: Invoke.  
19 A. I refuse to answer.  
20 Q. Someone that was paid for by Jeffrey Epstein  
21 to represent you?  
22 MR. PIKE: Form.  
23 A. I refuse to answer.  
24 Q. So once he hired you a criminal attorney then  
25 it seemed like you did something wrong?

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1 MR. PIKE: Form.  
2 A. I refuse to answer.  
3 Q. You hadn't actually gone into any relationship  
4 with Jeffrey Epstein with the intent to commit crimes,  
5 did you?  
6 A. I refuse to answer.  
7 Q. You didn't know that he was a child molester  
8 when you first met him, did you?  
9 MR. PIKE: Form.  
10 A. I refuse to answer.  
11 Q. Were you impressed by his money and his  
12 lifestyle?  
13 A. I refuse to answer.  
14 Q. Did you think that he could get you further in  
15 life if you would just listen to what he said?  
16 MR. PIKE: Form.  
17 A. I refuse to answer.  
18 Q. At this point in time you have no contact with  
19 him as a child molester, do you?  
20 MR. PIKE: Form.  
21 A. I refuse to answer.  
22 Q. Did Jeffrey Epstein assist in getting you a  
23 visa?  
24 A. I refuse to answer.  
25 MR. PIKE: Form.

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1 Q. Has he done any favors for your family?  
2 A. I refuse to answer.  
3 MR. PIKE: Form.  
4 Q. Is he paying for your college?  
5 A. I refuse to answer.  
6 MR. PIKE: Form.  
7 Q. Right now is he paying for your college?  
8 MR. ROSS: Invoke.  
9 A. I refuse to answer.  
10 MR. PIKE: Form.  
11 Q. Did Jeffrey Epstein ever talk to you about the  
12 chances of him going to prison?  
13 A. I refuse to answer.  
14 MR. PIKE: Form.  
15 Q. Did Jeffrey Epstein ever talk to you about  
16 what he intended his defenses to be to the criminal  
17 actions he committed against these underage minors?  
18 A. I refuse to answer.  
19 MR. PIKE: Form.  
20 Q. Did he tell you that he would spend as much  
21 money as possible to intimidate and harass these  
22 underage minor victims?  
23 A. I refuse to answer.  
24 MR. PIKE: Form.  
25 Q. Did he tell you that he would destroy their

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1 credibility?  
2 A. I refuse to answer.  
3 Q. Did he tell you that he could scare them to go  
4 away?  
5 A. I refuse to answer.  
6 MR. PIKE: Form and form to the last question.  
7 MR. EDWARDS: All right. Let's see, what did  
8 I say, I said this was --  
9 MR. ROSS: I.  
10 MR. EDWARDS: -- Plaintiff's I and we're going  
11 to write on the back of it and then -- okay.  
12 Q. Jeffrey Epstein kept message pads near all of  
13 his phones in his home, right?  
14 MR. PIKE: Form.  
15 A. I refuse to answer.  
16 Q. And those are message pads that have a carbon  
17 copy back side to them, you're familiar with them?  
18 MR. PIKE: Form.  
19 A. I refuse to answer.  
20 Q. And this is for anybody who takes a message  
21 they write it down that somebody called, the reason for  
22 calling, the time that they called?  
23 MR. PIKE: Form.  
24 A. I refuse to answer.  
25 Q. And many a times anytime that Jeffrey Epstein

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1 was in town there were at least two scheduled  
2 "massages" for lack of a better word, with Jeffrey  
3 Epstein and these underage minor females, correct?  
4 A. I refuse to answer.  
5 MR. PIKE: Form.  
6 Q. And do you have the -- and there was a  
7 particular scheduling book that contained these  
8 appointments with -- between Jeffrey Epstein and  
9 underage minor females, correct?  
10 MR. PIKE: Form.  
11 A. I refuse to answer.  
12 Q. And it was your primary responsibility to  
13 assist Sarah Kellen in setting these appointments up,  
14 right?  
15 A. I refuse to answer.  
16 MR. PIKE: Form.  
17 Q. It took at least two or three full-time  
18 employees to keep up with Jeffrey Epstein's addiction  
19 to underage minors, correct?  
20 A. I refuse to answer.  
21 MR. PIKE: Form.  
22 Q. Lesley Groff did pretty much the same thing up  
23 in New York, right?  
24 MR. PIKE: Form.  
25 A. I refuse to answer.

1 Q. And you're familiar that there is this group  
2 of girls in New York that were summoned to his home for  
3 generally the exact same thing as the Palm Beach girls?

4 A. I refuse to answer.

5 Q. All right.

6 MR. PIKE: Form.

7 Q. I'm going to show you an exhibit here, we'll  
8 mark it as -- you know what, it's a bunch of message  
9 pads, I'm going to mark it as 2A, -B, -C, -D, whatever.  
10 So we'll say 2A.

11 (Whereupon, Plaintiff's Exhibit 2A through 2H  
12 were marked for identification.)

13 Q. Do you recognize it?

14 A. I refuse to answer.

15 Q. Okay.

16 MR. PIKE: May I see that?

17 MR. EDWARDS: Sure.

18 Q. Do you recognize the handwriting on it?

19 A. I refuse to answer.

20 Q. It indicates "Adriana hasn't confirmed Julie  
21 for 11 yet, so she is keeping Brittany on hold in case  
22 Julie doesn't call back."

23 What does that message mean?

24 A. I refuse to answer.

25 MR. PIKE: Form.

1 that he would promise these girls something in order to  
2 get them to allow him to sexually abuse them?

3 MR. PIKE: Form.

4 A. I refuse to answer.

5 Q. Because he certainly did not want them to tell  
6 the police, correct?

7 A. I refuse to answer.

8 Q. And did you have many meetings about what to  
9 do if any of these girls told the police?

10 A. I refuse to answer.

11 MR. PIKE: Form.

12 Q. Was it always known that Jeffrey Epstein would  
13 hire everyone attorneys and tell everyone just not to  
14 talk?

15 MR. PIKE: Form.

16 A. I refuse to answer.

17 Q. And at the same time then he could employ a  
18 bunch of investigators, dig up a bunch of dirt on these  
19 girls, and intimidate them and scare them to go away,  
20 correct?

21 MR. PIKE: Form.

22 A. I refuse to answer.

23 Q. And Jeffrey Epstein doesn't like -- he didn't  
24 like any of these underage minor females, right?

25 MR. PIKE: Form.

1 Q. Julie's an underage minor female that Jeffrey  
2 Epstein was going to molest at 11:00, correct?

3 MR. PIKE: Form.

4 A. I refuse to answer.

5 Q. And if Julie wasn't available then you had  
6 another underage minor female named Brittany that could  
7 step in her place and fulfill that role for Jeffrey  
8 Epstein, correct?

9 MR. PIKE: Form.

10 A. I refuse to answer.

11 Q. All right. 2B is another message pad and I'm  
12 going to -- we'll stop skipping the process of moving  
13 this on and I'm assuming you're not going to be able to  
14 answer as to whether or not you -- you recognize that  
15 either, right?

16 A. I refuse to answer.

17 Q. Okay. This is a message from 9/4/05, so  
18 September 4th, 2005, 7:25 p.m. saying "Adriana  
19 cancelled Julie. She would like to speak to you I  
20 believe about college," and a telephone number. And  
21 then a question from you, "Should I schedule anyone  
22 else?" What did that message mean?

23 MR. PIKE: Form.

24 A. I refuse to answer.

25 Q. That another typical ploy of Mr. Epstein's,

1 A. I refuse to answer.

2 Q. In fact, it was the opposite, he liked to hurt  
3 them; isn't that true?

4 MR. PIKE: Form.

5 A. I refuse to answer.

6 Q. And after they came forward if they told the  
7 truth he was dead set on hurting them even more,  
8 correct?

9 MR. PIKE: Form.

10 A. I refuse to answer.

11 Q. And that's also a feeling that Ghislaine  
12 Maxwell shared as well, correct?

13 A. I refuse to answer.

14 Q. And that's something that she also told you,  
15 "Don't worry. If we get caught we have it covered and  
16 we'll just attack these little girls."

17 MR. PIKE: Form.

18 A. I refuse to answer.

19 Q. All right. There's another message from  
20 9/10/05. "Adriana says Lauren confirmed for 4 p.m."

21 Can you tell us what that message means?

22 MR. PIKE: Form.

23 A. I refuse to answer.

24 Q. It's another underage minor female that  
25 Jeffrey Epstein's going to molest at 4 p.m., correct?

1 A. I refuse to answer.  
 2 Q. And when I say "molest", you know, he may say  
 3 "massage", I mean, that's -- that's something  
 4 interchangeable, right?  
 5 MR. PIKE: Form.  
 6 A. I refuse to answer.  
 7 Q. It's the routine that I described in detail  
 8 that is identical with every single girl every single  
 9 time, correct?  
 10 A. I refuse to answer.  
 11 Q. And it's basically as far as he can get with  
 12 this underage minor female without her crying or  
 13 screaming or running out of the house?  
 14 MR. PIKE: Form.  
 15 A. I refuse to answer.  
 16 Q. Did you ever see any of the girls cry or  
 17 scream or run out of the house?  
 18 MR. PIKE: Form.  
 19 A. I refuse to answer.  
 20 Q. Did you have a personal relationship with any  
 21 of these underage minor females?  
 22 A. I refuse to answer.  
 23 Q. There's another message here from 9/10/05,  
 24 same day later in the day, 10 p.m. saying "Julie will  
 25 be at 11. Do you want me to cancel Brittany?"

1 Do you know what that message means?  
 2 MR. PIKE: Form.  
 3 A. I refuse to answer.  
 4 Q. What is this?  
 5 There's another message from 9/11/05 saying "I  
 6 got a car for," and then the name is blotted out. The  
 7 State Attorney's Office blotted the names of minors out  
 8 sometimes in their file. So do you -- do you know --  
 9 can you fill in that blank?  
 10 A. I refuse to answer.  
 11 Q. Do you know if this was the car that he rented  
 12 for Jane Doe 4?  
 13 A. I refuse to answer.  
 14 Q. All right. Or the car that he rented for AH?  
 15 A. I refuse to answer.  
 16 MR. PIKE: Form.  
 17 Q. You're familiar with both of those people,  
 18 right?  
 19 A. I refuse to answer.  
 20 Q. In fact, AH was somebody that was over at  
 21 Jeffrey Epstein's house many times, correct?  
 22 A. I refuse to answer.  
 23 MR. PIKE: Form.  
 24 Q. 9/3/2005. Message from Adriana saying "I left  
 25 message for Ashley to confirm for 11 a.m. and Vanessa

1 for 4:30 p.m."  
 2 Do you remember leaving that message?  
 3 A. I refuse to answer.  
 4 Q. And this is --  
 5 MR. PIKE: Form.  
 6 Q. It's his typical schedule where he schedules  
 7 one underage minor female to molest in the morning and  
 8 one in the afternoon, correct?  
 9 MR. PIKE: Form.  
 10 A. I refuse to answer.  
 11 Q. I mean, considering this is -- have you ever  
 12 worked anywhere else where there is somebody sexually  
 13 molesting underage minor females on a daily basis like  
 14 this?  
 15 MR. PIKE: Form.  
 16 A. I refuse to answer.  
 17 Q. At some point in time did you tell your  
 18 parents that this was happening?  
 19 MR. PIKE: Form.  
 20 A. I refuse to answer.  
 21 Q. Did you ever talk to anybody else in the house  
 22 and say "Hey, look, this is not right"?  
 23 A. I refuse to answer.  
 24 Q. Do you feel sorry for these girls?  
 25 A. I refuse to answer.

1 Q. And you say you do or you do not remember AH?  
 2 A. I refuse to answer.  
 3 Q. Okay. And do you know what happened up in the  
 4 bedroom between AH as a minor and Jeffrey Epstein?  
 5 MR. PIKE: Form.  
 6 A. I refuse to answer.  
 7 Q. Well, this is what she tells police: "She  
 8 arrived at the house, went upstairs to the bedroom.  
 9 She advised she immediately removed her clothing and  
 10 Nadia Marcinkova and Epstein were already naked in the  
 11 bedroom. AH explained that Nadia Marcinkova and she  
 12 had a sexual encounter that included kissing, touching,  
 13 and oral sex. AH remembered that she climaxed and was  
 14 removing herself from the massage table. Epstein then  
 15 turned AH onto her stomach on the massage table and  
 16 inserted his penis into her vagina. AH stated Epstein  
 17 began to pump his penis in her vagina. AH became upset  
 18 over this. She said her head was being held forcibly  
 19 against the bed as he continued to pump inside her.  
 20 She screamed 'No,' and Epstein stopped. He would  
 21 normally pay her \$200, but for this he apologized and  
 22 paid her a thousand dollars for that visit."  
 23 Are you familiar with that encounter?  
 24 A. I refuse to answer.  
 25 MR. PIKE: Form.

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1 Q. Do you remember a time when AH as a  
2 16-year-old I believe at this time left her house --  
3 left the house visibly upset?  
4 MR. PIKE: Form.  
5 A. I refuse to answer.  
6 Q. She advised that she was ripped and torn in  
7 her vagina area and had difficulty walking to the car;  
8 do you remember that?  
9 MR. PIKE: Form.  
10 A. I refuse to answer.  
11 Q. These message pads were message pads that were  
12 taken from trash pulls outside of Jeffrey Epstein's  
13 home and for the most -- well, there's so many messages  
14 here, but most of them are by somebody other than  
15 yourself. So my question is who are the other people  
16 that would take messages for Jeffrey Epstein for  
17 underage minor females to come to the house?  
18 MR. PIKE: Form.  
19 A. I refuse to answer.  
20 Q. And the messages include CL, "Can I come work  
21 today?"  
22 What does "work" mean?  
23 A. I refuse to answer.  
24 MR. PIKE: Form.  
25 Q. That means come to your house and get paid for

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1 Jeffrey Epstein sexually molesting this person while  
2 she was underage; is that correct?  
3 A. I refuse to answer.  
4 MR. PIKE: Form.  
5 Q. And it was also pretty frequent that the girls  
6 would come in tandem, isn't that true, two at a time?  
7 MR. PIKE: Form.  
8 A. I refuse to answer.  
9 Q. And one being the girl that would bring the  
10 new girl there, would wait downstairs while the new  
11 girl was upstairs getting molested but then getting  
12 paid?  
13 MR. PIKE: Form.  
14 A. I refuse to answer.  
15 Q. How did Jeffrey Epstein explain himself to you  
16 as to why he did this?  
17 MR. PIKE: Form.  
18 A. I refuse to answer.  
19 Q. Do you know when it is that he first became  
20 sexually obsessed with underage minor females?  
21 MR. PIKE: Asked and answered.  
22 A. I refuse to answer.  
23 MR. PIKE: Form.  
24 Q. Did you know that he was a school teacher at  
25 the Dalton School?

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1 A. I refuse to answer.  
2 Q. And at that point in time -- well, are you  
3 aware of him molesting underage minors while he was a  
4 teacher there?  
5 A. I refuse to answer.  
6 Q. There's another note that's not a message pad  
7 which I guess I will -- since it has your name on it I  
8 will mark it as what are we on -- 3 -- wait, C --  
9 MR. ROSS: 3.  
10 MR. EDWARDS: I messed up.  
11 MR. ROSS: 3.  
12 (Whereupon, Plaintiff's Exhibit 3 was marked  
13 for identification.)  
14 Q. Look at that while I fix what I've messed up  
15 over here.  
16 MR. ROSS: I'm going to show this to the  
17 witness.  
18 MR. EDWARDS: Yes. Yes.  
19 Q. Do you recognize that document?  
20 A. I refuse to answer.  
21 Q. There are a lot of different things on here  
22 that don't necessarily relate to you. At least I can't  
23 tell that they do. But it does indicate "Adriana's  
24 parents are going to the embassy on the 23rd."  
25 Do you remember when that happened?

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1 A. I refuse to answer.  
2 Q. Why did your parents go to the embassy?  
3 A. I refuse to answer.  
4 Q. More importantly why was Mr. Epstein concerned  
5 that your parents were going to the Embassy?  
6 MR. PIKE: Form.  
7 A. I refuse to answer.  
8 Q. Was -- at that point in time was Mr. Epstein  
9 assisting your parents with anything?  
10 A. I refuse to answer.  
11 Q. Are your parents citizens of the United  
12 States?  
13 MR. ROSS: Form.  
14 A. I refuse to answer.  
15 Q. Are you?  
16 A. No.  
17 Q. Has Mr. Epstein ever offered to get you a visa  
18 for the United States?  
19 A. I refuse to answer.  
20 MR. PIKE: Form.  
21 Q. Do you know Raer Roshan?  
22 A. I refuse to answer.  
23 Q. That was Jeffrey Epstein's partner in  
24 RadarOnline, correct?  
25 A. I refuse to answer.

1 Q. And if I showed you every single message pad  
2 here would you be able to answer any of the questions  
3 about any of the messages that were left at Jeffrey  
4 Epstein's house?

5 A. I refuse to answer.

6 MR. EDWARDS: Okay. That saves us a lot of  
7 time.

8 MR. ROSS: It did.

9 Q. Have you ever met Bill Clinton?

10 A. I refuse to answer.

11 Q. Is Bill Clinton -- was Bill Clinton a friend  
12 of Jeffrey Epstein's?

13 A. I refuse to answer.

14 Q. Is Bill Clinton somebody who Jeffrey Epstein  
15 has ever procured underage minor females for?

16 A. I refuse to answer.

17 MR. PIKE: Form.

18 Q. And just -- and just for, you know, the sake  
19 of what the evidence shows, there's no evidence that I  
20 have that indicates that that happened, but if you were  
21 going to answer that question I'm willing to ask it.

22 Have you met him at Jeffrey Epstein's house in  
23 Palm Beach County?

24 MR. PIKE: Form.

25 A. I refuse to answer.

1 A. I refuse to answer.

2 Q. And isn't it typical for Jeffrey Epstein to  
3 have a sex slave that flies with him on the airplane?

4 A. I refuse to answer.

5 MR. PIKE: Form.

6 Q. And one of the qualifications is that the  
7 section slave be underage, correct?

8 MR. PIKE: Form.

9 A. I refuse to answer.

10 Q. And if the sex slave is 15 years old isn't it  
11 your understanding and based on your observations that  
12 he will even make them dress as if they're 11 or 12?

13 MR. PIKE: Form.

14 A. I refuse to answer.

15 MR. PIKE: Form.

16 Q. Do you know President Andres Pastrana?

17 A. I refuse to answer.

18 Q. Do you know him as somebody who has had sex  
19 with underage minor females brought to him by Jeffrey  
20 Epstein?

21 MR. PIKE: Form.

22 A. I refuse to answer.

23 Q. Have you ever heard of Ehud Barak?

24 A. I refuse to answer.

25 MR. PIKE: Form.

1 Q. You have flown on Jeffrey Epstein's airplanes  
2 numerous times, correct?

3 A. I refuse to answer.

4 Q. As well has Bill Clinton and you're aware of  
5 that, right?

6 MR. PIKE: Form.

7 A. I refuse to answer.

8 Q. Have you ever seen the flight logs from  
9 Jeffrey Epstein's airplanes?

10 MR. PIKE: Form.

11 A. I refuse to answer.

12 Q. And on many times it is Bill Clinton, Secret  
13 Service agents, Jeffrey Epstein, Ghislaine Maxwell,  
14 Sarah Kellen, and others. Have you -- do you know  
15 about those flights?

16 A. I refuse to answer.

17 MR. PIKE: Form.

18 Q. And have you ever witnessed sex on any of  
19 Jeffrey Epstein's flights?

20 A. I refuse to answer.

21 MR. PIKE: Form.

22 Q. Do you know Emmy Taylor?

23 A. I refuse to answer.

24 Q. Is that somebody that is Ghislaine Maxwell's  
25 sex slave?

1 Q. Is that another person that Epstein -- Jeffrey  
2 Epstein procures underage minor females for?

3 MR. PIKE: Form.

4 A. I refuse to answer.

5 Q. You've met Naomi Campbell I'm assuming?

6 A. I refuse to answer.

7 Q. Anytime separate and apart from any dealings  
8 with Jeffrey Epstein have you met her in the modeling  
9 industry? That's a model, right?

10 MR. PIKE: Form.

11 MR. ROSS: You can answer the question.

12 A. No, I have not.

13 Q. Okay. Do you know Todd Meister?

14 A. I refuse to answer.

15 Q. Joel Pashcow?

16 A. I refuse to answer.

17 Q. You've been to their houses?

18 A. I refuse to answer.

19 Q. Do you know Aline Weber?

20 A. I refuse to answer.

21 Q. Have you ever stayed at the 301 East 66th  
22 Street places with Aline Weber?

23 MR. PIKE: Form.

24 A. I refuse to answer.

25 Q. And typically aren't there at least 16



78	<p>1 underage minor females staying at those various 2 condominiums located at 391 East 66th Street? 3 A. I refuse to answer. 4 Q. And those females get work visas to say that 5 they're models, but actually they are prostituted out 6 by Jeffrey Epstein and John Luc Brunel, correct? 7 A. I refuse to answer. 8 MR. PIKE: Form. 9 Q. And various businessmen and politicians around 10 New York and Washington, D.C. go to those apartments 11 frequently to have sex with underage minors; is that 12 true? 13 A. I refuse to answer. 14 Q. Do you remember a flight on December 3rd, 2004 15 that you took with Jeffrey Epstein, Nadia Marcinkova, 16 Sarah Kellen, and somebody with initials SH -- 17 A. I refuse to answer. 18 Q. -- from JFK to PBI? 19 MR. PIKE: Form. 20 Q. Do you remember that? 21 A. I refuse to answer. 22 Q. Who is SH? 23 A. I refuse to answer. 24 Q. Is that an underage minor? 25 A. I refuse to answer.</p>	80	<p>1 MR. PIKE: Form. 2 Q. And you flew to his island, right? 3 A. I refuse to answer. 4 MR. PIKE: Form. 5 Q. You flew to New Mexico? 6 A. I refuse to answer. 7 MR. PIKE: Form. 8 Q. You flew to New Jersey? 9 MR. PIKE: Form. 10 A. I refuse to answer. 11 Q. Several of the flights are just yourself, 12 Jeffrey Epstein, and Sarah Kellen. What did you do on 13 those flights? 14 MR. PIKE: Form. 15 A. I refuse to answer. 16 Q. Who's Adam Perrylang? 17 A. I refuse to answer. 18 Q. Is that somebody that you were made to have 19 sex with? 20 A. I refuse to answer. 21 Q. Did Jeffrey Epstein ever make you have sex 22 with any females? 23 MR. PIKE: Form. 24 A. I refuse to answer. 25 Q. Did he ever make you have sex with any of his</p>
79	<p>1 Q. Do you remember a flight that you took 2 December 27th with Nadia Marcinkova and Jeffrey 3 Epstein? 4 A. I refuse to answer. 5 Q. What airport is this, TIST? 6 A. I refuse to answer. 7 Q. Do you know Doug Band? 8 A. I refuse to answer. 9 Q. Isn't that Bill Clinton's assistant? 10 A. I refuse to answer. 11 Q. You've been on the airplane with him before? 12 A. I refuse to answer. 13 Q. Have you been on the airplane with Bill 14 Clinton before? 15 A. I refuse to answer. 16 Q. Who is Tatiana? 17 A. I refuse to answer. 18 Q. That's somebody you've flown with on Jeffrey 19 Epstein's plane on numerous occasions, correct? 20 MR. PIKE: Form. 21 A. I refuse to answer. 22 Q. In fact, during the year 2005 you flew on 23 Jeffrey Epstein's plane would you say more than 50 24 times? 25 A. I refuse to answer.</p>	81	<p>1 friends? 2 MR. PIKE: Form. 3 A. I refuse to answer. 4 Q. Who is Sandy Berger? 5 A. I refuse to answer. 6 Q. That's somebody else that was affiliated with 7 Bill Clinton at one point in time, correct? 8 A. I refuse to answer. 9 Q. A close friend of Jeffrey Epstein's? 10 MR. PIKE: Form. 11 A. I refuse to answer. 12 Q. He called the house within three weeks of the 13 search warrant being executed. Did he tip off Jeffrey 14 Epstein? 15 MR. PIKE: Form. 16 A. I refuse to answer. 17 Q. Is he somebody that's involved with underage 18 minors? 19 A. I refuse to answer. 20 Q. Do you know Igor Zimoviev? 21 A. I refuse to answer. 22 Q. Andrea Metrovich? 23 A. I refuse to answer. 24 Q. Have you flown on the airplane with Alan 25 Dershowitz before?</p>

82

1 MR. PIKE: Form.

2 A. I refuse to answer.

3 Q. And Jean Luc Brunel is somebody who you have

4 been on the airplane with several times, correct?

5 A. I refuse to answer.

6 MR. PIKE: Form.

7 Q. And when Jean Luc Brunel is on this airplane

8 there are underage minor -- minor females on the

9 airplane with you, correct?

10 MR. PIKE: Form.

11 A. I refuse to answer.

12 Q. Is there a back room to this airplane? Is

13 there any sort of separation or is it all one big room?

14 MR. PIKE: Form.

15 A. I refuse to answer.

16 Q. So if Jeffrey Epstein and Jean Luc Brunel are

17 engaged in sex acts with underage minors did you --

18 A. I refuse --

19 Q. Sorry -- did you observe any of those acts?

20 A. I refuse to answer.

21 MR. PIKE: Form.

22 Q. And on numerous of the flights the flight logs

23 indicate someone's name then oftentimes initials, but

24 sometimes it would just say "three females". Do you

25 know why?

83

1 A. I refuse to answer.

2 MR. PIKE: Form.

3 Q. Who's Claire Hazel?

4 A. I refuse to answer.

5 Q. Do you know Jo-Jo and Lynn Fontanella?

6 A. I refuse to answer.

7 Q. They're the house managers up at the mansion

8 up in Maahattan, correct?

9 MR. PIKE: Form.

10 A. I refuse to answer.

11 Q. And they assist Mr. Epstein in engaging in

12 underage sex with minors in New York, correct?

13 MR. PIKE: Form.

14 A. I refuse to answer.

15 Q. They also maintain a pretty close relationship

16 with the police?

17 A. I refuse to answer.

18 Q. And that's a big component also, right, that

19 Jeffrey Epstein has -- is friendly with the law

20 enforcement, correct?

21 MR. PIKE: Form.

22 A. I refuse to answer.

23 Q. Like law enforcement would do favors for not

24 only Jeffrey Epstein but his various assistants. If

25 you were speeding around the neighborhood they wouldn't

84

1 give you a ticket, correct?

2 MR. PIKE: Form.

3 A. I refuse to answer.

4 Q. Was it ever your job to call the police

5 department and ask if any police reports were on file

6 or anybody complained about the activities at Jeffrey

7 Epstein's house?

8 MR. PIKE: Form.

9 A. I refuse to answer.

10 Q. Have you ever gone physically to the police

11 department?

12 A. I refuse to answer.

13 Q. Was there a flight where you flew alone with

14 Jean Luc Brunel?

15 A. I refuse to answer.

16 Q. Have you ever flown on the plane with Prince

17 Andrew?

18 MR. PIKE: Form.

19 A. I refuse to answer.

20 Q. Do you know Zinta Braukis?

21 A. I refuse to answer.

22 Q. That's another model that Jeffrey Epstein

23 knows, correct?

24 A. I refuse to answer.

25 MR. PIKE: Form.

85

1 Q. Somebody that he had engaged in sex with when

2 she was underage?

3 A. I refuse to answer.

4 Q. She actually got a modeling contract out of

5 it?

6 MR. PIKE: Form.

7 A. I refuse to answer.

8 Q. Why does Jean Luc Brunel and Jeffrey Epstein

9 fly together so often?

10 MR. PIKE: Form.

11 A. I refuse to answer.

12 Q. And why does Ghislaine Maxwell also fly so

13 often with Jeffrey Epstein and Jean Luc Brunel?

14 A. I refuse to answer.

15 MR. PIKE: Form.

16 Q. Isn't it true that all three of them are

17 obsessed and addicted to sex with underage minors?

18 MR. PIKE: Form.

19 A. I refuse to answer.

20 MR. PIKE: Brad, how much longer do you have?

21 MR. EDWARDS: How long? You want to take a

22 break?

23 MR. PIKE: Yeah.

24 MR. EDWARDS: Sure. It's going a lot faster

25 than I thought it would.

1 VIDEOGRAPHER: Off the record, 11:33 a.m.  
 2 (Recess taken at 11:33 a.m.)  
 3 (Deposition resumed at 11:43 a.m.)  
 4 VIDEOGRAPHER: On the record, 11:43 a.m.  
 5 BY MR. EDWARDS:  
 6 Q. All right. There's one more message that I  
 7 wanted to ask you about. As I mentioned, I'm not going  
 8 to go through all of the messages that I have, but  
 9 there's one from 9/4/2005, 9:08 a.m. from Adriana. "Is  
 10 it okay for Tatam to stop by and drop something?"  
 11 A. I refuse to answer.  
 12 MR. PIKE: Form.  
 13 Q. So what were your hours working for Jeffrey  
 14 Epstein?  
 15 A. I refuse to answer.  
 16 Q. I mean, some of these messages are 9:00 in the  
 17 morning and others are as late as 8:30 or 9 at night.  
 18 So what were your hours?  
 19 A. I refuse to answer.  
 20 Q. Another message from 9/4 also, same day,  
 21 "Ashley," I think, "confirmed an 11 a.m., Vanessa is at  
 22 4:30 p.m."  
 23 MR. MERMELSTEIN: I think that's one you did.  
 24 MR. EDWARDS: Oh, yeah? Okay.  
 25 Q. All right. Do you remember that message?

1 A. I refuse to answer.  
 2 MR. EDWARDS: Do you care how I attach it  
 3 since it's --  
 4 MR. ROSS: No.  
 5 MR. EDWARDS: I'll attach it as whatever it  
 6 is.  
 7 MR. ROSS: 4.  
 8 MR. EDWARDS: 2 -- well, I'll just go 2H since  
 9 it's a message. You don't have a problem with  
 10 that? 2H?  
 11 MR. ROSS: Whatever.  
 12 (Whereupon, Plaintiff's Exhibit 2H was marked  
 13 for identification.)  
 14 Q. Do you still consider Jeffrey Epstein a  
 15 friend?  
 16 A. I refuse to answer.  
 17 MR. PIKE: Form.  
 18 Q. Did you ever think of Jeffrey Epstein as a  
 19 friend?  
 20 MR. PIKE: Form.  
 21 A. I refuse to answer.  
 22 Q. Other than the people that I've mentioned  
 23 of -- you know, President Pastrana and Ehud Burak and  
 24 Prince Andrew did you meet any other people of royalty  
 25 being friends with Jeffrey Epstein?

1 MR. PIKE: Form.  
 2 A. I refuse to answer.  
 3 Q. Can you tell us any of the other folks that  
 4 Jeffrey Epstein would supply underage minor girls to?  
 5 MR. PIKE: Form.  
 6 A. I refuse to answer.  
 7 Q. Do you know a man by the name of Glenn Dubin?  
 8 A. I refuse to answer.  
 9 Q. Do you know his wife?  
 10 A. I refuse to answer.  
 11 Q. His wife at some point in time was associated  
 12 with Jeffrey Epstein; is that correct?  
 13 A. I refuse to answer.  
 14 Q. And her name's Eva Dubin; is that right?  
 15 A. I refuse to answer.  
 16 Q. Either way, isn't it true that Jeffrey Epstein  
 17 then started supplying underage females to Glenn Dubin?  
 18 MR. PIKE: Form.  
 19 A. I refuse to answer.  
 20 Q. Do you know Johanna Sjoberg?  
 21 A. I refuse to answer.  
 22 Q. Is that somebody who also worked for Jeffrey  
 23 Epstein?  
 24 A. I refuse to answer.  
 25 MR. PIKE: Form.

1 Q. Did Jeffrey Epstein ever get a legitimate  
 2 massage from somebody that's a masseuse?  
 3 MR. PIKE: Form.  
 4 A. I refuse to answer.  
 5 Q. The underage females that we've talked about  
 6 particularly, LM, EW, and Jane Doe, those girls were  
 7 not prostitutes, were they?  
 8 A. I refuse to answer.  
 9 Q. These were just girls who were in 8th, 9th,  
 10 10th grade in high school, right?  
 11 A. I refuse to answer.  
 12 Q. These were girls that you knew had never  
 13 committed prostitution in the past, right?  
 14 A. I refuse to answer.  
 15 Q. And that goes for all of these girls on the  
 16 phone list of underage minors to call, these were not  
 17 prostitutes, correct?  
 18 A. I refuse to answer.  
 19 Q. You never called a prostitution or escort  
 20 service for Jeffrey Epstein, did you?  
 21 MR. PIKE: Form.  
 22 A. I refuse to answer.  
 23 Q. And as well you never called a legitimate  
 24 massage parlor for Jeffrey Epstein, correct?  
 25 A. I refuse to answer.

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1 MR. PIKE: Form.

2 Q. He devised this scheme of having underage

3 minor girls bring him other underage minor girls so

4 that he could gain access to his target age group, 12

5 to 16 years old, correct?

6 A. I refuse to answer.

7 Q. Have you heard Jeffrey Epstein say "The

8 younger the better?"

9 A. I refuse to answer.

10 Q. And did Jeffrey Epstein tell you that it made

11 him happy the younger the girl was?

12 A. I refuse to answer.

13 MR. PIKE: Form.

14 Q. The less developed the girl is the more

15 excited Jeffrey Epstein gets; is that true?

16 MR. PIKE: Form.

17 A. I refuse to answer.

18 Q. Do you ever plan to talk to Jeffrey Epstein in

19 the future?

20 A. I refuse to answer.

21 MR. PIKE: Form.

22 Q. Would you ever work for him again?

23 A. I refuse to answer.

24 Q. Why didn't you stop working for him sooner?

25 A. I refuse to answer.

91

1 MR. PIKE: Form.

2 Q. Did you -- well, you knew that it was illegal

3 what he was doing at the time you were doing it,

4 correct?

5 A. I refuse to answer.

6 Q. Did you know that you were part of a large

7 child molestation ring?

8 MR. PIKE: Form.

9 A. I refuse to answer.

10 Q. Did you ever tell anyone while you were

11 working for him that you wanted to stop?

12 A. I refuse to answer.

13 MR. PIKE: Form.

14 Q. Did you continue working there because you

15 were just scared to stop?

16 A. I refuse to answer.

17 MR. PIKE: Form.

18 Q. Were you in fear of what Ghislaine Maxwell or

19 Jeffrey Epstein might do to you if you quit performing

20 your services for his child molestation ring?

21 A. I refuse to answer.

22 MR. PIKE: Form.

23 Q. Did Jeffrey Epstein ever threaten you?

24 A. I refuse to answer.

25 MR. PIKE: Form.

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1 Q. Did Ghislaine Maxwell ever threaten you?

2 A. I refuse to answer.

3 Q. How was it decided who would call which girl?

4 A. I refuse to answer.

5 Q. And by that, just so it's clear, like I said,

6 there's going to be many, many, many message pads, I

7 have not counted them, but a lot created by either

8 yourself or someone named Janusz Banaziak or Louella

9 Rabuyo, Alfredo Rodriguez, Nadia Marcinkova, Sarah

10 Kellen, various people that we know to have been

11 employed at Jeffrey Epstein's home. And it seems that

12 on one particular day Sarah may call several girls, you

13 may call several girls, Nadia may call several girls.

14 Who is directing which -- which of you, which of the

15 assistants is going to call the underage minor to give

16 them an appointment?

17 A. I refuse to answer.

18 MR. PIKE: Form.

19 Q. And what would happen on the occasions where

20 Jeffrey Epstein says he's going to be in town and then

21 he's ultimately not in town but a girl shows up anyway?

22 MR. PIKE: Form.

23 A. I refuse to answer.

24 Q. Weren't you just told just to pay her to keep

25 her happy?

93

1 A. I refuse to answer.

2 Q. And isn't part of the whole scheme that these

3 girls were typically told "Don't tell anybody what goes

4 on inside this house," right?

5 MR. PIKE: Form.

6 A. I refuse to answer.

7 Q. And did Jeffrey Epstein tell you that because

8 these girls are young and they're poor and they're

9 underprivileged type girls they're likely not going to

10 say anything anyway? Isn't that what he told you?

11 MR. PIKE: Form.

12 A. I refuse to answer.

13 Q. Did Ghislaine Maxwell talk to you about that

14 as well?

15 A. I refuse to answer.

16 MR. PIKE: Form.

17 Q. Have you seen Jeffrey Epstein angry?

18 A. I refuse to answer.

19 Q. Isn't it true that he's very nice and engaging

20 as long as he gets his way and gets you to cooperate,

21 right?

22 A. I refuse to answer.

23 Q. But if he doesn't get his way he gets very,

24 very angry and mad and scary; isn't that true?

25 A. I refuse to answer.

94

1 Q. And you've seen both sides of him, right?

2 A. I refuse to answer.

3 Q. In fact, you know of girls who were 13 years

4 old and cooperated with everything he said because they

5 felt they had no choice up in that bedroom, right?

6 A. I refuse to answer.

7 MR. PIKE: Form.

8 Q. And you also know girls who resisted and were

9 yelled at and told to grab their money and get out of

10 there, right?

11 A. I refuse to answer.

12 Q. Wouldn't you agree that that house upstairs

13 can be somewhat confusing in how it's -- how it's laid

14 out?

15 A. I refuse to answer.

16 Q. In fact, there's a stairwell that starts from

17 the kitchen, there's a door and it almost blends in in

18 the kitchen with the other closets, correct?

19 A. I refuse to answer.

20 MR. PIKE: Form.

21 Q. But you open that door and there's a stairway

22 that twists it seems to the left and there's another

23 door at the top of that stairway, right?

24 A. I refuse to answer.

25 Q. And then when you exit that stairway you take

95

1 a right and you head towards a little hallway that

2 eventually leads into Mr. Epstein's bedroom, right?

3 A. I refuse to answer.

4 Q. And if it's your first time in that bedroom as

5 a 14-year-old girl and you don't like what's happened

6 up there would you agree that it's a tough way to find

7 your -- a place to find your way out of?

8 MR. PIKE: Form.

9 A. I refuse to answer.

10 Q. Did Jeffrey -- didn't Jeffrey Epstein tell you

11 that he would act as a father-type figure to these

12 girls?

13 A. I refuse to answer.

14 MR. PIKE: Form.

15 Q. And he would propose that what they are doing

16 for him or with him despite the law is okay?

17 A. I refuse to answer.

18 MR. PIKE: Form.

19 Q. And they could continue to make a lot of money

20 if they would come over and be his sex victims, right?

21 MR. PIKE: Form.

22 A. I refuse to answer.

23 Q. And you were aware when my client, LM, was

24 pregnant at 16 years old that Jeffrey Epstein bought

25 everything on her baby registry, right?

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1 A. I refuse to answer.

2 MR. PIKE: Form.

3 Q. Was it you or Sarah Kellen that took all of

4 the gifts over to her home?

5 MR. PIKE: Form.

6 A. I refuse to answer.

7 Q. I believe it was Sarah Kellen in a -- did

8 Jeffrey Epstein own a Mercedes?

9 MR. PIKE: Form.

10 A. I refuse to answer.

11 Q. And do you remember when Sarah Kellen loaded

12 up the Mercedes with all the baby gifts and took it to

13 my client's trailer?

14 A. I refuse to answer.

15 Q. And that was so that while LM -- that was to

16 thank her while she was pregnant she continued to bring

17 him 13-, 14-, and 15-year-old girls to molest, correct?

18 MR. PIKE: Form.

19 A. I refuse to answer.

20 Q. Because LM would no longer qualify as somebody

21 he'd be sexually interacting with as she was pregnant,

22 correct?

23 MR. PIKE: Form.

24 A. I refuse to answer.

25 Q. Because the only real disqualifications for

97

1 interacting sexually with Mr. Epstein are if you have

2 tattoos, right?

3 A. I refuse to answer.

4 Q. If you're African-American or black?

5 A. I refuse to answer.

6 Q. You've never known him to interact with an

7 African-American or black girl, have you?

8 A. I refuse to answer.

9 Q. If you've been pregnant?

10 A. I refuse to answer.

11 Q. Or if you are pregnant, correct?

12 A. I refuse to answer.

13 Q. But certainly he was not above having a

14 pregnant 16-year-old girl bringing him underage minor

15 females, correct?

16 A. I refuse to answer.

17 Q. In fact --

18 MR. PIKE: Form.

19 Q. -- it was his belief that he was doing her a

20 favor in that he was giving her money for providing a

21 service, correct?

22 MR. PIKE: Form.

23 A. I refuse to answer.

24 Q. Is it Jeffrey Epstein's belief that he did

25 these girls a favor?

1 A. I refuse to answer.  
 2 Q. I mean, doesn't he think that these girls are  
 3 lucky that he ever -- that they ever -- that he ever  
 4 allowed them out of their trailer and into his mansion,  
 5 correct?  
 6 A. I refuse to answer.  
 7 MR. PIKE: Form.  
 8 Q. We've defined the molestation statute or at  
 9 least I read it to you earlier and now we've talked  
 10 about this scheme of Jeffrey Epstein gaining access to  
 11 this number of underage minor females. At the time  
 12 when you were working for him did you recognize him as  
 13 a serial child molester?  
 14 MR. PIKE: Form.  
 15 A. I refuse to answer.  
 16 Q. Do you know of anybody that ever worked for  
 17 him that quit working for him because of what he was  
 18 doing?  
 19 A. I refuse to answer.  
 20 MR. PIKE: Form.  
 21 Q. Do you know Michael Friedman?  
 22 A. I refuse to answer.  
 23 Q. Is that somebody you ever met there?  
 24 A. I refuse to answer.  
 25 Q. What countries does Jeffrey Epstein typically

1 bring underage minor females from?  
 2 A. I refuse to answer.  
 3 Q. Do you know why he chooses the countries that  
 4 he chooses to import underage minor females from?  
 5 A. I refuse to answer.  
 6 MR. PIKE: Form.  
 7 Q. Was Nadia -- do you know how old Nadia  
 8 Marcinkova was when she came to this country?  
 9 A. I refuse to answer.  
 10 Q. Have you had conversations with Nadia  
 11 Marcinkova about Jeffrey Epstein bringing her to this  
 12 country?  
 13 A. I refuse to answer.  
 14 Q. She's been described by some as his  
 15 Yugoslavian lesbian sex slave. Is that something that  
 16 is an accurate description based on the observations  
 17 you have?  
 18 A. I refuse to answer.  
 19 MR. PIKE: Form.  
 20 Q. Did you ever engage in any lesbian sex with  
 21 Nadia Marcinkova?  
 22 A. I refuse to answer.  
 23 Q. Has Sarah Kellen ever had sex with Jeffrey  
 24 Epstein?  
 25 MR. PIKE: Form.

1 A. I refuse to answer.  
 2 Q. Do you know how it is that Sarah Kellen met  
 3 Jeffrey Epstein?  
 4 A. I refuse to answer.  
 5 Q. Do you know Story Cowles?  
 6 A. I refuse to answer.  
 7 Q. You know who Sergio Cordero is?  
 8 A. I refuse to answer.  
 9 Q. Well, that's somebody who also assists  
 10 Mr. Epstein in bringing him underage minor females for  
 11 sex, correct?  
 12 A. I refuse to answer.  
 13 MR. PIKE: Form.  
 14 Q. And Khalid Monroe, you know who that is?  
 15 A. I refuse to answer.  
 16 Q. Also somebody that through MC Squared or some  
 17 affiliation with that modeling agency would help for  
 18 Jeffrey Epstein to gain access to underage minor  
 19 females for sex, correct?  
 20 MR. PIKE: Form.  
 21 A. I refuse to answer.  
 22 Q. And do you know of trips that Mr. Cordero,  
 23 Mr. Brunel, and Mr. Epstein took to Brazil specifically  
 24 for the purposes of Mr. Epstein engaging in sex with  
 25 12-year-old girls?

1 MR. PIKE: Form.  
 2 A. I refuse to answer.  
 3 Q. Are you -- you are aware that Jeffrey Epstein  
 4 pled guilty to two felonies related to his sexual  
 5 interactions, correct?  
 6 A. I refuse to answer.  
 7 Q. Okay.  
 8 VIDEOGRAPHER: Excuse me, counsel.  
 9 MR. ROSS: I object on privilege grounds --  
 10 attorney-client privilege grounds.  
 11 MR. EDWARDS: Okay, fine. I was trying to get  
 12 into an area we may get answers.  
 13 VIDEOGRAPHER: Could I just get you to put  
 14 your phone on the table? I'm starting to get  
 15 interference.  
 16 MR. ROSS: The phone?  
 17 VIDEOGRAPHER: Yes, sir.  
 18 MR. EDWARDS: You got a secret phone?  
 19 VIDEOGRAPHER: It's anytime it receives any  
 20 kind of information.  
 21 MR. ROSS: Oh, okay, yeah, it's --  
 22 VIDEOGRAPHER: It's not that it's ringing.  
 23 MR. ROSS: Right. It's not doing it now.  
 24 VIDEOGRAPHER: I apologize for the  
 25 interruption.

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1 **Q.** All right. I ask you that question because  
 2 there was also something called a non-prosecution  
 3 agreement. Are you familiar with that document?  
 4 A. I refuse to answer.  
 5 MR. ROSS: Attorney-client privilege.  
 6 **Q.** And that is also a document that included your  
 7 name as a co-conspirator; are you familiar with that?  
 8 A. I refuse to answer.  
 9 MR. ROSS: Attorney-client privilege.  
 10 **Q.** And that is because of your involvement with  
 11 calling on the telephone underage minors to bring them  
 12 to Jeffrey Epstein's house, correct?  
 13 A. I refuse to answer.  
 14 **Q.** Or for your involvement in scheduling  
 15 appointments in Jeffrey Epstein's appointment book for  
 16 underage minor -- underage minor females to be involved  
 17 with Jeffrey Epstein sexually, correct?  
 18 MR. PIKE: Form.  
 19 A. I refuse to answer.  
 20 **Q.** It is certainly not because you sought out  
 21 this child molestation ring in hopes of rising to the  
 22 top, correct?  
 23 MR. PIKE: Form.  
 24 A. I refuse to answer.  
 25 **Q.** Didn't you do everything that you did that

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1 anybody could ever say is illegal at the direction of  
 2 Jeffrey Epstein?  
 3 A. I refuse to answer.  
 4 **Q.** And if it wasn't at the direction of Jeffrey  
 5 Epstein it was at the direction of Ghislaine Maxwell or  
 6 Sarah Kellen, correct?  
 7 MR. PIKE: Form.  
 8 A. I refuse to answer.  
 9 **Q.** I mean, those things were not things that you  
 10 would have done but for being under the supervision of  
 11 Jeffrey Epstein; isn't that right?  
 12 MR. PIKE: Form.  
 13 A. I refuse to answer.  
 14 **Q.** And you continued to do these things either  
 15 out of fear or because you were just impressed with  
 16 Jeffrey Epstein's lifestyle?  
 17 A. I refuse to answer.  
 18 **Q.** Aren't you angry for him involving you in this  
 19 criminal activity?  
 20 A. I refuse to answer.  
 21 MR. PIKE: Form.  
 22 **Q.** Do you ever intend in the future to talk about  
 23 what he did and what he involved you in?  
 24 MR. PIKE: Form.  
 25 A. I refuse to answer.

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1 **Q.** Wouldn't you like to separate yourself being  
 2 the person that you are from this person who brought  
 3 you into this mess?  
 4 MR. PIKE: Form.  
 5 A. I refuse to answer.  
 6 **Q.** Is Jeffrey Epstein paying for your attorney  
 7 now?  
 8 MR. PIKE: Form.  
 9 A. I refuse to answer.  
 10 MR. ROSS: Well, actually you can answer.  
 11 A. No, my parents help me.  
 12 **Q.** Are you aware of Jeffrey Epstein's closest  
 13 friends now?  
 14 A. I refuse to answer.  
 15 MR. PIKE: Form.  
 16 **Q.** Who are the people that you believe are  
 17 Jeffrey Epstein's enemies?  
 18 MR. PIKE: Form.  
 19 A. I refuse to answer.  
 20 **Q.** Did you ever find out that Jeffrey Epstein and  
 21 Ghislaine Maxwell had been targeting and preying upon  
 22 underage females for sex for more than a decade?  
 23 MR. PIKE: Form.  
 24 A. I refuse to answer.  
 25 **Q.** Who is Jeffrey Epstein's girlfriend now, if

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1 you know?  
 2 A. I refuse to answer.  
 3 MR. PIKE: Form.  
 4 **Q.** Since being on house arrest has Jeffrey  
 5 Epstein continued to engage in sex with underage minor  
 6 females?  
 7 MR. PIKE: Form.  
 8 A. I refuse to answer.  
 9 **Q.** Knowing that his habit was more than -- was at  
 10 least two underage minor females for sex every single  
 11 day do you believe that he stopped?  
 12 MR. PIKE: Form.  
 13 A. I refuse to answer.  
 14 **Q.** Isn't it your belief that he will continue to  
 15 do that once all of these cases are over?  
 16 A. I refuse to answer.  
 17 MR. PIKE: Form.  
 18 **Q.** Isn't it true that Jeffrey Epstein believes  
 19 that he is entitled to have sex with whomever he wants  
 20 including 12-, 13-, 14-year-old girls?  
 21 MR. PIKE: Form.  
 22 A. I refuse to answer.  
 23 **Q.** Do you know whether he continues -- do you  
 24 know whether he intends to continue to molest underage  
 25 minors within the United States?

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1 MR. PIKE: Form.

2 A. I refuse to answer.

3 Q. Do you know Mike Sanka?

4 A. I refuse to answer.

5 Q. That's somebody else that assisted Jeffrey

6 Epstein in gaining access to underage minor females

7 that were foreigners, correct?

8 A. I refuse to answer.

9 MR. PIKE: Form.

10 Q. He's also involved in the modeling agency,

11 too, correct?

12 MR. PIKE: Form.

13 A. I refuse to answer.

14 Q. That's a friend of or former friend of Jean

15 Luc Brunel's?

16 A. I refuse to answer.

17 Q. How many times has Jean Luc Brunel shown up at

18 Jeffrey Epstein's house with underage minor females?

19 MR. PIKE: Form.

20 A. I refuse to answer.

21 Q. And when that would happen isn't it true that

22 they would have orgies with these underage minor

23 females?

24 MR. PIKE: Form.

25 A. I refuse to answer.

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1 Q. What was done -- or let me ask it a different

2 way. Strike that.

3 Where is the scheduling book for the massage

4 appointments for Jeffrey Epstein?

5 MR. PIKE: Form.

6 A. I refuse to answer.

7 Q. Is that something else that was removed from

8 the home prior to the search warrant being executed?

9 A. I refuse to answer.

10 MR. PIKE: Form.

11 Q. Do you know how it is that -- well, did

12 Jeffrey Epstein ever tell you that because of the

13 people he knew he would not be going to prison for the

14 crimes that he committed?

15 A. I refuse to answer.

16 MR. PIKE: Form.

17 Q. And is it your understanding that Ken Starr

18 had played a major role in devising the non-prosecution

19 agreement or having the government agree not to

20 prosecute Jeffrey Epstein for his crimes against

21 minors?

22 A. I refuse to answer.

23 MR. PIKE: Form.

24 Q. Is it also your understanding that Bill

25 Clinton played somewhat of a role in helping Jeffrey

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1 Epstein out of the trouble that he would have been in

2 related to his sexual interactions with minor females?

3 A. I refuse to answer.

4 MR. PIKE: Form.

5 Q. Did Jeffrey Epstein tell you that you need to

6 cooperate if you want the protection that me and my

7 connections can give you for this activity?

8 MR. PIKE: Form.

9 A. I refuse to answer.

10 Q. You admit that you called LM on the telephone

11 for her to come to Jeffrey Epstein's house to be

12 molested by Jeffrey Epstein when she was an underage

13 female?

14 A. I refuse to answer.

15 MR. PIKE: Form. Asked and answered twice.

16 Q. Do you agree that you called EW on the

17 telephone for the purposes of her coming to Jeffrey

18 Epstein's house for him to sexually molest her?

19 MR. PIKE: Same objection.

20 A. I refuse to answer.

21 Q. And do you agree that you called Jane Doe and

22 told her to come to your house to work, meaning for

23 Jeffrey Epstein to sexually molest her?

24 MR. PIKE: Asked and answered.

25 A. I refuse to answer.

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1 Q. The first trial that is set in these cases is

2 in July of this year. Do you intend to be in the local

3 area?

4 MR. ROSS: You can answer.

5 A. Yes.

6 Q. Okay. And what address will you be at?

7 MR. ROSS: You can answer.

8 A. 1040 South Shore Drive.

9 Q. That's Miami?

10 A. Miami Beach, Florida.

11 Q. And the ZIP is?

12 A. 33141.

13 Q. And I presume that if I needed to find you or

14 locate you or anything else I could go through your

15 attorney?

16 A. Yes.

17 Q. Okay. Who do you live at that address with?

18 MR. ROSS: You can answer.

19 A. With my husband and my mom-in-law and his

20 sister as well.

21 Q. And your husband's name is Duncan?

22 A. Duncan Ross.

23 Q. And your mother-in-law's name?

24 A. Monica Ross.

25 Q. And who else lives at the house with you, I'm



1 sorry?  
 2 A. His sister.  
 3 **Q. And her name is?**  
 4 A. Stella Erin Ross.  
 5 **Q. And have you told Monica or Stella your**  
 6 **involvement with Jeffrey Epstein?**  
 7 A. I refuse to answer.  
 8 **Q. Have you told your parents?**  
 9 A. I refuse to answer.  
 10 **Q. Are your parents in the country now?**  
 11 MR. ROSS: You can answer.  
 12 A. No.  
 13 **Q. Do they have plans to come back?**  
 14 MR. ROSS: You can answer.  
 15 A. They may visit, I'm not sure.  
 16 **Q. But on a permanent basis they're in Poland?**  
 17 A. Yes.  
 18 **Q. Okay. What's the address where they are in**  
 19 **Poland?**  
 20 A. Kuznicy Kollatajowska 33, Warsaw, Poland.  
 21 **Q. She's great. I'm sure she got that.**  
 22 A. Would you like me to spell it out?  
 23 K-U-Z-I-N-C-Y, second word,  
 24 K-O-L-L-A-T-A-J-O-W-S-K-I-A, Warsaw, Poland 02495.  
 25 MR. EDWARDS: One way to never find a witness

1 is just move to Poland. There's no way.  
 2 MR. ROSS: Couldn't get anyone to type the  
 3 subpoena.  
 4 MR. EDWARDS: Right, exactly. All right. I  
 5 don't have any other questions for you. Thank you.  
 6 THE WITNESS: Thank you.  
 7 CROSS-EXAMINATION  
 8 BY MR. MERMELSTEIN:  
 9 **Q. Okay. Mrs. Ross, I have some questions for**  
 10 **you. Your husband, Duncan Ross, what does he do for a**  
 11 **living?**  
 12 A. He's a Ph.D. student.  
 13 **Q. And what is he a Ph.D. in?**  
 14 A. He works on bone marrow transplant immunology.  
 15 **Q. So is he a medical doctor?**  
 16 A. He's scientist. He's working on his Ph.D.  
 17 degree.  
 18 **Q. And which school is he working on his Ph.D.**  
 19 **at?**  
 20 A. University of Miami.  
 21 **Q. And how long has he been doing that?**  
 22 A. I cannot recall when he started but we were  
 23 already married. Maybe one or two years into my  
 24 marriage. I do not recall the exact time.  
 25 **Q. And I believe you testified that you met him**

1 in Europe, correct?  
 2 A. Correct.  
 3 **Q. And did he have a different employment or**  
 4 **profession then?**  
 5 A. Yes.  
 6 **Q. What was he doing then?**  
 7 A. Well, at that time he was serving in the  
 8 entertainment business. He was DJing and -- yeah.  
 9 When I met him he came to Europe for a DJ event. DJing  
 10 event.  
 11 **Q. And where was that in Europe?**  
 12 A. He went to Spain and then I was in Monaco at  
 13 the time and he knew the people that I was there with  
 14 and we were introduced. That's where we met.  
 15 **Q. And did he have connections to modeling in the**  
 16 **United States?**  
 17 A. Yes.  
 18 **Q. And how did he have those connections?**  
 19 A. I'm -- you know, I'm not sure. I don't know  
 20 at this time, but he knew agencies here and he was  
 21 doing, I believe, some photographic work as well  
 22 himself.  
 23 **Q. So he was a DJ and a professional**  
 24 **photograph -- photographer?**  
 25 A. Yes. You may say so, yes.

1 **Q. And a scientist as well?**  
 2 A. Yes.  
 3 **Q. Did he do work for particular modeling**  
 4 **agencies in the United States?**  
 5 A. I mean, do you -- I don't understand your  
 6 question. Do you mean like --  
 7 **Q. Well, did he perform work or services for**  
 8 **particular modeling agencies in the United States?**  
 9 A. Well, I believe he would hire models from  
 10 modeling agencies, yes.  
 11 **Q. He would hire models?**  
 12 A. Yes, for -- you know, that's how -- how it  
 13 works. You hire a model from a modeling agency for a  
 14 particular job, a client that you may have.  
 15 **Q. So as a photographer he would hire models for**  
 16 **a particular modeling agency?**  
 17 MR. PIKE: Form.  
 18 A. Yes.  
 19 **Q. And do you know which modeling agencies he**  
 20 **typically worked with?**  
 21 A. Well, I presume Elite Models because, you  
 22 know, he had connection and he invited me. I think  
 23 just various Miami Beach -- you know, Miami, South  
 24 Beach modeling agencies.  
 25 **Q. Did he work for MC Squared?**

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1 A. I refuse to answer.

2 Q. In 2004 and 2005 you were employed by Jeffrey

3 Epstein, correct?

4 MR. PIKE: Form.

5 A. I refuse to answer.

6 Q. And as an employee of Jeffrey Epstein you were

7 under his instruction and supervision, correct?

8 MR. PIKE: Form.

9 A. I refuse to answer.

10 MR. PIKE: Let's go off the record for a

11 second.

12 MR. MERMELSTEIN: Sure.

13 VIDEOGRAPHER: Off the record at 12:12 p.m.

14 (Discussion off the record.)

15 MR. MERMELSTEIN: I'll be brief on the general

16 questions.

17 VIDEOGRAPHER: On the record, 12:14 p.m.

18 BY MR. MERMELSTEIN:

19 Q. And as an employee of Jeffrey Epstein were you

20 also subject to the -- to the instructions and

21 supervision of Ghislaine Maxwell?

22 MR. PIKE: Form.

23 A. I refuse to answer.

24 Q. And as an employee of Jeffrey Epstein did you

25 work under the supervision and instruction of his

115

1 primary assistant Sarah Kellen?

2 MR. PIKE: Form.

3 A. I refuse to answer.

4 Q. Okay. Did Jeffrey Epstein tell you that --

5 that he recruited from western Palm Beach County

6 underage girls to come to his Palm Beach mansion for

7 sexual activity?

8 MR. PIKE: Form.

9 A. I refuse to answer.

10 Q. And did Jeffrey Epstein have a computer

11 database at his Palm Beach mansion where he listed

12 underage high school girls in Palm Beach County and

13 their contact information so that he could have these

14 underage minors come to his house for sexual activity?

15 MR. PIKE: Form.

16 A. I refuse to answer.

17 Q. And did Jeffrey Epstein tell you that the

18 reason he brought in underage minors from western Palm

19 Beach County is because he anticipated they would be

20 impressed, in awe, and intimidated by his wealth?

21 MR. PIKE: Form.

22 A. I refuse to answer.

23 Q. And as young girls who were impressed and in

24 awe and intimidated of his wealth they would do what he

25 asked them to do?

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1 MR. PIKE: Form.

2 A. I refuse to answer.

3 Q. And as young underage girls who were

4 impressed, intimidated, and in awe of his wealth they

5 would be unlikely to -- to complain to authorities that

6 he was engaging in sexual activity with them?

7 A. I refuse to answer.

8 MR. PIKE: Form.

9 Q. Okay. Did Jeffrey Epstein instruct you to

10 call girls on the telephone to schedule appointments

11 for them to come to his Palm Beach house for massages

12 which were, in fact, to be sexual activity?

13 MR. PIKE: Form.

14 A. I refuse to answer.

15 Q. Prior to May 2005 did you call Jane Doe 4 to

16 schedule appointments for her to come to the Epstein

17 house to engage in -- to give Jeffrey Epstein a massage

18 which would, in fact, be sexual activity with Jeffrey

19 Epstein?

20 MR. PIKE: Form.

21 A. I refuse to answer.

22 Q. Okay. Prior to May 2005 while you were at the

23 Epstein house in Palm Beach did you receive calls from

24 Jane Doe 4 regarding the scheduling of an appointment

25 for her to come to the Epstein house to give Jeffrey

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1 Epstein a massage?

2 MR. PIKE: Form.

3 A. I refuse to answer.

4 Q. When Jane Doe 7 -- let me strike that.

5 Do you know Jane Doe 7?

6 A. I refuse to answer.

7 Q. When Jane Doe 7 was a minor female did you

8 call Jane Doe 7 to schedule appointments for her to

9 come to the Epstein house in Palm Beach to give Epstein

10 a massage?

11 MR. PIKE: Form.

12 A. I refuse to answer.

13 Q. When Jane Doe 7 was a minor female did you

14 receive calls from Jane Doe 7 while you were at the

15 Epstein house for her to come to the house by

16 appointment and give Jeffrey Epstein a massage?

17 MR. PIKE: Form.

18 A. I refuse to answer.

19 Q. The computer database that Jeffrey Epstein

20 maintained girls from western Palm Beach County who

21 would come to the house in Palm Beach to give Epstein a

22 massage, did that computer database include the name

23 and contact information for Jane Doe 2?

24 MR. PIKE: Form.

25 A. I refuse to answer.

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1 Q. Do you know who Jane Doe 2 is?

2 A. I refuse to answer.

3 Q. Do you know who Jane Doe 5 is?

4 A. I refuse to answer.

5 Q. Did the computer database that Epstein

6 maintained on his computers in his home have the name

7 and contact information for Jane Doe 5 so that Epstein

8 could contact her for -- for massages in his Palm Beach

9 home?

10 MR. PIKE: Form.

11 A. I refuse to answer.

12 Q. Do you know the name Jane Doe 6?

13 A. I refuse to answer.

14 Q. Did the computer database that Epstein

15 maintained in his home of underage girls who he would

16 have come over for massages and sexual activity did

17 that computer database include the name and contact

18 information for Jane Doe 6?

19 A. I refuse to answer.

20 Q. Do you know the name Jane Doe 3?

21 A. I refuse to answer.

22 Q. Did the computer database that Jeffrey Epstein

23 maintained in his home include the name and contact

24 information of Jane Doe 3 so that he could contact Jane

25 Doe 3 to come to his Palm Beach home and give him a

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1 message which would become sexual activity?

2 A. I refuse to answer.

3 Q. Did the computer database that Jeffrey Epstein

4 maintained in his home include the name Jane Doe 4?

5 MR. PIKE: Form.

6 A. I refuse to answer.

7 Q. Do you know Jane Doe 4?

8 A. I refuse to answer.

9 Q. Did the -- did Jeffrey Epstein tell you that

10 he maintained the contact information for Jane Doe 4 in

11 his computer database in his home so that he could

12 contact her to come to his Palm Beach mansion for

13 massages?

14 MR. PIKE: Form.

15 A. I refuse to answer.

16 Q. Did you know for a fact that the computer

17 database included the name Jane Doe 4 so that Jeffrey

18 Epstein could contact her and she would come to the

19 Palm Beach mansion to give Jeffrey Epstein a massage?

20 MR. PIKE: Form.

21 A. I refuse to answer.

22 Q. Did you know that the computer database that

23 Jeffrey Epstein maintained his home contained the name

24 and contact information of Jane Doe 7 --

25 A. I refuse -- sorry.

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1 Q. I'm sorry -- so he would contact Jane Doe 7

2 and have her come to his house to give him a massage?

3 A. I refuse to answer.

4 Q. Are you aware that the computer database that

5 Jeffrey Epstein maintained in his home contained the

6 name Jane Doe 8 so that he could contact Jane Doe 8 and

7 have him come to the house in Palm Beach for purposes

8 of giving him a massage?

9 MR. PIKE: Form.

10 A. I refuse to answer.

11 Q. You removed three computers from the Palm

12 Beach house with another gentleman prior to the search

13 warrant being issued by the Palm Beach police; isn't

14 that correct?

15 A. I refuse to answer.

16 MR. PIKE: Form. Asked and answered.

17 Q. And Jeffrey Epstein instructed you to remove

18 those computers; is that correct?

19 MR. PIKE: Form, asked and answered.

20 A. I refuse to answer.

21 Q. And Jeffrey Epstein told you that the reason

22 he was instructing you to remove the computers was to

23 hide his sexual activities with underage minors from

24 the authorities?

25 MR. PIKE: Form.

121

1 A. I refuse to answer.

2 Q. As an employee of Jeffrey Epstein did you know

3 Janusz Banaziak?

4 A. I refuse to answer.

5 MR. PIKE: Form.

6 Q. Was Janusz Banaziak also an employee of

7 Jeffrey Epstein?

8 MR. PIKE: Form.

9 A. I refuse to answer.

10 Q. When Janusz Banaziak testified that you and

11 another gentleman removed the three computers from

12 Jeffrey Epstein's home he was telling the truth,

13 correct?

14 A. I refuse to answer.

15 MR. PIKE: Form.

16 Q. Did you observe Jeffrey Epstein persuading,

17 inducing, or enticing underage girls to engage in

18 sexual activities with him?

19 A. I refuse to answer.

20 Q. Did you -- strike that.

21 Did you observe Jeffrey Epstein persuading,

22 inducing, or enticing girls who came to his house for

23 the purpose of giving him a massage to engage in sexual

24 activity with him?

25 MR. PIKE: Form.

122

1 A. I refuse to answer.

2 Q. Did Jeffrey Epstein tell you that he induced,

3 persuaded, or enticed underage girls to engage in

4 sexual activities with him when they came to his Palm

5 Beach mansion to give him a massage?

6 MR. PIKE: Form.

7 A. I refuse to answer.

8 Q. Would you instruct -- when you spoke to

9 underage girls to schedule appointments for massage in

10 Epstein's home would you instruct these girls to lie

11 about their ages and say they were 18 years old when

12 you knew that they were younger than 18?

13 A. I refuse to answer.

14 Q. Did Jeffrey Epstein instruct you as to what to

15 say to the girls who you contacted by telephone to make

16 appointments to schedule massages in Epstein's home?

17 A. I refuse to answer.

18 MR. PIKE: Form.

19 Q. And would Jeffrey Epstein tell you to have the

20 girls who you contacted by the telephone to make

21 appointments to come to the mansion to give Jeffrey

22 Epstein massages, that they should -- that these girls

23 should lie about their ages to Jeffrey Epstein?

24 MR. PIKE: Form.

25 A. I refuse to answer.

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1 Q. Prior to May 2005 are you aware that Jeffrey

2 Epstein had numerous appointments with Jane Doe 4 for

3 her to come to the mansion to come to give him a

4 massage?

5 A. I refuse to answer.

6 MR. PIKE: Form.

7 Q. Prior to May 2005 are you aware that Jane Doe

8 4 would come to the mansion to give Jeffrey Epstein a

9 massage on a frequent and regular basis?

10 A. I refuse to answer.

11 MR. PIKE: Form.

12 Q. Are you aware that prior to May 2005 Jeffrey

13 Epstein engaged with -- engaged in sexual activities

14 with Jane Doe 4 at the Palm Beach mansion 50 to a

15 hundred times?

16 A. I refuse to answer.

17 MR. PIKE: Form.

18 Q. Did Jeffrey Epstein admit to you that on

19 numerous occasions he -- when Jane Doe 4 was an

20 underage minor he touched her breasts?

21 MR. PIKE: Form.

22 A. I refuse to answer.

23 Q. Did Jeffrey Epstein admit to you that on

24 numerous occasions when Jane Doe 4 was an underage

25 minor he touched and groped her buttocks?

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1 A. I refuse to answer.

2 Q. Did Jeffrey Epstein admit to you on numerous

3 occasions when Jane Doe 4 was an underage minor that he

4 rubbed Jane Doe 4's vagina?

5 A. I refuse to answer.

6 MR. PIKE: Form.

7 Q. Did Jeffrey Epstein admit to you that on

8 occasions prior to Jane Doe 4 turning the age of 18

9 that he performed oral sex on Jane Doe 4?

10 MR. PIKE: Form.

11 A. I refuse to answer.

12 Q. Did Jeffrey Epstein admit to you that on

13 numerous occasions prior to Jane Doe 4 reaching the age

14 of 18 he would place a vibrator on Jane Doe 4's

15 genitals?

16 MR. PIKE: Form.

17 A. I refuse to answer.

18 Q. Did Jeffrey Epstein admit to you that prior to

19 Jane Doe 4 becoming 18 years of age he would masturbate

20 in her presence?

21 A. I refuse to answer.

22 MR. PIKE: Form to the last question.

23 MR. MERMELSTEIN: Hum?

24 MR. PIKE: Form to the last question.

25 Q. Did Jeffrey Epstein admit to you that prior to

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1 Jane Doe 7 reaching the age of 18 years old he would

2 touch her breasts?

3 MR. PIKE: Form.

4 A. I refuse to answer.

5 Q. Did Jeffrey Epstein admit to you that prior to

6 Jane Doe 7 reaching the age of 18 he would grope her --

7 grope Jane Doe 7's buttocks?

8 MR. PIKE: Form.

9 A. I refuse to answer.

10 Q. And did Jeffrey Epstein admit to you that

11 prior to Jane Doe 7 reaching the age of 18 he would rub

12 Jane Doe 7's vagina?

13 A. I refuse to answer.

14 MR. PIKE: Form.

15 Q. Do you know who Haley Robson is?

16 A. I refuse to answer.

17 Q. Did Jeffrey Epstein instruct you to call Haley

18 Robson on numerous occasions to recruit underage girls

19 to come to the Palm Beach Mansion to give Jeffrey

20 Epstein a massage?

21 MR. PIKE: Form.

22 A. I refuse to answer.

23 Q. Did Jeffrey Epstein instruct you on numerous

24 occasions to contact Haley Robson for the purpose of

25 scheduling underage girls for appointments to come to

126

1 the Palm Beach mansion and give Jeffrey Epstein a  
 2 massage?  
 3 A. I refuse to answer.  
 4 MR. PIKE: Form.  
 5 Q. Did Jeffrey Epstein advise you that Haley  
 6 Robson was his contact in western Palm Beach County  
 7 high schools for the purpose of recruiting underage  
 8 girls to come to the Palm Beach mansion where he would  
 9 then engage in sexual activity with them?  
 10 A. I refuse to answer.  
 11 MR. PIKE: Form.  
 12 Q. Did Sarah Kellen instruct you on how to  
 13 contact underage girls for the purpose of bringing them  
 14 to the Palm Beach mansion for massages and what to say  
 15 to these young girls?  
 16 MR. PIKE: Form.  
 17 A. I refuse to answer.  
 18 Q. Did Sarah Kellen train you in how to contact  
 19 girls and recruit them to come to the Palm Beach  
 20 mansion and -- and provide Jeffrey Epstein with  
 21 massages?  
 22 A. I refuse to answer.  
 23 MR. PIKE: Form.  
 24 Q. Was one of your primary duties scheduling  
 25 regular appointments, at least two per day, for Jeffrey

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1 Epstein to have underage girls come to the mansion to  
 2 give him a massage?  
 3 MR. PIKE: Asked and answered, form.  
 4 A. I refuse to answer.  
 5 MR. MERMELSTEIN: Okay. That's all I have.  
 6 MR. PIKE: I have no questions.  
 7 MR. EDWARDS: I only have a couple.  
 8 I'll go ahead and mark this as Number 4.  
 9 (Whereupon, Plaintiff's Exhibit 4 was marked  
 10 for identification.)  
 11 REDIRECT EXAMINATION  
 12 BY MR. EDWARDS:  
 13 Q. This photograph appears to be Jeffrey Epstein,  
 14 yourself, and Maer Roshan in this photograph taken from  
 15 an internet newspaper. Can you tell me where that  
 16 picture was taken?  
 17 A. I refuse to answer.  
 18 MR. PIKE: May I see that, counsel?  
 19 Q. Was this related -- this event, was it related  
 20 to MC Squared?  
 21 A. I refuse to answer.  
 22 Q. All right. What is -- I know that you told us  
 23 that you're not employed now because you're in school.  
 24 What was your last employment?  
 25 A. I was working at the local CPA firm.

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1 Q. Excuse me?  
 2 A. CPA firm.  
 3 Q. Okay. What was the name of that CPA firm?  
 4 A. William Owens, CPA, P.A.  
 5 Q. William Owens. And is that in Miami?  
 6 A. Correct.  
 7 Q. Where did you work prior to that?  
 8 A. I worked for maybe less than a month at a  
 9 clothing store.  
 10 Q. What clothing store?  
 11 A. Club Monaco.  
 12 Q. Where's that?  
 13 A. South Beach.  
 14 Q. Where in South Beach?  
 15 A. It's on Collins Avenue and I believe maybe 6th  
 16 and 8th, I'm not sure.  
 17 Q. Okay. Why'd you leave there?  
 18 A. The clothing store?  
 19 Q. Correct.  
 20 A. Because I got the accounting job.  
 21 Q. And that's what you want to be you said?  
 22 A. Yes, um-hum.  
 23 Q. Okay. And I suppose that you left the  
 24 accounting firm because you went to school to finish  
 25 your degree?

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1 A. Well, I was working part-time and going to  
 2 school part-time and it just became too challenging.  
 3 The accounting program is very demanding, so I wanted  
 4 to dedicate myself to study.  
 5 Q. How long were you at this accounting firm  
 6 Williams Owens -- William Owens?  
 7 A. Maybe two and a half years about maybe.  
 8 Something like that.  
 9 Q. All right. So we're in -- when was it that  
 10 you left there?  
 11 A. May of 2009.  
 12 Q. Okay. May '09, so that brings us back to late  
 13 2006 or something when you started there?  
 14 A. Yes. That would be about right, yes.  
 15 Q. And then it was sometime earlier than that in  
 16 2006 when you were at the clothing store?  
 17 A. Yes.  
 18 Q. And you were there for about a month?  
 19 A. About, yes.  
 20 Q. Give or take --  
 21 A. Yes.  
 22 Q. -- a week or so?  
 23 Where -- where did you work prior to the  
 24 clothing store Club Monaco?  
 25 A. I was modeling.

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1 Q. And where were you modeling?  
2 A. In Miami. New York.  
3 Q. For what agency?  
4 A. In Miami I was with Elite Models. I was with  
5 Michele Pommier --  
6 Q. Who's that?  
7 A. Michele Pommier Agency.  
8 Q. Okay. How do you spell the last name?  
9 A. P-O-M-M-I-E-R. And then --  
10 Q. Okay. That was in Miami?  
11 A. Yes.  
12 Q. And then what agency did you work through in  
13 New York?  
14 A. ID Models.  
15 Q. Excuse me?  
16 A. ID Models.  
17 Q. ID?  
18 A. Yes.  
19 Q. Just in the letter I --  
20 A. Yes.  
21 Q. -- letter D?  
22 And who was the person that got you hooked up  
23 at ID Models?  
24 A. My husband had that contact.  
25 Q. Okay. How long did you work with ID Models?

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1 A. I'm trying to think. I do not recall exact  
2 timeframe.  
3 Q. All right. Well, if the clothing store was  
4 sometime late 2006 are we talking about earlier in the  
5 year 2006 when you were working with Elite in Miami and  
6 ID Models in New York?  
7 MR. ROSS: I'm going to ask you to invoke.  
8 THE WITNESS: I'm sorry?  
9 MR. ROSS: You should invoke with regard to  
10 this timeframe you're talking about now.  
11 MR. EDWARDS: Okay.  
12 A. I refuse to answer.  
13 Q. Okay. Can you tell me about any job that you  
14 had modeling or otherwise prior to working at ID Models  
15 or with Elite?  
16 A. Recall -- just name any --  
17 Q. Any -- what was your -- what employment did  
18 you have just prior to working with Elite Models and ID  
19 Models?  
20 A. I was working as a model in Europe. I  
21 graduated from high school in 2002 and I dedicated that  
22 year to modeling and so I was modeling. I did not have  
23 employment.  
24 Q. All right. So just so I understand you were  
25 modeling in Europe, you came over here in 2002.

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1 A. Um-hum.  
2 Q. There's a period of time from 2002 through  
3 2006 where -- you know, 2006 you start with ID Models  
4 and again with Elite. I know when you came over here  
5 in 2002 you were with Elite also, right?  
6 A. I'm sorry, you're confusing me with the  
7 timeframe.  
8 Q. I'm confusing myself, how about that. Let's  
9 start over.  
10 2002 you come over to the United States,  
11 you're working at Elite?  
12 A. Yes, I've been invited by Elite.  
13 Q. Okay. And then if I understand you correctly  
14 over time you continue to work with or through Elite?  
15 A. Well, I've been, you know, changing agencies  
16 throughout the period.  
17 Q. Okay. What are some of the other modeling  
18 agencies you have worked for or with?  
19 A. I refuse to answer.  
20 Q. Okay. The only other names of modeling  
21 agencies that you can answer are ID Models and Elite;  
22 is that correct?  
23 THE WITNESS: Should I?  
24 MR. ROSS: Well, she's already answered also  
25 Michele Pommier.

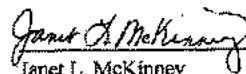
133

1 MR. EDWARDS: But I thought that was somebody  
2 through Elite, like they're --  
3 MR. ROSS: No, no, no, Michele Pommier is a --  
4 MR. EDWARDS: Different, okay.  
5 Q. All right. Is there anybody else that you're  
6 able to -- to tell me where you worked?  
7 MR. ROSS: Invoke as to any further  
8 information.  
9 THE WITNESS: I'm sorry?  
10 MR. ROSS: Invoke your privilege.  
11 A. I refuse to answer any questions.  
12 MR. EDWARDS: All right. That's all I got.  
13 MR. MERMELSTEIN: Can I just follow up a  
14 couple?  
15 RE-CROSS-EXAMINATION  
16 BY MR. MERMELSTEIN:  
17 Q. In what has been marked as Exhibit 2C is a  
18 phone message from you to Adri -- from you to Jeffrey  
19 Epstein dated September 10th, 2005 at 1:15 p.m.  
20 And the message that you left was "Lauren  
21 confirmed 4 p.m.", is that correct?  
22 A. I refuse to answer.  
23 Q. Is the Lauren referred to in this message  
24 Lauren Murphy?  
25 MR. PIKE: Form.

1 A. I refuse to answer.  
 2 Q. And did you schedule Lauren --  
 3 MR. PIKE: Form.  
 4 Q. -- Lauren Murphy to come to the Palm Beach  
 5 mansion as an underage female to give Jeffrey Epstein  
 6 massages?  
 7 MR. PIKE: Form.  
 8 A. I refuse to answer.  
 9 Q. Also what has been marked as Exhibit 2F is a  
 10 phone message from you to Jeffrey Epstein dated  
 11 September 11th, 2005 at 9:15 a.m. And the message was  
 12 that you got a car for a particular person. Do you  
 13 recall that?  
 14 MR. PIKE: Form.  
 15 A. I refuse to answer.  
 16 Q. Is the car that you obtained on  
 17 September 11th, 2005 for Jane Doe 4?  
 18 MR. PIKE: Form.  
 19 A. I refuse to answer.  
 20 Q. And Jane Doe 4 is a girl who had been coming  
 21 to the Palm Beach mansion to give Jeffrey Epstein a  
 22 massage and engage in sexual activities with him for a  
 23 substantial period of time; is that correct?  
 24 A. I refuse to answer.  
 25 Q. And also what has been marked as Exhibit 2H --

1 and no word index.  
 2 MR. MERMELSTEIN: I'll take a copy with a  
 3 mini.  
 4 (The deposition was concluded at 12:42 p.m.)  
 5 (Reading and signing of the deposition was  
 6 waived by the witness and all parties.)  
 7  
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1 actually --  
 2 MR. EDWARDS: Is that G?  
 3 MR. MERMELSTEIN: Are they similar?  
 4 MR. EDWARDS: Yeah, I guess they blocked out  
 5 names on one of them and they didn't on the other.  
 6 MR. MERMELSTEIN: Right. Okay.  
 7 Q. And what has been marked as Exhibit 2G is a  
 8 message from you to Jeffrey Epstein dated  
 9 September 3rd, 2005 at 8:50 p.m. And the message you  
 10 left is, quote, "I left message for Ashley to confirm  
 11 for 11:00 a.m. and Vanessa for 4:30 p.m."  
 12 Did you, in fact, leave that message?  
 13 MR. PIKE: Form.  
 14 A. I refuse to answer.  
 15 Q. And this message that you left confirmed an  
 16 appointment for Jane Doe 4 for 4:30 p.m., correct?  
 17 A. I refuse to answer.  
 18 MR. MERMELSTEIN: All right. That's all I  
 19 have.  
 20 MR. ROSS: Waive.  
 21 MR. MERMELSTEIN: All right.  
 22 VIDEOGRAPHER: Off the record, 12:42 p.m.  
 23 THE REPORTER: Are you ordering?  
 24 MR. EDWARDS: Yes.  
 25 MR. PIKE: I want a copy, a mini, no ASCII,

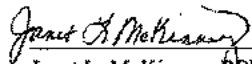

1 CERTIFICATE OF OATH  
 2 STATE OF FLORIDA  
 3 COUNTY OF BROWARD  
 4  
 5 I, Janet L. McKinney, Registered Professional  
 6 Reporter, Florida Professional Reporter, Certified  
 7 LiveNote Reporter, Notary Public, State of Florida,  
 8 certify that ADRIANA ROSS personally appeared before me  
 9 on March 15, 2010 and was duly sworn.  
 10 Signed this 21st day of March, 2010.  
 11  
 12  
 13  
 14   
 15 Janet L. McKinney  
 16 Registered Professional Reporter  
 17 Florida Professional Reporter  
 18 Certified LiveNote Reporter  
 19 Notary Public, State of Florida  
 20 Commission No.: DD552183  
 21 Expires: June 2, 2010  
 22  
 23  
 24  
 25

1 CERTIFICATE OF REPORTER  
2 STATE OF FLORIDA  
3 COUNTY OF BROWARD  
4

5 I, Janet McKinney, Registered Professional  
6 Reporter, Florida Professional Reporter, Certified  
7 LiveNote Reporter, certify that I was authorized to and  
8 did stenographically report the deposition of ADRIANA  
9 ROSS, pages 1 through 138; that a review of the  
10 transcript was not requested; and that the transcript  
11 is a true record of my stenographic notes.

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

17 Dated this 21st day of March, 2010.

18  

19 Janet L. McKinney, RPR, FPR  
20 Registered Professional Reporter  
21 Florida Professional Reporter  
22 Certified LiveNote Reporter  
23  
24  
25



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# ATTACHMENT 14

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

CASE NO. 08-CIV-80119-MARRA/JOHNSON

JANE DOE NO. 2,  
Plaintiff,

-vs- VOLUME I OF III  
JEFFREY EPSTEIN,  
Defendant.

Related cases:

08-80232, 08-08380, 08-80381, 08-80994  
08-80993, 08-80811, 08-80893, 09-80469  
09-80591, 09-80656, 09-80802, 09-81092

VIDEOTAPED DEPOSITION OF  
SARAH KELLEN

Wednesday, March 24, 2010  
10:37 - 6:51 p.m.

250 Australian Avenue South  
Suite 1500  
West Palm Beach, Florida 33401

Reported By:  
Cynthia Hopkins, RPR, FPR  
Notary Public, State of Florida  
Prose Court Reporting Services  
Job No.: 1484

IN THE CIRCUIT COURT OF THE 15TH JUDICIAL CIRCUIT  
IN AND FOR PALM BEACH COUNTY, FLORIDA  
CASE NO. 502008CA028051XXXXMB AB

L.M.,

Plaintiff,

-vs- VOLUME I OF III  
JEFFREY EPSTEIN,  
Defendant.

VIDEOTAPED DEPOSITION OF  
SARAH KELLEN

Wednesday, March 24, 2010  
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IN THE CIRCUIT COURT OF THE 15TH JUDICIAL CIRCUIT  
IN AND FOR PALM BEACH COUNTY, FLORIDA  
CASE NO. 502008CA028058XXXXMB AD

E.W.,

Plaintiff,

-vs- VOLUME I OF III  
JEFFREY EPSTEIN,  
Defendant.

VIDEOTAPED DEPOSITION OF  
SARAH KELLEN

Wednesday, March 24, 2010  
10:37 - 6:51 p.m.

250 Australian Avenue South  
Suite 1500  
West Palm Beach, Florida 33401

Reported By:  
Cynthia Hopkins, RPR, FPR  
Notary Public, State of Florida  
Prose Court Reporting Services  
Job No.: 1484

IN THE CIRCUIT COURT OF THE FIFTEENTH JUDICIAL  
CIRCUIT IN AND FOR PALM BEACH COUNTY, FLORIDA  
CASE No.502008CA037319XXXXMB AB

B.B.

Plaintiff,

-vs- VOLUME I OF III  
JEFFREY EPSTEIN  
AND SARAH KELLEN,

Defendants.

VIDEOTAPED DEPOSITION OF  
SARAH KELLEN

Wednesday, March 24, 2010  
10:37 - 6:51 p.m.

250 Australian Avenue South  
Suite 1500  
West Palm Beach, Florida 33401

Reported By:  
Cynthia Hopkins, RPR, FPR  
Notary Public, State of Florida  
Prose Court Reporting Services  
Job No.: 1484



1 APPEARANCES:  
 2 On behalf of the Plaintiffs, B.B.:  
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 LEOPOLD KUVIN  
 4 2925 PGA Boulevard  
 Suite 200  
 5 Palm Beach Gardens, Florida 33410  
 Phone: 561.515.1400  
 6  
 7 On behalf of the Plaintiffs, L.M., E.W. and  
 Jane Doe:  
 8  
 9 MATTHEW WEISSING, ESQUIRE  
 FARMER, JAFFE, WEISSING, EDWARDS  
 10 FISTOS & LHRMAN, P.L.  
 425 North Andrews Avenue  
 Suite 2  
 11 Fort Lauderdale, Florida 33301  
 Phone: 954.524.2820  
 12  
 13 On behalf of Jane Does 1 through 8:  
 14 ADAM D. HOROWITZ, ESQUIRE  
 MERMELSTEIN & HOROWITZ, P.A.  
 15 18205 Biscayne Boulevard  
 Suite 2218  
 16 Miami, Florida 33160  
 Phone: 305.931.2200  
 17 E-mail: Ahorowitz@sxabuseattorney.com  
 18 On behalf of the Plaintiffs, 101, 102 and 103:  
 19 KATHERINE W. EZELL, ESQUIRE  
 AMY JOSEFSBERG EDERI, ESQUIRE  
 20 PODHURST ORSECK  
 25 West Flagler Street  
 Suite 800  
 21 Miami, Florida 33130  
 Phone: 305.358.2800  
 22 (Via telephone)  
 23  
 24  
 25

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1 Appearances continued...  
 2 On behalf of the Plaintiff, Jane Doe II:  
 3 ISIDRO MANUEL GARCIA, ESQUIRE  
 GARCIA, ELKINS & BOEHRINGER  
 4 224 Datura Avenue, Suite 900  
 West Palm Beach, Florida 33401  
 Phone: 561.832.8033  
 5  
 6  
 7 On behalf of the Defendant:  
 8 JACK ALAN GOLDBERGER, ESQUIRE  
 ATTERBURY, GOLDBERGER & WEISS, P.A.  
 9 250 Australian Avenue South  
 Suite 1400  
 10 West Palm Beach, Florida 33401-5012  
 Phone: 561.659.8300  
 11  
 12  
 13 On behalf of the Witness:  
 14 BRUCE E. REINHART, ESQUIRE  
 LAW OFFICE OF BRUCE E. REINHART  
 15 One Clearlake Center  
 250 South Australian Avenue, Suite 1400  
 16 West Palm Beach, Florida 33401  
 Phone: 561.202.6360  
 17  
 18  
 19  
 20 ALSO PRESENT:  
 21 Jessica Cadwell, Paralegal  
 Burman, Critton, Luttier & Coleman, P.A.  
 22 Joseph Kozak, Videographer  
 Prose Court Reporting Services  
 23  
 24  
 25

1 PROCEEDINGS  
 2  
 3  
 4 THE VIDEOGRAPHER: We are now on video  
 5 record. This is Media No. 1 in the videotaped  
 6 deposition of Sarah Kellen in the matter of  
 7 Jane Doe versus Jeffrey Epstein, et al. Today  
 8 is Wednesday, March 24th, 2010. It is  
 9 10:36 a.m. We are here at Prose Court  
 10 Reporting, 250 South Australian Avenue, West  
 Palm Beach, Florida.  
 11 My name is Joe Kozak. I'm the  
 12 videographer. The reporter is Cindy  
 13 Hopkins from Prose Court Reporting Agency.  
 14 Would counsel please introduce  
 15 yourselves, and then the court reporter  
 16 will swear in the witness.  
 17 MR. KUVIN: Good morning. Spencer Kuvin  
 18 on behalf of one of the Plaintiffs.  
 19 MR. HOROWITZ: Adam Horowitz on behalf of  
 20 Jane Does 2 through 8. And just for the record  
 21 purposes, the deposition is also being taken in  
 22 the federal cases, I believe, case being  
 23 Jane Doe 2 versus Jeffrey Epstein.  
 24 MR. WEISSING: Matt Weissing on behalf of  
 25 three of the Plaintiffs.

1 MR. GARCIA: Sid Garcia for Jane Doe,  
 2 Roman Numeral II.  
 3 MR. GOLDBERGER: Jack Goldberger on behalf  
 4 of Jeffrey Epstein.  
 5 MS. CADWELL: Jessica Cadwell, paralegal,  
 6 on behalf of Jeffrey Epstein.  
 7 MR. RHEINHART: Bruce Rheinart on behalf  
 8 of the witness, Sarah Kellen.  
 9 MR. KUVIN: Kathy, your turn.  
 10 MS. EZELL: Okay. Kathy Ezell and Amy  
 11 Ederi on behalf of Plaintiff, Jane Doe 103.  
 12 Thereupon,  
 13 (SARAH KELLEN)  
 14 Having been first duly sworn or affirmed, was  
 15 examined and testified as follows:  
 16 DIRECT EXAMINATION  
 17 BY MR. KUVIN:  
 18 Q. Good morning.  
 19 A. Morning.  
 20 Q. Could you give us your full name, please.  
 21 A. Sarah Kellen.  
 22 Q. Do you have a middle name?  
 23 A. Lynelle.  
 24 Q. Would you spell that for us?  
 25 A. L-y-n-n-e-l-l-e.

1 privilege.  
 2 MR. KUVIN: I'll agree with that  
 3 procedure.  
 4 MR. RHEINHART: Anyone object to that  
 5 procedure?  
 6 MR. GOLDBERGER: Actually I think if, in  
 7 fact, this deposition is used in a trial, I  
 8 think you would want the lengthier answer as  
 9 being the answer that is played to the jury.  
 10 So either you guys can agree that it gets cut  
 11 in or she's going to have to -- I can't tell  
 12 you what to do, but I would suggest that she  
 13 give the lengthier answer each time.  
 14 But there's got to be a way that you  
 15 guys can reach an agreement though, that  
 16 from a technology perspective, that the  
 17 lengthy answer that she just gave would be  
 18 used during any trial testimony. Can that  
 19 be done?  
 20 MR. KUVIN: I don't know procedurally  
 21 whether it can be done.  
 22 MR. GOLDBERGER: I think --  
 23 MR. KUVIN: I don't know that, well --  
 24 MR. GOLDBERGER: And again, it's not my,  
 25 it's not my deal. I'm just telling you how

1 Q. What's your current address?  
 2 MR. RHEINHART: I'm going to instruct the  
 3 witness not to answer that question on the  
 4 basis of her Fifth and 14th Amendment  
 5 privileges against self-incrimination.  
 6 MR. KUVIN: Okay. We had spoken before  
 7 with respect to there are likely going to be  
 8 answers similar to that throughout this  
 9 deposition. I have agreed to a procedure that  
 10 we can do a shortened answer. However you want  
 11 to handle that, I leave it up to you. But I do  
 12 agree that whatever the shortened answer is,  
 13 that it will satisfy the length, lengthy answer  
 14 that she would like to give.  
 15 So, do we want to do that with this  
 16 question, or how do you want to handle  
 17 that procedurally?  
 18 MR. RHEINHART: Well, I think I have given  
 19 the instruction. I think she, will give her  
 20 the same instruction in the future to the  
 21 extent that it's relevant, and I think that if  
 22 we can all just agree that if she simply says  
 23 or I simply say "The Fifth Amendment," that  
 24 will qualify as giving a sufficient answer to  
 25 -- as a matter of law, and will invoke that

1 we've done it in the past.  
 2 MR. KUVIN: I hear you, and I have a  
 3 number of issues primary, primarily of which  
 4 that you're not here to represent anyone  
 5 currently.  
 6 MR. GOLDBERGER: Yeah, I am. I'm  
 7 actually, I'm actually here representing  
 8 Jeffrey Epstein, so...  
 9 MR. KUVIN: Okay. With respect to all the  
 10 civil cases, though, you're not here to  
 11 represent anyone, so --  
 12 MR. GOLDBERGER: Yes, I am.  
 13 MR. KUVIN: With the exception --  
 14 MR. GOLDBERGER: I represent -- I am -- I  
 15 don't mean to interrupt you, but I am counsel  
 16 of record in the civil cases.  
 17 MR. KUVIN: Okay. Okay.  
 18 MR. RHEINHART: If we have a stipulation,  
 19 what's the problem? Are you --  
 20 MR. KUVIN: There is none.  
 21 MR. RHEINHART: -- worried about a waiver?  
 22 MR. GOLDBERGER: No, I'm not worried about  
 23 that at all. I'm worried about what is played  
 24 to a jury if this gets tried.  
 25 MR. KUVIN: Okay. And I appreciate you

1 coaching Bruce, but I think he can handle  
 2 himself pretty adequately now --  
 3 MR. GOLDBERGER: I have --  
 4 MR. KUVIN: So I leave it up to Bruce --  
 5 MR. GOLDBERGER: I have all the confidence  
 6 in Bruce.  
 7 MR. KUVIN: Mr. Rheinart, with respect to  
 8 how you want to handle it, I think we have an  
 9 agreement.  
 10 MR. RHEINHART: I'm satisfied that we have  
 11 a stipulation, and I assume if there is ever a  
 12 trial, that would be played or produced to the  
 13 jury that simply by using shorthand, what she's  
 14 really saying is the lengthier answer now. I'm  
 15 satisfied with that.  
 16 MR. KUVIN: And I agree with that.  
 17 BY MR. KUVIN:  
 18 Q. Okay. Ma'am, what is your current  
 19 address?  
 20 MR. RHEINHART: Again, I will instruct the  
 21 witness not to answer the question.  
 22 THE WITNESS: On the instruction of my  
 23 lawyer, I choose to invoke my Fifth Amendment  
 24 right.  
 25

1 I choose to invoke my Fifth Amendment right.  
 2 BY MR. KUVIN:  
 3 Q. Would you agree with me that you're  
 4 approximately 5 feet, 8 inches tall?  
 5 MR. RHEINHART: Same instruction.  
 6 THE WITNESS: On the advice of my lawyer,  
 7 I must invoke my Fifth Amendment right.  
 8 BY MR. KUVIN:  
 9 Q. Would you agree with me that your eyes are  
 10 hazel?  
 11 MR. RHEINHART: Same instruction.  
 12 THE WITNESS: On the advice of my lawyer,  
 13 I choose to invoke my Fifth Amendment right.  
 14 BY MR. KUVIN:  
 15 Q. Would you agree with me that you were born  
 16 in Hawaii?  
 17 MR. RHEINHART: Same instruction.  
 18 THE WITNESS: On the advice of my lawyer,  
 19 I choose to invoke my Fifth Amendment right.  
 20 BY MR. KUVIN:  
 21 Q. What are the names of your parents?  
 22 MR. RHEINHART: Same instruction.  
 23 THE WITNESS: On the advice of my lawyer,  
 24 I must invoke my Fifth Amendment right.  
 25

1 BY MR. KUVIN:  
 2 Q. What is your current phone number?  
 3 MR. RHEINHART: Same instruction.  
 4 THE WITNESS: On the advice of my lawyer,  
 5 I choose to invoke my Fifth Amendment right.  
 6 BY MR. KUVIN:  
 7 Q. What is your cellphone number?  
 8 MR. RHEINHART: Same instruction --  
 9 THE WITNESS: On the advice of my lawyer,  
 10 I choose to invoke my Fifth Amendment right.  
 11 MR. RHEINHART: You have to let me speak  
 12 before you answer in case there's an objection  
 13 or any of the other lawyers have an objection.  
 14 BY MR. KUVIN:  
 15 Q. I am going to show you a photograph. Oh,  
 16 what is your date of birth?  
 17 MR. RHEINHART: Same instruction.  
 18 THE WITNESS: On the advice of my lawyer,  
 19 I choose to invoke my Fifth Amendment right.  
 20 MR. KUVIN: Let's make is easier.  
 21 BY MR. KUVIN:  
 22 Q. Ms. Kellen, would you agree with me that  
 23 your date of birth is May 25th, 1979?  
 24 MR. RHEINHART: Same instruction.  
 25 THE WITNESS: On the advice of my lawyer,

1 BY MR. KUVIN:  
 2 Q. Are you married or single?  
 3 MR. RHEINHART: Same instruction.  
 4 THE WITNESS: On the advice of my lawyer,  
 5 I must to invoke my Fifth Amendment right.  
 6 (Plaintiff's Exhibit No. 1 was marked for  
 7 identification.)  
 8 MR. KUVIN: I'm going to show you what  
 9 we'll mark as Plaintiff's Exhibit 1.  
 10 And I'll ask the videographer to zoom  
 11 in here for a second.  
 12 BY MR. KUVIN:  
 13 Q. Okay. Ma'am, I am going to show you a  
 14 photograph we've marked as Plaintiff's Exhibit 1 and  
 15 ask you if you recognize this registered sex  
 16 offender.  
 17 MR. RHEINHART: First, object to the form  
 18 of the question. It assumes facts not before  
 19 the witness, and I'll give the witness the same  
 20 instruction as to that question.  
 21 THE WITNESS: At the advice of my lawyer,  
 22 I must invoke my Fifth Amendment right.  
 23 BY MR. KUVIN:  
 24 Q. Would you agree with me that this  
 25 registered sex offender's name is Jeffrey Epstein?

1 MR. RHEINHART: Same instruction, same  
2 objection.

3 THE WITNESS: At the advice of my lawyer,  
4 I must invoke my Fifth Amendment right.

5 BY MR. KUVIN:

6 Q. Would you agree with me that Jeffrey  
7 Epstein is a sexual offender?

8 MR. RHEINHART: Object to the form of the  
9 question and instruct the witness not to answer  
10 on her Fifth Amendment privilege.

11 THE WITNESS: On the advice of my lawyer I  
12 must invoke my Fifth Amendment right.

13 BY MR. KUVIN:

14 Q. Would you agree with me that  
15 Jeffrey Epstein sexually abused you?

16 MR. RHEINHART: Objection to the form,  
17 both as to the form of the question as to  
18 harassing and instruct the witness not to  
19 answer, based on the Fifth Amendment privilege.

20 THE WITNESS: On the advice of my lawyer,  
21 I must invoke my Fifth Amendment right.

22 BY MR. KUVIN:

23 Q. Would you agree with me that you were a  
24 minor when Jeffrey Epstein first had sexual  
25 relations with you?

1 question. It's ambiguous and compound, and I  
2 will instruct the witness not to answer based  
3 on her Fifth Amendment privilege.

4 THE WITNESS: On the advice of my lawyer,  
5 I must invoke my Fifth Amendment right.

6 BY MR. KUVIN:

7 Q. And why did you do that?

8 MR. RHEINHART: Object to the form. It's  
9 ambiguous, in fact that what?

10 BY MR. KUVIN:

11 Q. Why did you bring minor girls to  
12 Jeffrey Epstein for him to have sex with?

13 MR. RHEINHART: Same objection as to form  
14 and instruct the witness not to answer.

15 THE WITNESS: On the advice of my lawyer,  
16 I must invoke my Fifth Amendment right.

17 BY MR. KUVIN:

18 Q. What do you currently do for a job?

19 MR. RHEINHART: Instruct the witness not  
20 to answer the question.

21 THE WITNESS: On the advice of my lawyer,  
22 I must invoke my Fifth Amendment right.

23 BY MR. KUVIN:

24 Q. Would you agree with me that you currently  
25 work for Jeffrey Epstein?

1 MR. RHEINHART: Object to the form. It  
2 assumes facts not before the witness. It is a  
3 compound question and I would instruct the  
4 witness not to answer based on her Fifth  
5 Amendment privilege.

6 THE WITNESS: On the advice of my lawyer,  
7 I must invoke my Fifth Amendment right.

8 BY MR. KUVIN:

9 Q. Would you agree with me that you have had  
10 sex with Jeffrey Epstein?

11 MR. RHEINHART: Same instruction.

12 THE WITNESS: On the advice of my lawyer,  
13 I must invoke my Fifth Amendment right.

14 BY MR. KUVIN:

15 Q. Would you agree with me that you first had  
16 sex with Jeffrey Epstein when you were under the age  
17 of 18?

18 MR. RHEINHART: Same instruction.

19 THE WITNESS: On the advice of my lawyer,  
20 I must invoke my Fifth Amendment right.

21 BY MR. KUVIN:

22 Q. Would you agree with me, ma'am, that you  
23 brought numerous underage girls to Jeffrey Epstein  
24 so that he could have sex with them?

25 MR. RHEINHART: Object to the form of the

1 MR. RHEINHART: Instruct the witness not  
2 to answer the question.

3 THE WITNESS: On the advice of my lawyer,  
4 I must invoke my Fifth Amendment right.

5 BY MR. KUVIN:

6 Q. How long have you worked for  
7 Jeffrey Epstein?

8 MR. RHEINHART: Same instruction.

9 THE WITNESS: On the advice of my lawyer,  
10 I must invoke my Fifth Amendment right.

11 BY MR. KUVIN:

12 Q. Would you agree with me that you've worked  
13 for Jeff, Jeffrey Epstein for over 20 years as his  
14 personal assistant?

15 MR. RHEINHART: Instruct the witness not  
16 to answer the question.

17 THE WITNESS: On the instruction of my  
18 lawyer, I must invoke my Fifth Amendment right.

19 BY MR. KUVIN:

20 Q. Would you agree with me that when you  
21 first were hired by Jeffrey Epstein as his personal  
22 assistant, you were under the age of 18?

23 MR. RHEINHART: Object to the form. It's  
24 compound and assumes facts not present before  
25 the witness, and I instruct the witness not to

1 answer the question based on her Fifth  
 2 Amendment privilege.  
 3 THE WITNESS: On the instruction of my  
 4 lawyer, I must invoke my Fifth Amendment right.  
 5 BY MR. KUVIN:  
 6 Q. Who introduced you to Jeffrey Epstein the  
 7 first time that you met him?  
 8 MR. RHEINHART: Same instruction.  
 9 THE WITNESS: On the instruction of my  
 10 lawyer, I must invoke my Fifth Amendment right.  
 11 BY MR. KUVIN:  
 12 Q. Did Ghislaine Maxwell introduce you to  
 13 Jeffrey Epstein for the first time?  
 14 MR. RHEINHART: Same instruction.  
 15 THE WITNESS: On the instruction of my  
 16 lawyer, I must invoke my Fifth Amendment right.  
 17 BY MR. KUVIN:  
 18 Q. When was the first time you were in  
 19 Jeffrey Epstein's home located on El Brillo Way on  
 20 Palm Beach Island?  
 21 MR. RHEINHART: Object to the form of the  
 22 question as compound and assuming facts not  
 23 before the witness. And I instruct the witness  
 24 not to answer based on her Fifth Amendment  
 25 privilege.

1 witness, and I will instruct the witness not to  
 2 answer based on her Fifth Amendment privilege.  
 3 THE WITNESS: On the instruction of my  
 4 lawyer, I must invoke my Fifth Amendment right.  
 5 BY MR. KUVIN:  
 6 Q. Would you agree with me that  
 7 Jeffrey Epstein owns numerous planes, private  
 8 planes?  
 9 MR. RHEINHART: Instruct the witness not  
 10 to answer.  
 11 THE WITNESS: On the instruction of my  
 12 lawyer, I must invoke my Fifth Amendment right.  
 13 BY MR. KUVIN:  
 14 Q. And you've been on every one of those  
 15 private planes; isn't that true?  
 16 MR. RHEINHART: Object to the form. It  
 17 assumes facts not before the witness, and I  
 18 will instruct the witness not to answer based  
 19 on her Fifth Amendment privilege.  
 20 THE WITNESS: On the instruction of my  
 21 lawyer, I must invoke my Fifth Amendment right.  
 22 BY MR. KUVIN:  
 23 Q. Ma'am, isn't it true that you've seen the  
 24 passenger manifest for Jeffrey Epstein's plane?  
 25 MR. RHEINHART: Object to the form. It

1 THE WITNESS: On the instruction of my  
 2 lawyer, I must invoke my Fifth Amendment right.  
 3 BY MR. KUVIN:  
 4 Q. Would you agree with me that  
 5 Jeffrey Epstein owns a home at 358 El Brillo Way,  
 6 Palm Beach Island, Florida?  
 7 MR. RHEINHART: Instruct the witness not  
 8 to answer based on her Fifth Amendment  
 9 privilege.  
 10 THE WITNESS: On instruction of my  
 11 counsel, I must invoke my Fifth Amendment  
 12 right.  
 13 BY MR. KUVIN:  
 14 Q. Would you agree with me that you've been  
 15 in that home numerous times?  
 16 MR. RHEINHART: Instruct the witness not  
 17 to answer the question based on her Fifth  
 18 Amendment privilege.  
 19 THE WITNESS: On instruction of my lawyer,  
 20 I must invoke my Fifth Amendment right.  
 21 BY MR. KUVIN:  
 22 Q. Would you agree with me that you have gone  
 23 on Jeffrey Epstein's plane numerous times?  
 24 MR. RHEINHART: Object to the form. It  
 25 assumes facts that are not present for the

1 assumes facts that are not established as known  
 2 to this witness, and I instruct the witness not  
 3 to answer the question based on her Fifth  
 4 Amendment privilege.  
 5 THE WITNESS: On the instruction of my  
 6 lawyer, I must invoke my Fifth Amendment right.  
 7 MR. KUVIN: Let me show you what we'll  
 8 mark as Exhibit 2.  
 9  
 10 (Plaintiff's Exhibit No. 2 was marked for  
 11 identification.)  
 12 MR. KUVIN: Thank you.  
 13 MR. RHEINHART: Do you want to zoom in on  
 14 it like you did the last time?  
 15 MR. KUVIN: No, that's fine.  
 16 MR. RHEINHART: Take your time.  
 17 MR. KUVIN: And flip through.  
 18 BY MR. KUVIN:  
 19 Q. All right. Ma'am, would you agree with me  
 20 that this is a passenger manifest for one of  
 21 Jeffrey Epstein's airplanes?  
 22 MR. RHEINHART: Instruct the witness not  
 23 to answer the question based on her Fifth  
 24 Amendment privilege.  
 25 THE WITNESS: On the instruction of my

1 lawyer I must exercise my Fifth Amendment  
2 right.

3 BY MR. KUVIN:

4 Q. And would you agree with me that you  
5 appear as a passenger on these flight manifests on  
6 numerous occasions?

7 MR. RHEINHART: Object to the form. It  
8 assumes facts not established as known to this  
9 witness, and I instruct the witness not to  
10 answer the question.

11 THE WITNESS: On the instruction of my  
12 lawyer, I must exercise my Fifth Amendment  
13 right.

14 BY MR. KUVIN:

15 Q. Would you agree with me that your name  
16 does, in fact, appear on the passenger manifest for  
17 these planes, for this plane?

18 MR. RHEINHART: Same objection and same  
19 instruction.

20 THE WITNESS: On the advice of my lawyer,  
21 I must invoke my Fifth Amendment right.

22 BY MR. KUVIN:

23 Q. Who are the two females that appear on the  
24 passenger manifest for January 11, 2005, on the  
25 first page of Exhibit 2?

1 Amendment privilege.

2 THE WITNESS: On the instruction of my  
3 lawyer, I must invoke my Fifth Amendment right.

4 BY MR. KUVIN:

5 Q. Would you also agree with me that the two  
6 unknown females listed on the passenger manifest  
7 marked as Exhibit 2 were underage girls, under the  
8 age of 18?

9 MR. RHEINHART: Object to the form. It  
10 calls for speculation. Also it's not been  
11 established this witness has any knowledge of  
12 this document and instruct her not to answer  
13 based on her Fifth Amendment privilege.

14 THE WITNESS: On the instruction of my  
15 lawyer, I must invoke my Fifth Amendment right.

16 BY MR. KUVIN:

17 Q. Would you agree with me that the girls  
18 that are listed as females one, and the second  
19 female for this flight of January 11, 2005, from  
20 West Palm Beach to the U.S. Virgin Islands, that  
21 those two females were under the age of 17?

22 MR. RHEINHART: Same objection. It has  
23 not been established the witness has any  
24 knowledge of this document. It calls for her  
25 to speculate, and I instruct her not to answer

1 MR. RHEINHART: I'll object to the form,  
2 and it has not been established this witness  
3 knows anything about this document, and I will  
4 instruct her not to answer based on the Fifth  
5 Amendment privilege.

6 THE WITNESS: On the instruction of my  
7 lawyer I must invoke my Fifth Amendment right.

8 BY MR. KUVIN:

9 Q. Do you agree with me that you took a  
10 flight on Jeffrey Epstein's plane from West Palm  
11 Beach to the U.S. Virgin Islands, St. Thomas on  
12 January 11, 2005?

13 MR. RHEINHART: Instruct the witness not  
14 to answer the question based on her Fifth  
15 Amendment privilege.

16 THE WITNESS: On the instruction of my  
17 lawyer I must invoke my Fifth Amendment right.

18 BY MR. KUVIN:

19 Q. Would you agree with me that on that  
20 flight were you, Jeffrey Epstein, Nadia Marcinkova  
21 and two unknown females?

22 MR. RHEINHART: Object to the form. Again  
23 assumes facts that have not been established  
24 this witness has any knowledge of and instruct  
25 the witness not to answer based on her Fifth

1 based on her Fifth Amendment privilege.

2 THE WITNESS: On the instruction of my  
3 lawyer, I must invoke my Fifth Amendment right.

4 BY MR. KUVIN:

5 Q. Would you agree with me that the two  
6 females shown on the flight with you of January 11,  
7 2005 were under the age of 16?

8 MR. RHEINHART: Same objection as to form.  
9 It has not been established this witness knows  
10 anything about whether there were these  
11 witnesses, these females and who they are, so  
12 it's asking her to speculate, and I instruct  
13 her not to answer based on her Fifth Amendment  
14 privilege.

15 THE WITNESS: On the instruction of my  
16 lawyer, I must invoke my Fifth Amendment  
17 privilege.

18 BY MR. KUVIN:

19 Q. Ma'am, you were on that flight of  
20 January 11, 2005, were you not?

21 MR. RHEINHART: I instruct the witness not  
22 to answer based on her Fifth Amendment  
23 privilege.

24 THE WITNESS: On the instruction of my  
25 lawyer I must invoke my Fifth Amendment right.

1 BY MR. KUVIN:  
 2 Q. You also agree with me that the two girls  
 3 that are listed as on that flight with you of  
 4 January 11, 2005, were under the age of 15 years  
 5 old?  
 6 MR. RHEINHART: Object to the form. It  
 7 calls for speculation, lack of personal  
 8 knowledge, and instruct the witness not to  
 9 answer based on her Fifth Amendment privilege.  
 10 THE WITNESS: On the instruction of my  
 11 lawyer, I must invoke my Fifth Amendment right.  
 12 BY MR. KUVIN:  
 13 Q. Would you agree with me that the two  
 14 females listed as being on that flight with you of  
 15 January 11 of 2005 were under the age of 14 years  
 16 old?  
 17 MR. RHEINHART: Object to the form. It  
 18 calls for speculation. The witness has no  
 19 personal knowledge and instruct the witness not  
 20 to answer based on her Fifth Amendment  
 21 privilege.  
 22 THE WITNESS: On the instruction of my  
 23 lawyer, I must invoke my Fifth Amendment right.  
 24 BY MR. KUVIN:  
 25 Q. Would you agree with me that the two

1 MR. RHEINHART: Same instruction.  
 2 THE WITNESS: On the instruction of my  
 3 lawyer, I must invoke my Fifth Amendment right.  
 4 BY MR. KUVIN:  
 5 Q. Who is Dana Burns?  
 6 MR. RHEINHART: Same instruction.  
 7 THE WITNESS: On the advice of my lawyer,  
 8 I must invoke my Fifth Amendment right.  
 9 BY MR. KUVIN:  
 10 Q. Who is Mark Zeff.  
 11 MR. RHEINHART: Same instruction.  
 12 THE WITNESS: On the advice of my lawyer,  
 13 I must invoke my Fifth Amendment right.  
 14 BY MR. KUVIN:  
 15 Q. Who is David Mullen?  
 16 MR. RHEINHART: Same instruction.  
 17 THE WITNESS: On the advice of my lawyer,  
 18 I must invoke my Fifth Amendment right.  
 19 BY MR. KUVIN:  
 20 Q. Who is Todd Meister?  
 21 MR. RHEINHART: Same instruction.  
 22 THE WITNESS: On the advice of my lawyer,  
 23 I must invoke my Fifth Amendment right.  
 24 BY MR. KUVIN:  
 25 Q. Who is Jean-Luc Brunel?

1 females listed as being on the flight with you of  
 2 January 11, 2005, from West Palm Beach to the U.S.  
 3 Virgin Islands, with Jeffrey Epstein as well, were  
 4 under the age of 13 years old and you were aware of  
 5 that?  
 6 MR. RHEINHART: Object to the form both as  
 7 compound, it also assumes facts that it has not  
 8 been established this witness has any knowledge  
 9 of, calls for her to speculate, and I instruct  
 10 her not to answer based on her Fifth Amendment  
 11 privilege.  
 12 THE WITNESS: On the instruction of my  
 13 lawyer I must invoke my Fifth Amendment right.  
 14 BY MR. KUVIN:  
 15 Q. Who is Adriana Musinska?  
 16 MR. RHEINHART: I'm sorry. Can you repeat  
 17 the name?  
 18 MR. KUVIN: Musinska, M-u-s-i-n-s-k-a.  
 19 MR. RHEINHART: I'll instruct the witness  
 20 not to answer based on her Fifth Amendment  
 21 privilege.  
 22 THE WITNESS: On instruction of my lawyer,  
 23 I must invoke my Fifth Amendment right.  
 24 BY MR. KUVIN:  
 25 Q. Who's Ghislaine Maxwell?

1 MR. RHEINHART: Same instruction.  
 2 THE WITNESS: On the advice of my lawyer,  
 3 I must invoke my Fifth Amendment right.  
 4 BY MR. KUVIN:  
 5 Q. Ma'am, would you agree with me that all of  
 6 the names I just recently mentioned where you  
 7 invoked your Fifth Amendment, were involved in a  
 8 conspiracy to abuse underaged girls, girls under the  
 9 age of 18 for sexual gain and pleasure?  
 10 MR. RHEINHART: Object to the form of the  
 11 question. It calls for a legal conclusion. It  
 12 is compound. It calls for her to speculate.  
 13 There is no basis for her to be able to give a  
 14 legal opinion as to what a conspiracy is, and I  
 15 instruct her not to answer based on her Fifth  
 16 Amendment privilege.  
 17 THE WITNESS: On the advice of my lawyer,  
 18 I must invoke my Fifth Amendment right.  
 19 BY MR. KUVIN:  
 20 Q. Would you agree with me that all of the  
 21 names I just mentioned were individuals that were  
 22 working together for their own sexual gain and  
 23 pleasure?  
 24 MR. RHEINHART: Object to the form of the  
 25 question as ambiguous and compound. I instruct

1 her not to answer based on her Fifth Amendment  
 2 privilege.  
 3 THE WITNESS: On the advice of my lawyer I  
 4 must invoke my Fifth Amendment privilege.  
 5 BY MR. KUVIN:  
 6 Q. What is MC Squared?  
 7 MR. RHEINHART: I instruct the witness not  
 8 to answer based on her Fifth Amendment  
 9 privilege.  
 10 THE WITNESS: On the advice of my lawyer I  
 11 must invoke my Fifth Amendment right.  
 12 BY MR. KUVIN:  
 13 Q. Would you agree with me that MC Squared is  
 14 a modeling agency that was funded by  
 15 Jeffrey Epstein?  
 16 MR. RHEINHART: I instruct the witness not  
 17 to answer based on her Fifth Amendment  
 18 privilege.  
 19 THE WITNESS: The advice of my lawyer I  
 20 must invoke my Fifth Amendment right.  
 21 BY MR. KUVIN:  
 22 Q. Would you agree with me that MC Squared  
 23 was wholly funded by Jeffrey Epstein?  
 24 MR. RHEINHART: Object to the form of the  
 25 question as to what "wholly funded" means, and

1 BY MR. KUVIN:  
 2 Q. Would you agree with me that Jeffrey  
 3 Epstein worked closely with Jean-Luc Brunel in order  
 4 to obtain girls from out of state and bring them to  
 5 Florida for their own sexual pleasure?  
 6 MR. RHEINHART: Object to the form as  
 7 ambiguous, whose own sexual pleasure, and  
 8 instruct the witness not to answer the question  
 9 based on her Fifth Amendment privilege.  
 10 MR. KUVIN: Perfectly good objection. She  
 11 doesn't have to answer the question. Let me  
 12 clarify.  
 13 BY MR. KUVIN:  
 14 Q. Would you agree with me, ma'am, that both  
 15 Jean-Luc Brunel and Jeffrey Epstein worked together  
 16 to obtain underage girls from out of state and bring  
 17 them to Florida for both of their own sexual  
 18 pleasure?  
 19 MR. RHEINHART: I'm going to object as  
 20 compound and instruct -- I object to the form  
 21 as compound, and instruct the witness not to  
 22 answer based on her Fifth Amendment privilege.  
 23 THE WITNESS: On the instruction of my  
 24 lawyer I must invoke my Fifth Amendment right.  
 25

1 I would instruct the witness not to answer the  
 2 question based on her Fifth Amendment  
 3 privilege.  
 4 THE WITNESS: On the advice of my lawyer I  
 5 must invoke my Fifth Amendment right.  
 6 BY MR. KUVIN:  
 7 Q. Would you agree with me that  
 8 Jeffrey Epstein is the sole individual whose money  
 9 was used to start the company, MC Squared?  
 10 MR. RHEINHART: Instruct the witness not  
 11 to answer the question based on her Fifth  
 12 Amendment privilege.  
 13 THE WITNESS: On the advice of my lawyer I  
 14 must invoke my Fifth Amendment right.  
 15 BY MR. KUVIN:  
 16 Q. Would you agree with me that  
 17 Jean-Luc Brunel worked with Jeffrey Epstein to  
 18 obtain underage girls for both of their sexual  
 19 pleasure?  
 20 MR. RHEINHART: Object to the form of the  
 21 question as ambiguous and instruct the witness  
 22 not to answer based on her Fifth Amendment  
 23 privilege.  
 24 THE WITNESS: On the advice of my lawyer I  
 25 must invoke my Fifth Amendment right.

1 BY MR. KUVIN:  
 2 A. Would you agree with me that  
 3 Ghislaine Maxwell, Jean-Luc Brunel, and Jeffrey Epstein  
 4 worked together to obtain underage girls from out of  
 5 state and bring them into the State of Florida for their  
 6 own sexual pleasure?  
 7 MR. RHEINHART: Object to the form of the  
 8 question as compound and ambiguous, and  
 9 instruct the witness not to answer based on her  
 10 Fifth Amendment privilege.  
 11 THE WITNESS: On the instruction of my  
 12 lawyer, I must invoke my Fifth Amendment right.  
 13 (Katherine Ezell and Amy Ederi  
 14 entered the deposition.)  
 15 MR. GOLDBERGER: That's why we're --  
 16 MR. KUVIN: That's why we lost them.  
 17 MR. RHEINHART: Do you want to take a  
 18 one-minute break so we can --  
 19 MR. KUVIN: Yeah, let's take a quick  
 20 one-minute break.  
 21 THE VIDEOGRAPHER: We're now off video  
 22 record. The time is 10:56 a.m.  
 23 (A brief recess was held.)  
 24 (Plaintiff's Exhibit No. 3 was marked for  
 25 identification.)



1 THE VIDEOGRAPHER: We're now on video  
2 record at 11:01 a.m.

3 MR. KUVIN: Just for the video record and  
4 for the written record Katherine Ezell and Amy  
5 Ederi have now appeared and are present in  
6 person.

7 MR. GOLDBERGER: Just one more matter for  
8 the record. Jack Goldberger, on behalf of  
9 Jeffrey Epstein. Rather than impose a form  
10 objection to every question, I think we have  
11 reached an agreement that on behalf of  
12 Mr. Epstein, I am adopting the form objections  
13 that Mr. Rheinart is making on behalf of his  
14 client nunc pro tunc to the beginning of this  
15 deposition.

16 MR. KUVIN: No objection.

17 MR. GOLDBERGER: Okay.

18 BY MR. KUVIN:

19 Q. All right. All right. Ms. Kellen, would  
20 you agree with me that there was an agreement  
21 between Jeffrey Epstein, Ghislaine Maxwell,  
22 Jean-Luc Brunel, yourself and Nadia Marcinkova to  
23 bring in girls from out of state that were underage?

24 MR. RHEINHART: Object to the form of the  
25 question as leading, as compound, and instruct

1 personal knowledge and instruct her not to  
2 answer based on her Fifth Amendment privilege.  
3 It's also compound.

4 THE WITNESS: On the instruction of my  
5 lawyer I must invoke my Fifth Amendment  
6 privilege.

7 BY MR. KUVIN:

8 Q. The witness says that you may not have  
9 knowledge or we don't know whether you have  
10 knowledge regarding this passenger manifest, so let  
11 me ask you, do you have any knowledge about this  
12 passenger manifest?

13 MR. RHEINHART: Object to the form of the  
14 question as ambiguous as to this and what a  
15 manifest is, and also her knowledge, and I will  
16 instruct her not to answer based on her Fifth  
17 Amendment privilege.

18 THE WITNESS: On the instruction of my  
19 lawyer, I must invoke my Fifth Amendment  
20 privilege.

21 BY MR. KUVIN:

22 Q. Based on the objection, do you know what a  
23 manifest is?

24 MR. RHEINHART: Object to the form of the  
25 question as ambiguous and instruct her not to

1 the witness not to answer based on her Fifth  
2 Amendment privilege.

3 THE WITNESS: On the instruction of my  
4 lawyer I must invoke my Fifth Amendment right.

5 BY MR. KUVIN:

6 Q. Would you agree with me that there was an  
7 agreement between Jeffrey Epstein,  
8 Ghislaine Maxwell, Jean-Luc Brunel, yourself and  
9 Nadia Marcinkova to bring in girls that were  
10 underage from out of state for sexual contact?

11 MR. RHEINHART: Object to the form of the  
12 question as leading and compound, and I  
13 instruct the witness not to answer based on her  
14 Fifth Amendment privilege.

15 THE WITNESS: On the instruction of my  
16 lawyer I must invoke my Fifth Amendment  
17 privilege.

18 BY MR. KUVIN:

19 Q. All right. Let me show you what we've  
20 premarked as Plaintiff's Exhibit 3. Do you  
21 recognize this as the passenger manifest for one of  
22 Jeffrey Epstein's planes?

23 MR. RHEINHART: I object to the form of  
24 the question. It assumes facts that this  
25 witness, evidence that this witness has no

1 answer based on her Fifth Amendment privilege.

2 THE WITNESS: On the instruction of my  
3 lawyer I must invoke my Fifth Amendment right.

4 BY MR. KUVIN:

5 Q. Have you heard the word "manifest" before?

6 MR. RHEINHART: I'll instruct the witness  
7 not to answer based on her Fifth Amendment  
8 privilege.

9 THE WITNESS: On the instruction of my  
10 lawyer I must invoke my Fifth Amendment right.

11 BY MR. KUVIN:

12 Q. Would you agree with me, ma'am, that you  
13 have seen this passenger manifest, listed as  
14 Exhibit 3, in the past?

15 MR. RHEINHART: I'll instruct the witness  
16 not to answer based on her Fifth Amendment  
17 privilege.

18 THE WITNESS: On the instruction of my  
19 lawyer I must invoke my Fifth Amendment right.

20 BY MR. KUVIN:

21 Q. Who is Zinta Broukis?

22 MR. RHEINHART: I'll instruct the witness  
23 not to answer based on her Fifth Amendment  
24 privilege.

25 THE WITNESS: On the instruction of my

1 lawyer I must invoke my Fifth Amendment  
 2 privilege.  
 3 MR. KUVIN: Spelling for the court  
 4 reporter is Z-i-n-t-a, B-r-o-u-k-i-s.  
 5 BY MR. KUVIN:  
 6 Q. Who is Eva Andersson, with two S's?  
 7 MR. RHEINHART: I'll instruct the witness  
 8 not to answer based on her Fifth Amendment  
 9 privilege.  
 10 THE WITNESS: On the instruction of my  
 11 lawyer, I must invoke my Fifth Amendment right.  
 12 BY MR. KUVIN:  
 13 Q. Who is Sevina Dubin (phonetic)?  
 14 MR. RHEINHART: Same instruction.  
 15 THE WITNESS: On the instruction of my  
 16 lawyer, I must invoke my Fifth Amendment right.  
 17 BY MR. KUVIN:  
 18 Q. Who is Mya Dubin (phonetic)?  
 19 MR. RHEINHART: Same instruction.  
 20 THE WITNESS: On the instruction of my  
 21 lawyer I must invoke my Fifth Amendment right.  
 22 BY MR. KUVIN:  
 23 Q. Who is Chris Valdez (phonetic)?  
 24 MR. RHEINHART: Same instruction.  
 25 THE WITNESS: On the instruction of my

1 listed in the passenger list to the left?  
 2 MR. RHEINHART: Object to the form, the  
 3 question is leading and instruct the witness  
 4 not to answer based on the Fifth Amendment  
 5 privilege.  
 6 THE WITNESS: On the instruction of my  
 7 lawyer, I must invoke my Fifth Amendment right.  
 8 BY MR. KUVIN:  
 9 Q. Would you agree with me that you were on a  
 10 plane with Jeffrey Epstein on April 27, 2005?  
 11 MR. RHEINHART: Same instruction.  
 12 THE WITNESS: On the instruction of my  
 13 lawyer, I must invoke my Fifth Amendment right.  
 14 BY MR. KUVIN:  
 15 Q. Would you agree with me that on that plane  
 16 of April 27, 2005, from Teterboro, New Jersey, to  
 17 West Palm Beach, was a female who was under the age  
 18 of 16?  
 19 MR. RHEINHART: Object to the form. It  
 20 assumes facts not established. Any personal  
 21 knowledge by this witness, and instruct her not  
 22 to answer based on her Fifth Amendment  
 23 privilege. It also calls for speculation.  
 24 THE WITNESS: On the instruction of my  
 25 lawyer, I must invoke my Fifth Amendment

1 lawyer I must invoke my Fifth Amendment right.  
 2 BY MR. KUVIN:  
 3 Q. Who is James Stanley?  
 4 MR. RHEINHART: Same instruction.  
 5 THE WITNESS: On the instruction of my  
 6 lawyer, I must invoke my Fifth Amendment right.  
 7 BY MR. KUVIN:  
 8 Q. Who is Sophia Stanley?  
 9 MR. RHEINHART: Same instruction.  
 10 THE WITNESS: On the instruction of my  
 11 lawyer I must invoke my Fifth Amendment right.  
 12 BY MR. KUVIN:  
 13 Q. Who is Alexis Stanley?  
 14 MR. RHEINHART: Same instruction.  
 15 THE WITNESS: On the instruction of my  
 16 lawyer, I must invoke my Fifth Amendment right.  
 17 BY MR. KUVIN:  
 18 Q. Ma'am, if you would, in Exhibit 3, would  
 19 you turn to the date of April 27, 2005, for me?  
 20 It's about halfway through the packet. April 27,  
 21 '05. Are you there?  
 22 A. Uh-huh.  
 23 Q. Okay. On this particular date, will you  
 24 agree with me that you flew from Teterboro,  
 25 New Jersey to West Palm Beach on a plane with people

1 privilege.  
 2 BY MR. KUVIN:  
 3 Q. Would you agree with me that on the flight  
 4 of April 27, 2005, from Teterboro, New Jersey to  
 5 West Palm Beach was a female on the plane with you  
 6 that was under the age of 15?  
 7 MR. RHEINHART: Object to the form of the  
 8 question. It requires speculation. It assumes  
 9 facts not established before this witness.  
 10 I'll instruct her not to answer based on her  
 11 Fifth Amendment privilege. It's also  
 12 ambiguous.  
 13 THE WITNESS: On the instruction of my  
 14 lawyer, I must invoke my Fifth Amendment  
 15 privilege.  
 16 BY MR. KUVIN:  
 17 Q. Will you turn to May 6, 2005, please. And  
 18 this is, for the record, in Exhibit 3. On May 6th,  
 19 2005, ma'am, will you agree with me that you took a  
 20 flight from Teterboro, New Jersey to West Palm  
 21 Beach, with Jeffrey Epstein, Nadia Marcinkova,  
 22 Andriana, Andrea Musinska, David Mullen, Larry  
 23 Morrison and another female?  
 24 MR. RHEINHART: Object to the form of the  
 25 question as compound, calling for speculation.

1 I instruct the witness not to answer based on  
 2 her Fifth Amendment privilege.  
 3 THE WITNESS: On the instruction of my  
 4 lawyer, I must invoke my Fifth Amendment  
 5 privilege.  
 6 BY MR. KUVIN:  
 7 Q. Would you agree with me, ma'am, that on  
 8 the flight of May 6th, 2005, that's shown in  
 9 Exhibit 3, that the female identified in the  
 10 passenger manifest was under the age of 16?  
 11 MR. RHEINHART: Object to the form. It  
 12 assumes facts not established that this witness  
 13 has any personal knowledge. It calls for her  
 14 to speculate, and I'll instruct her not to  
 15 answer based on her Fifth Amendment privilege.  
 16 THE WITNESS: On the instruction of my  
 17 lawyer, I must invoke my Fifth Amendment  
 18 privilege.  
 19 BY MR. KUVIN:  
 20 Q. Would you agree with me that the female  
 21 identified in the passenger manifest of May 6th,  
 22 2005, was under the age of 15?  
 23 MR. RHEINHART: Same objection as the  
 24 previous question, same instruction.  
 25 THE WITNESS: On the instruction of my

1 BY MR. KUVIN:  
 2 Q. Do you also agree with me on that flight  
 3 of June 20th, 2005, was an unidentified female,  
 4 according to the passenger manifest?  
 5 MR. RHEINHART: Object to the form --  
 6 excuse me -- as leading, and instruct the  
 7 witness not to answer based on her Fifth  
 8 Amendment privilege.  
 9 THE WITNESS: On the instruction of my  
 10 lawyer, I must choose to invoke my Fifth  
 11 Amendment privilege.  
 12 BY MR. KUVIN:  
 13 Q. Would you agree with me that that female  
 14 listed on the flight of June 20, 2005, was under the  
 15 age of 16 years old?  
 16 MR. RHEINHART: Objection to the form as  
 17 leading and also requiring speculation. I'll  
 18 instruct the witness not to answer based on her  
 19 Fifth Amendment privilege.  
 20 THE WITNESS: On the instruction of my  
 21 lawyer, I must choose to invoke my Fifth  
 22 Amendment privilege.  
 23 BY MR. KUVIN:  
 24 Q. Would you agree with me that the  
 25 unidentified female on the passenger manifest of

1 lawyer I must invoke my Fifth Amendment  
 2 privilege.  
 3 BY MR. KUVIN:  
 4 Q. Would you agree with me that the female  
 5 listed in the passenger manifest of May 6th, 2005,  
 6 was under the age, was under the age of 14?  
 7 MR. RHEINHART: Same instruction as to the  
 8 previous two questions and the same objection  
 9 as to those two questions.  
 10 THE WITNESS: On the instruction of my  
 11 lawyer I must invoke my Fifth Amendment  
 12 privilege.  
 13 BY MR. KUVIN:  
 14 Q. If you would turn to the date of June 20  
 15 of 2005 for me, please. On the date of June 20,  
 16 2005, would you agree with me that you took a flight  
 17 with Jeffrey Epstein from West Palm Beach to  
 18 Teterboro, New Jersey?  
 19 MR. RHEINHART: Object to the form as  
 20 leading. I'll instruct the witness not to  
 21 answer based on her Fifth Amendment privilege.  
 22 THE WITNESS: On the instruction of my  
 23 lawyer, I must invoke my Fifth Amendment  
 24 privilege.  
 25

1 June 20, 2005, was under the age of 14?  
 2 MR. RHEINHART: Objection, calls for  
 3 speculation, instruct the witness not to answer  
 4 based on her Fifth Amendment privilege.  
 5 THE WITNESS: On the instruction of my  
 6 lawyer, I must invoke my Fifth Amendment  
 7 privilege.  
 8 BY MR. KUVIN:  
 9 Q. Turn to the date of June 30, if you would,  
 10 2005. Would you agree with me that you took a  
 11 flight from Teterboro, New Jersey, to West Palm  
 12 Beach on June 30, 2005, with Jeffrey Epstein?  
 13 MR. RHEINHART: Object to the form as  
 14 leading and compound, instruct the witness not  
 15 to answer based on her Fifth Amendment  
 16 privilege.  
 17 THE WITNESS: On the instruction of my  
 18 lawyer I must, I must invoke my Fifth Amendment  
 19 right.  
 20 BY MR. KUVIN:  
 21 Q. Would you agree with me that Dana Burns  
 22 was on that flight?  
 23 MR. RHEINHART: Same instruction.  
 24 THE WITNESS: On the instruction of my  
 25 lawyer I must invoke my Fifth Amendment

1 privilege.  
 2 BY MR. KUVIN:  
 3 Q. Would you agree with me that there was  
 4 also another female on that flight with you?  
 5 MR. RHEINHART: Same instruction.  
 6 THE WITNESS: On the instruction of my  
 7 lawyer, I must invoke my Fifth Amendment  
 8 privilege.  
 9 BY MR. KUVIN:  
 10 Q. Would you agree with me that you had  
 11 personal knowledge that that young female on that  
 12 flight with you of June 30, 2005, was under the age  
 13 of 16?  
 14 MR. RHEINHART: Object to the form as  
 15 compound and calling for speculation, and  
 16 instruct the witness not to answer based on her  
 17 Fifth Amendment privilege.  
 18 THE WITNESS: On the instruction of my  
 19 lawyer, I must invoke my Fifth Amendment  
 20 privilege.  
 21 BY MR. KUVIN:  
 22 Q. Would you agree with me that you had  
 23 personal knowledge that that young female on the  
 24 flight of June 30, 2005, was under the age of 15?  
 25 MR. RHEINHART: Same instruction, calls

1 THE WITNESS: On the instruction of my  
 2 lawyer I must invoke my Fifth Amendment  
 3 privilege.  
 4 BY MR. KUVIN:  
 5 Q. Would you agree with me that on both of  
 6 those flights were girls that were under the age of  
 7 16?  
 8 MR. RHEINHART: Same form objection as to  
 9 compound, also ambiguous and requiring  
 10 speculation and instruct the witness not to  
 11 answer based on her Fifth Amendment privilege.  
 12 THE WITNESS: The instruction of my lawyer  
 13 I must invoke my Fifth Amendment privilege.  
 14 BY MR. KUVIN:  
 15 Q. Would you agree with me, ma'am, that you  
 16 have flown on Jeffrey Epstein's plane from  
 17 Teterboro, New Jersey, to West Palm Beach, on  
 18 numerous occasions where there were girls on the  
 19 plane under the age of 16?  
 20 MR. RHEINHART: Object to the form as  
 21 compound and ambiguous as to what numerous  
 22 means. Instruct the witness not to answer  
 23 based on her Fifth Amendment privilege.  
 24 THE WITNESS: On the instruction of my  
 25 lawyer I must invoke my Fifth Amendment

1 for speculation.  
 2 THE WITNESS: On the instruction of my  
 3 lawyer, I must invoke my Fifth Amendment  
 4 privilege.  
 5 BY MR. KUVIN:  
 6 Q. Would you agree with me that you had  
 7 personal knowledge that that young female on the  
 8 flight of June 30, 2005, with you was under the age  
 9 of 14?  
 10 MR. RHEINHART: Objection to form as to  
 11 compound and requiring speculation. I'll  
 12 instruct the witness not to answer based on her  
 13 Fifth Amendment privilege.  
 14 THE WITNESS: On the instruction of my  
 15 lawyer I must invoke my Fifth Amendment  
 16 privilege.  
 17 BY MR. KUVIN:  
 18 Q. Ma'am, just so we can be quicker about  
 19 this, there are flights of July 5th, July 15. It  
 20 looks like those are the last two. Would you agree  
 21 with me that on July 5th and July 15, you took  
 22 flights on Jeffrey Epstein's plane?  
 23 MR. RHEINHART: Object to the form as  
 24 compound and instruct the witness not to answer  
 25 based on Fifth Amendment privilege.

1 privilege.  
 2 BY MR. KUVIN:  
 3 Q. Would you agree with me that you have  
 4 flown on Jeffrey Epstein's plane from Teterboro, New  
 5 Jersey, to West Palm Beach on at least 100 occasions  
 6 where there were girls on the plane with you under  
 7 the age of 16?  
 8 MR. RHEINHART: Object to the form as  
 9 compound, requiring speculation and ambiguous,  
 10 and instruct her not to answer based on her  
 11 Fifth Amendment privilege.  
 12 THE WITNESS: On the instruction of my  
 13 lawyer I must invoke my Fifth Amendment  
 14 privilege.  
 15 BY MR. KUVIN:  
 16 Q. Would you agree with me, ma'am, that you  
 17 have flown on Jeffrey Epstein's plane at least 100  
 18 times from Teterboro, New Jersey to West Palm Beach,  
 19 Florida, where there were girls under the age of 15  
 20 on the plane with you?  
 21 MR. RHEINHART: Same objections as the  
 22 previous question, same instruction.  
 23 THE WITNESS: On the instruction of my  
 24 lawyer, I must invoke my Fifth Amendment  
 25 privilege.

1 BY MR. KUVIN:

2 Q. Would you agree with me that you have  
3 flown on Jeffrey Epstein's plane from Teterboro, New  
4 Jersey to West Palm Beach on at least 100 occasions  
5 where there were girls on the plane with you that  
6 were under the age of 14?

7 MR. RHEINHART: Objection to the form.  
8 It's compound and ambiguous, calls for  
9 speculation and instruct her not to answer  
10 based on her Fifth Amendment privilege.

11 THE WITNESS: On the instruction of my  
12 lawyer, I must invoke my Fifth Amendment  
13 privilege.

14 BY MR. KUVIN:

15 Q. Would you agree with me that you have been  
16 on the plane, one of Jeffrey Epstein's -- strike  
17 that.

18 Would you agree with me that you have  
19 been on Jeffrey Epstein's plane with him to Paris  
20 where there have been girls on the plane with you  
21 under the age of 16?

22 MR. RHEINHART: Objection to the form as  
23 compound, assuming facts not established the  
24 witness has any knowledge, and instruct the  
25 witness not to answer based on her Fifth

1 occasions where Jeffrey Epstein was flying with  
2 young girls under the age of 16 from Teterboro, New  
3 Jersey, to Florida, West Palm Beach, Florida, with  
4 girls under the age of 16, was doing so, so that he  
5 could have sexual contact with them?

6 MR. RHEINHART: Object to the form. It's  
7 compound and requires her to assume facts that  
8 have not been established, and it's ambiguous,  
9 and instruct her not to answer based on the  
10 Fifth Amendment privilege.

11 THE WITNESS: On the instruction of my  
12 lawyer, I must assert my Fifth Amendment right.

13 BY MR. KUVIN:

14 Q. Do you agree with me that on the flights  
15 from West Palm Beach to Paris, where you were  
16 present on the plane with Jeffrey Epstein, that  
17 there were girls under the age of 16 that  
18 Jeffrey Epstein was having sexual contact with on  
19 that plane?

20 MR. RHEINHART: Same objections as  
21 previously stated. It's compound, ambiguous,  
22 and assumes facts that she has no knowledge, or  
23 it has not been established that she has any  
24 knowledge of, and instruct her not to answer  
25 based on the Fifth Amendment, and it's leading.

1 Amendment privilege. It's also leading.

2 THE WITNESS: On the instruction of my  
3 lawyer, I must invoke my Fifth Amendment  
4 privilege.

5 BY MR. KUVIN:

6 Q. Would you agree with me that you have been  
7 on the plane with Jeffrey Epstein on flights to  
8 Paris where there have been girls on the plane with  
9 you under the age of 15?

10 MR. RHEINHART: Same objection and same  
11 instruction as the previous question.

12 THE WITNESS: On the instruction of my  
13 lawyer, I must invoke my Fifth Amendment  
14 privilege.

15 BY MR. KUVIN:

16 Q. Would you agree with me that you have been  
17 on those same flights we have been discussing where  
18 there have been girls under the age of 14?

19 MR. RHEINHART: Same instruction and same  
20 objection as the previous two questions.

21 THE WITNESS: On the instruction of my  
22 lawyer, I must invoke my Fifth Amendment  
23 privilege.

24 BY MR. KUVIN:

25 Q. Would you agree with me that on the

1 THE WITNESS: On the instruction of my  
2 lawyer I must invoke my Fifth Amendment right.

3 BY MR. KUVIN:

4 Q. Ma'am, you've been on the plane, you've  
5 been on a plane with Jeffrey Epstein in the past,  
6 have you not?

7 MR. RHEINHART: Objection to the form as  
8 leading, and instruct her not to answer based  
9 on the Fifth Amendment privilege.

10 THE WITNESS: On the instruction of my  
11 lawyer, I must invoke my Fifth Amendment  
12 privilege.

13 BY MR. KUVIN:

14 Q. Have you been on a plane with  
15 Jeffrey Epstein ever in your entire life?

16 MR. RHEINHART: Instruct the witness not  
17 to answer based on her Fifth Amendment right.

18 THE WITNESS: On the instruction of my  
19 lawyer I must invoke my Fifth Amendment  
20 privilege.

21 BY MR. KUVIN:

22 Q. Have you ever been on a plane with  
23 Jeffrey Epstein where there was a girl on the plane  
24 with you under the age of 14?

25 MR. RHEINHART: Same instruction.

1 THE WITNESS: On the instruction of my  
 2 lawyer, I must invoke my Fifth Amendment  
 3 privilege.  
 4 BY MR. KUVIN:  
 5 Q. Ma'am, isn't it true that you've seen  
 6 Jeffrey Epstein have sex with girls under the age of  
 7 14 on his plane?  
 8 MR. RHEINHART: Objection to the form. It  
 9 assumes facts that it's not been established  
 10 that she would have any knowledge of, and I'll  
 11 instruct her not to answer based on her Fifth  
 12 Amendment right.  
 13 THE WITNESS: On the instruction of my  
 14 lawyer, I must invoke my Fifth Amendment  
 15 privilege.  
 16 BY MR. KUVIN:  
 17 Q. Would you agree with me that you've seen  
 18 Jeffrey Epstein have sex with girls on his plane in  
 19 your presence during flights to Paris?  
 20 MR. RHEINHART: Same objection previously  
 21 stated, and it assumes facts that have not been  
 22 established and instruct her not to answer  
 23 based on her Fifth Amendment right.  
 24 THE WITNESS: On the instruction of my  
 25 lawyer, I must invoke my Fifth Amendment

1 MR. RHEINHART: Same objection as stated  
 2 to the previous question; it's ambiguous and  
 3 instruct her not to answer based on the Fifth  
 4 Amendment.  
 5 THE WITNESS: On the instruction of my  
 6 lawyer, I must invoke my Fifth Amendment right.  
 7 MR. KUVIN: Just to clarify, is the  
 8 ambiguity the word "sex"?  
 9 MR. RHEINHART: Sex and also assumes that  
 10 she's ever met Jeffrey Epstein in her life.  
 11 MR. KUVIN: Any other words in there I  
 12 need to clarify?  
 13 MR. RHEINHART: No.  
 14 BY MR. KUVIN:  
 15 Q. Okay. Ma'am, do you -- what's your  
 16 definition of the word "sex"?  
 17 MR. RHEINHART: Object to the form of the  
 18 question and instruct the witness not to answer  
 19 based on her Fifth Amendment privilege.  
 20 THE WITNESS: On the instruction of my  
 21 lawyer, I must invoke my Fifth Amendment right.  
 22 BY MR. KUVIN:  
 23 Q. Would you agree with me that the word  
 24 "sex" means both vaginal intercourse as well as oral  
 25 sex? Would you agree with that definition?

1 privilege.  
 2 BY MR. KUVIN:  
 3 Q. Ma'am, isn't it true that you've seen  
 4 Jeffrey Epstein and Jean-Luc Brunel have sex with  
 5 girls under the age of 14 on Mr. Epstein's plane on  
 6 flights to Paris?  
 7 MR. RHEINHART: Objection to the form.  
 8 It's compound, as to several answers all at the  
 9 same time and certain facts, and instruct her  
 10 not to answer based on her Fifth Amendment.  
 11 THE WITNESS: On the instruction of my  
 12 lawyer, I must invoke my Fifth Amendment  
 13 privilege.  
 14 BY MR. KUVIN:  
 15 Q. Ma'am, isn't it true that you have had sex  
 16 with Jeffrey Epstein on his plane?  
 17 MR. RHEINHART: Instruct the witness not  
 18 to answer based on the Fifth Amendment  
 19 privilege, also object to the form of the  
 20 question as compound and ambiguous.  
 21 THE WITNESS: On the instruction of my  
 22 lawyer, I must invoke my Fifth Amendment right.  
 23 BY MR. KUVIN:  
 24 Q. Isn't it true that you've had sex with  
 25 Jeffrey Epstein on his plane on flights to Paris?

1 MR. RHEINHART: You can answer that.  
 2 THE WITNESS: No.  
 3 BY MR. KUVIN:  
 4 Q. Okay. Would you agree with me that sex,  
 5 for the purpose of our questions here today, will be  
 6 limited strictly to vaginal intercourse?  
 7 A. Sorry. Can you repeat that?  
 8 Q. Yes. For the purpose of my questions here  
 9 today, will you agree that the word "sex" will be  
 10 limited to vaginal intercourse between a man's penis  
 11 and a woman's vagina?  
 12 MR. RHEINHART: If you're instructing her  
 13 that in the future she should assume that  
 14 that's what you mean by your question, that's  
 15 fine.  
 16 MR. KUVIN: Okay.  
 17 MR. RHEINHART: If that's what you mean,  
 18 then that's understood.  
 19 MR. KUVIN: That's what I mean.  
 20 MR. RHEINHART: Okay.  
 21 MR. KUVIN: All right. Let's go with that  
 22 definition. And for the purposes of my  
 23 questions, "oral sex" will mean contact between  
 24 an individual's mouth and a man's sexual organ,  
 25 penis. Fair enough?

1 MR. RHEINHART: Understood.  
 2 MR. KUVIN: Okay.  
 3 BY MR. KUVIN:  
 4 Q. Working with those definitions if we  
 5 could, would you agree with me that you had sex with  
 6 Jeffrey Epstein on his plane?  
 7 MR. RHEINHART: Objection to the form.  
 8 It's compound and instruct her not to answer  
 9 based on the Fifth Amendment privilege, because  
 10 to do so would implicitly admit that she's ever  
 11 met Jeffrey Epstein in her life, and so as to  
 12 that she's invoking the Fifth Amendment  
 13 privilege.  
 14 THE WITNESS: On the instruction of my  
 15 lawyer, I must invoke my Fifth Amendment  
 16 privilege.  
 17 BY MR. KUVIN:  
 18 Q. Would you agree with me that you have had  
 19 oral sex with Jeffrey Epstein on his plane?  
 20 MR. RHEINHART: Same objection stated to  
 21 the previous question. It's compound and it  
 22 assumes facts that's not been established as to  
 23 which she is invoking her Fifth Amendment  
 24 privilege.  
 25 THE WITNESS: On the instruction of my

1 Mr. Epstein's residence, as to her knowledge of  
 2 Mr. Epstein and other facts as to which she's  
 3 invoking her Fifth Amendment privilege.  
 4 THE WITNESS: On the instruction of my  
 5 lawyer, I must to invoke my Fifth Amendment  
 6 privilege.  
 7 MR. KUVIN: Let me show you what we'll  
 8 mark as Exhibit 6. And this one I'm going to  
 9 show it to the camera real briefly, if I could.  
 10 Okay.  
 11 MR. RHEINHART: Let me see it. Thank you.  
 12 (Plaintiff's Exhibit No. 6 was marked for  
 13 identification.)  
 14 BY MR. KUVIN:  
 15 Q. Ma'am, do you recognize any of the girls  
 16 shown in Exhibit 6?  
 17 MR. RHEINHART: I'll instruct the witness  
 18 not to answer based on her Fifth Amendment  
 19 privilege.  
 20 THE WITNESS: On the instruction of my  
 21 lawyer, I must invoke my Fifth Amendment right.  
 22 BY MR. KUVIN:  
 23 Q. Would you agree with me that that is you  
 24 on the right in this photograph, the far right?  
 25 MR. RHEINHART: I'll instruct the witness

1 lawyer, I must invoke my Fifth Amendment  
 2 privilege.  
 3 BY MR. KUVIN:  
 4 Q. Would you agree with me that you have had  
 5 sex with Jeffrey Epstein in his home --  
 6 MR. RHEINHART: Object to the --  
 7 MR. KUVIN: -- here in West Palm, in West  
 8 Palm Beach?  
 9 MR. RHEINHART: I'll instruct the witness  
 10 not to answer based on her Fifth Amendment  
 11 privilege and same objection previously stated  
 12 to the last two questions.  
 13 THE WITNESS: On the instruction of my  
 14 lawyer, I must invoke my Fifth Amendment  
 15 privilege.  
 16 BY MR. KUVIN:  
 17 Q. Would you agree with me that you have had  
 18 oral sex with Jeffrey Epstein in his home in West  
 19 Palm Beach?  
 20 MR. GARCIA: Is it West, or Palm Beach?  
 21 MR. KUVIN: Palm Beach Island, I think  
 22 it's, because -- yeah, for clarity, his home on  
 23 Palm Beach.  
 24 MR. RHEINHART: Object to the form. It  
 25 assumes facts as to her knowledge of

1 not to answer.  
 2 THE WITNESS: On the instruction of my  
 3 lawyer, I must invoke my Fifth Amendment  
 4 privilege.  
 5 BY MR. KUVIN:  
 6 Q. Would you agree with me that that is  
 7 Nadia Marcinkova on the left in that photograph that  
 8 we marked as Exhibit 6?  
 9 MR. RHEINHART: Same instruction.  
 10 THE WITNESS: On the instruction of my  
 11 lawyer, I must invoke my Fifth Amendment  
 12 privilege.  
 13 BY MR. KUVIN:  
 14 Q. How old are you in this photograph?  
 15 MR. RHEINHART: Same instruction.  
 16 THE WITNESS: On the instruction of my  
 17 lawyer, I must invoke my Fifth Amendment  
 18 privilege.  
 19 BY MR. KUVIN:  
 20 Q. How old is Nadia Marcinkova in this  
 21 photograph, if you know?  
 22 MR. RHEINHART: I'm going to object to the  
 23 form in that it assumes facts as to her  
 24 knowledge of anything about Ms. Marcinkova, and  
 25 as to which she is invoking her Fifth Amendment

1 privilege.  
 2 THE WITNESS: On the instruction of my  
 3 lawyer, I must invoke my Fifth Amendment  
 4 privilege.  
 5 MR. KUVIN: This is Exhibit 7. Let me  
 6 show you what we'll mark as Exhibit 7.  
 7 (Plaintiff's Exhibit No. 7 was marked for  
 8 identification.)  
 9 BY MR. KUVIN:  
 10 Q. Do you recognize the girl that's shown in  
 11 Exhibit 7?  
 12 MR. RHEINHART: I need to consult with her  
 13 one second.  
 14 MR. KUVIN: Sure.  
 15 THE VIDEOGRAPHER: Are we off the record?  
 16 MR. KUVIN: No, no.  
 17 MR. RHEINHART: Instruct the witness to  
 18 invoke her Fifth Amendment privilege as to  
 19 Exhibit 7.  
 20 MR. KUVIN: She's clipped up. Okay.  
 21 MR. RHEINHART: Now you have to answer.  
 22 THE WITNESS: On the advice of my lawyer,  
 23 I must invoke my Fifth Amendment privilege.  
 24 BY MR. KUVIN:  
 25 Q. Would you agree with me that the girl

1 THE WITNESS: On the instruction of my  
 2 lawyer, I must invoke my Fifth Amendment  
 3 privilege.  
 4 BY MR. KUVIN:  
 5 Q. Would you agree with me that Haley Robson  
 6 has been to Mr. Epstein's home on hundreds of  
 7 occasions?  
 8 MR. RHEINHART: Object to the form as  
 9 compound and also assumes knowledge as this  
 10 witness has and instruct her to invoke her  
 11 Fifth Amendment privilege relating to  
 12 Ms. Robson.  
 13 THE WITNESS: On the instruction of my  
 14 lawyer, I must invoke my Fifth Amendment  
 15 privilege.  
 16 BY MR. KUVIN:  
 17 Q. Would you agree with me that you directed  
 18 Haley Robson on hundreds of occasions to bring girls  
 19 under the age of 16 to Mr. Epstein's house?  
 20 MR. RHEINHART: Object to the form of the  
 21 question as compound and ambiguous and assuming  
 22 facts as to which there is no factual basis  
 23 that this witness has any knowledge and  
 24 instruct the witness not to answer based on her  
 25 Fifth Amendment privilege.

1 shown in Exhibit 7 is Haley Robson?  
 2 MR. RHEINHART: Instruct the witness not  
 3 to answer based on the Fifth Amendment  
 4 privilege.  
 5 THE WITNESS: On the instruction of my  
 6 lawyer, I must invoke my Fifth Amendment  
 7 privilege.  
 8 BY MR. KUVIN:  
 9 Q. Do you agree with me that Haley Robson was  
 10 under the age of 16 when she was first asked to go  
 11 to Mr. Epstein's home?  
 12 MR. RHEINHART: Objection to the form. It  
 13 assumes any knowledge by this witness as to the  
 14 person you identified as Haley Robson. It's  
 15 compound and I would instruct her not to answer  
 16 based on her Fifth Amendment privilege.  
 17 THE WITNESS: On the instruction of my  
 18 lawyer, I must invoke my Fifth Amendment  
 19 privilege.  
 20 BY MR. KUVIN:  
 21 Q. Would you agree with me that you know  
 22 personally Haley Robson?  
 23 MR. RHEINHART: Instruct the witness not  
 24 to answer based on the Fifth Amendment  
 25 privilege.

1 THE WITNESS: On the instruction of my  
 2 lawyer, I must choose to invoke my Fifth  
 3 Amendment right.  
 4 BY MR. KUVIN:  
 5 Q. Would you agree with me that on hundreds  
 6 of occasions you directed Haley Robson to bring  
 7 underage girls under the age of 16 to Mr. Epstein's  
 8 home for sex with Mr. Epstein?  
 9 MR. RHEINHART: Object to the form. It's  
 10 compound and it assumes facts as to this —  
 11 that this witness has no personal knowledge,  
 12 and it's been established by this record, and  
 13 instruct her to invoke her Fifth Amendment  
 14 privilege.  
 15 THE WITNESS: On the instruction of my  
 16 lawyer, I must invoke my Fifth Amendment  
 17 privilege.  
 18 MR. KUVIN: We'll mark this as Exhibit 8.  
 19 (Plaintiff's Exhibit No. 8 was marked for  
 20 identification.)  
 21 BY MR. KUVIN:  
 22 Q. Ma'am, do you recognize the person that's  
 23 shown in Exhibit 8?  
 24 MR. RHEINHART: Let me consult one second.  
 25 MR. KUVIN: Sure.



1 MR. RHEINHART: I instruct the witness not  
 2 to answer the question based on her Fifth  
 3 Amendment privilege.  
 4 THE WITNESS: Based on the instruction of  
 5 my lawyer, I must invoke my Fifth Amendment  
 6 right.  
 7 BY MR. KUVIN:  
 8 Q. Would you agree with me that the person  
 9 shown on Exhibit 8 is you?  
 10 MR. RHEINHART: Same instruction.  
 11 THE WITNESS: On the instruction of my  
 12 lawyer, I must invoke my Fifth Amendment  
 13 privilege.  
 14 BY MR. KUVIN:  
 15 Q. Would you agree with me that this is a  
 16 modeling shot of you that was taken through one of  
 17 Mr. Epstein's modeling agencies?  
 18 MR. RHEINHART: Object to the form of the  
 19 question as compound and assuming facts as to  
 20 which there has been no basis that this witness  
 21 has any personal knowledge, and she's going  
 22 invoke her Fifth Amendment privilege.  
 23 THE WITNESS: On the instruction of my  
 24 lawyer, I must invoke my Fifth Amendment  
 25 privilege.

1 MR. GARCIA: He didn't make a Fifth  
 2 Amendment objection. So can we just rephrase  
 3 the question?  
 4 MR. RHEINHART: I would instruct the  
 5 witness not to answer based on the Fifth  
 6 Amendment privilege to clarify.  
 7 MR. KUVIN: Okay. Let's mark this as  
 8 Exhibit 9.  
 9 MR. RHEINHART: And for the record, the  
 10 basis is that it assumes her knowledge of  
 11 anything relating to Jeffrey Epstein, the  
 12 question assumed that.  
 13 (Plaintiff's Exhibit No. 9 was marked for  
 14 identification.)  
 15 BY MR. KUVIN:  
 16 Q. Ma'am, do you recognize the girl shown in  
 17 Exhibit 9?  
 18 MR. RHEINHART: I'll instruct the witness  
 19 not to answer based on her Fifth Amendment  
 20 privilege.  
 21 THE WITNESS: On the instruction of my  
 22 lawyer, I must invoke my Fifth Amendment right.  
 23 BY MR. KUVIN:  
 24 Q. Would you agree with me that the girl  
 25 shown in Exhibit 9 is Nadia Marcinkova?

1 BY MR. KUVIN:  
 2 Q. Would you agree with me that you were  
 3 under the age of 18 in this photograph we've marked  
 4 as Exhibit 8?  
 5 MR. RHEINHART: Same objection as to the  
 6 previous question and same instruction.  
 7 THE WITNESS: On the instruction of my  
 8 lawyer, I must invoke my Fifth Amendment right.  
 9 BY MR. KUVIN:  
 10 Q. Would you agree with me that you were  
 11 under the age of 17 in this photograph that we've  
 12 marked as Exhibit 8?  
 13 MR. RHEINHART: Same objection as the  
 14 previous two question and the same instruction.  
 15 THE WITNESS: On the instruction of my  
 16 lawyer, I must invoke my Fifth Amendment right.  
 17 BY MR. KUVIN:  
 18 Q. Would you agree with me that Jeffrey  
 19 Epstein kept this photograph of you in his home, if  
 20 you know.  
 21 MR. RHEINHART: Object to the form of the  
 22 question as compound and ambiguous, and I would  
 23 instruct the witness not to answer.  
 24 THE WITNESS: On the instruction of my  
 25 lawyer, I must invoke my Fifth Amendment right.

1 MR. RHEINHART: Same instruction.  
 2 THE WITNESS: On the instruction of my  
 3 lawyer, I must invoke my Fifth Amendment  
 4 privilege.  
 5 MR. KUVIN: I forgot to do one more thing.  
 6 If you could give that back to me for just one  
 7 second just for the record so we can see what  
 8 we're talking about here.  
 9 Okay. I will give you back Exhibit  
 10 9.  
 11 MR. RHEINHART: Thank you.  
 12 BY MR. KUVIN:  
 13 Q. Would you agree with me that this  
 14 photograph of Nadia Marcinkova was taken when she  
 15 was under the age of 18?  
 16 MR. RHEINHART: Objection to the form. It  
 17 assumes this witness has any knowledge that the  
 18 person in the photograph is, in fact, Nadia  
 19 Marcinkova. Therefore, it's ambiguous and  
 20 compound, and I'll instruct her not to answer  
 21 based on her Fifth Amendment privilege.  
 22 THE WITNESS: On the instruction of my  
 23 lawyer, I must invoke my Fifth Amendment right.  
 24 BY MR. KUVIN:  
 25 Q. Would you agree with me that the girl

1 shown in that photograph -- strike that.  
 2 Would you agree with me that this  
 3 photograph was kept by Jeffrey Epstein in his home?  
 4 MR. RHEINHART: Objection to the form as  
 5 to being compound in that it assumes that she  
 6 has any knowledge of Jeffrey Epstein or his  
 7 home, and I would instruct her not to answer  
 8 based on her Fifth Amendment.  
 9 THE WITNESS: On the instruction of my  
 10 lawyer, I must invoke my Fifth Amendment right.  
 11 BY MR. KUVIN:  
 12 Q. Would you agree with me that  
 13 Nadia Marcinkova was under the age of 16 when this  
 14 photograph was taken in Exhibit 9?  
 15 MR. RHEINHART: Objection to the form as  
 16 compound and also assuming this witness has any  
 17 knowledge that the person in the photograph is,  
 18 in fact, Nadia Marcinkova. Therefore, I would  
 19 instruct her to invoke her Fifth Amendment  
 20 privilege.  
 21 THE WITNESS: On the instruction of my  
 22 lawyer, I must invoke my Fifth Amendment right.  
 23 BY MR. KUVIN:  
 24 Q. Ma'am, is Jeffrey Epstein paying for your  
 25 attorney today?

1 implicitly assumes that she does, I would  
 2 instruct her not to answer it based on her  
 3 Fifth Amendment privilege.  
 4 THE WITNESS: Upon the instruction of my  
 5 lawyer, I must invoke my Fifth Amendment  
 6 privilege.  
 7 BY MR. KUVIN:  
 8 Q. Ma'am, are you aware of the effect, the  
 9 emotional effect on the underage girls that have  
 10 been abused by Jeffrey Epstein? Are you aware of  
 11 the emotional effect that it's had on the underage  
 12 girls that have been abused by Jeffrey Epstein?  
 13 MR. RHEINHART: Objection to the form as  
 14 to, again, the question assumes this witness  
 15 has any knowledge, first, of Jeffrey Epstein,  
 16 second that Jeffrey Epstein has sexually abused  
 17 anyone ever, and third, that anyone has been  
 18 damaged by anything that Jeffrey Epstein has  
 19 done, and fourth, that she would somehow have  
 20 any knowledge of these people's emotional  
 21 situations. For all those reasons, the  
 22 question is ambiguous and compound, and I would  
 23 instruct her not to answer based on her Fifth  
 24 Amendment.  
 25 THE WITNESS: Upon the instruction of my

1 MR. RHEINHART: I'll instruct the witness  
 2 not to answer based on her Fifth Amendment  
 3 privilege.  
 4 THE WITNESS: On the instruction of my  
 5 lawyer, I must invoke my Fifth Amendment right.  
 6 BY MR. KUVIN:  
 7 Q. Ma'am, is Jeffrey Epstein paying for you  
 8 to keep quiet with respect to the things he has done  
 9 to underage girls?  
 10 MR. RHEINHART: Objection to the form in  
 11 that it's ambiguous and compound, also assumes  
 12 this witness has any knowledge at all of  
 13 Jeffrey Epstein, and therefore I am instructing  
 14 her to invoke her Fifth Amendment privilege.  
 15 THE WITNESS: On the instruction of my  
 16 lawyer, I must invoke my Fifth Amendment  
 17 privilege.  
 18 BY MR. KUVIN:  
 19 Q. Ma'am, how much is Jeffrey Epstein paying  
 20 you to keep quiet with respect to things he's done  
 21 to underage girls?  
 22 MR. RHEINHART: Object to the form as  
 23 multiple compound questions, and it's again  
 24 assuming this witness has any knowledge at all  
 25 of Jeffrey Epstein. Since the question

1 lawyer, I must invoke my Fifth Amendment right.  
 2 BY MR. KUVIN:  
 3 Q. Ma'am, do you have any regret for what  
 4 you've done?  
 5 MR. RHEINHART: Objection to the form.  
 6 That question is not designed to lead to  
 7 discoverable evidence. It's meant solely for  
 8 the purpose of harassment, and I would instruct  
 9 her not to answer.  
 10 BY MR. KUVIN:  
 11 Q. Ma'am, do you have any regrets for what  
 12 Jeffrey Epstein has done through you in obtaining  
 13 underage girls for sexual abuse?  
 14 MR. RHEINHART: Same objection as the  
 15 previous question as well as that question is  
 16 now free to assume this witness has any  
 17 knowledge at all of Jeffrey Epstein or  
 18 Jeffrey Epstein having abused any underage  
 19 women or girls or anything else that  
 20 Jeffrey Epstein may ever have done.  
 21 And therefore, since it assumes that  
 22 fact, I would instruct her not to answer  
 23 based on her Fifth Amendment.  
 24 BY MR. KUVIN:  
 25 Q. Are you scared of Jeffrey Epstein?

1 MR. KUVIN: I'm sorry, you had to respond.  
 2 I cut you off.  
 3 THE WITNESS: Upon the instruction of my  
 4 lawyer, I must invoke my Fifth Amendment right.  
 5 BY MR. KUVIN:  
 6 Q. Are you scared of Jeffrey Epstein?  
 7 MR. RHEINHART: Objection to the form in  
 8 that it assumes this witness has ever met  
 9 Jeffrey Epstein in her life. Because it  
 10 assumes that, I would instruct her not to  
 11 answer based on the Fifth Amendment.  
 12 THE WITNESS: On the instruction of my  
 13 lawyer, I must invoke my Fifth Amendment right.  
 14 BY MR. KUVIN:  
 15 Q. Are you aware of Jeffrey Epstein's sexual  
 16 obsession for children?  
 17 MR. RHEINHART: Same instructions as the  
 18 previous question, also objection to the  
 19 question. It's not designed to lead to any  
 20 discoverable evidence at all. It's simply  
 21 meant for harassment.  
 22 THE WITNESS: On the instruction of my  
 23 lawyer, I must invoke my Fifth Amendment  
 24 privilege.  
 25

1 lawyer, and I must invoke my Fifth Amendment  
 2 privilege.  
 3 BY MR. KUVIN:  
 4 Q. Do you know who Les Wexner is?  
 5 MR. RHEINHART: I'll instruct the witness  
 6 not to answer based on her Fifth Amendment  
 7 privilege.  
 8 THE WITNESS: On the instruction of my  
 9 lawyer, I must invoke my Fifth Amendment  
 10 privilege.  
 11 BY MR. KUVIN:  
 12 Q. Do you know whether or not Mr. Epstein has  
 13 had a homosexual relationship with Les Wexner in the  
 14 past?  
 15 MR. RHEINHART: Objection to the form in  
 16 that it again assumes that this witness knows  
 17 anything at all about Jeffrey Epstein or has  
 18 ever met Jeffrey Epstein in her life, and  
 19 therefore, I would instruct her not to answer  
 20 based on her Fifth Amendment privilege, and the  
 21 question is compound and ambiguous.  
 22 THE WITNESS: On the instruction of my  
 23 lawyer, I must invoke my Fifth Amendment  
 24 privilege.  
 25

1 BY MR. KUVIN:  
 2 Q. At what point did you realize that  
 3 Jeffrey Epstein was sexually attracted to girls  
 4 under the age of 18?  
 5 MR. RHEINHART: Once again, the question  
 6 assumes this witness knows anything at all  
 7 about Jeffrey Epstein, underage women, sexual  
 8 abuse of underage women, and she's not going to  
 9 answer any questions that assume that as a  
 10 predicate. They are objectionable as ambiguous  
 11 and compound, and I instruct her not to answer.  
 12 THE WITNESS: On the instruction of my  
 13 lawyer, I must invoke my Fifth Amendment  
 14 privilege.  
 15 BY MR. KUVIN:  
 16 Q. Are you aware whether or not  
 17 Jeffrey Epstein has had any homosexual relationships  
 18 in the past?  
 19 MR. RHEINHART: Same objection as the  
 20 previous question. The question as stated  
 21 assumes this witness has some knowledge of  
 22 Jeffrey Epstein. And since it assumes that  
 23 fact, it is ambiguous and it's compound, and I  
 24 instruct her not to answer.  
 25 THE WITNESS: On the instruction of my

1 BY MR. KUVIN:  
 2 Q. Do you know the magician by the name  
 3 David Copperfield?  
 4 MR. RHEINHART: I'll instruct the witness  
 5 not to answer based on her Fifth Amendment  
 6 right.  
 7 THE WITNESS: On the instruction of my  
 8 lawyer, I must invoke my Fifth Amendment  
 9 privilege.  
 10 BY MR. KUVIN:  
 11 Q. You are aware, are you not, that  
 12 David Copperfield has visited Jeffrey Epstein's home  
 13 in Palm Beach?  
 14 MR. RHEINHART: Objection to the form as  
 15 it once again assumes she has some knowledge of  
 16 Jeffrey Epstein, or whether he has a home in  
 17 Palm Beach. Because those facts are implicit  
 18 in the question, the question is ambiguous and  
 19 compound. I would instruct her not to answer  
 20 based on her Fifth Amendment.  
 21 THE WITNESS: On the instruction of my  
 22 lawyer, I must invoke my Fifth Amendment  
 23 privilege.  
 24 BY MR. KUVIN:  
 25 Q. You are aware, are you not, that

1 David Copperfield and Jeffrey Epstein used to share  
 2 for sexual -- for sex, girls under the age of 16?  
 3 MR. RHEINHART: Same objection as  
 4 previously stated to the last I don't know how  
 5 many questions. This question again assumes  
 6 this witness knows Jeffrey Epstein, has any  
 7 knowledge of Jeffrey Epstein's life. And  
 8 because it assumes that fact, there is an  
 9 underlying predicate it is ambiguous and  
 10 compound. I would instruct her not to answer.  
 11 THE WITNESS: On the instruction of my  
 12 lawyer, I must invoke my Fifth Amendment  
 13 privilege.  
 14 BY MR. KUVIN:  
 15 Q. From the time you met Mr. Epstein, isn't  
 16 it true that he would arrange for underage girls,  
 17 girls under the age of 18, to have sex with every  
 18 single day?  
 19 MR. RHEINHART: Let me try this again.  
 20 Objection to the form. Any question you're  
 21 going to ask her that assumes she knows  
 22 Jeffrey Epstein, she's ever met Jeffrey  
 23 Epstein, she's ever seen Jeffrey Epstein, knows  
 24 where he lives, knows what he does, if it  
 25 assumes that as part of the question, I will

1 privilege.  
 2 THE WITNESS: On the instruction of my  
 3 lawyer, I must invoke my Fifth Amendment  
 4 privilege.  
 5 BY MR. KUVIN:  
 6 Q. How many people did Jeffrey Epstein use to  
 7 help him bring minor females to his house in Palm  
 8 Beach for sex?  
 9 MR. RHEINHART: Same objection as the  
 10 previous question and I instruct her not to  
 11 answer.  
 12 THE WITNESS: On the instruction of my  
 13 lawyer, I must invoke my Fifth Amendment  
 14 privilege.  
 15 BY MR. KUVIN:  
 16 Q. Do you agree that Jeffrey Epstein is a  
 17 child molester?  
 18 MR. RHEINHART: That question is solely  
 19 intended to harass the witness and it's  
 20 ambiguous as to what a child molester means,  
 21 and you're asking for a legal conclusion and  
 22 instruct her not to answer.  
 23 BY MR. KUVIN:  
 24 Q. In your own opinion.  
 25 MR. RHEINHART: I will again instruct her

1 deem the question to be ambiguous and compound,  
 2 because you're asking her to admit as a  
 3 predicate that she knows Mr. Epstein. As to  
 4 any question like that, I am going to instruct  
 5 her to take the Fifth Amendment on that basis.  
 6 So I would again instruct her to take the Fifth  
 7 Amendment as to that question.  
 8 THE WITNESS: On the instruction of my  
 9 lawyer, I must invoke my Fifth Amendment  
 10 privilege.  
 11 MR. KUVIN: If you want to short circuit  
 12 that, anytime I mention Jeffrey Epstein you can  
 13 have a standing objection on that issue. I  
 14 have no problem.  
 15 MR. RHEINHART: Great.  
 16 BY MR. KUVIN:  
 17 Q. Can you explain, if you would, to a jury  
 18 how Mr. Epstein would access underage minor females  
 19 for sex every day?  
 20 MR. RHEINHART: The question is compound  
 21 in that it asks about Mr. Epstein every day,  
 22 underage females, and involves multiple  
 23 questions in the same question, and also based  
 24 on the standing objection, I would instruct her  
 25 not to answer based on her Fifth Amendment

1 not to answer based on her Fifth Amendment  
 2 privilege as well as the question having no  
 3 legitimate basis and will not lead to  
 4 discoverable evidence.  
 5 THE WITNESS: On the instruction of my  
 6 lawyer, I must invoke my Fifth Amendment  
 7 privilege.  
 8 BY MR. KUVIN:  
 9 Q. Would you agree that Jeffrey Epstein is  
 10 obsessed with underage females?  
 11 MR. RHEINHART: Objection to the form.  
 12 It's ambiguous as to what you mean by  
 13 "obsessed." I'll instruct the witness not to  
 14 answer based on her Fifth Amendment privilege,  
 15 because the question assumes knowledge of  
 16 Jeffrey Epstein.  
 17 THE WITNESS: On the instruction of my  
 18 lawyer, I must invoke my Fifth Amendment  
 19 privilege.  
 20 BY MR. KUVIN:  
 21 Q. How would you define the word "obsessed"?  
 22 MR. RHEINHART: You can answer that.  
 23 THE WITNESS: I don't know. You like it a  
 24 lot. I don't know.  
 25

1 BY MR. KUVIN:  
 2 Q. Okay. Using your definition of obsessed,  
 3 would you agree with me that Jeffrey Epstein was  
 4 obsessed with underage females?  
 5 MR. RHEINHART: Same objection; same  
 6 instruction.  
 7 THE WITNESS: On the instruction of my  
 8 lawyer, I must invoke my Fifth Amendment  
 9 privilege.  
 10 BY MR. KUVIN:  
 11 Q. When was the first time that you learned  
 12 Mr. Epstein was getting a massage from a girl under  
 13 the age of 16?  
 14 MR. RHEINHART: One second.  
 15 MR. KUVIN: Sure.  
 16 MR. RHEINHART: I want to make the  
 17 standing objection for the reasons previously  
 18 stated, the question is otherwise also compound  
 19 in that it assumes multiple facts and asks her  
 20 to answer multiple questions at the same time.  
 21 I'll instruct her not to answer based on her  
 22 Fifth Amendment.  
 23 THE WITNESS: On the instruction of my  
 24 lawyer, I must invoke my Fifth Amendment  
 25 privilege.

1 lawyer, I must invoke my Fifth Amendment  
 2 privilege.  
 3 BY MR. KUVIN:  
 4 Q. Did you keep a journal with the names of  
 5 girls in it in the year 2005?  
 6 MR. RHEINHART: Objection to the form as  
 7 ambiguous. What do you mean by "journal"?  
 8 MR. KUVIN: I will define it.  
 9 MR. RHEINHART: Please.  
 10 BY MR. KUVIN:  
 11 Q. Did you keep a pad of paper, either a  
 12 ringed notebook or some other format with the names  
 13 of girls and their phone numbers in it in 2005?  
 14 MR. RHEINHART: I'll instruct the witness  
 15 not to answer based on her Fifth Amendment  
 16 privilege. Also the question remains  
 17 ambiguous.  
 18 THE WITNESS: On the instruction of my  
 19 lawyer, I must invoke my Fifth Amendment  
 20 privilege.  
 21 BY MR. KUVIN:  
 22 Q. Would you agree with me that you kept a  
 23 pad of paper or a journal, however you want to  
 24 describe it, that contain the names of hundreds of  
 25 underage girls and their phone numbers?

1 BY MR. KUVIN:  
 2 Q. Do you know who owns the home at 358  
 3 El Brillo Way?  
 4 MR. RHEINHART: Same instructions as to  
 5 the standing objection.  
 6 THE WITNESS: On the instruction of my  
 7 lawyer, I must invoke my Fifth Amendment  
 8 privilege.  
 9 BY MR. KUVIN:  
 10 Q. Have you been on Palm Beach Island before?  
 11 MR. RHEINHART: I am sorry. Can you  
 12 restate the question?  
 13 MR. KUVIN: Sure.  
 14 BY MR. KUVIN:  
 15 Q. Have you been on the Island of Palm Beach  
 16 before?  
 17 MR. RHEINHART: You can answer that yes or  
 18 no.  
 19 THE WITNESS: Yes.  
 20 BY MR. KUVIN:  
 21 Q. How many times?  
 22 MR. RHEINHART: I'll instruct her not to  
 23 answer that question based on her Fifth  
 24 Amendment privilege.  
 25 THE WITNESS: On the instruction of my

1 MR. RHEINHART: Object to the form of the  
 2 question. It's compound and asking her to  
 3 answer multiple questions at the same time.  
 4 It's also leading, and I would instruct her not  
 5 to answer based on her Fifth Amendment.  
 6 THE WITNESS: On the instruction of my  
 7 lawyer, I must invoke my Fifth Amendment right.  
 8 BY MR. KUVIN:  
 9 Q. Would you agree with me that you kept a  
 10 pad of paper, notebook, or journal with the names of  
 11 hundreds of girls under the age of 16 so that you  
 12 could contact them and have them come to  
 13 Jeffrey Epstein's home for sex with him?  
 14 MR. RHEINHART: Objection to the form as  
 15 compound and ambiguous, and I'll instruct her  
 16 not to answer based on Fifth Amendment.  
 17 THE WITNESS: On the instruction of my  
 18 lawyer, I must invoke my Fifth Amendment  
 19 privilege.  
 20 BY MR. KUVIN:  
 21 Q. Do you know Alfredo Rodriguez?  
 22 MR. RHEINHART: I'll instruct the witness  
 23 not to answer based on her Fifth Amendment  
 24 privilege.  
 25 THE WITNESS: On the instruction of my

1 lawyer, I must invoke my Fifth Amendment  
 2 privilege.  
 3 BY MR. KUVIN:  
 4 Q. Are you aware that Alfredo Rodriguez has  
 5 pled guilty to federal charges for hiding a journal  
 6 containing the names of women?  
 7 MR. RHEINHART: Objection to the form as  
 8 compound and instruct her not to answer.  
 9 THE WITNESS: On the instruction of my  
 10 lawyer, I must choose to invoke my Fifth  
 11 Amendment privilege.  
 12 BY MR. KUVIN:  
 13 Q. Do you have a personal fear of criminal  
 14 prosecution as you sit here today?  
 15 MR. RHEINHART: I instruct the witness --  
 16 object to the form. That's the whole basis why  
 17 one would invoke the Fifth Amendment so clearly  
 18 she's does. I am not going to have her answer  
 19 the question. It's solely meant to harass.  
 20 MR. KUVIN: So is she not going to answer  
 21 that question?  
 22 MR. RHEINHART: She's not going to answer  
 23 that question.  
 24 MR. KUVIN: I think what I need to  
 25 establish is that she personally has a fear,

1 prosecution by either the State or the federal  
 2 government?  
 3 MR. RHEINHART: She's not answering that  
 4 question. She's not required to answer the  
 5 question. She's invoked her Fifth Amendment  
 6 privilege. She will continue to do so as to  
 7 that question. You can move on.  
 8 BY MR. KUVIN:  
 9 Q. Ma'am, are you invoking your Fifth  
 10 Amendment because your lawyer is advising you to  
 11 invoke your Fifth Amendment, or because you  
 12 personally have a fear that you might be prosecuted  
 13 by either the state or the federal government?  
 14 MR. RHEINHART: We have now been down this  
 15 street four times. She's not going to answer  
 16 the question. You can move along or we can  
 17 leave.  
 18 MR. KUVIN: I am just clarifying the  
 19 question, and I appreciate it. And you can  
 20 object. I just want to make sure that I have a  
 21 clear record of every possible machination of  
 22 the question so that I don't get hit later with  
 23 you didn't ask the specific question you need  
 24 to ask. So, I'm not doing it certainly to  
 25 harass. I just want to make sure that the

1 not her lawyer. So I would like to establish  
 2 whether the witness has a personal fear.  
 3 MR. RHEINHART: Well, first of all, under  
 4 the Fifth Amendment you don't have to be in  
 5 fear. You just have to believe that the  
 6 government believes you can be prosecuted for  
 7 something. She's been invoking the Fifth  
 8 Amendment on her own. It is implicit in her  
 9 invocation in what she fears. She's not going  
 10 to answer that question.  
 11 MR. KUVIN: Well, I tend to disagree. She  
 12 hasn't been invoking it on her own. She's been  
 13 invoking it after you have instructed her to  
 14 invoke it. So I want to know her personal --  
 15 MR. RHEINHART: You can take that up with  
 16 the judge then. She's not answering the  
 17 question. She's invoking her Fifth Amendment  
 18 on her own accord based on the advice of her  
 19 lawyer. And you can take it up somewhere else,  
 20 but she's not answering that question.  
 21 MR. KUVIN: Well, then let me clarify the  
 22 record.  
 23 BY MR. KUVIN:  
 24 Q. Ma'am, are you invoking your Fifth  
 25 Amendment because you personally have a concern of

1 record is very clear of my question.  
 2 MR. RHEINHART: I understand. You can  
 3 move on.  
 4 BY MR. KUVIN:  
 5 Q. Ma'am, have you had any direct  
 6 communications with the State Attorney's office in  
 7 the last two years?  
 8 MR. RHEINHART: When you say "direct  
 9 communications," can you clarify?  
 10 MR. KUVIN: Yes.  
 11 BY MR. KUVIN:  
 12 Q. You, personally, have you spoken with  
 13 anyone in the State Attorney's office in the last  
 14 two years?  
 15 MR. KUVIN: I can't imagine there would be  
 16 a Fifth Amendment for that.  
 17 MR. RHEINHART: Let me consult. If I  
 18 might. Okay?  
 19 MR. KUVIN: Sure.  
 20 MR. RHEINHART: It would all depend on  
 21 what was said to her if she could consult with  
 22 them now. For example, if they consulted and  
 23 they told her they were about to prosecute,  
 24 then there could be a Fifth Amendment claim,  
 25 couldn't there?

1 MR. KUVIN: No, not as to the statements  
 2 they told her. I mean, that's certainly not  
 3 Fifth Amendment. That's something that was  
 4 told to her.  
 5 MR. RHEINHART: We'll take that up  
 6 elsewhere if you need to. You can answer.  
 7 MR. KUVIN: Okay.  
 8 THE WITNESS: No, I have not.  
 9 BY MR. KUVIN:  
 10 Q. All right. Ma'am, have you had any  
 11 personal communications with anyone working for the  
 12 federal government in the last two years?  
 13 MR. RHEINHART: When you say "the federal  
 14 government" do you mean the postal service, the  
 15 entire federal government, or do you want to  
 16 clarify that?  
 17 MR. KUVIN: Well, I certainly could leave  
 18 it open-ended. If she's talked to a post  
 19 office employee, that would be interesting, but  
 20 certainly not to this case.  
 21 BY MR. KUVIN:  
 22 Q. Let's talk about the U.S. Attorney's  
 23 Office or anyone working on behalf of the U.S.  
 24 Attorney's Office.  
 25 A. Have I personally ever spoken to anyone?

1 Q. Have you spoken with anybody at the U.S.  
 2 Attorney's Office in the last five years?  
 3 A. No.  
 4 Q. Have you spoken with anyone at the FBI in  
 5 the last five years?  
 6 A. No.  
 7 Q. Have you spoken with anyone at the  
 8 Palm Beach Police Department in the last five years?  
 9 MR. RHEINHART: When you say, "the Palm  
 10 Beach Police," for any purpose or as related to  
 11 this case? Again, for example, if there was  
 12 like a parking ticket --  
 13 MR. KUVIN: Sure.  
 14 MR. RHEINHART: -- or some other thing. I  
 15 want to clarify that.  
 16 BY MR. KUVIN:  
 17 Q. Let's, let's start with broad, and we can  
 18 work to specific. Can you recall having any  
 19 conversations for any reason with the Palm Beach  
 20 Police Department in the last five years?  
 21 A. No.  
 22 Q. Okay. Do you have knowledge whether or  
 23 not the Palm Beach Police Department ever requested  
 24 for you to come in for an interview at any time in  
 25 the last five years?

1 Q. Yes, ma'am, personally have you ever had  
 2 any conversations with anyone at the U.S. Attorney's  
 3 Office or one of their -- one -- a person  
 4 representing to be from that office in the last two  
 5 years.  
 6 A. No.  
 7 Q. Okay. Do you know, as you sit here today,  
 8 whether or not you ever were requested to give a  
 9 statement by the State Attorney's office for the  
 10 Palm Beach Police Department?  
 11 MR. RHEINHART: May I consult?  
 12 MR. KUVIN: Yes.  
 13 MR. RHEINHART: You may answer. And for  
 14 the record, I was just determining whether the  
 15 answer to that question would be protected by  
 16 the attorney-client privilege.  
 17 MR. KUVIN: Understood.  
 18 THE WITNESS: No, I don't. I don't know.  
 19 BY MR. KUVIN:  
 20 Q. Let me clarify the last two questions I  
 21 asked about the State Attorney's Office and the U.S.  
 22 Attorney's Office. Have you spoken with anybody  
 23 personally at the State Attorney's Office in the  
 24 last five years?  
 25 A. No.

1 MR. RHEINHART: If you know the answer to  
 2 that question because that's something your  
 3 attorney told you, you don't have to answer  
 4 that question. Otherwise, go ahead and answer.  
 5 THE WITNESS: No.  
 6 BY MR. KUVIN:  
 7 Q. Okay. When did you first retain an  
 8 attorney? What date did you first retain a -- I  
 9 mean, let me clarify. What date did you first  
 10 retain a criminal attorney?  
 11 MR. RHEINHART: I'll instruct her not to  
 12 answer based on the Fifth Amendment privilege.  
 13 THE WITNESS: On the instruction of my  
 14 lawyer, I must invoke my Fifth Amendment  
 15 privilege.  
 16 BY MR. KUVIN:  
 17 Q. Did you first retain a criminal attorney  
 18 in the year 2005?  
 19 MR. RHEINHART: Same instruction.  
 20 THE WITNESS: On the instruction of my  
 21 lawyer, I must invoke my Fifth Amendment  
 22 privilege.  
 23 BY MR. KUVIN:  
 24 Q. Did you retain a criminal attorney in  
 25 2004?

1 MR. RHEINHART: Same instruction.  
 2 THE WITNESS: On the instruction of my  
 3 lawyer, I must invoke my Fifth Amendment  
 4 privilege.  
 5 BY MR. KUVIN:  
 6 Q. Have you ever worked as a professional  
 7 model?  
 8 MR. RHEINHART: May I consult?  
 9 MR. KUVIN: Sure.  
 10 MR. RHEINHART: You can answer the  
 11 question.  
 12 THE WITNESS: Yes.  
 13 BY MR. KUVIN:  
 14 Q. When?  
 15 A. I don't remember. I don't remember the dates.  
 16 It was at least maybe ten years ago.  
 17 Q. And you're how old now?  
 18 MR. RHEINHART: I'll instruct the witness  
 19 not to answer the question. Nice try.  
 20 Instruct you not to answer based on  
 21 your Fifth Amendment privilege.  
 22 THE WITNESS: On the instruction of my  
 23 lawyer, I'm going to invoke my Fifth Amendment  
 24 privilege.  
 25 MR. KUVIN: I'm just trying to find out.

1 assumes facts that have not been established  
 2 and it's compound.  
 3 THE WITNESS: On the instruction of my  
 4 lawyer, I must invoke my Fifth Amendment  
 5 privilege.  
 6 MR. RHEINHART: And to clarify the  
 7 objection is that it assumes that she's ever  
 8 met or knows anything about Jean-Luc Brunel.  
 9 BY MR. KUVIN:  
 10 Q. Were you ever promised anything regarding  
 11 your modeling career by Jeffrey Epstein?  
 12 MR. RHEINHART: Same objection, instruct  
 13 the witness not to answer.  
 14 THE WITNESS: On the instruction of my  
 15 lawyer, I must invoke my Fifth Amendment  
 16 privilege.  
 17 BY MR. KUVIN:  
 18 Q. You would agree with me that there is a  
 19 financial arrangement between Jean-Luc Brunel and  
 20 Jeffrey Epstein, do you not?  
 21 MR. RHEINHART: Objection. It assumes she  
 22 has any knowledge of either Mr. Epstein or  
 23 Mr. Brunel, and as to that she is going to  
 24 invoke her Fifth Amendment privilege. The  
 25 question is compound and therefore ambiguous.

1 MR. RHEINHART: Like I said, good try.  
 2 Move on.  
 3 BY MR. KUVIN:  
 4 Q. With respect to your work as a  
 5 professional model, what company did you work for?  
 6 MR. RHEINHART: Instruct the witness not  
 7 to answer based on the Fifth Amendment  
 8 privilege.  
 9 THE WITNESS: On the instruction of my  
 10 lawyer, I invoke my Fifth Amendment privilege.  
 11 BY MR. KUVIN:  
 12 Q. What is your understanding of  
 13 Mr. Epstein's involvement with the modeling  
 14 industry?  
 15 MR. RHEINHART: Standing objection, and  
 16 instruct the witness not to answer based on  
 17 Fifth Amendment, on that basis.  
 18 THE WITNESS: Upon the instruction of my  
 19 lawyer, I must invoke my Fifth Amendment  
 20 privilege.  
 21 BY MR. KUVIN:  
 22 Q. Were you ever promised anything regarding  
 23 your modeling career by Jean-Luc Brunel?  
 24 MR. RHEINHART: Instruct the witness not  
 25 to answer based on Fifth Amendment, also

1 THE WITNESS: On the instruction of my  
 2 lawyer, I must invoke my Fifth Amendment  
 3 privilege.  
 4 BY MR. KUVIN:  
 5 Q. Would you agree with me that  
 6 Ghislaine Maxwell provides underage girls to  
 7 Mr. Epstein for sex?  
 8 MR. RHEINHART: Objection to the form. It  
 9 assumes she knows anything at all about  
 10 Ghislaine Maxwell and asks her to assume that  
 11 she does, and therefore it is compound and  
 12 ambiguous, and I would instruct her not to  
 13 answer.  
 14 THE WITNESS: Upon the instruction of my  
 15 lawyer, I must invoke my Fifth Amendment  
 16 privilege.  
 17 MR. KUVIN: That's a good point. Take a  
 18 look at what we'll mark as Exhibit 10.  
 19 (Plaintiff's Exhibit No. 10 was marked for  
 20 identification.)  
 21 MR. KUVIN: All me to show it to the  
 22 camera first.  
 23 MR. RHEINHART: Okay.  
 24 MR. KUVIN: Okay.  
 25 THE WITNESS: Okay.



1 BY MR. KUVIN:  
 2 Q. Take a look at what we marked as Exhibit  
 3 10. Do you recognize the two people in that  
 4 photograph?  
 5 MR. RHEINHART: I'll instruct the witness  
 6 not to answer based on her Fifth Amendment  
 7 privilege.  
 8 THE WITNESS: On the instruction of my  
 9 lawyer, I must invoke my Fifth Amendment  
 10 privilege.  
 11 BY MR. KUVIN:  
 12 Q. Would you agree with me that's  
 13 Ghislaine Maxwell on the right and Jeffrey Epstein  
 14 on the left?  
 15 MR. RHEINHART: Objection to the form. It  
 16 assumes that she knows who Ghislaine Maxwell  
 17 and Jeffrey Epstein are, and therefore it's  
 18 compound and ambiguous, and I would instruct  
 19 her not to answer.  
 20 THE WITNESS: On the instruction of my  
 21 lawyer, I must invoke my Fifth Amendment  
 22 privilege.  
 23 MR. KUVIN: Okay. I will mark this as  
 24 Exhibit 11.  
 25

1 You're asking the witness three  
 2 questions at the same time, and I would  
 3 instruct her not to answer based on the  
 4 Fifth Amendment.  
 5 THE WITNESS: On the instruction of my  
 6 lawyer, I must invoke my Fifth Amendment  
 7 privilege.  
 8 MR. KUVIN: Just so we're clear, had she  
 9 answered the first two questions, then  
 10 obviously I wouldn't have to ask the third one  
 11 that has all of them in it but --  
 12 MR. RHEINHART: If you had accepted her  
 13 answer, you would have known that she wasn't  
 14 going to answer these, and we could have saved  
 15 a few minutes.  
 16 MR. KUVIN: And as you well know, I must  
 17 ask the question in order to gain the inference  
 18 at trial.  
 19 MR. RHEINHART: I understand.  
 20 MR. KUVIN: All right.  
 21 (Plaintiff's Exhibit No. 12 was marked for  
 22 identification.)  
 23 BY MR. KUVIN:  
 24 Q. Do you recognize the gentleman that is  
 25 shown --

1 (Plaintiff's Exhibit No. 11 was marked for  
 2 identification.)  
 3 BY MR. KUVIN:  
 4 Q. Let me show you what we marked as  
 5 Exhibit 11. Hang on one second.  
 6 MR. RHEINHART: Sure.  
 7 BY MR. KUVIN:  
 8 Q. Do you recognize the young lady shown in  
 9 Exhibit 11?  
 10 MR. RHEINHART: I'll instruct the witness  
 11 not to answer based on her Fifth Amendment  
 12 privilege.  
 13 THE WITNESS: On the instruction of my  
 14 lawyer, I must invoke my Fifth Amendment  
 15 privilege.  
 16 BY MR. KUVIN:  
 17 Q. Do you agree with me that the young girl  
 18 shown in Exhibit 11 was recruited by Ghislaine  
 19 Maxwell to, for sexual activity with  
 20 Jeffrey Epstein?  
 21 MR. RHEINHART: Objection to the form. It  
 22 assumes she knows who the person is in Exhibit  
 23 11, and assumes she knows who Ghislaine Maxwell  
 24 is, and assumes she knows who Jeffrey Epstein  
 25 is, and is therefore compound.

1 MR. RHEINHART: We'll have a job here.  
 2 MR. KUVIN: That is true.  
 3 BY MR. KUVIN:  
 4 Q. -- that is shown in Exhibit 12?  
 5 MR. KUVIN: Let me hold this for the  
 6 camera first.  
 7 MR. RHEINHART: I'm sorry. Is there a  
 8 question pending?  
 9 MR. KUVIN: Yes.  
 10 BY MR. KUVIN:  
 11 Q. Do you recognize the gentleman shown in  
 12 Exhibit 12?  
 13 MR. RHEINHART: I instruct her not to  
 14 answer based on the Fifth Amendment.  
 15 THE WITNESS: On the instruction of my  
 16 lawyer, I must invoke my Fifth Amendment  
 17 privilege.  
 18 BY MR. KUVIN:  
 19 Q. Would you agree with me that that is  
 20 Prince Andrew shown in Exhibit 12?  
 21 MR. RHEINHART: Same instruction.  
 22 THE WITNESS: On the instruction of my  
 23 lawyer, I must invoke my Fifth Amendment  
 24 privilege.  
 25

1 BY MR. KUVIN:  
 2 Q. Would you agree with me that you have been  
 3 present where Jeffrey Epstein and Prince Andrew have  
 4 had sexual relations with underage girls?  
 5 MR. RHEINHART: Objection to the form,  
 6 it's compound in that it assumes she knows who  
 7 the person is in Picture 12, she knows who  
 8 Prince Andrew is, and she knows who Jeffrey  
 9 Epstein is. It's compound and ambiguous, and  
 10 I'll instruct her not to answer based on her  
 11 Fifth Amendment.  
 12 THE WITNESS: On the instruction of my  
 13 lawyer, I must invoke my Fifth Amendment  
 14 privilege.  
 15 BY MR. KUVIN:  
 16 Q. Would you agree with me that Prince Andrew  
 17 and Jeffrey Epstein used to share underaged girls  
 18 for sexual relations?  
 19 MR. RHEINHART: Same objection previously  
 20 stated, requires her to also speculate who  
 21 Prince Andrew is. I instruct her not to answer  
 22 based on the Fifth Amendment.  
 23 THE WITNESS: On the instruction of my  
 24 lawyer, I must invoke my Fifth Amendment  
 25 privilege.

1 break now.  
 2 MR. KUVIN: Okay.  
 3 THE VIDEOGRAPHER: We're now off video  
 4 record. The time is 11:57 a.m.  
 5 (A luncheon recess was held.)  
 6 (Plaintiff's Exhibit No's 4 was marked for  
 7 identification.)  
 8 (Plaintiff's Exhibit No. 5 was marked for  
 9 identification.)  
 10 THE VIDEOGRAPHER: We're now on video  
 11 record. The time is 1:02 p.m.  
 12 MR. KUVIN: All right, counsel. I'm going  
 13 to ask a couple more general questions, and  
 14 then when we get into the specifics of the  
 15 individual girls, I just want to make sure,  
 16 once again, on the record, as we've done in  
 17 every deposition in this case, that we'll use  
 18 the Plaintiff's full name with the  
 19 understanding that the final transcript will  
 20 only contain their initials, and there will be  
 21 a key at the conclusion that's only provided to  
 22 the parties in this case and their counsel to  
 23 be kept confidential going forward. But  
 24 obviously, for the purposes of this deposition,  
 25 we will be using full names.

1 MR. RHEINHART: Also requires speculation  
 2 as to who Jeffrey Epstein is as well.  
 3 BY MR. KUVIN:  
 4 Q. Do you know who Prince Andrew is?  
 5 MR. RHEINHART: I'll instruct her not to  
 6 answer based on the Fifth Amendment.  
 7 THE WITNESS: On the instruction of my  
 8 lawyer, I must invoke my Fifth Amendment  
 9 privilege.  
 10 MR. KUVIN: It's almost 12:00. Do you  
 11 want to take a quick lunch?  
 12 MR. RHEINHART: Sure. How much longer do  
 13 you think you will be, Mr. Kuvin, before we go  
 14 on to other counsel?  
 15 MR. KUVIN: Probably not that much longer.  
 16 MR. RHEINHART: Okay.  
 17 MR. KUVIN: I have to get through a couple  
 18 of more generic stuff, and then get into the  
 19 specifics of my cases and then --  
 20 MR. RHEINHART: Okay. So, we, but just so  
 21 we have a sense of planning whether this is the  
 22 right time for a lunch break. You're not going  
 23 to finish in the next 15 or 20 minutes?  
 24 MR. KUVIN: No, not even close.  
 25 MR. RHEINHART: Okay. Let's take a lunch

1 MR. RHEINHART: Agreed.  
 2 MR. KUVIN: Okay. Is there any  
 3 disagreement with that around the table?  
 4 MR. HOROWITZ: Agreed.  
 5 MR. WEISSING: Agreed.  
 6 MS. EZELL: Agreed.  
 7 MR. KUVIN: Jack, do you agree to the --  
 8 MR. GOLDBERGER: I thought I'm not a part  
 9 of it.  
 10 MR. KUVIN: Well, you've been playing a  
 11 part, so I want to make sure you agree.  
 12 MR. GOLDBERGER: Yeah, I agree. I agree.  
 13 MR. RHEINHART: Hold on. Let me just  
 14 explain to her what we're talking about.  
 15 MR. KUVIN: Please do.  
 16 MR. RHEINHART: But when the transcript is  
 17 typed up, it won't have her name it will just  
 18 have initials. But we'll get a code that  
 19 explains the name. So that way you would be  
 20 asked if you recognize the name not a set of  
 21 initials that you may not understand or a Jane  
 22 Doe number that you do not know.  
 23 MR. KUVIN: That's way too confusing.  
 24 Okay?  
 25 MR. RHEINHART: Correct.

1 BY MR. KUVIN:  
 2 Q. Let's take a look at what I've marked --  
 3 premarked as Exhibit 4. It's a stack of documents,  
 4 just so you understand what this is and your  
 5 attorney can object or agree or disagree as he sees  
 6 fit, but this is a stack of documents that was part  
 7 of the trash pull from Jeffrey Epstein's home as  
 8 part of the criminal investigation. Just so you're  
 9 aware of what these are.  
 10 MR. RHEINHART: That was retrieved, that  
 11 was retrieved by the Palm Beach Police  
 12 Department from the trash --  
 13 MR. KUVIN: That's correct.  
 14 MR. RHEINHART: -- at the home of what is  
 15 known to be Mr. Epstein's home?  
 16 MR. KUVIN: Correct.  
 17 MR. RHEINHART: Okay.  
 18 MR. KUVIN: All right. And that's not a  
 19 question. I just wanted to kind of give you a  
 20 context for what I'm going to be asking you  
 21 about.  
 22 MR. RHEINHART: Thank you.  
 23 BY MR. KUVIN:  
 24 Q. All right. In taking a look at Exhibit 4,  
 25 I'd like you to take a look at the front page, the

1 objection to the form.  
 2 THE WITNESS: At the instruction of my  
 3 lawyer, I must invoke my Fifth Amendment  
 4 privilege.  
 5 BY MR. KUVIN:  
 6 Q. Yes. Do you know Alex Hall?  
 7 MR. RHEINHART: Instruct the witness not  
 8 to answer the question based on her Fifth  
 9 Amendment privilege.  
 10 THE WITNESS: On the instruction of my  
 11 lawyer, I must exercise my Fifth Amendment  
 12 privilege.  
 13 BY MR. KUVIN:  
 14 Q. Will you agree with me that on the first  
 15 page of Exhibit 4, you were to arrange for roses to  
 16 be delivered to Jane Doe No. 103 at her high school  
 17 performance?  
 18 MR. RHEINHART: Objection to the form.  
 19 It's compound in that it assumes this is the  
 20 witness's handwriting and assumes the witness  
 21 knows a person by the name of Jane Doe No. 103  
 22 and the witness otherwise knows Jeffrey Epstein  
 23 whose name is at the bottom of the paper, and  
 24 therefore, it's compound and ambiguous, and  
 25 instruct her not to answer.

1 first page of those documents.  
 2 Is that your handwriting, ma'am?  
 3 MR. RHEINHART: Instruct the witness not  
 4 to answer based on the Fifth Amendment  
 5 privilege.  
 6 THE WITNESS: At the instruction of my  
 7 lawyer, I must exercise my Fifth Amendment  
 8 right.  
 9 BY MR. KUVIN:  
 10 Q. And, in fact, that is your handwriting on  
 11 this notepad, is it not?  
 12 MR. RHEINHART: Same instruction. It's  
 13 the same question.  
 14 THE WITNESS: On the instruction of my  
 15 lawyer, I must invoke my Fifth Amendment right.  
 16 BY MR. KUVIN:  
 17 Q. In this note do you agree that you  
 18 arranged for an extension of one month on the rental  
 19 car for a young lady under the age of 16?  
 20 MR. RHEINHART: Objection to the form. It  
 21 is compound. It assumes that this is her  
 22 handwriting. It doesn't identify who the young  
 23 lady might be, and it's otherwise ambiguous, so  
 24 I instruct her not to answer on the Fifth  
 25 Amendment privilege in addition to the legal

1 THE WITNESS: On the instruction of my  
 2 lawyer, I must exercise my Fifth Amendment  
 3 right.  
 4 MR. KUVIN: I forgot to mention this at  
 5 the beginning, but objection to form usually  
 6 covers all that stuff like vague and compound,  
 7 and --  
 8 MR. RHEINHART: Okay.  
 9 MR. KUVIN: -- I'll leave it up to you,  
 10 but objection to form as far as the civil arena  
 11 context will cover all of those.  
 12 MR. RHEINHART: Just figured I'd make the  
 13 record clear in case we ever have an issue, or  
 14 in case you want to correct it based on what I  
 15 believe to be the improper form, I will give  
 16 you a chance to correct it.  
 17 BY MR. KUVIN:  
 18 Q. No problem. All right. On Page 2 of  
 19 Exhibit 4, if you'd take a look at that. Is that  
 20 your handwriting?  
 21 MR. RHEINHART: Instruct the witness not  
 22 to answer based on the Fifth Amendment  
 23 privilege.  
 24 THE WITNESS: On the instruction of my  
 25 lawyer, I choose to exercise my Fifth Amendment

1 right.  
 2 BY MR. KUVIN:  
 3 Q. Do you know who Larry is, as referred to  
 4 in Page 2 of Exhibit 4?  
 5 MR. RHEINHART: I'm sorry. Can you --  
 6 BY MR. KUVIN:  
 7 Q. Do you know who --  
 8 MR. RHEINHART: -- restate the question?  
 9 BY MR. KUVIN:  
 10 Q. Do you know who Larry is as referred to in  
 11 Page 2 of Exhibit 4?  
 12 MR. RHEINHART: So, just so I'm clear,  
 13 what the question is, the document on its face  
 14 has the name Larry in it. You're just asking  
 15 this witness whether she knows who this person  
 16 Larry is?  
 17 MR. KUVIN: Correct.  
 18 MR. RHEINHART: Instruct the witness not  
 19 to answer based on her Fifth Amendment  
 20 privilege.  
 21 THE WITNESS: On the instruction of my  
 22 lawyer, I must invoke my Fifth Amendment right.  
 23 BY MR. KUVIN:  
 24 Q. Do you know why Larry was recommending  
 25 that Mr. Epstein leave?

1 MR. RHEINHART: Okay. I would be happy  
 2 to.  
 3 MR. KUVIN: I just want to clarify,  
 4 because I don't think --  
 5 MR. RHEINHART: Okay.  
 6 MR. KUVIN: I don't think this is a  
 7 problem, but I just want to clear it up.  
 8 MR. RHEINHART: Thank you, Mr. Kuvin.  
 9 I'll let her answer that question.  
 10 MR. KUVIN: Not a problem.  
 11 MR. RHEINHART: So the question pending  
 12 is, is that your handwriting?  
 13 MR. KUVIN: Correct.  
 14 BY MR. KUVIN:  
 15 Q. Is this your handwriting? Just yes or no.  
 16 A. No.  
 17 Q. Okay. Thank you. All right. Let's look  
 18 at Page 4 of Exhibit 4. All right. This one's a  
 19 little different. Is this your handwriting?  
 20 MR. RHEINHART: Let me consult with her  
 21 again.  
 22 Okay. That's fine. You can answer  
 23 the question consistent with the  
 24 conversation we just had.  
 25 THE WITNESS: No.

1 MR. RHEINHART: Objection to the form and  
 2 instruct the witness not to answer based upon  
 3 her Fifth Amendment privilege.  
 4 THE WITNESS: On the instruction of my  
 5 lawyer, I must invoke my Fifth Amendment right.  
 6 BY MR. KUVIN:  
 7 Q. Would you agree with me that Larry was  
 8 calling to warn Mr. Epstein to leave town because he  
 9 was going to be arrested?  
 10 MR. RHEINHART: Objection to the form.  
 11 The question assumes facts that are not before  
 12 her, and it requires her to speculate, and also  
 13 implies that she knows anything at all about  
 14 Jeffrey Epstein, so I will instruct her not to  
 15 answer.  
 16 THE WITNESS: On the instruction of my  
 17 lawyer, I wish to exercise my Fifth Amendment  
 18 right.  
 19 BY MR. KUVIN:  
 20 Q. Take a look at Page 3 of Exhibit 4,  
 21 please. Is that your handwriting?  
 22 MR. RHEINHART: I'll instruct her not to  
 23 answer based on the Fifth Amendment privilege.  
 24 MR. KUVIN: Before we do that, would you  
 25 consult with her?

1 BY MR. KUVIN:  
 2 Q. Do you know who Danielle is as referred to  
 3 in this note of Page 4 of Exhibit 4?  
 4 MR. RHEINHART: Instruct the witness not  
 5 to answer based on her Fifth Amendment  
 6 privilege.  
 7 THE WITNESS: On the instruction of my  
 8 lawyer, I must exercise my Fifth Amendment  
 9 right.  
 10 BY MR. KUVIN:  
 11 Q. All right. Let's look at Page 5,  
 12 Exhibit 4.  
 13 Before we go to Page 5, rather, going  
 14 back to Page 4 for a minute. Will you agree with me  
 15 that Danielle as referred to in Page 4 of Exhibit 4  
 16 is a girl that is under the age of 16?  
 17 MR. RHEINHART: Object to the form. You  
 18 previously asked if she knew who Danielle was,  
 19 and she invoked her Fifth Amendment privilege.  
 20 Since the new question presumes that she does  
 21 know who Danielle is she is going to invoke her  
 22 Fifth Amendment privilege upon my instruction.  
 23 MR. KUVIN: All right. Let's look at  
 24 Page 5.  
 25 MR. RHEINHART: Let her answer.

1 MR. KUVIN: I'm sorry, go ahead.  
 2 THE WITNESS: On the instruction of my  
 3 lawyer, I must invoke my Fifth Amendment  
 4 privilege.  
 5 BY MR. KUVIN:  
 6 Q. All right. Take a look at Page 5, if you  
 7 would. Have you ever ordered anything, anything  
 8 yourself from Amazon.com?  
 9 MR. RHEINHART: You're asking for herself  
 10 or anyone else if she has ever placed an order  
 11 with Amazon.com for any reason?  
 12 MR. KUVIN: I am asking whether she  
 13 personally has ever placed an order with a  
 14 company called Amazon.com.  
 15 MR. RHEINHART: Yes or no. You can answer  
 16 that.  
 17 THE WITNESS: Yes.  
 18 BY MR. KUVIN:  
 19 Q. Okay. So you would agree with me that you  
 20 know what Amazon.com is?  
 21 A. Yes.  
 22 Q. Okay. Now, have you ever placed an order  
 23 through Amazon.com for things to be delivered at  
 24 358 El Brillo Way?  
 25 MR. RHEINHART: Instruct the witness to

1 that Page 5 of Exhibit 4 appears to be a receipt for  
 2 books ordered through Amazon.com?  
 3 MR. RHEINHART: You can answer that yes or  
 4 no.  
 5 THE WITNESS: It looks like a receipt from  
 6 Amazon.  
 7 BY MR. KUVIN:  
 8 Q. Okay. And did you place this order for  
 9 Jeffrey Epstein?  
 10 MR. RHEINHART: Instruct the witness not  
 11 to answer the question in that the question  
 12 presumes that she knows who Jeffrey Epstein is,  
 13 and therefore, I instruct her not to answer.  
 14 THE WITNESS: On advice of counsel, I must  
 15 invoke my Fifth Amendment privilege.  
 16 BY MR. KUVIN:  
 17 Q. Have you ever read the book identified in  
 18 Page 5 of Exhibit 4 called Slave Craft: Road Maps  
 19 for Erotic Servitude - Principals, Skills and Tools?  
 20 MR. RHEINHART: Instruct the witness not  
 21 to answer based on her Fifth Amendment  
 22 privilege.  
 23 THE WITNESS: On the instruction of my  
 24 lawyer, I must choose to invoke my Fifth  
 25 Amendment right.

1 invoke her Fifth Amendment privilege as to that  
 2 question.  
 3 THE WITNESS: On the instruction of my  
 4 lawyer, I must invoke my Fifth Amendment  
 5 privilege.  
 6 BY MR. KUVIN:  
 7 Q. Will you agree with me --  
 8 MR. RHEINHART: I'm sorry, Mr. Kuvin, for,  
 9 for the record, the page, pages of this exhibit  
 10 are not numbered, but the page we're looking at  
 11 purports to be a receipt for an order from  
 12 Amazon.com; is that correct?  
 13 MR. KUVIN: Correct. I just want her to  
 14 establish foundation before I got into  
 15 specifics.  
 16 MR. RHEINHART: No, but you referred to it  
 17 as Page 5, but they are not numbered, so I just  
 18 wanted to make sure that we're looking at the  
 19 same page on the exhibit.  
 20 MR. KUVIN: That is true. I'm just trying  
 21 to establish foundation for the questions I'm  
 22 about to ask her.  
 23 MR. RHEINHART: Understood.  
 24 BY MR. KUVIN:  
 25 Q. All right. Ma'am, would you agree with me

1 BY MR. KUVIN:  
 2 Q. Did you ever see that book I just  
 3 described at the home of Jeffrey Epstein on  
 4 358 El Brillo Way?  
 5 MR. RHEINHART: Objection to the form in  
 6 that it presumes she knows Jeffrey Epstein and  
 7 has ever been to 358 El Brillo Way. So, I  
 8 instruct her not to answer based on the Fifth  
 9 Amendment.  
 10 THE WITNESS: On the instruction of my  
 11 lawyer, I must choose to invoke my Fifth  
 12 Amendment right.  
 13 BY MR. KUVIN:  
 14 Q. Have you ever seen the book, Training With  
 15 Miss Abernathy: A Workbook for Erotic Slaves and  
 16 Their Owners, at the home of Jeffrey Epstein on  
 17 358 El Brillo Way?  
 18 MR. RHEINHART: Same objection and same  
 19 instruction as the previous question.  
 20 THE WITNESS: On the instruction of my  
 21 lawyer, I must choose to invoke my Fifth  
 22 Amendment right.  
 23 BY MR. KUVIN:  
 24 Q. Have you ever read that book that I just  
 25 described which is shown in Page 5 of Exhibit 4?

1 MR. RHEINHART: Same instruction.  
 2 THE WITNESS: On the instruction of my  
 3 lawyer, I must choose to invoke my Fifth  
 4 Amendment right.  
 5 BY MR. KUVIN:  
 6 Q. Let's look at the sixth page of Exhibit 4,  
 7 please. Is that your handwriting?  
 8 A. No.  
 9 Q. All right. Let's look at Page 7. Is that  
 10 your handwriting?  
 11 A. No.  
 12 Q. Okay. Look at the next page which would  
 13 be Page 8. Is that your handwriting?  
 14 A. No.  
 15 Q. Let's see how much quicker this goes.  
 16 Let's look at Page 9. Is that your handwriting?  
 17 A. No.  
 18 Q. Look at Page 9 again, if you would.  
 19 MR. RHEINHART: When you say Page 9,  
 20 that's the page that purports to say 10:00.  
 21 MR. KUVIN: Dr. Bard.  
 22 MR. RHEINHART: -- Dr. Bard at the top?  
 23 MR. KUVIN: Correct.  
 24 MR. RHEINHART: Okay.  
 25

1 BY MR. KUVIN:  
 2 Q. This note, Page 9 of Exhibit 4, appears to  
 3 state that Sarah is trying to move -- and then  
 4 there's a blanked out name, for 11 then Brittany  
 5 could work at 6. Do you know anyone with the name  
 6 Brittany?  
 7 MR. RHEINHART: If she knows anyone in the  
 8 world by that name?  
 9 MR. KUVIN: Yeah. We could start with  
 10 that.  
 11 MR. RHEINHART: I'm saying, in the  
 12 context, are you asking in the context of this  
 13 note which you just read, or are you asking,  
 14 generically, does she know anyone in the world  
 15 by the name of Brittany?  
 16 MR. KUVIN: Why don't we first do it in  
 17 the context of this note.  
 18 BY MR. KUVIN:  
 19 Q. Is this note referring to you when it  
 20 says, "Sarah"?  
 21 MR. RHEINHART: Instruct the witness not  
 22 to answer based on her Fifth Amendment  
 23 privilege.  
 24 THE WITNESS: On the advice of counsel, I  
 25 must invoke my Fifth Amendment right.

1 BY MR. KUVIN:  
 2 Q. Do you know who Dr. Bard is?  
 3 MR. RHEINHART: Instruct the witness not  
 4 to answer based on the Fifth Amendment, because  
 5 this sheet of paper has Jeffrey Epstein's name  
 6 on the bottom, so the question implies that she  
 7 knows some connection between Dr. Bard and  
 8 Mr. Epstein.  
 9 MR. KUVIN: Hang on a minute. Based on  
 10 the objection, let me reword the question.  
 11 BY MR. KUVIN:  
 12 Q. Independent from this note and independent  
 13 from anyone who may or may not be known as  
 14 Jeffrey Epstein, do you know anyone by the name of  
 15 Dr. Bard?  
 16 A. I'm sorry. Ask the question again.  
 17 Q. Yes. I don't want you to assume anything  
 18 from, the purpose of my question has anything to do  
 19 with someone who may be known as Jeffrey Epstein.  
 20 All I'm asking you is, generally, do  
 21 you know a person by the name of Dr. Bard?  
 22 MR. RHEINHART: Let me consult.  
 23 MR. KUVIN: Yes, yeah.  
 24 THE WITNESS: At the advice of counsel, I  
 25 must invoke my Fifth Amendment right.

1 BY MR. KUVIN:  
 2 Q. In the context of this note, do you know  
 3 who Brittany is?  
 4 MR. RHEINHART: Same instruction.  
 5 THE WITNESS: On the advice of counsel, I  
 6 must invoke my Fifth Amendment right.  
 7 BY MR. KUVIN:  
 8 Q. All-right. Let's look at Page 10.  
 9 MR. RHEINHART: Mr. Kuvin, let me go back.  
 10 MR. KUVIN: Sure.  
 11 MR. RHEINHART: As to Page 1 of this  
 12 exhibit, I think you had asked the witness  
 13 whether this was her handwriting.  
 14 MR. KUVIN: Do you want to have her go  
 15 back and answer?  
 16 MR. RHEINHART: Yes, I would. Having  
 17 consulted with her further, I will have her go  
 18 back to this question.  
 19 MR. KUVIN: Let's do that. I'll, I'll go  
 20 back and ask the question so that we can be  
 21 clear.  
 22 BY MR. KUVIN:  
 23 Q. On the Exhibit 4, the first page of  
 24 Exhibit 4, ma'am, is that your handwriting? Yes or  
 25 no.

1 A. No.  
 2 Q. Okay. All right. Let's skip Page 10,  
 3 because I think that's just a duplicate, and go to  
 4 Page 11, if you would.  
 5 MR. RHEINHART: Page 11 is --  
 6 MR. KUVIN: It looks like DTG Operations,  
 7 d/b/a Dollar Rent a Car.  
 8 MR. RHEINHART: Got it. It's a printed  
 9 sheet, not a handwritten sheet.  
 10 MR. KUVIN: Correct.  
 11 MR. RHEINHART: Okay. Thank you.  
 12 BY MR. KUVIN:  
 13 Q. All right. Do you know a gentleman by the  
 14 name of Janusz Banasiak, spelled J-a-n-u-s-z,  
 15 B-a-n-a-s-i-a-k?  
 16 MR. RHEINHART: Instruct the witness not  
 17 to answer based on her Fifth Amendment  
 18 privilege.  
 19 THE WITNESS: On the instruction of, my  
 20 lawyer, I must invoke my Fifth Amendment  
 21 privilege.  
 22 BY MR. KUVIN:  
 23 Q. Ma'am, isn't it true that you rented cars  
 24 through Dollar Rent a Car for underage girls, girls  
 25 under the age of 18?

1 it in giving my advice, so thank you for  
 2 clarifying.  
 3 MR. KUVIN: Absolutely.  
 4 BY MR. KUVIN:  
 5 Q. All right. In Page 11 of Exhibit 4,  
 6 there's a reference in the top right-hand corner, a  
 7 message to a Mr. Goldsmith. Do you see that?  
 8 A. Uh-huh.  
 9 Q. Yes?  
 10 MR. RHEINHART: You have to say yes or no  
 11 on the record.  
 12 THE WITNESS: Yes, I see it.  
 13 BY MR. KUVIN:  
 14 Q. Okay. All right. Do you know who  
 15 Mr. Goldsmith is?  
 16 MR. RHEINHART: I instruct the witness  
 17 not to answer based on her privilege against  
 18 self-incrimination.  
 19 THE WITNESS: At the advice of counsel, I  
 20 must invoke my Fifth Amendment privilege.  
 21 BY MR. KUVIN:  
 22 Q. Is this your handwriting on exhibit -- on  
 23 the messages shown in Exhibit 4, Page 11?  
 24 MR. RHEINHART: Same instruction.  
 25 THE WITNESS: At the advice of counsel, I

1 MR. RHEINHART: Instruct the witness not  
 2 to answer based on the Fifth Amendment  
 3 privilege.  
 4 THE WITNESS: On the instruction of my  
 5 lawyer, I must invoke the Fifth Amendment  
 6 privilege.  
 7 BY MR. KUVIN:  
 8 Q. Did you rent any cars from Dollar Rent a  
 9 Car in West Palm Beach in the last five years?  
 10 MR. RHEINHART: Same instruction.  
 11 THE WITNESS: On the instruction of my  
 12 lawyer, I must invoke my Fifth Amendment  
 13 privilege.  
 14 BY MR. KUVIN:  
 15 Q. Let's take a look at Page 11.  
 16 MR. RHEINHART: If we can just -- let me  
 17 go back, Mr. Kuvin, to clarify the prior two  
 18 questions. When you say, "did you rent," did  
 19 you mean did she personally pay for the rental,  
 20 or was she, in any way, involved in arranging  
 21 the rental?  
 22 MR. KUVIN: The second part, in any way  
 23 involved in arranging for the rental of a  
 24 vehicle.  
 25 MR. RHEINHART: That's how I interpreted

1 must invoke my Fifth Amendment privilege.  
 2 MR. RHEINHART: Hold on a second, Sarah.  
 3 MR. KUVIN: Yeah, check.  
 4 MR. RHEINHART: Okay. Can you repeat the  
 5 question again? Maybe I misheard it,  
 6 Mr. Kuvin.  
 7 MR. KUVIN: Yeah, not a problem. Let me  
 8 lay a little foundation for it.  
 9 MR. RHEINHART: That's okay. If you can  
 10 just ask the question again. I think I just  
 11 misheard what you were asking.  
 12 BY MR. KUVIN:  
 13 Q. Is this your handwriting shown on the  
 14 messages which is Page 11 of Exhibit 4?  
 15 A. No.  
 16 Q. Okay. Is this handwriting that of  
 17 Ms. Sjoberg?  
 18 MR. KUVIN: Johanna -- I'm sorry, Sjoberg,  
 19 Sjoberg? How do you pronounce it, Sjoberg?  
 20 MS. CADWELL: Sjoberg?  
 21 MR. KUVIN: I knew somebody would know.  
 22 MR. RHEINHART: Did we get a  
 23 pronunciation, I'm sorry?  
 24 MR. KUVIN: Yes.  
 25

1 BY MR. KUVIN:  
 2 Q. Is this the handwriting of  
 3 Johanna Sjoberg, if you know?  
 4 MR. RHEINHART: Hold on. Let me object to  
 5 the form in that it presumes she knows what  
 6 Ms. Sjoberg's handwriting is like or that she's  
 7 ever known Ms. Sjoberg. So before you ask the  
 8 question, try to clarify that.  
 9 MR. KUVIN: Well, that's what I'm trying  
 10 to find out.  
 11 BY MR. KUVIN:  
 12 Q. Do you recognize this as the handwriting  
 13 of Johanna Sjoberg? And it can be a yes or no.  
 14 MR. RHEINHART: My, my objection to the  
 15 form is that you, you haven't asked her whether  
 16 she actually knows who Johanna Sjoberg is, or  
 17 whether she would recognize her handwriting if  
 18 she saw it.  
 19 MR. KUVIN: I would love to ask that  
 20 question if she'd answer it.  
 21 MR. RHEINHART: Well, if she'll answer,  
 22 that's a different question. But I think you  
 23 need to ask it first otherwise this question is  
 24 ambiguous.  
 25 MR. KUVIN: All right.

1 appear to be directed -- well, let me, let me back  
 2 up.  
 3 Page 11 of Exhibit 4 appears to be a  
 4 message dated October 2nd, 2005, from Sarah. Do you  
 5 see that top left-hand corner?  
 6 A. Yes.  
 7 Q. Okay. At 10:40 a.m. My question is: Did  
 8 you call and leave a message at 10:40 a.m. on  
 9 October 2, 2005, stating: Julia's sick and she  
 10 can't come today?  
 11 MR. RHEINHART: Instruct the witness not  
 12 to answer the question based on her Fifth  
 13 Amendment privilege.  
 14 THE WITNESS: On the instruction of my  
 15 lawyer I must exercise my Fifth Amendment  
 16 privilege.  
 17 BY MR. KUVIN:  
 18 Q. Upside down at the bottom of Page 11 is  
 19 another phone message dated 10/1 of 2005. Appears  
 20 to be written to someone named Sarah. Do you see  
 21 that?  
 22 A. Yes.  
 23 Q. Okay. Do you --  
 24 MR. RHEINHART: Is it written, I'm sorry,  
 25 is it written to someone named Sarah or it

1 BY MR. KUVIN:  
 2 Q. Not, not to beat a dead horse on the  
 3 point, do you know Johanna Sjoberg?  
 4 MR. RHEINHART: I instruct the witness not  
 5 to answer.  
 6 THE WITNESS: On advice of counsel, I must  
 7 invoke my Fifth Amendment privilege.  
 8 BY MR. KUVIN:  
 9 Q. Have you seen Johanna Sjoberg's  
 10 handwriting in the past?  
 11 MR. RHEINHART: Objection to the form as  
 12 previously stated. I'll instruct the witness  
 13 not to answer.  
 14 THE WITNESS: On advice of counsel, I must  
 15 invoke my Fifth Amendment privilege.  
 16 BY MR. KUVIN:  
 17 Q. Do you recognize Page 11 in Exhibit 4 as  
 18 the handwriting of Johanna Sjoberg?  
 19 MR. RHEINHART: Objection to the form for  
 20 the reasons previously stated many, many times,  
 21 and I will instruct her not to answer.  
 22 THE WITNESS: At the advice of counsel, I  
 23 must invoke my Fifth Amendment privilege.  
 24 BY MR. KUVIN:  
 25 Q. Did you ever see these messages that

1 appears to be a phone call from a person named  
 2 Sarah?  
 3 MR. KUVIN: From a person named Sarah.  
 4 Thank you.  
 5 BY MR. KUVIN:  
 6 Q. Did you call someone, anyone on October 1  
 7 of 2005 at 9:50 a.m., to confirm two people, one at  
 8 11:00 and one at 4:00 p.m.?  
 9 MR. RHEINHART: Instruct the witness not  
 10 to answer based on her Fifth Amendment  
 11 privilege against self-incrimination since this  
 12 document was seized from Mr. Epstein's home.  
 13 THE WITNESS: At the instruction of my  
 14 lawyer, I must invoke my Fifth Amendment  
 15 privilege.  
 16 BY MR. KUVIN:  
 17 Q. Are you the Sarah that's referred to in  
 18 these phone messages that we've been looking at?  
 19 MR. RHEINHART: Instruct the witness not  
 20 to answer.  
 21 THE WITNESS: On the instruction of my  
 22 lawyer, I must invoke my Fifth Amendment  
 23 privilege.  
 24 BY MR. KUVIN:  
 25 Q. Let's skip Page 12 and go to Page 13 of



1 this same exhibit, if you would. Okay.  
 2 Is that your handwriting on Page 13  
 3 which happens to be a note stating "Johanna S. is  
 4 coming"?  
 5 MR. RHEINHART: Okay. Hold on. Can you  
 6 just show me what page you're looking at?  
 7 Okay. We skipped a page.  
 8 THE WITNESS: No.  
 9 BY MR. KUVIN:  
 10 Q. Okay. Do you recognize whose it is?  
 11 MR. RHEINHART: Let me talk to you again.  
 12 BY MR. KUVIN:  
 13 Q. If it's a yes, you might want to talk to  
 14 him; if it's a no, it might be quick.  
 15 A. No, no. Sorry.  
 16 Q. Let's look at Page 14, same exhibit. The  
 17 note on the right-hand side states, "The girl from  
 18 St. Bart's got sick so she won't be able to come.  
 19 Sarah got message from her." First of all, just  
 20 generally, do you see the note I'm referring to?  
 21 A. Yes.  
 22 Q. Okay. Do you know what that is talking  
 23 about?  
 24 A. No.  
 25 Q. Is that your handwriting?

1 Fifth Amendment right.  
 2 BY MR. KUVIN:  
 3 Q. Are you aware that Jeffrey Epstein would  
 4 refer to "work" as performing naked massages for  
 5 him?  
 6 MR. RHEINHART: Object to the form of the  
 7 question. It's compound and I instruct the  
 8 witness not to answer.  
 9 THE WITNESS: On advice of counsel, I wish  
 10 to invoke my Fifth Amendment right.  
 11 BY MR. KUVIN:  
 12 Q. Let's take a look at the next page, Page  
 13 16. All right. If we look at not the message, the  
 14 phone message, but the note next to that it says:  
 15 Haley on Saturday with Sage at 10:30.  
 16 Do you know who Haley is as referred  
 17 to in this note?  
 18 A. On the advice of counsel, I must invoke my  
 19 Fifth Amendment right.  
 20 Q. Do you know who Sage is as referred to in  
 21 this note?  
 22 A. On the advice of counsel, I must invoke my  
 23 Fifth Amendment right.  
 24 MR. GARCIA: I haven't heard the counsel  
 25 give any advice.

1 A. No.  
 2 Q. Did Mr. Epstein obtain girls under the age  
 3 of 16 from St. Bart's?  
 4 MR. RHEINHART: Instruct the witness not  
 5 to answer. Object to the form of the question  
 6 in that it presumes that she knows who  
 7 Mr. Epstein is.  
 8 THE WITNESS: On advice of counsel, I must  
 9 invoke my Fifth Amendment privilege.  
 10 BY MR. KUVIN:  
 11 Q. All right. Let's take a look at the next  
 12 page. Appears to be a note, phone message of -- I  
 13 can't read the date, 2005 to Jeffrey from  
 14 Melissa Hanes. Just generally, do you see what I'm  
 15 talking about so we're on the same page here?  
 16 A. Yes.  
 17 Q. Okay. Do you know who Melissa Hanes is?  
 18 A. On the advice of counsel, I wish to invoke my  
 19 Fifth Amendment right.  
 20 Q. All right. The note appears to say: She  
 21 called again, if she could work any time Monday  
 22 through Friday.  
 23 Do you know what that message  
 24 pertains to?  
 25 A. On advice of counsel, I wish to invoke my

1 MR. RHEINHART: You don't know what we've  
 2 talked about outside of the room so...  
 3 MR. GARCIA: Just changing the procedure  
 4 is all?  
 5 MR. RHEINHART: I'm changing the procedure  
 6 for Mr. Kuvin.  
 7 MR. KUVIN: I'm all happy for speed.  
 8 BY MR. KUVIN:  
 9 Q. All right. Let's look at Page 17 of  
 10 Exhibit 4. It appears to be a phone message at the  
 11 bottom dated 9/1/05 to Jeffrey from Jean-Luc. Let  
 12 me ask this: Do you recognize the phone number  
 13 that's listed there of (646)286-7000?  
 14 MR. RHEINHART: Instruct the witness not  
 15 to answer based on her Fifth Amendment  
 16 privilege and self-incrimination.  
 17 THE WITNESS: On advice of counsel, I must  
 18 invoke my Fifth Amendment right.  
 19 MR. KUVIN: Let me show this one to the  
 20 camera if I could. If you could focus on the  
 21 bottom message for me.  
 22 THE VIDEOGRAPHER: I can't really read  
 23 that.  
 24 MR. KUVIN: Do I need to tilt it?  
 25 THE VIDEOGRAPHER: I think you need to

1 bring the whole paper up closer.  
 2 MR. KUVIN: Towards you?  
 3 THE VIDEOGRAPHER: Yes, towards the lens.  
 4 MR. KUVIN: Just pass that up so we can  
 5 get a good shot of the bottom message.  
 6 THE VIDEOGRAPHER: Up a little higher,  
 7 please. Let it focus. That's good. Go out.  
 8 Okay.  
 9 MR. KUVIN: All right. Thank you very  
 10 much.  
 11 BY MR. KUVIN:  
 12 Q. The message appears to read: 9/1/2005 to  
 13 Jeffrey, 8:08, Jean-Luc, telephone. He has a  
 14 teacher for you to teach you how to speak Russian.  
 15 She is two times eight years old, not blonde.  
 16 Lessons are free and you can have first today if you  
 17 call. Do you know what that message is referring  
 18 to?  
 19 MR. RHEINHART: Instruct the witness not  
 20 to answer the question. Object to the form of  
 21 the question because in that it presumes she  
 22 has knowledge of either Jeffrey or Jean-Luc or  
 23 that phone number.  
 24 THE WITNESS: On the advice of counsel, I  
 25 wish to invoke my Fifth Amendment right.

1 Do you -- first of all, do you see  
 2 that in front of you? Are we talking about the same  
 3 thing here?  
 4 A. Yes.  
 5 Q. Okay. Do you know who "Haley" is  
 6 referring to in this note?  
 7 MR. RHEINHART: Instruct the witness not  
 8 to answer based on her Fifth Amendment  
 9 privilege.  
 10 THE WITNESS: On the instruction of my  
 11 lawyer, I must invoke my Fifth Amendment  
 12 privilege.  
 13 BY MR. KUVIN:  
 14 Q. Does your handwriting appear anywhere on  
 15 Page 19 here --  
 16 A. On the --  
 17 Q. -- on either note?  
 18 A. On the advice of my lawyer, I must invoke my  
 19 Fifth Amendment privilege.  
 20 Q. Is that your handwriting on the left in  
 21 the note that I just read that says: Haley,  
 22 11:00 a.m.?  
 23 MR. RHEINHART: Same instruction.  
 24 THE WITNESS: On the instruction of my  
 25 lawyer, I must invoke my Fifth Amendment

1 BY MR. KUVIN:  
 2 Q. Would you agree with me that this message  
 3 is a message from Jean-Luc, that he's providing a  
 4 16-year-old girl to Jeffrey Epstein?  
 5 MR. RHEINHART: Object to the form in that  
 6 it calls for speculation and also assumes facts  
 7 as to Mr. Jean-Luc and Mr. Epstein; therefore,  
 8 I instruct her to invoke her Fifth Amendment  
 9 privilege.  
 10 THE WITNESS: On the instruction from my  
 11 lawyer, I must invoke my Fifth Amendment  
 12 privilege.  
 13 BY MR. KUVIN:  
 14 Q. Skip the next page if you would, and the  
 15 following page will be Page 19 of Exhibit 4. It  
 16 should be two messages.  
 17 MR. RHEINHART: Show me what you're  
 18 looking at.  
 19 MR. KUVIN: And the top left one says,  
 20 "Friday."  
 21 MR. RHEINHART: Thank you.  
 22 BY MR. KUVIN:  
 23 Q. The message on the left-hand side that  
 24 appears to be, have a date of 4/8/05 and a number 7  
 25 written on it. It says: Haley, 11:00 a.m.

1 privilege.  
 2 BY MR. KUVIN:  
 3 Q. All right. Let's take a look at the next  
 4 page which is Page 20. Is that your handwriting on  
 5 this paper?  
 6 MR. RHEINHART: Let me talk to her.  
 7 THE WITNESS: On the advice of my lawyer,  
 8 I wish to invoke my Fifth Amendment privilege.  
 9 BY MR. KUVIN:  
 10 Q. Is this a list of girls that were being  
 11 provided to Jeffrey Epstein for sex?  
 12 MR. RHEINHART: Objection to the form, the  
 13 standing objection previously stated. I will  
 14 instruct the witness not to answer that  
 15 question.  
 16 THE WITNESS: On the instruction of my  
 17 lawyer, I must invoke my Fifth Amendment  
 18 privilege.  
 19 BY MR. KUVIN:  
 20 Q. Did Jeffrey Epstein not like girls that  
 21 had tattoos?  
 22 MR. RHEINHART: Objection to the form  
 23 based on the standing objection and the same  
 24 instruction.  
 25 THE WITNESS: On the instruction of my

1 lawyer, I must invoke my Fifth Amendment  
 2 privilege.  
 3 BY MR. KUVIN:  
 4 Q. Did Jeffrey Epstein not like girls that  
 5 had blonde hair?  
 6 MR. RHEINHART: Standing objection and the  
 7 same instruction.  
 8 THE WITNESS: On the instruction of my  
 9 lawyer, I must invoke my Fifth Amendment  
 10 privilege.  
 11 BY MR. KUVIN:  
 12 Q. Take a look at the next page, if you  
 13 would. This one.  
 14 MR. RHEINHART: Thank you.  
 15 BY MR. KUVIN:  
 16 Q. Is that your handwriting?  
 17 A. On instruction of my lawyer, I must invoke my  
 18 Fifth Amendment privilege.  
 19 Q. Is this an additional -- on Page 21, is  
 20 this an additional list of girls that were being  
 21 provided to Jeffrey Epstein for sex?  
 22 MR. RHEINHART: I'm sorry. Did we change  
 23 to a different page or the same page?  
 24 MR. KUVIN: The same page.  
 25

1 MR. RHEINHART: Same instruction.  
 2 THE WITNESS: On the advice of my lawyer,  
 3 I must choose to invoke my Fifth Amendment  
 4 right.  
 5 BY MR. KUVIN:  
 6 Q. Do you know who E.W. is?  
 7 MR. RHEINHART: Same instruction.  
 8 THE WITNESS: On the advice of my lawyer,  
 9 I wish to invoke my Fifth Amendment privilege.  
 10 BY MR. KUVIN:  
 11 Q. Do you know who L.M. is?  
 12 MR. RHEINHART: Let me consult for a  
 13 second.  
 14 MR. KUVIN: Yep.  
 15 (A discussion was held off the record.)  
 16 MR. RHEINHART: Mr. Kuvin, I'm just asking  
 17 you to clarify. Are you asking if she's ever  
 18 heard the name of these people or whether she's  
 19 actually ever met someone she knows to have  
 20 that name?  
 21 MR. KUVIN: Second part, whether she knows  
 22 someone personally by that name. I don't want  
 23 to know what somebody may have told her.  
 24 MR. RHEINHART: Sure.  
 25 MR. KUVIN: Certainly not attorneys or

1 BY MR. KUVIN:  
 2 Q. Is this an additional list of girls that  
 3 were --  
 4 MR. RHEINHART: Thank you.  
 5 BY MR. KUVIN:  
 6 Q. -- being provided to Jeffrey Epstein for  
 7 sex?  
 8 MR. RHEINHART: Objection to the form.  
 9 The same objection and the same instruction.  
 10 THE WITNESS: On the instruction of my  
 11 lawyer, I must invoke my Fifth Amendment  
 12 privilege.  
 13 BY MR. KUVIN:  
 14 Q. Page 22. Note on the right appears to  
 15 say: Johanna has a friend, Andrea, that would like  
 16 to work tonight. Do you know who Johanna is refer,  
 17 referring to in that note?  
 18 MR. RHEINHART: Instruct the witness not  
 19 to answer based on the privilege against  
 20 self-incrimination.  
 21 THE WITNESS: On the advice of my lawyer,  
 22 I wish to assert my Fifth Amendment right.  
 23 BY MR. KUVIN:  
 24 Q. Do you know who Andrea is referring to in  
 25 that note?

1 anything like that. I want to know whether she  
 2 has any personal knowledge of someone by the  
 3 name of L.M.  
 4 MR. RHEINHART: Okay. Based on our  
 5 conversation, she can answer or not answer the  
 6 question.  
 7 THE WITNESS: On the advice of my lawyer,  
 8 I choose to invoke my Fifth Amendment right.  
 9 MR. KUVIN: Okay. It's like a  
 10 cough/sneeze.  
 11 MR. GARCIA: I tried to stifle it, but --  
 12 MR. GOLDBERGER: You got it all over me.  
 13 Just kidding.  
 14 MR. GARCIA: You don't want to get this.  
 15 I've had it for a couple of days.  
 16 MR. KUVIN: What number are we on? 13.  
 17 That's why I always leave some with numbers  
 18 still on there to show the picture to the  
 19 camera.  
 20 Exhibit 13 will be pursuant to  
 21 confidentiality and the identities of the  
 22 girls involved in this case.  
 23 MR. RHEINHART: As I presume the prior  
 24 questions were as well.  
 25 MR. KUVIN: Yes. Absolutely. This is

1 different because it's an exhibit.  
 2 MR. RHEINHART: Agreed.  
 3 MR. KUVIN: Okay.  
 4 (Plaintiff's Exhibit No. 13 was marked for  
 5 identification.)  
 6 MR. RHEINHART: We're moving off of  
 7 Exhibit 12?  
 8 MR. KUVIN: Yes.  
 9 MR. RHEINHART: I was looking at the next  
 10 exhibit.  
 11 MR. KUVIN: We're done with the trash.  
 12 MR. RHEINHART: Okay.  
 13 BY MR. KUVIN:  
 14 Q. Just take a look at Exhibit 13. Do you  
 15 recognize the girl in that photograph?  
 16 A. On the advice of my lawyer, I must choose to  
 17 exercise my Fifth Amendment privilege.  
 18 Q. Do you agree with me that that girl shown  
 19 in that photograph is B.B.?  
 20 MR. RHEINHART: Objection to the form for  
 21 the reasons previously stated, causes her to  
 22 speculate, and I instruct her not to answer  
 23 based on her Fifth Amendment privilege.  
 24 THE WITNESS: On the advice of my lawyer,  
 25 I must choose to exercise my Fifth Amendment

1 in Exhibit 13 came to Mr. Epstein's home when she  
 2 was only 15 years old?  
 3 MR. RHEINHART: Objection to the form  
 4 based on the standing objection, also  
 5 speculation as to any age and instruct the  
 6 witness not to answer.  
 7 THE WITNESS: On the advice of my lawyer,  
 8 I must choose to exercise my Fifth Amendment  
 9 right.  
 10 BY MR. KUVIN:  
 11 Q. Do you agree with me that when you  
 12 arranged to have this girl come to Mr. Epstein's  
 13 home, that you were aware that she was 15 years old?  
 14 MR. RHEINHART: Objection to the form. It  
 15 is compound. It assumes facts that are not  
 16 admitted by this witness, and it's ambiguous in  
 17 that regard, and therefore I instruct her not  
 18 to answer.  
 19 THE WITNESS: On the advice of my lawyer,  
 20 I must choose to exercise my Fifth Amendment  
 21 right.  
 22 BY MR. KUVIN:  
 23 Q. Do you agree that when this girl was  
 24 brought to Mr. Epstein's home, that she performed a  
 25 massage on Mr. Epstein while he was naked?

1 privilege.  
 2 BY MR. KUVIN:  
 3 Q. Do you agree with me that you arranged to  
 4 have the girl shown in Exhibit 13 be brought to  
 5 Mr. Epstein's home for sex with Mr. Epstein?  
 6 MR. RHEINHART: Objection to the form as  
 7 compound, and also the standing objection, and  
 8 instruct the witness not to answer.  
 9 THE WITNESS: On the advice of my lawyer,  
 10 I must choose to exercise my Fifth Amendment  
 11 privilege.  
 12 BY MR. KUVIN:  
 13 Q. Would you agree with me that the girl  
 14 shown in Exhibit 13 did, in fact, come to  
 15 Mr. Epstein's home in 2005?  
 16 MR. RHEINHART: Same objection previously  
 17 stated. It's compound as to the date, place,  
 18 person, and also presumes knowledge of  
 19 Mr. Epstein, so I would instruct her not to  
 20 answer.  
 21 THE WITNESS: On the advice of my lawyer,  
 22 I must choose to exercise my Fifth Amendment  
 23 privilege.  
 24 BY MR. KUVIN:  
 25 Q. Do you agree with me that the girl shown

1 MR. RHEINHART: Objection to the form,  
 2 standing objection. The question assumes that  
 3 this witness has any knowledge of  
 4 Jeffrey Epstein or whether this person ever  
 5 came to Mr. Epstein's home. It is therefore  
 6 ambiguous, and I instruct her not to answer.  
 7 THE WITNESS: On the instruction of my  
 8 lawyer, I must choose to exercise my Fifth  
 9 Amendment right.  
 10 BY MR. KUVIN:  
 11 Q. Do you agree with me that this girl shown  
 12 in Exhibit 13 was 15 years old at the time she was  
 13 asked by Jeffrey Epstein to remove her clothes?  
 14 MR. RHEINHART: Objection to the form. It  
 15 requires speculation and assumes facts relating  
 16 to Mr. Epstein and events that may have  
 17 occurred which this witness has no knowledge  
 18 and has not admitted any knowledge. And I  
 19 instruct her not to answer.  
 20 THE WITNESS: On advice of counsel I must  
 21 choose to exercise my Fifth Amendment right.  
 22 BY MR. KUVIN:  
 23 Q. Do you agree that you described for the  
 24 girl as shown in Exhibit 13 -- by the way, her name  
 25 is B.B. -- that you described to B.B. how to set up

1 the massage table in Jeffrey Epstein's bathroom?  
2 MR. RHEINHART: Objection to the form for  
3 the reasons previously stated, and instruct the  
4 witness not to answer.

5 THE WITNESS: On the advice of counsel, I  
6 must choose to exercise my Fifth Amendment  
7 right.

8 BY MR. KUVIN:

9 Q. Do you agree that you showed B.B. where  
10 the massage oils are kept in Jeffrey Epstein's  
11 bathroom in his home?

12 MR. RHEINHART: Objection to the form in  
13 that it assumes knowledge of Jeffrey Epstein,  
14 knowledge that this person was ever at  
15 Jeffrey Epstein's home none of which is  
16 admitted or acknowledged by this witness, and  
17 instruct the witness not to answer.

18 THE WITNESS: On advice of counsel I must  
19 choose to invoke my Fifth Amendment right.

20 BY MR. KUVIN:

21 Q. Do you agree that you showed B.B., as  
22 shown in Exhibit 13, where Mr. Epstein kept the  
23 vibrators in his bathroom at his house?

24 MR. RHEINHART: Same objection as stated  
25 to the previous question as to the form of the

1 counsel, I must choose to invoke my Fifth  
2 Amendment right.

3 BY MR. KUVIN:

4 Q. Do you agree with me that during the  
5 massage that B.B. was forced to give to Mr. Epstein,  
6 that he touched her between her legs?

7 MR. RHEINHART: Objection to the form. It  
8 is ambiguous including the term "forced." It  
9 assumes facts that this witness has not  
10 admitted or that this witness has not  
11 acknowledged any personal knowledge and  
12 instruct her not to answer.

13 THE WITNESS: On the instruction of my  
14 lawyer, I must therefore invoke my Fifth  
15 Amendment right.

16 BY MR. KUVIN:

17 Q. Do you agree with me that Mr. Epstein  
18 touched B.B. between her legs?

19 MR. RHEINHART: Objection to the form and  
20 the question presumes knowledge of  
21 Jeffrey Epstein. Instruct the witness not to  
22 answer.

23 THE WITNESS: On the instruction of my  
24 lawyer, I must choose to invoke my Fifth  
25 Amendment right.

1 question, and instruct the witness not to  
2 answer.

3 THE WITNESS: On advice of counsel, I must  
4 choose to exercise my Fifth Amendment right.

5 BY MR. KUVIN:

6 Q. Do you agree with me that in 2005 you  
7 knowingly provided B.B., a 15-year-old girl, to  
8 Mr. Epstein so that he could sexually abuse her?

9 MR. RHEINHART: Objection to the form as  
10 to it calling for a legal conclusion as to  
11 assuming multiple facts, since therefore  
12 compound and instruct the witness not to  
13 answer.

14 THE WITNESS: On advice of counsel, I must  
15 choose to invoke my Fifth Amendment right.

16 BY MR. KUVIN:

17 Q. Do you agree with me that B.B. was given  
18 to Mr. Epstein to perform a naked massage of him  
19 while he touched B.B.?

20 MR. RHEINHART: Objection to the form.  
21 Standing objection and other facts that are  
22 assumed in the question to which this witness  
23 does not admit, and therefore the witness is  
24 instructed not to answer the question.

25 THE WITNESS: On the instruction of my

1 BY MR. KUVIN:

2 Q. Do you agree with me that B.B. told  
3 Mr. Epstein to stop touching him there -- touching  
4 her there?

5 MR. RHEINHART: Same objection previously  
6 stated to the last question and instruct the  
7 witness not to answer.

8 THE WITNESS: On the instruction of my  
9 lawyer, I must invoke my Fifth Amendment right.

10 BY MR. KUVIN:

11 Q. Do you agree with me that you have  
12 personal knowledge that after telling Mr. Epstein to  
13 stop touching her between her legs, Mr. Epstein  
14 apologized and then touched her again between her  
15 legs?

16 MR. RHEINHART: Objection to the form and  
17 the standing objection previously stated as  
18 well as the question is compound and instruct,  
19 and ambiguous, and I instruct the witness not  
20 to answer.

21 THE WITNESS: On the instruction of my  
22 lawyer, I must choose to exercise my Fifth  
23 Amendment right.

24 BY MR. KUVIN:

25 Q. Do you agree with me that Mr. Epstein

1 specifically targeted young underage girls that were  
2 economically disadvantaged for his own sexual  
3 pleasure?

4 MR. RHEINHART: Objection to the form.  
5 Several of the terms are ambiguous and it  
6 assumes knowledge of Mr. Epstein and his  
7 habits, and therefore, I instruct the witness  
8 not to answer the question.

9 THE WITNESS: On the instruction of my  
10 lawyer, I must choose to exercise my Fifth  
11 Amendment right.

12 BY MR. KUVIN:

13 Q. Do you agree with me that Mr. Epstein  
14 would pay these girls 2 to \$300 for this sexual  
15 massage?

16 MR. RHEINHART: Objection to the form.  
17 Standing objection and assumes knowledge of  
18 Mr. Epstein and his practices, so therefore, I  
19 instruct the witness not to answer.

20 THE WITNESS: On the instruction of my  
21 lawyer, I must choose to invoke my Fifth  
22 Amendment right.

23 BY MR. KUVIN:

24 Q. Do you agree with me that you handed B.B.  
25 \$200?

1 Mr. Epstein naked massages?

2 MR. RHEINHART: Object to the form. It's  
3 multiple layers of compound questioning,  
4 includes terms like "enterprise" that are  
5 ambiguous and may call for a legal conclusion  
6 that this witness is not competent to give. I  
7 instruct the witness not to answer.

8 THE WITNESS: On the instruction of my  
9 lawyer, I must choose to exercise my Fifth  
10 Amendment right.

11 BY MR. KUVIN:

12 Q. Do you agree with me that there is a  
13 staircase leading out of Mr. Epstein's kitchen in  
14 his home on Palm Beach?

15 MR. RHEINHART: Objection to the form,  
16 presumes knowledge of Mr. Epstein or his home  
17 on Palm Beach. Instruct the witness not to  
18 answer.

19 THE WITNESS: On the instruction of my  
20 lawyer, I must choose to invoke my Fifth  
21 Amendment right.

22 BY MR. KUVIN:

23 Q. Do you agree with me that when B.B. was  
24 brought to Mr. Epstein's bathroom, that he walked  
25 out of the shower wearing a towel?

1 MR. RHEINHART: Objection to the form,  
2 instruct the witness not to answer.

3 THE WITNESS: On the instruction of my  
4 lawyer, I must choose to invoke my Fifth  
5 Amendment right.

6 BY MR. KUVIN:

7 Q. And just so we're clear, do you agree with  
8 me that you handed B.B. in 2005, \$200 after she was  
9 in the bathroom with Mr. Epstein at his home?

10 MR. RHEINHART: Objection to the form.  
11 The question presumes knowledge of a person by  
12 the name of B.B., therefore I instruct the  
13 witness not to answer the question.

14 THE WITNESS: On the instruction of my  
15 lawyer, I must choose to invoke my Fifth  
16 Amendment right.

17 BY MR. KUVIN:

18 Q. Do you agree with me that Mr. Epstein had  
19 a plan -- let me rephrase that.

20 Do you agree with me that Mr. Epstein  
21 had an enterprise, a sexual enterprise, established  
22 by which young girls would be brought to his home,  
23 introduced to you, where you would then set up a  
24 massage table, show them where the oils were, and  
25 have these young girls under the age of 18, give

1 MR. RHEINHART: Objection to the form in  
2 that it presumes knowledge of B.B., that Ms.  
3 B.B. was ever at Mr. Epstein's home, that this  
4 witness knows anything about Mr. Epstein or his  
5 home; therefore, the question is compound and  
6 ambiguous, and I instruct her not to answer.

7 THE WITNESS: On the instruction of my  
8 lawyer, I must choose to assert my Fifth  
9 Amendment right.

10 BY MR. KUVIN:

11 Q. Do you know C.L.?

12 A. On the instruction of my lawyer, I must choose  
13 to assert my Fifth Amendment privilege.

14 Q. Did you have C.L. -- excuse me, strike  
15 that. Did you tell C.L. to come over to  
16 Mr. Epstein's home to give Mr. Epstein a massage?

17 MR. RHEINHART: Objection to the form.  
18 It's compound. Stand objection, standing  
19 objection, sorry. Instruct the witness not to  
20 answer.

21 THE WITNESS: On the instruction of my  
22 lawyer, I must choose to invoke my Fifth  
23 Amendment right.

24 BY MR. KUVIN:

25 Q. Did you introduce C.L. to Jeffrey Epstein?

1 MR. RHEINHART: Objection to the form,  
 2 standing objection. Instruct the witness not  
 3 to answer.  
 4 THE WITNESS: On the instruction from my  
 5 lawyer, I must choose to invoke my Fifth  
 6 Amendment right.  
 7 BY MR. KUVIN:  
 8 Q. Do you agree with me that Mr. Epstein  
 9 threatened C.L. with physical violence?  
 10 MR. RHEINHART: Objection to the form, the  
 11 standing objection, as well as ambiguous as to  
 12 the term "threaten." Instruct the witness not  
 13 to answer.  
 14 THE WITNESS: Upon instruction from my  
 15 lawyer, I must choose to invoke my Fifth  
 16 Amendment right.  
 17 BY MR. KUVIN:  
 18 Q. Do you agree with me that Jeffrey Epstein  
 19 told C.L. that if she talks to anyone about what had  
 20 occurred at his home, bad things would happen to  
 21 her?  
 22 MR. RHEINHART: Objection to the form,  
 23 it's compound, and a standing objection. Also  
 24 assumes numerous other facts that this witness  
 25 has not acknowledge nor admitted, and therefore

1 BY MR. KUVIN:  
 2 Q. Would you agree with see that you visited  
 3 a man by the name of Jeffrey Epstein while he was in  
 4 jail in Palm Beach County?  
 5 MR. RHEINHART: Objection to the form,  
 6 standing objection. Assumes other facts that  
 7 this witness has not acknowledged, and instruct  
 8 her not to answer.  
 9 THE WITNESS: Upon instruction from the  
 10 lawyer, I must choose to invoke my Fifth  
 11 Amendment right.  
 12 BY MR. KUVIN:  
 13 Q. Do you agree that you arranged to have  
 14 C.L. come to Jeffrey Epstein's home for a nude  
 15 massage?  
 16 MR. RHEINHART: Objection to the form,  
 17 standing objection previously stated.  
 18 THE WITNESS: On the instruction of my  
 19 lawyer, I must choose to invoke my Fifth  
 20 Amendment right.  
 21 BY MR. KUVIN:  
 22 Q. Do you agree that C.L. has been to  
 23 358 El Brillo Way on at least two occasions?  
 24 MR. RHEINHART: Objection to the form. It  
 25 assumes knowledge of C.L. and of 358 El Brillo

1 I instruct her not to answer.  
 2 THE WITNESS: On the instruction from my  
 3 lawyer, I must choose to invoke my Fifth  
 4 Amendment privilege.  
 5 BY MR. KUVIN:  
 6 Q. Would you agree with me that in 2005 that  
 7 Jeffrey Epstein was between the ages of 45 and 55  
 8 years old?  
 9 MR. RHEINHART: Objection to the form.  
 10 Standing objection as to any knowledge of  
 11 Jeffrey Epstein. Instruct the witness not to  
 12 answer.  
 13 THE WITNESS: The instruction of my  
 14 lawyer, I must choose to assert my Fifth  
 15 Amendment right.  
 16 BY MR. KUVIN:  
 17 Q. Would you agree with me that  
 18 Jeffrey Epstein has tremendous wealth?  
 19 MR. RHEINHART: Objection to the form as  
 20 stated in the previous question, and instruct  
 21 the witness not to answer.  
 22 THE WITNESS: On the instruction from the  
 23 lawyer, I must choose to invoke my Fifth  
 24 Amendment right.  
 25

1 Way, to which the witness has not acknowledged,  
 2 and instruct the witness not to answer.  
 3 THE WITNESS: On the instruction of my  
 4 lawyer, I must choose to invoke my Fifth  
 5 Amendment right.  
 6 BY MR. KUVIN:  
 7 Q. Do you agree that Mr. Epstein has an  
 8 odd-shaped penis?  
 9 MR. RHEINHART: Objection to the form of  
 10 the question. It assumes knowledge of  
 11 Mr. Epstein. It assumes knowledge of  
 12 Mr. Epstein's body parts, and instruct the  
 13 witness not to answer.  
 14 THE WITNESS: On advice -- on the  
 15 instruction of my lawyer, I must choose to  
 16 invoke my Fifth Amendment right.  
 17 BY MR. KUVIN:  
 18 Q. Have you seen Jeffrey Epstein's penis?  
 19 MR. RHEINHART: Objection to the form, and  
 20 we're getting awfully close to a line here, Mr.  
 21 Kuvin.  
 22 MR. KUVIN: I think the identity of  
 23 something that young 14 and 15-year-old girls  
 24 have seen is directly relevant to the issues in  
 25 this case. If they can describe it, then

1 obviously it's important because they are the  
 2 only ones that are answering questions in this  
 3 case.  
 4 MR. RHEINHART: Well, people have rights.  
 5 People will assert their rights, and I am just  
 6 telling you, we're getting close to a line  
 7 here.  
 8 MR. KUVIN: I think I'm being  
 9 respectful --  
 10 MR. RHEINHART: You haven't crossed it yet  
 11 because I'm still here, but I'm just warning  
 12 you.  
 13 Instruct the witness not to answer  
 14 any question that presumes existence or  
 15 any knowledge of Jeffrey Epstein or any of  
 16 his body parts.  
 17 MR. KUVIN: Okay.  
 18 THE WITNESS: On the instruction of my  
 19 lawyer, I must choose to assert my Fifth  
 20 Amendment right.  
 21 BY MR. KUVIN:  
 22 Q. Do you know whether or not Mr. Epstein has  
 23 any identifying characteristics to any of his  
 24 private genitalia?  
 25 MR. RHEINHART: Objection to the form for

1 MR. KUVIN: The Epstein matter.  
 2 MR. RHEINHART: I instruct the witness not  
 3 to answer. Objection to the form as compound  
 4 and assumes the existence of Mr. Epstein which,  
 5 again, we are not acknowledging, and therefore  
 6 am instructing her not to answer.  
 7 THE WITNESS: On the instruction of my  
 8 lawyer, I choose to assert my Fifth Amendment  
 9 right.  
 10 BY MR. KUVIN:  
 11 Q. Are you aware that Mr. Epstein negotiated  
 12 for your immunity from prosecution in the  
 13 non-prosecution agreement that was entered into with  
 14 the United States Attorney's Office for the Southern  
 15 District of Florida?  
 16 MR. RHEINHART: Again, objection to the  
 17 form for the reasons previously stated as to  
 18 the standing objection and instruct her not to  
 19 answer.  
 20 THE WITNESS: On the instruction of my  
 21 lawyer, I must choose to invoke my Fifth  
 22 Amendment right.  
 23 BY MR. KUVIN:  
 24 Q. Do you agree with me that B.B. was  
 25 emotionally traumatized as a result of the incidents

1 the reason previously stated, because it  
 2 presumes that she has any knowledge of who  
 3 Jeffrey Epstein is or what his body parts look  
 4 like, and I would instruct her not to answer.  
 5 THE WITNESS: On the instruction of my  
 6 lawyer, I must choose to assert my Fifth  
 7 Amendment right.  
 8 BY MR. KUVIN:  
 9 Q. Have you heard anyone other than your  
 10 lawyers that have described what any of  
 11 Mr. Epstein's body parts look like?  
 12 MR. RHEINHART: Objection to the form. It  
 13 is irrelevant what she's heard from other  
 14 people, and again, it presumes facts that she's  
 15 not acknowledged. It is compound, and it is  
 16 harassing at this point.  
 17 THE WITNESS: On instruction of my lawyer,  
 18 I must choose to invoke my Fifth Amendment  
 19 right.  
 20 BY MR. KUVIN:  
 21 Q. Were you consulted with respect to the  
 22 non-prosecution agreement that was entered into with  
 23 the United States Attorney's Office for the Southern  
 24 District of Florida as it relates to this case?  
 25 MR. RHEINHART: Which case?

1 that occurred Jeffrey Epstein's home in 2005?  
 2 MR. RHEINHART: Objection to the form. It  
 3 assumes any knowledge of B.B. or any incidents  
 4 that would have occurred at a home purporting  
 5 to belong to a person by the name of Jeffrey  
 6 Epstein, and instruct her not to answer.  
 7 THE WITNESS: Upon instruction from my  
 8 lawyer, I must choose to invoke my Fifth  
 9 Amendment right.  
 10 BY MR. KUVIN:  
 11 Q. Do you agree with me that C.L. was  
 12 emotionally traumatized as a result of the incidents  
 13 that occurred at Jeffrey Epstein's home?  
 14 MR. RHEINHART: Same objection as to the  
 15 previous question, and instruct the witness not  
 16 to answer.  
 17 THE WITNESS: On the instruction of my  
 18 lawyer, I must choose to invoke my Fifth  
 19 Amendment privilege.  
 20 BY MR. KUVIN:  
 21 Q. Do you know Jane Doe No. 102?  
 22 MR. RHEINHART: Instruct the witness not  
 23 to answer based on Fifth Amendment privilege.  
 24 THE WITNESS: On instruction of my lawyer,  
 25 I must choose to invoke my Fifth Amendment



1 right.  
 2 BY MR. KUVIN:  
 3 Q. Have you known Jeffrey Epstein to keep  
 4 underage, under the age of 18, sex slaves?  
 5 MR. RHEINHART: Objection to the form both  
 6 as to ambiguity as to what you mean by "sex  
 7 slaves," and "keep," also the standing  
 8 objection as to any knowledge of Mr. Epstein  
 9 and instruct the witness not to answer.  
 10 THE WITNESS: On the instruction of my  
 11 lawyer, I must choose to invoke my Fifth  
 12 Amendment right.  
 13 BY MR. KUVIN:  
 14 Q. Where do most of the models come from that  
 15 are part of MC Squared Modeling Agency?  
 16 MR. RHEINHART: Objection to the form. It  
 17 assumes knowledge of an entity by the name of  
 18 MC Squared Modeling which the witness has not  
 19 acknowledged and therefore I instruct her not  
 20 to answer, and the question is compound.  
 21 THE WITNESS: On the instruction of my  
 22 lawyer, I must choose to invoke my Fifth  
 23 Amendment privilege.  
 24 BY MR. KUVIN:  
 25 Q. Who gets visas for the models at MC

1 in New York?  
 2 MR. RHEINHART: Instruct the witness not  
 3 to answer based on the Fifth Amendment  
 4 privilege.  
 5 THE WITNESS: On the instruction of my  
 6 lawyer, I choose to invoke my Fifth Amendment  
 7 right.  
 8 BY MR. KUVIN:  
 9 Q. Are you aware that various underage girls  
 10 brought in from out of the country live at 301 East  
 11 66th Street?  
 12 MR. RHEINHART: Objection to the form.  
 13 It's compound, and instruct the witness not to  
 14 answer.  
 15 THE WITNESS: On the instruction from my  
 16 lawyer, I must choose to invoke my Fifth  
 17 Amendment right.  
 18 BY MR. KUVIN:  
 19 Q. You've stayed at that address before, have  
 20 you not?  
 21 MR. RHEINHART: Instruct the witness not  
 22 to answer.  
 23 THE WITNESS: On the instruction of my  
 24 lawyer, I must choose to invoke my Fifth  
 25 Amendment right.

1 Squared, if you know?  
 2 MR. RHEINHART: Same, same objection as to  
 3 the previous question, same instruction.  
 4 THE WITNESS: On the instruction of my  
 5 lawyer, I must choose to invoke my Fifth  
 6 Amendment right.  
 7 BY MR. KUVIN:  
 8 Q. Do you work with Jeffrey Epstein to get  
 9 visas for out-of-the-country models or models that  
 10 are -- strike that.  
 11 Do you work with Jeffrey Epstein to  
 12 get visas for girls that are underage and bring them  
 13 into the United States so that they can work as  
 14 models for MC Squared?  
 15 MR. RHEINHART: Objection to the form and  
 16 assumes knowledge as to Mr. Epstein and as to  
 17 MC Squared and other matters that are not  
 18 admitted or acknowledged by this witness. The  
 19 question is compound. I would instruct her not  
 20 to answer.  
 21 THE WITNESS: On the instruction from my  
 22 lawyer, I must choose to invoke my Fifth  
 23 Amendment right.  
 24 BY MR. KUVIN:  
 25 Q. Do you know who owns 301 East 66th Street

1 BY MR. KUVIN:  
 2 Q. You've stayed there hundreds of times,  
 3 have you, hundreds of times have you not?  
 4 MR. RHEINHART: Instruct the witness not  
 5 to answer.  
 6 THE WITNESS: On instruction from my  
 7 lawyer, I must choose to invoke my Fifth  
 8 Amendment right.  
 9 BY MR. KUVIN:  
 10 Q. Are you aware that Mr. Epstein obtains  
 11 visas for girls from out of the country to work as  
 12 models and then prostitutes them out?  
 13 MR. RHEINHART: Objection to the form of  
 14 the question in that it is ambiguous and it  
 15 assumes numerous facts that have not  
 16 acknowledged that this witness has any  
 17 knowledge of, and the term "prostitutes them  
 18 out" is ambiguous, so I would instruct her not  
 19 to answer the question.  
 20 THE WITNESS: On the instruction of my  
 21 lawyer, I must choose to invoke my Fifth  
 22 Amendment right.  
 23 BY MR. KUVIN:  
 24 Q. You know what Radar Online is, do you not?  
 25 MR. RHEINHART: Instruct the witness not

1 to answer the question based on her Fifth  
 2 Amendment privilege.  
 3 THE WITNESS: On the instruction of my  
 4 lawyer, I must choose to invoke my Fifth  
 5 Amendment right.  
 6 BY MR. KUVIN:  
 7 Q. In fact, you were around when  
 8 Jeffrey Epstein bought Radar Online, were you not?  
 9 MR. RHEINHART: Objection to the form,  
 10 standing objection as to any knowledge of  
 11 Jeffrey Epstein or of Radar Online, and  
 12 instruct the witness not to answer.  
 13 THE WITNESS: On the instruction from my  
 14 lawyer, I must choose to invoke my Fifth  
 15 Amendment right.  
 16 BY MR. KUVIN:  
 17 Q. Are you aware that Jeffrey Epstein  
 18 accessed or obtained underage girls through his  
 19 Radar connection?  
 20 MR. RHEINHART: Same objection as  
 21 previously stated to the last question and same  
 22 instruction.  
 23 THE WITNESS: On the instruction from my  
 24 lawyer, I must choose to invoke my Fifth  
 25 Amendment privilege.

1 THE WITNESS: On the instruction from my  
 2 lawyer, I choose to invoke my Fifth Amendment  
 3 right.  
 4 BY MR. KUVIN:  
 5 Q. Would you agree with me that Jeffrey  
 6 Epstein has a list of underage girls that live  
 7 within a close proximity to all of his different  
 8 homes in every different state?  
 9 MR. RHEINHART: Objection to the form in  
 10 that it assumes Mr. Epstein has homes in every  
 11 single state and that she knows who Mr. Epstein  
 12 is, and therefore I instruct her not to answer.  
 13 THE WITNESS: On advice of my lawyer, I  
 14 must choose to invoke my Fifth Amendment right.  
 15 BY MR. KUVIN:  
 16 Q. You're aware Mr. Epstein has a home in New  
 17 York, right?  
 18 MR. RHEINHART: Instruct the witness not  
 19 to answer, and standing objection of knowledge  
 20 of Mr. Epstein.  
 21 THE WITNESS: On the instruction of my  
 22 lawyer, I must invoke my Fifth Amendment right.  
 23 BY MR. KUVIN:  
 24 Q. Are you aware that he has a home in New  
 25 Mexico?

1 BY MR. KUVIN:  
 2 Q. How many different properties does  
 3 Jeffrey Epstein own?  
 4 MR. RHEINHART: Objection to the form,  
 5 standing objection. Instruct the witness not  
 6 to answer.  
 7 THE WITNESS: On the instruction of my  
 8 lawyer, I must choose to invoke my Fifth  
 9 Amendment right.  
 10 BY MR. KUVIN:  
 11 Q. You've been to all of Jeffrey Epstein's  
 12 home, have you not?  
 13 MR. RHEINHART: Same objection as  
 14 previously stated to the last question. Same  
 15 instruction.  
 16 THE WITNESS: On the instruction from my  
 17 lawyer, I must invoke my Fifth Amendment right.  
 18 BY MR. KUVIN:  
 19 Q. You agree with me that Jeffrey Epstein  
 20 keeps a list of girls in the nearby areas around all  
 21 of his homes and properties?  
 22 MR. RHEINHART: Objection to the form, for  
 23 the standing objection as well as ambiguous as  
 24 to "nearby," and "all of his properties," so I  
 25 instruct the witness not to answer.

1 MR. RHEINHART: By he, you mean  
 2 Mr. Epstein?  
 3 MR. KUVIN: Yeah.  
 4 MR. RHEINHART: Got to make sure the  
 5 question is clear.  
 6 MR. KUVIN: Yes.  
 7 MR. RHEINHART: Standing objection to the  
 8 form and instruct the witness not to answer.  
 9 THE WITNESS: On the instruction from my  
 10 lawyer, I must choose to invoke my Fifth  
 11 Amendment privilege.  
 12 BY MR. KUVIN:  
 13 Q. Are you aware he has a home in the U.S.  
 14 Virgin Islands?  
 15 MR. RHEINHART: Same instruction, same  
 16 objection.  
 17 THE WITNESS: On the instruction of my  
 18 lawyer, I must choose to invoke my Fifth  
 19 Amendment right.  
 20 BY MR. KUVIN:  
 21 Q. And isn't it true that you kept a list of  
 22 underage girls that could service, in other words,  
 23 give Mr. Epstein naked massages in every place that  
 24 he has one of those homes I just described?  
 25 MR. RHEINHART: Same objection as

1 previously stated, the standing objection and  
 2 instruct her not to answer.  
 3 THE WITNESS: On the instruction of my  
 4 lawyer, I must choose to invoke my Fifth  
 5 Amendment right.  
 6 BY MR. KUVIN:  
 7 Q. Now, you're also aware, are you not, that  
 8 Jeffrey Epstein would pay other girls to bring  
 9 additional underage girls to him for naked massages,  
 10 are you not?  
 11 MR. RHEINHART: Standing objection and  
 12 instruct the witness not to answer.  
 13 THE WITNESS: On the instruction from my  
 14 lawyer, I must choose to invoke my Fifth  
 15 Amendment privilege.  
 16 BY MR. KUVIN:  
 17 Q. And, in fact, you frequently would pay  
 18 other girls to bring additional girls under the age  
 19 of 18 to Mr. Epstein for naked massages?  
 20 MR. RHEINHART: Objection to the form,  
 21 standing objection as to Mr. Epstein, also as  
 22 to any knowledge of any naked massages by  
 23 anybody to anybody. Instruct the witness not  
 24 to answer.  
 25 THE WITNESS: On the instruction of my

1 to Mr. Epstein's house on Palm Beach, you were aware  
 2 that they were brought so that Mr. Epstein could  
 3 molest them, correct?  
 4 MR. RHEINHART: Objection to the form as  
 5 to knowledge of Mr. Epstein, as to knowledge of  
 6 any home on Palm Beach, and ambiguous as to the  
 7 term "molest," and instruct the witness not to  
 8 answer.  
 9 THE WITNESS: On the instruction from my  
 10 lawyer, I must choose to invoke my Fifth  
 11 Amendment right.  
 12 BY MR. KUVIN:  
 13 Q. You're aware that Mr. Epstein raped  
 14 several underage minors in his bedroom?  
 15 MR. RHEINHART: Objection to the form as  
 16 to knowledge of Mr. Epstein, and also ambiguous  
 17 as to the term "rape."  
 18 THE WITNESS: On the instruction of my  
 19 lawyer, I must choose to invoke my Fifth  
 20 Amendment rights.  
 21 BY MR. KUVIN:  
 22 Q. Do you know what the term "rape" means?  
 23 MR. RHEINHART: Not as you used it. If  
 24 you want to tell us what you mean by when you  
 25 used it, we'll be happy to answer --

1 lawyer, I choose to invoke my Fifth Amendment  
 2 right.  
 3 BY MR. KUVIN:  
 4 Q. And there was a complete list of girls,  
 5 underage girls, that was stored on Mr. Epstein's  
 6 computer system; isn't that true?  
 7 MR. RHEINHART: Objection to the form.  
 8 It's ambiguous as to what a complete list is,  
 9 and also a standing objection to any knowledge  
 10 of Mr. Epstein, and instruct the witness not to  
 11 answer.  
 12 THE WITNESS: On the instruction from my  
 13 lawyer, I must choose to invoke my Fifth  
 14 Amendment privilege.  
 15 BY MR. KUVIN:  
 16 Q. In fact, you've seen the list of underage  
 17 girls that exists on Mr. Epstein's computer, have  
 18 you not?  
 19 MR. RHEINHART: Objection to the form,  
 20 standing objection.  
 21 THE WITNESS: On the instruction from my  
 22 lawyer, I must choose to invoke my Fifth  
 23 Amendment right.  
 24 BY MR. KUVIN:  
 25 Q. When underage minor females were brought

1 MR. KUVIN: I want to know if --  
 2 MR. RHEINHART: -- or evaluate your  
 3 question.  
 4 MR. KUVIN: I want to know if she has her  
 5 own definition of what the phrase or word  
 6 "rape" means, so that we can use her definition  
 7 of that word. I want to make sure it's  
 8 completely unambiguous.  
 9 MR. RHEINHART: Your asking the question.  
 10 If you want to define the term, she'll respond  
 11 to your question.  
 12 BY MR. KUVIN:  
 13 Q. Do you what the term or word "rape" means?  
 14 A. Yes.  
 15 Q. Okay. What is your understanding of that  
 16 word?  
 17 MR. RHEINHART: Now, we're not answering  
 18 that question. It's your term. It's your  
 19 question. If you want to define it, you can go  
 20 ahead and define it.  
 21 MR. KUVIN: Well, I beg --  
 22 MR. RHEINHART: If you want to give her  
 23 specifics as to what she -- you can define it.  
 24 MR. KUVIN: I beg to differ with you, and  
 25 I don't know that that's a proper objection.

1 I'm asking her her understanding of the word.  
 2 MR. RHEINHART: And I am instructing her  
 3 not to answer it because that question is not  
 4 likely to lead to discoverable evidence. It's  
 5 simply meant to harass her. And you can define  
 6 the term in your question.  
 7 MR. KUVIN: Well, with all due respect,  
 8 it's certainly not to harass if there have been  
 9 girls that were alleging that they were raped.  
 10 MR. RHEINHART: Well, you define what you  
 11 mean by when you say that they allege that they  
 12 have been raped, and she will be happy to  
 13 evaluate your question.  
 14 MR. KUVIN: And that's what I'm trying to  
 15 understand.  
 16 MR. RHEINHART: She's not going to  
 17 speculate on what you mean when you frame a  
 18 word in your question.  
 19 MR. KUVIN: That's exactly what I'm trying  
 20 to do. I'm trying to make sure that we are  
 21 using the same definition, so I would like to  
 22 use her definition of the word.  
 23 MR. RHEINHART: Right. She's not going to  
 24 answer it, so you can either move on we can  
 25 stop.

1 or vaginal penetration or union with the sexual  
 2 organ of another, or oral, anal or vaginal  
 3 penetration of another with any other object,  
 4 or with any object. Excuse me. All right?  
 5 MR. RHEINHART: Okay.  
 6 BY MR. KUVIN:  
 7 Q. Do you understand that definition as I  
 8 have explained it to you, or would you like me to  
 9 read it again?  
 10 A. Read it again, please.  
 11 Q. Absolutely. Florida law defines "rape" as  
 12 oral, anal or vaginal penetration by, or union with  
 13 the sexual organ of another; or oral, anal or  
 14 vaginal penetration by another with any object. And  
 15 obviously that is without the other's consent.  
 16 A. You did not say that.  
 17 MR. RHEINHART: Okay.  
 18 BY MR. KUVIN:  
 19 Q. Adding without the other's consent,  
 20 obviously, to that definition.  
 21 Now, let's use that definition for  
 22 "rape," because that's as it's defined by Florida  
 23 law. Using that definition, are you aware, as you  
 24 sit here today, that Jeffrey Epstein has raped  
 25 underage girls?

1 MR. KUVIN: Okay. So you're instructing  
 2 her not to answer the question?  
 3 MR. RHEINHART: I am instructing her not  
 4 to answer the question for the third time.  
 5 MR. KUVIN: Okay. I just want to be  
 6 clear.  
 7 MR. GARCIA: What's the legal objection?  
 8 MR. RHEINHART: I've already stated what  
 9 my legal objection is. It's meant solely for  
 10 harassment. It's not likely to lead to  
 11 discoverable evidence.  
 12 BY MR. KUVIN:  
 13 Q. Okay. For the purpose of my question, I  
 14 would like to, because your attorney won't allow you  
 15 to define the word "rape," I would like you to use  
 16 the word and understand the word "rape" to mean  
 17 sexual contact with an individual, including  
 18 sexual -- well, let me clarify here. Hang on. You  
 19 know what, if we're going to do it, let's do it  
 20 right since we can't use your definition.  
 21 MR. RHEINHART: You can use whatever  
 22 definition you like, but you need to tell me  
 23 what it is.  
 24 MR. KUVIN: Let's use the definition of  
 25 "rape" as defined by Florida law as oral, anal

1 MR. RHEINHART: Standing objection to the  
 2 form of the question, and I would instruct the  
 3 witness not to answer.  
 4 THE WITNESS: On the instruction of my  
 5 lawyer, I must choose to invoke my Fifth  
 6 Amendment right.  
 7 BY MR. KUVIN:  
 8 Q. Are you aware as you sit here today that  
 9 Jeffrey Epstein raped B.B.?  
 10 MR. RHEINHART: Objection to the form.  
 11 The question assumes that he did, or that she  
 12 has any knowledge of whether he did, so I  
 13 instruct the witness not to answer.  
 14 THE WITNESS: On the instruction of my  
 15 lawyer, I must choose to invoke my Fifth  
 16 Amendment privilege.  
 17 BY MR. KUVIN:  
 18 Q. Are you aware as you sit here today, that  
 19 Jeffrey Epstein -- well, let me rephrase that.  
 20 You are aware, are you not, as you  
 21 sit here today, that Jeffrey Epstein raped C.L.?  
 22 MR. RHEINHART: Objection to the form as  
 23 leading, and also again assumes -- your  
 24 question assumes that she knows things that  
 25 she's not acknowledged that she knows or

1 doesn't know, and I instruct her not to answer.  
2 THE WITNESS: On the instruction of my  
3 lawyer, I must choose to invoke my Fifth  
4 Amendment right.

5 BY MR. KUVIN:

6 Q. Do you agree that Jeffrey Epstein has  
7 raped hundreds of girls under the age of 18?

8 MR. RHEINHART: Objection to the form,  
9 standing objection as to any knowledge of  
10 Jeffrey Epstein. Instruct the witness not to  
11 answer.

12 THE WITNESS: On the instruction of my  
13 lawyer, I must choose to invoke my Fifth  
14 Amendment privilege.

15 BY MR. KUVIN:

16 Q. You're aware, are you not, that  
17 Jeffrey Epstein has raped hundreds of girls under  
18 the age of 17?

19 MR. RHEINHART: Objection to the form as  
20 leading. Instruct the witness not to answer  
21 for the reasons previously stated to the last  
22 the question.

23 THE WITNESS: On the instruction of my  
24 lawyer, I must choose to assert my Fifth  
25 Amendment right.

1 MR. RHEINHART: Same objection as  
2 previously stated as to ambiguity and compound,  
3 and instruct the witness not to answer.

4 THE WITNESS: On the instruction of my  
5 lawyer, I must choose to invoke my Fifth  
6 Amendment right.

7 BY MR. KUVIN:

8 Q. Have you ever had sexual contact in any  
9 manner with any underage girls that were brought to  
10 Mr. Epstein's home?

11 MR. RHEINHART: Objection to the form.  
12 Standing objection, compound, instruct the  
13 witness not to answer.

14 THE WITNESS: On the instruction of my  
15 lawyer, I must choose to invoke my Fifth  
16 Amendment right.

17 BY MR. KUVIN:

18 Q. Did you keep an appointment book for  
19 Mr. Epstein?

20 MR. RHEINHART: Objection to the form,  
21 standing objection. Instruct the witness not  
22 to answer.

23 THE WITNESS: On the instruction of my  
24 lawyer, I must choose to invoke my Fifth  
25 Amendment right.

1 BY MR. KUVIN:

2 Q. You're aware, as you sit here today, are  
3 you not, that Jeffrey Epstein has raped hundreds of  
4 girls under the age of 16?

5 MR. RHEINHART: Objection to the form.  
6 Standing objection. It assumes numerous facts  
7 mixed in a compound question, and therefore I  
8 instruct the witness not to answer.

9 THE WITNESS: On the instruction of my  
10 lawyer, I must choose to assert my Fifth  
11 Amendment right.

12 BY MR. KUVIN:

13 Q. Isn't it true that Mr. Epstein had at  
14 least one or two scheduled appointments for sex with  
15 underage girls every day while he was here in Palm  
16 Beach County in the year 2005?

17 MR. RHEINHART: Objection to the form.  
18 It's compound, standing objection as well, and  
19 instruct the witness not to answer.

20 THE WITNESS: On the instruction of my  
21 lawyer, I must choose to invoke my Fifth  
22 Amendment right.

23 BY MR. KUVIN:

24 Q. Did you actually locate underage girls in  
25 Palm Beach for Jeffrey Epstein to rape?

1 BY MR. KUVIN:

2 Q. Did you preserve a document that shows the  
3 appointments kept for Mr. Epstein in the years 2004?

4 MR. RHEINHART: Objection to the form, the  
5 standing objection, compound question and  
6 instruct the witness not to answer.

7 THE WITNESS: On the instruction of my  
8 lawyer, I must choose to invoke my Fifth  
9 Amendment right.

10 BY MR. KUVIN:

11 Q. Same question with respect to any  
12 appointments kept for Mr. Epstein in 2005.

13 MR. RHEINHART: Same objection previously  
14 stated to the previous question.

15 THE WITNESS: On the instruction of my  
16 lawyer, I must choose to invoke my Fifth  
17 Amendment right.

18 BY MR. KUVIN:

19 Q. Same with respect to any appointments kept  
20 for Mr. Epstein in 2006.

21 MR. RHEINHART: Same objection as  
22 previously stated to the last two questions.

23 THE WITNESS: On the instruction of my  
24 lawyer, I must choose to invoke my Fifth  
25 Amendment privilege.

1 BY MR. KUVIN:  
 2 Q. Have you provided any appointment books to  
 3 anyone with respect to appointments for Mr. Epstein?  
 4 MR. RHEINHART: Same standing objection as  
 5 to knowledge of Mr. Epstein. The question is  
 6 compound and instruct the witness not to  
 7 answer.  
 8 THE WITNESS: On the instruction of my  
 9 lawyer, I must choose to invoke my Fifth  
 10 Amendment right.  
 11 BY MR. KUVIN:  
 12 Q. Would Ep -- Mr. Epstein pay the underage  
 13 girls more money if they took off both their tops  
 14 and their bottoms?  
 15 MR. RHEINHART: Objection to the form,  
 16 standing objection. Instruct the witness not  
 17 to answer.  
 18 THE WITNESS: On the instruction of my  
 19 lawyer, I must choose to invoke my Fifth  
 20 Amendment right.  
 21 BY MR. KUVIN:  
 22 Q. Would Mr. Epstein pay the underage girls  
 23 more if they would actually touch his penis?  
 24 MR. RHEINHART: Same instruction, same  
 25 objection.

1 MR. RHEINHART: Yeah, whenever you get to  
 2 a convenient point in your questioning, I think  
 3 we can use a break. If you're in the middle of  
 4 something, I don't want to stop you.  
 5 MR. KUVIN: No, this is fine. We can take  
 6 a quick break. Five minutes?  
 7 MR. RHEINHART: Yes, thank you.  
 8 THE VIDEOGRAPHER: We're now off the  
 9 record. It is 2:08 p.m.  
 10 (A brief recess was held.)  
 11  
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1 THE WITNESS: On the instruction of my  
 2 lawyer, I must choose to assert my Fifth  
 3 Amendment right.  
 4 BY MR. KUVIN:  
 5 Q. Would Mr. Epstein pay the underage girls  
 6 more if he would allow them to have sex with them?  
 7 MR. RHEINHART: Can you restate that  
 8 again?  
 9 MR. KUVIN: Yes.  
 10 BY MR. KUVIN:  
 11 Q. Would Mr. Epstein pay the underage girls  
 12 more money if they would allow him to have sex with  
 13 them?  
 14 MR. RHEINHART: Objection to the form,  
 15 standing objection. Instruct the witness not  
 16 to answer.  
 17 THE WITNESS: On the instruction of my  
 18 lawyer, I must invoke my Fifth Amendment right.  
 19 MR. KUVIN: Hang on one second. You can  
 20 stop at any time I'll sign it.  
 21 MR. RHEINHART: Mr. Kuvin, I don't know if  
 22 you're getting to a convenient breaking point  
 23 but --  
 24 MR. KUVIN: Do you want to take a quick  
 25 one?

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

CASE NO. 08-CIV-80119-MARRA/JOHNSON

JANE DOE NO. 2,  
Plaintiff,

-vs- VOLUME II OF III  
JEFFREY EPSTEIN,  
Defendant.

Related cases:

08-80232, 08-08380, 08-80381, 08-80994  
08-80993, 08-80811, 08-80893, 09-80469  
09-80591, 09-80656, 09-80802, 09-81092

VIDEOTAPED DEPOSITION OF  
SARAH KELLEN

Wednesday, March 24, 2010  
10:37 - 6:51 p.m.

250 Australian Avenue South  
Suite 1500  
West Palm Beach, Florida 33401

Reported By:  
Cynthia Hopkins, RPR, FPR  
Notary Public, State of Florida  
Prose Court Reporting  
Job No.: 1484

IN THE CIRCUIT COURT OF THE 15TH JUDICIAL CIRCUIT  
IN AND FOR PALM BEACH COUNTY, FLORIDA  
CASE NO. 502008CA028051XXXXMB AB

L.M.,

Plaintiff,

-vs- VOLUME II OF III

JEFFREY EPSTEIN,

Defendant.

VIDEOTAPED DEPOSITION OF SARAH KELLEN

Wednesday, March 24, 2010  
10:37 - 6:51 p.m.

250 Australian Avenue South  
West Palm Beach, Florida 33401

Reported By:  
Cynthia Hopkins, RPR, FPR  
Notary Public, State of Florida  
Prose Court Reporting

IN THE CIRCUIT COURT OF THE 15TH JUDICIAL CIRCUIT  
IN AND FOR PALM BEACH COUNTY, FLORIDA  
CASE NO. 502008CA028058XXXXMB AD

E.W.,

Plaintiff,

-vs- VOLUME II OF III

JEFFREY EPSTEIN,

Defendant.

DEPOSITION OF SARAH KELLEN

Wednesday, March 24, 2010  
10:37 - 6:51 p.m.

250 Australian Avenue South  
West Palm Beach, Florida 33401

Reported By:  
Cynthia Hopkins, RPR, FPR  
Notary Public, State of Florida  
Prose Court Reporting

IN THE CIRCUIT COURT OF THE FIFTEENTH JUDICIAL  
CIRCUIT IN AND FOR PALM BEACH COUNTY, FLORIDA  
CASE No.502008CA037319XXXXMB AB

B.B.

Plaintiff,

-vs- VOLUME II OF III

JEFFREY EPSTEIN  
AND SARAH KELLEN,

Defendants.

VIDEOTAPED DEPOSITION OF  
SARAH KELLEN

Wednesday, March 24, 2010  
10:37 - 6:51 p.m.

250 Australian Avenue South  
Suite 1500  
West Palm Beach, Florida 33401

Reported By:  
Cynthia Hopkins, RPR, FPR  
Notary Public, State of Florida  
Prose Court Reporting Services  
Job No.: 1484

1 APPEARANCES:  
 2 On behalf of the Plaintiffs, B.B.:  
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 4 LEOPOLD KUVIN  
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 Suite 200  
 5 Palm Beach Gardens, Florida 33410  
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 6  
 7 On behalf of the Plaintiffs, L.M., E.W. and  
 Jane Doe:  
 8  
 9 MATTHEW WEISSING, ESQUIRE  
 FARMER, JAFFE, WEISSING, EDWARDS  
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 13 On behalf of Jane Does 1 through 8:  
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 Suite 2218  
 16 Miami, Florida 33160  
 Phone: 305.931.2200  
 17 E-mail: Ahorowitz@sexabuseattorney.com  
 18 On behalf of the Plaintiffs, 101, 102 and 103:  
 19 KATHERINE W. EZELL, ESQUIRE  
 AMY JOSEFSBERG EDERI, ESQUIRE  
 20 PODHURST ORSECK  
 25 West Flagler Street  
 Suite 800  
 21 Miami, Florida 33130  
 22 Phone: 305.358.2382  
 23 (Via telephone)  
 24  
 25

1  
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 24  
 25

1 Appearances continued..  
 2 On behalf of the Plaintiff, Jane Doe II:  
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 7 On behalf of the Defendant:  
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 ATTERBURY, GOLDBERGER & WEISS, P.A.  
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 Suite 1400  
 10 West Palm Beach, Florida 33401-5012  
 Phone: 561.659.8300  
 11  
 12  
 13 On behalf of the Witness:  
 14 BRUCE E. REINHART, ESQUIRE  
 LAW OFFICE OF BRUCE E. REINHART  
 15 One Clearlake Center  
 250 South Australian Avenue, Suite 1400  
 16 West Palm Beach, Florida 33401  
 Phone: 561.202.6360  
 17  
 18  
 19  
 20 ALSO PRESENT:  
 21 Jessica Cadwell, Paralegal  
 Burman, Critton, Luttier & Coleman, P.A.  
 22 Joseph Kozak, Videographer  
 Prose Court Reporting Services  
 23  
 24  
 25

1 PROCEEDINGS  
 2 \* \* \* \* \*  
 3 THE VIDEOGRAPHER: We're now back on the  
 4 record. It is 2:19 p.m. Starting Media Unit  
 5 No. 2.  
 6 CONTINUED DIRECT EXAMINATION  
 7 BY MR. KUVIN:  
 8 Q. All right. Did Jeffrey Epstein talk to  
 9 you about whether or not he was going to be going to  
 10 jail after he was arrested?  
 11 MR. RHEINHART: Objection to the form,  
 12 standing objection. Instruct the witness not  
 13 to answer.  
 14 THE WITNESS: On the instruction of my  
 15 lawyer, I must invoke my Fifth Amendment right.  
 16 BY MR. KUVIN:  
 17 Q. How did you first learn of the criminal  
 18 investigation with respect to Mr. Epstein?  
 19 MR. RHEINHART: Objection to the form,  
 20 standing objection. Instruct the witness not  
 21 to answer.  
 22 THE WITNESS: On the instruction of my  
 23 lawyer, I must exercise my Fifth Amendment  
 24 right.  
 25



1 BY MR. KUVIN:  
 2 Q. Do you know who tipped off Jeffrey Epstein  
 3 about an ongoing investigation against him back in  
 4 2005?  
 5 MR. RHEINHART: Same objection as  
 6 previously stated to the last two questions and  
 7 same instruction.  
 8 THE WITNESS: On the instruction of my  
 9 lawyer, I must invoke my Fifth Amendment right.  
 10 BY MR. KUVIN:  
 11 Q. Were you aware that there was a warrant  
 12 issued for your arrest in connection with  
 13 Jeffrey Epstein?  
 14 MR. RHEINHART: Objection to the form,  
 15 standing objection, same instruction.  
 16 THE WITNESS: On the instruction of my  
 17 lawyer, I must invoke my Fifth Amendment right.  
 18 BY MR. KUVIN:  
 19 Q. Have you seen the warrant that was issued  
 20 for your arrest in connection with Jeffrey Epstein?  
 21 MR. RHEINHART: Same objection and same  
 22 instruction as the last question.  
 23 THE WITNESS: On the instruction of my  
 24 lawyer, I must invoke my Fifth Amendment right.  
 25

1 not know about.  
 2 But if you can answer, go ahead.  
 3 THE WITNESS: No.  
 4 BY MR. KUVIN:  
 5 Q. Let me show what we'll mark as Exhibit 14,  
 6 which purports to be a request for a warrant for  
 7 your arrest.  
 8 MR. RHEINHART: Okay.  
 9 (Plaintiff's Exhibit No. 14 was marked for  
 10 identification.)  
 11 BY MR. KUVIN:  
 12 Q. Just yes or no; have you seen that request  
 13 for a warrant before?  
 14 A. No.  
 15 Q. All right. If you would turn to the  
 16 probable cause affidavit. If you would go ahead and  
 17 turn to the -- keep turning, and again. There we  
 18 go.  
 19 All right. There's a document attached to  
 20 this exhibit entitled, Probable Cause Affidavit.  
 21 Have you had a chance to read through this 22-page  
 22 document in the past?  
 23 MR. RHEINHART: I'm sorry. Are you asking  
 24 her if she's ever seen it before or if she's  
 25 ever read it before?

1 BY MR. KUVIN:  
 2 Q. Have you seen the probable cause affidavit  
 3 with respect to the arrest warrant issued for your  
 4 arrest on May 1, 2006?  
 5 MR. RHEINHART: Hang on one second. I  
 6 will object to the form. Can you, can you  
 7 repeat the question just for the record?  
 8 MR. KUVIN: Yes.  
 9 BY MR. KUVIN:  
 10 Q. Have you been made aware, or have you --  
 11 let me clarify. Have you seen the probable cause  
 12 affidavit that was attached to your warrant for  
 13 arrest on May 1, 2006?  
 14 MR. RHEINHART: Object to the form. I  
 15 don't believe there ever was a warrant issued,  
 16 but go ahead and answer the question, if you  
 17 can.  
 18 THE WITNESS: No.  
 19 BY MR. KUVIN:  
 20 Q. Have you seen the request for a warrant  
 21 with the attached probable cause affidavit that was  
 22 issued on May 1st, 2006?  
 23 MR. RHEINHART: Object to the form.  
 24 Assumes her knowledge of something that she may  
 25 not know, the existence of something she may

1 MR. KUVIN: Good point.  
 2 BY MR. KUVIN:  
 3 Q. Let's ask first: Have ever seen it  
 4 before?  
 5 A. I don't believe so.  
 6 Q. Okay. If you would turn to -- keep it in  
 7 front of you -- if we turn to Page 22, and we look  
 8 at the last paragraph.  
 9 Do you agree that Epstein in the years,  
 10 2005, 2004 and 2005, did commit lewd and lascivious  
 11 molestation on a 14-year-old girl?  
 12 MR. RHEINHART: Just if I can clarify, are  
 13 you asking whether that's what the document  
 14 says?  
 15 MR. KUVIN: No, I'm asking whether she's  
 16 aware of it.  
 17 MR. RHEINHART: I'm going to object to the  
 18 form. It calls for a legal conclusion that  
 19 she's not competent to make. That's ambiguous  
 20 in that regard, and also the standing objection  
 21 and I will instruct her not to answer.  
 22 THE WITNESS: On the advice of my lawyer,  
 23 I must to invoke my Fifth Amendment right.  
 24 BY MR. KUVIN:  
 25 Q. Do you agree that in the years 2004 and

1 2005 Mr. Epstein molested hundreds of 14, 15, and  
2 16-year-old girls?

3 MR. RHEINHART: Same objection to the  
4 form, standing objection and also calls for a  
5 legal conclusion and is ambiguous. Instruct  
6 the witness not to answer.

7 THE WITNESS: On the instruction of my  
8 lawyer, I must invoke my Fifth Amendment right.  
9 BY MR. KUVIN:

10 Q. Do you agree that the facts contained  
11 within this probable cause affidavit are true and  
12 accurate?

13 MR. RHEINHART: Objection to the form.  
14 You've never established that she's read it, so  
15 how can she say whether it's true and accurate.  
16 I instruct the witness not to answer the  
17 question. Do you want to clarify your  
18 question?

19 MR. KUVIN: No.

20 BY MR. KUVIN:

21 Q. Were you present at 358 El Brillo Way when  
22 the search warrant was issued for that home?

23 MR. RHEINHART: Objection to the form as  
24 to any knowledge of 358 El Brillo Way. Also  
25 ambiguous. Are you asking about when the

1 Jeffrey Epstein took nude photos of girls under the  
2 age of 18?

3 MR. RHEINHART: Objection to the form,  
4 standing objection, instruct the witness not to  
5 answer.

6 THE WITNESS: On the instruction of my  
7 lawyer, I must invoke my Fifth Amendment right.  
8 BY MR. KUVIN:

9 Q. Have you taken any photographs of girls  
10 under the age of 18, nude photographs of girls under  
11 the age of 18 yourself?

12 MR. RHEINHART: Object to the form as  
13 ambiguous. Can we get a time period or any  
14 sort of --

15 MR. KUVIN: Sure.

16 MR. RHEINHART: -- limitation of that?

17 MR. KUVIN: Absolutely.

18 BY MR. KUVIN:

19 Q. In the years of 2004 to 2006, did you ever  
20 taken any nude photographs of underage girls being  
21 girls under the age of 18?

22 MR. RHEINHART: Object to the form as  
23 ambiguous. Instruct the witness not to answer.

24 THE WITNESS: On the advice of my lawyer,  
25 I must exercise my Fifth Amendment right.

1 warrant was issued or when the warrant was  
2 executed?

3 MR. KUVIN: I don't know. You criminal  
4 guys know the language.

5 BY MR. KUVIN:

6 Q. When the cops came into the house and  
7 searched the home at 358 El Brillo Way, were you  
8 there?

9 MR. RHEINHART: Objection to the form as  
10 to compound, and assuming knowledge as to  
11 358 El Brillo Way or any search by the police.  
12 Instruct the witness not to answer.

13 THE WITNESS: On the instruction of my  
14 lawyer, I must exercise my Fifth Amendment  
15 privilege.

16 BY MR. KUVIN:

17 Q. Are you aware of any covert cameras that  
18 exist in the home at 358 El Brillo Way?

19 MR. RHEINHART: Objection to the form.  
20 Standing objection as it relates to El Brillo  
21 Way, and instruct the witness not to answer.

22 THE WITNESS: On the instruction of my  
23 lawyer, I must invoke my Fifth Amendment right.

24 BY MR. KUVIN:

25 Q. Are you aware or whether or not

1 MR. KUVIN: And just so we're clear, when  
2 you say "instruct the witness not to answer,"  
3 you mean for the Fifth Amendment grounds as  
4 opposed to --

5 MR. RHEINHART: Well, technically that  
6 would be manufacturing child pornography, so if  
7 the truthful answer that question would be yes,  
8 she would be admitting to a crime.

9 MR. KUVIN: No, I understand that.

10 MR. RHEINHART: So yes, I'm instructing  
11 her not to answer the question.

12 MR. KUVIN: Because there have been some  
13 questions that we've instructed her, you've  
14 instructed her not to answer at all, and then  
15 others -- I just wanted for clarify.

16 MR. RHEINHART: Thank you. I was getting  
17 sloppy. I apologize.

18 MR. KUVIN: That's okay.

19 BY MR. KUVIN:

20 Q. All right. Do you agree that you have --  
21 well, let me ask you this: Have you taken any video  
22 of girls under the age of 18, nude girls under the  
23 age of 18 in the years 2004 through 2006?

24 MR. RHEINHART: Once again --

25 MR. KUVIN: Go ahead.

1 MR. RHEINHART: Wait. Hold on a second.  
 2 Let me go back to the prior question about  
 3 still photographs.  
 4 MR. KUVIN: Yes.  
 5 MR. RHEINHART: Okay. And I think the  
 6 question was whether she had taken between '04  
 7 and '06 any still photographs of nude women  
 8 under the age of 18.  
 9 MR. KUVIN: Yes.  
 10 MR. RHEINHART: Is that correct? I want  
 11 to go back to that question.  
 12 MR. KUVIN: Okay. You can go back to that  
 13 question.  
 14 THE WITNESS: No.  
 15 BY MR. KUVIN:  
 16 Q. Have you taken any nude videotape of girls  
 17 under the age of 18 for the years 2004 through 2006?  
 18 A. No.  
 19 Q. Asking those same questions, have you  
 20 taken any nude photographs of girls under the age of  
 21 18 from 2004 through 2006?  
 22 A. No.  
 23 Q. Have you taken any nude video of girls  
 24 under the age of 18 from 2004 to 2006?  
 25 A. No.

1 Standing objection as to knowledge of  
 2 Mr. Epstein. Instruct the witness not to  
 3 answer based on the Fifth Amendment.  
 4 THE WITNESS: On the instruction of my  
 5 lawyer I must exercise my Fifth Amendment  
 6 right.  
 7 BY MR. KUVIN:  
 8 Q. Do you know whether or not an attempt to  
 9 give a \$90,000 donation was an attempt to stop the  
 10 Palm Beach Police from investigating Mr. Epstein?  
 11 MR. RHEINHART: Objection to the form.  
 12 Standing objection as previously stated, and  
 13 the same instructions as the previous question.  
 14 THE WITNESS: At the instruction of my  
 15 lawyer, I must invoke my Fifth Amendment right.  
 16 MR. KUVIN: Hold on a second. Almost  
 17 done.  
 18 BY MR. KUVIN:  
 19 Q. Is your mother also named Sarah Kellen?  
 20 A. No.  
 21 Q. Did you ever live at 2644 Peter Street,  
 22 Honolulu, Hawaii?  
 23 MR. RHEINHART: Instruct the witness not  
 24 to answer based on the Fifth Amendment  
 25 privilege against self-incrimination.

1 Q. Do you know what the COUQ Foundation is?  
 2 A. Can you repeat that?  
 3 Q. Do you know what the COUQ Foundation is?  
 4 MR. RHEINHART: Mr. Kuvin, can I clarify?  
 5 Are you asking if she's ever heard of such an  
 6 entity or whether she actually knows what that  
 7 entity is?  
 8 MR. KUVIN: Let's start with if she's ever  
 9 heard over it, and then I will follow up with  
 10 the following question of whether she knows  
 11 what it is.  
 12 MR. RHEINHART: Okay.  
 13 BY MR. KUVIN:  
 14 Q. Have you ever heard of this, about the  
 15 COUQ Foundation before?  
 16 MR. RHEINHART: I instruct her not to  
 17 answer based on her Fifth Amendment privilege.  
 18 THE WITNESS: On the advice of my lawyer,  
 19 I must assert my Fifth Amendment right.  
 20 BY MR. KUVIN:  
 21 Q. Were you aware that Mr. Epstein, through  
 22 the COUQ Foundation, attempted to make a \$90,000  
 23 donation to the Palm Beach Police Department in  
 24 2006?  
 25 MR. RHEINHART: Objection to the form.

1 THE WITNESS: On the instruction of my  
 2 lawyer, I must invoke my Fifth Amendment right.  
 3 BY MR. KUVIN:  
 4 Q. Did you ever live at 301 East 66th Street,  
 5 Apartment 10-N in New York, New York?  
 6 MR. RHEINHART: Same instruction as  
 7 previous question.  
 8 THE WITNESS: On the instruction of my  
 9 lawyer, I must invoke my Fifth Amendment right.  
 10 BY MR. KUVIN:  
 11 Q. Have you ever gone by the name of Sarah  
 12 Bonk, B-o-n-k?  
 13 MR. RHEINHART: Same instruction as the  
 14 previous two questions.  
 15 THE WITNESS: On the instruction of my  
 16 lawyer I must invoke my Fifth Amendment right.  
 17 BY MR. KUVIN:  
 18 Q. Did you change your name from Sarah Bonk  
 19 to Sarah Kellen?  
 20 MR. RHEINHART: Objection to the form and  
 21 it assumes a prior question that there was no  
 22 answer to, and I would instruct the witness not  
 23 to answer.  
 24 THE WITNESS: Upon the instruction of my  
 25 lawyer, I must invoke my Fifth Amendment right.

1 BY MR. KUVIN:  
 2 Q. Have you ever used the alias of  
 3 Sarah Bonk?  
 4 MR. RHEINHART: Objection to the -- I'm  
 5 sorry. Instruct the witness not to answer  
 6 based on Fifth Amendment privileges.  
 7 THE WITNESS: Upon the instruction of my  
 8 lawyer, I must invoke my Fifth Amendment right.  
 9 BY MR. KUVIN:  
 10 Q. Do your parents live in North Carolina?  
 11 MR. RHEINHART: Instruct the witness not  
 12 to answer the question based on her Fifth  
 13 Amendment privilege.  
 14 THE WITNESS: On instruction of my lawyer  
 15 I must invoke my Fifth Amendment right.  
 16 BY MR. KUVIN:  
 17 Q. Do you have any brothers and sisters?  
 18 MR. RHEINHART: Same instruction as the  
 19 previous question.  
 20 THE WITNESS: On the instruction of my  
 21 lawyer, I must invoke my Fifth Amendment right.  
 22 BY MR. KUVIN:  
 23 Q. Have your parents met Jeffrey Epstein?  
 24 MR. RHEINHART: Objection to the form.  
 25 Standing objection and also instruct the

1 compound, instruct the witness not to answer.  
 2 THE WITNESS: On the instruction of my  
 3 lawyer, I must invoke my Fifth Amendment right.  
 4 BY MR. KUVIN:  
 5 Q. Have you ever used illegal drugs with  
 6 Nadia Marcinkova?  
 7 MR. RHEINHART: Same objection and  
 8 instruction as to the previous question.  
 9 THE WITNESS: On the instruction of my  
 10 lawyer, I must invoke my Fifth Amendment right.  
 11 BY MR. KUVIN:  
 12 Q. Did you ever use the phone number of  
 13 655-0995?  
 14 MR. RHEINHART: Instruct the witness not  
 15 to answer based on her Fifth Amendment  
 16 privilege.  
 17 THE WITNESS: On the instruction of my  
 18 lawyer, I must invoke my Fifth Amendment right.  
 19 BY MR. KUVIN:  
 20 Q. Have you ever used the phone number  
 21 881-8116, 881-8116?  
 22 MR. RHEINHART: Thank you.  
 23 THE WITNESS: I don't recognize that  
 24 number.  
 25

1 witness not to answer based on her Fifth  
 2 Amendment privilege.  
 3 THE WITNESS: On the instruction of my  
 4 lawyer, I must invoke my Fifth Amendment right.  
 5 BY MR. KUVIN:  
 6 Q. Do your parents know what you've done with  
 7 Jeffrey Epstein as it relates to this case?  
 8 MR. RHEINHART: Objection to the form as  
 9 stated to the previous question, and same  
 10 instruction.  
 11 THE WITNESS: On the instruction of my  
 12 lawyer, I must invoke my Fifth Amendment right.  
 13 BY MR. KUVIN:  
 14 Q. Have you ever used illegal drugs with  
 15 Jeffrey Epstein?  
 16 MR. RHEINHART: Objection to the form.  
 17 Standing objection, instruct the witness not to  
 18 answer.  
 19 THE WITNESS: On the instruction of my  
 20 lawyer, I must invoke my Fifth Amendment right.  
 21 BY MR. KUVIN:  
 22 Q. Have you ever used illegal drugs with  
 23 Ghislaine Maxwell?  
 24 MR. RHEINHART: Objection to the form,  
 25 assumes knowledge of Ghislaine Maxwell. It's

1 BY MR. KUVIN:  
 2 Q. Okay. When the police entered Jeffrey  
 3 Epstein's home, they took something that's called a  
 4 bottle of Peach Flavored Joy Jelly. Just a  
 5 foundation of what I'm about to ask you.  
 6 Have you ever seen anything called Peach  
 7 Flavored Joy Jelly ever anywhere, first of all?  
 8 Have you ever seen that before anywhere?  
 9 MR. RHEINHART: Just so I am clear about  
 10 your question --  
 11 MR. KUVIN: Not necessarily in a home,  
 12 just anywhere in her entire life has she ever  
 13 seen a bottle of something called Peach  
 14 Flavored Joy Jelly.  
 15 THE WITNESS: No, I have not.  
 16 BY MR. KUVIN:  
 17 Q. Okay. Also taken from the home were, was  
 18 an adult sex toy called a Twin Torpedo which,  
 19 according to Detective Recarey during his deposition  
 20 was a double-headed dildo. Not with respect to  
 21 Mr. Epstein, but in your life, have you ever seen  
 22 something called a Twin Torpedo or double-headed  
 23 dildo?  
 24 A. No, I have not.  
 25 Q. Also confiscated from the home was soap in

1 the shape of a penis and vagina. Once again, not  
 2 necessarily with respect to Mr. Epstein's home, in  
 3 your entire life have you ever seen soap in the  
 4 shape of a penis and vagina?  
 5 A. Not that I recall.  
 6 Q. Do you ever recall being in Ohio?  
 7 MR. RHEINHART: Ever in her life?  
 8 MR. KUVIN: The state, ever in her life.  
 9 BY MR. KUVIN:  
 10 Q. Let's start there, recall being in the  
 11 State of Ohio for any reason?  
 12 A. Maybe for a layover, but not that I  
 13 specifically remember.  
 14 Q. Okay. Do you know an Ivan Robles?  
 15 A. No.  
 16 Q. Have you seen a gentleman by the name of  
 17 Alan Dershowitz at the home of Jeffrey Epstein  
 18 before?  
 19 MR. RHEINHART: Objection to the form.  
 20 Standing objection, presumes knowledge of  
 21 Jeffrey Epstein or his home. Instruct the  
 22 witness not to answer.  
 23 THE WITNESS: On the instruction of my  
 24 lawyer, I must exercise my Fifth Amendment  
 25 right.

1 THE WITNESS: On the instruction of my  
 2 lawyer, I must invoke my Fifth Amendment right.  
 3 BY MR. KUVIN:  
 4 Q. Do you agree that these corporations that  
 5 I just mentioned were utilized by Jeffrey Epstein in  
 6 an attempt to have sexual relationships with  
 7 underage girls?  
 8 MR. RHEINHART: Objection to the form as  
 9 to compound, and also assumes knowledge of  
 10 Mr. Epstein, asks for more than one answer to  
 11 the question. I would instruct her not to  
 12 answer based on her Fifth Amendment privilege  
 13 because the question assumes knowledge of  
 14 Mr. Epstein.  
 15 THE WITNESS: Upon instruction of my  
 16 lawyer I must invoke my Fifth Amendment right.  
 17 MR. KUVIN: I think I am done. Hang on  
 18 one second.  
 19 All right. I appreciate it. That's all  
 20 the questions I have at this time. Reserve the  
 21 right to ask any follow-up questions if other  
 22 attorneys raise new and different issues by  
 23 their questioning.  
 24 MR. RHEINHART: Understood.  
 25 MR. KUVIN: Pass the witness at this time.

1 BY MR. KUVIN:  
 2 Q. Have you ever heard of the El Zorro Ranch  
 3 Corporation?  
 4 MR. RHEINHART: Instruct the witness not  
 5 to answer based on her Fifth Amendment  
 6 privilege.  
 7 THE WITNESS: On the instruction of my  
 8 lawyer I must exercise my Fifth Amendment  
 9 right.  
 10 BY MR. KUVIN:  
 11 Q. Have you ever heard of the New York  
 12 Strategy Group?  
 13 MR. RHEINHART: Same instruction.  
 14 THE WITNESS: On the instruction of my  
 15 lawyer, I must invoke my Fifth Amendment right.  
 16 BY MR. KUVIN:  
 17 Q. Have you ever heard of the Ghislaine  
 18 Corporation?  
 19 MR. RHEINHART: Same instruction.  
 20 THE WITNESS: On the instruction of my  
 21 lawyer, I must invoke my Fifth Amendment right.  
 22 BY MR. KUVIN:  
 23 Q. Have you ever heard of the Financial  
 24 Strategy Group?  
 25 MR. RHEINHART: Same instruction.

1 Who wants to go? Mr. Horowitz, do you have a  
 2 microphone?  
 3 MR. HOROWITZ: I do.  
 4 CROSS (SARAH KELLEN)  
 5 BY MR. HOROWITZ:  
 6 Q. Ms. Kellen, did you use the telephone  
 7 number, the (917)855-3363 at any time between 2001  
 8 and 2006?  
 9 A. On the advice of my lawyer, I must exercise my  
 10 Fifth Amendment right.  
 11 Q. Did you use the telephone number  
 12 (917)855-3363 between 2001 and 2006 at Jeffrey  
 13 Epstein's expense?  
 14 MR. RHEINHART: Objection to the form in  
 15 that it assumes knowledge of Jeffrey Epstein.  
 16 Standing objection as previously stated with  
 17 Mr. Kuvin. Instruct the witness not to answer,  
 18 based on her Fifth Amendment right.  
 19 THE WITNESS: On the instruction of my  
 20 lawyer, I must exercise my Fifth Amendment  
 21 right.  
 22 BY MR. HOROWITZ:  
 23 Q. Did you use the telephone number  
 24 (917)855-3363 at Jeffrey Epstein's direction?  
 25 MR. RHEINHART: Same objection as the

1 previous question and the same instruction.  
 2 THE WITNESS: On the instruction of my  
 3 lawyer, I must exercise my Fifth Amendment  
 4 right.  
 5 BY MR. HOROWITZ:  
 6 Q. Was (917)855-3363 a telephone number from  
 7 which you placed telephone calls on behalf of  
 8 Jeffrey Epstein?  
 9 MR. RHEINHART: Same objection as the  
 10 previous question and the same instruction.  
 11 THE WITNESS: On the instruction of my  
 12 lawyer, I must invoke my Fifth Amendment right.  
 13 BY MR. HOROWITZ:  
 14 Q. Between 2001 and 2006, was it your job to  
 15 set up massage tables for Jeffrey Epstein?  
 16 MR. RHEINHART: Same objection as the  
 17 previous question, same instruction.  
 18 THE WITNESS: On the instruction of my  
 19 lawyer, I must invoke my Fifth Amendment right.  
 20 BY MR. HOROWITZ:  
 21 Q. Between 2001 and 2006, was it your job to  
 22 arrange massage oils before Jeffrey Epstein's  
 23 massages?  
 24 MR. RHEINHART: Objection to the form.  
 25 It's compound and assumes facts not admitted to

1 lawyer, I must choose to exercise my Fifth  
 2 Amendment right.  
 3 BY MR. HOROWITZ:  
 4 Q. Did Jeffrey Epstein ever admit to you that  
 5 between the years 2001 and 2006 he had sexual  
 6 contact with underage girls who came to, quote, work  
 7 for him?  
 8 MR. RHEINHART: Objection to the form,  
 9 standing objection previously stated. Also  
 10 ambiguous as to the term "work for him."  
 11 Instruct the witness not to answer based on her  
 12 Fifth Amendment privilege.  
 13 THE WITNESS: On the instruction of my  
 14 lawyer, I must choose to exercise my Fifth  
 15 Amendment right.  
 16 BY MR. HOROWITZ:  
 17 Q. Between the years 2001 and 2006, did  
 18 Jeffrey Epstein ever tell you that he masturbated in  
 19 the presence of underage girls who came to, quote,  
 20 work for him?  
 21 MR. RHEINHART: Objection to the form.  
 22 Standing objection previously stated and  
 23 instruct the witness not to answer.  
 24 THE WITNESS: On the instruction of my  
 25 lawyer, I must exercise my Fifth Amendment

1 be to the knowledge of this witness, and I  
 2 instruct her not to answer based on her Fifth  
 3 Amendment privilege.  
 4 THE WITNESS: On the instruction of my  
 5 lawyer, I must invoke my Fifth Amendment right.  
 6 BY MR. HOROWITZ:  
 7 Q. At any time between 2001 and 2006, was it  
 8 your job to place telephone calls to girls under the  
 9 age of 18 when Jeffrey Epstein was in Palm Beach to  
 10 see if the girls wanted to, quote/unquote, work?  
 11 MR. RHEINHART: Objection to the form as  
 12 compound and instruct the witness not to answer  
 13 based on her Fifth Amendment privilege.  
 14 THE WITNESS: On the instruction of my  
 15 lawyer, I must invoke my Fifth Amendment right.  
 16 BY MR. HOROWITZ:  
 17 Q. Between the years 2001 and 2006, did you  
 18 and Jeffrey Epstein have an understanding between  
 19 the two of you that the term "work" referred to him  
 20 having sexual contact with girls under the age of  
 21 18?  
 22 MR. RHEINHART: Objection to the form,  
 23 standing object, standing objection, and  
 24 instruct the witness not to answer.  
 25 THE WITNESS: On the instruction of my

1 right.  
 2 BY MR. HOROWITZ:  
 3 Q. Do you know a girl named -- or did you  
 4 know a girl named Jane Doe No. 2, (spells name),  
 5 when she was still under the age of 18?  
 6 A. On the instruction of my lawyer, I must choose  
 7 to invoke my Fifth Amendment right.  
 8 Q. Do you acknowledge that Jane Doe No. 2  
 9 came to Jeffrey Epstein's Palm Beach estate in late  
 10 2004?  
 11 MR. RHEINHART: Objection to the form.  
 12 Standing objection previously stated as to  
 13 compound and ambiguous, and I instruct the  
 14 witness not to answer based on her Fifth  
 15 Amendment privilege, based on the prior, based  
 16 on the prior answer to the prior question.  
 17 THE WITNESS: Sorry.  
 18 MR. HOROWITZ: There was a question  
 19 pending.  
 20 MR. RHEINHART: There was a question  
 21 pending. I have instructed you not to answer.  
 22 THE WITNESS: Oh, then upon the  
 23 instruction of my lawyer, I must invoke my  
 24 Fifth Amendment right.  
 25

1 BY MR. HOROWITZ:

2 Q. Between the years 2001 and 2006, did  
3 Jeffrey, did Jeffrey Epstein instruct you to  
4 communicate by telephone to arrange for girls under  
5 the age of 18 to come to his house for his sexual  
6 gratification?

7 MR. RHEINHART: Objection to the form.  
8 Standing objection previously stated, and also  
9 it's ambiguous. Instruct the witness not to  
10 answer based on her Fifth Amendment privilege.

11 THE WITNESS: On the instruction of my  
12 lawyer, I must exercise my Fifth Amendment  
13 privilege.

14 BY MR. HOROWITZ:

15 Q. In late 2004, did you receive a telephone  
16 call wherein you were told that a girl named Jane  
17 Doe No. 3 was bringing Jane Doe No. 2 to Jeffrey  
18 Epstein's home?

19 MR. RHEINHART: Objection to form.  
20 Standing objection, compound, and instruct the  
21 witness not to answer based upon her Fifth  
22 Amendment privilege.

23 THE WITNESS: On the instruction of my  
24 lawyer, I must exercise my Fifth Amendment  
25 right.

1 THE WITNESS: On the instruction of my  
2 lawyer, I must invoke my Fifth Amendment right.

3 BY MR. HOROWITZ:

4 Q. Did you tell Jeffrey Epstein that you had  
5 to confirm by telephone that Jane Doe No. 2 would be  
6 coming to his home at a specific time to give him a  
7 massage?

8 MR. RHEINHART: Objection to the form,  
9 standing objection as previously stated, and  
10 the same instruction to the witness.

11 THE WITNESS: On the instruction of my  
12 lawyer, I must invoke my Fifth Amendment right.

13 BY MR. HOROWITZ:

14 Q. Did Jeffrey Epstein tell you that it was  
15 his intent during the course of Jane Doe No. 2's  
16 visit to his home to have sexual contact with her?

17 MR. RHEINHART: Objection to the form as  
18 previously stated to the last question and same  
19 instruction to the witness.

20 THE WITNESS: On the instruction of my  
21 lawyer, I must invoke my Fifth Amendment right.

22 BY MR. HOROWITZ:

23 Q. At any point did Jane Doe No. 2 tell you  
24 that she was 18 years old or older?

25 MR. RHEINHART: Objection to the form,

1 BY MR. HOROWITZ:

2 Q. Did Jeffrey Epstein observe you receive a  
3 telephone call wherein you were told that Jane Doe  
4 No. 3 was bringing Jane Doe No. 2 to his home?

5 MR. RHEINHART: Standing objection to the  
6 form as stated to the previous question, same  
7 instruction.

8 THE WITNESS: On the instruction of my  
9 lawyer, I must invoke my Fifth Amendment right.

10 BY MR. HOROWITZ:

11 Q. Did Jeffrey Epstein instruct you to  
12 communicate by telephone to arrange for Jane Doe  
13 No. 2 to come to his home for his sexual  
14 gratification?

15 MR. RHEINHART: Standing objection as  
16 previously stated, same instruction to the  
17 witness.

18 THE WITNESS: On the instruction of my  
19 lawyer, I must invoke my Fifth Amendment right.

20 BY MR. HOROWITZ:

21 Q. Did Jeffrey Epstein inform you that Jane  
22 Doe No. 2 would be giving him a massage that was  
23 sexual in nature?

24 MR. RHEINHART: Standing objection to the  
25 form and the same instruction to the witness.

1 assumes knowledge of a person by the name of  
2 Jane Doe No. 2. It's a compound question and  
3 instruct the witness not to answer.

4 THE WITNESS: On the instruction of my  
5 lawyer, I must invoke my Fifth Amendment right.

6 BY MR. HOROWITZ:

7 Q. In your own mind, is it, is it accurate to  
8 say that you never believed that Jane Doe No. 2 was  
9 18 or older, correct?

10 MR. RHEINHART: Objection to the form,  
11 same basis as the prior question, and the same  
12 instruction.

13 THE WITNESS: On the instruction of my  
14 lawyer, I must invoke my Fifth Amendment right.

15 BY MR. HOROWITZ:

16 Q. Did Jane Doe No. 2 tell you that she  
17 attended Royal Palm Beach High School?

18 MR. RHEINHART: Same objection as the  
19 previous question, same instruction.

20 THE WITNESS: On the instruction of my  
21 lawyer, I must invoke my Fifth Amendment right.

22 BY MR. HOROWITZ:

23 Q. Are you aware -- did, did Jeffrey Epstein  
24 tell you that he sexually abused Jane Doe No. 2 when  
25 she was a child?

1 MR. RHEINHART: Objection to the form.  
2 Standing objection relating to Jeffrey Epstein  
3 or any knowledge of Jeffrey Epstein. Also as  
4 to Jane Doe No. 2, same instruction to the  
5 witness.

6 THE WITNESS: On the instruction of my  
7 lawyer, I must invoke my Fifth Amendment right.  
8 BY MR. HOROWITZ:

9 Q. Did Jeffrey Epstein instruct you to take  
10 Jane Doe No. 2's name and telephone number for the  
11 purpose of calling her to come to his house for more  
12 sexual activity?

13 MR. RHEINHART: Objection to the form.  
14 Standing objection, same objection to the  
15 previous question, same instruction.

16 THE WITNESS: On the instruction of my  
17 lawyer, I must invoke my Fifth Amendment right.  
18 BY MR. HOROWITZ:

19 Q. Did Jeffrey Epstein instruct you to put  
20 Jane Doe No. 2's name and telephone number into a  
21 master journal or log in which you and he archived  
22 the names and contact information of teenage girls?

23 MR. RHEINHART: Objection to the form,  
24 standing objection, otherwise compound and  
25 instruct the witness not to answer.

1 answer that. You can move on.

2 MR. HOROWITZ: You're, you're directing  
3 her not to answer that?

4 MR. RHEINHART: I'm directing her not to  
5 answer that question because there are, there  
6 are legal bases for the objections that  
7 underlie the Fifth Amendment invocation, and at  
8 some point presumably a judge will rule on  
9 those before the jury ever hears this.

10 BY MR. HOROWITZ:

11 Q. Ms. Kellen, did you know a girl named Jane  
12 Doe No. 3 when she was still a child?

13 MR. RHEINHART: Objection to the form as  
14 to what you mean by when you say a child and  
15 also assumes knowledge of a person, so I  
16 instruct the witness not to answer.

17 THE WITNESS: On the instruction of my  
18 lawyer, I must invoke my Fifth Amendment right.  
19 BY MR. HOROWITZ:

20 Q. Did, did Jeffrey Epstein instruct you to  
21 communicate by telephone with Haley Robson for the  
22 purpose of arranging for underage girls to come to  
23 his house so that he, Jeffrey Epstein, could engage  
24 in sexual activity?

25 MR. RHEINHART: Objection to the form.

1 THE WITNESS: On the instruction of my  
2 lawyer, I must invoke my Fifth Amendment right.  
3 BY MR. HOROWITZ:

4 Q. Did you, in fact, place Jane Doe No. 2's  
5 name and telephone number into a master journal or  
6 log in which you and Jeffrey Epstein archived the  
7 names and contact information for teenage girls?

8 MR. RHEINHART: Objection to the form,  
9 same as the previous question, ambiguous and  
10 compound, and I instruct the witness not to  
11 answer.

12 THE WITNESS: On the instruction of my  
13 lawyer, I must invoke my Fifth Amendment right.  
14 BY MR. HOROWITZ:

15 Q. You have asserted a Fifth Amendment  
16 objection as to a number of my questions relating to  
17 Jane Doe No. 2. Is there any reason in your mind a  
18 jury should not infer from your responses today that  
19 you did, in fact, assist Mr. Epstein in procuring  
20 minors for sexual activity?

21 MR. RHEINHART: Right. Objection to the  
22 form. We're not going to answer that. That  
23 calls for a legal conclusion, and for her to  
24 speculate on legal objections that have been  
25 made by her counsel, and we're not going to

1 Standing objection, compound and ambiguous.  
2 Instruct the witness not to answer on Fifth  
3 Amendment grounds.

4 THE WITNESS: On the instruction of my  
5 lawyer, I must invoke my Fifth Amendment right.  
6 BY MR. HOROWITZ:

7 Q. Did Jeffrey Epstein instruct you to  
8 communicate by telephone to arrange for Jane Doe No.  
9 3 to give him a massage?

10 MR. RHEINHART: Same objection as stated  
11 to the previous question, and standing  
12 objection, and instruct the witness not to  
13 answer.

14 THE WITNESS: On the instruction of my  
15 lawyer, I must invoke my Fifth Amendment right.  
16 BY MR. HOROWITZ:

17 Q. Did Jeffrey Epstein inform you that the  
18 massage Jane Doe No. 3 was to give him would be  
19 sexual in nature?

20 MR. RHEINHART: Same standing objection  
21 previously stated, and I instruct the witness  
22 not to answer.

23 THE WITNESS: On the instruction of my  
24 lawyer, I must invoke my Fifth Amendment right.  
25



1 BY MR. HOROWITZ:  
 2 Q. Did Jeffrey Epstein observe you speaking  
 3 with Haley Robson by telephone arranging for Jane  
 4 Doe No. 3 to come to his home to give him a massage?  
 5 MR. RHEINHART: Objection to the form.  
 6 Standing objection, otherwise compound and  
 7 ambiguous and instruct the witness not to  
 8 answer.  
 9 THE WITNESS: On the instruction of my  
 10 lawyer, I must invoke the Fifth Amendment  
 11 right.  
 12 BY MR. HOROWITZ:  
 13 Q. Did you tell Jeffrey Epstein that you had  
 14 confirmed by telephone that Jane Doe No. 3 would be  
 15 coming to his home, his home at a specific time to  
 16 give him a massage?  
 17 MR. RHEINHART: Same objection as stated  
 18 to the previous question. Same instruction to  
 19 the witness.  
 20 THE WITNESS: On the instruction of my  
 21 lawyer, I must invoke my Fifth Amendment right.  
 22 BY MR. HOROWITZ:  
 23 Q. Did Jeffrey Epstein tell you it was his  
 24 intent during the course of Jane Doe No. 3's visit  
 25 to his home to engage her in sexual activity?

1 MR. RHEINHART: Same objection to the  
 2 previous question, same instruction.  
 3 THE WITNESS: On the instruction of my  
 4 lawyer, I must invoke my Fifth Amendment right.  
 5 BY MR. HOROWITZ:  
 6 Q. Jane Doe No. 3 told you she attended Royal  
 7 Palm High School, correct?  
 8 MR. RHEINHART: Instruct the witness not  
 9 to answer based on her Fifth Amendment  
 10 privilege.  
 11 THE WITNESS: On the instruction of my  
 12 lawyer, I must invoke my Fifth Amendment right.  
 13 BY MR. HOROWITZ:  
 14 Q. Did Jeffrey Epstein instruct you to take  
 15 Jane Doe No. 3's name and telephone number for the  
 16 purpose of calling her to come back to his home for  
 17 more sexual activity?  
 18 MR. RHEINHART: Objection to the form,  
 19 standing objection previously stated. Instruct  
 20 the witness not to answer.  
 21 THE WITNESS: On the instruction of my  
 22 lawyer I must invoke my Fifth Amendment right.  
 23 BY MR. HOROWITZ:  
 24 Q. Did you, in fact, after Jane Doe No. 3's  
 25 first visit to Jeffrey Epstein's home, call her to

1 MR. RHEINHART: Same objection stated to  
 2 the previous two questions and the same  
 3 instruction.  
 4 THE WITNESS: On the instruction of my  
 5 lawyer, I must invoke my Fifth Amendment right.  
 6 BY MR. HOROWITZ:  
 7 Q. Did Jeffrey Epstein tell you that during  
 8 the course of Jane Doe No. 3's visit to his home,  
 9 that he did, in fact, persuade her to engage in  
 10 sexual activity?  
 11 MR. RHEINHART: Objection to the form.  
 12 Standing objection previously stated. Instruct  
 13 the witness not to answer.  
 14 THE WITNESS: On the instruction of my  
 15 lawyer, I must invoke my Fifth Amendment right.  
 16 BY MR. HOROWITZ:  
 17 Q. At any point did Jane Doe No. 3 tell you  
 18 that she was 18 or older?  
 19 MR. RHEINHART: Objection to the form and  
 20 instruct the witness not to answer.  
 21 THE WITNESS: On the instruction of my  
 22 lawyer, I must invoke my Fifth Amendment right.  
 23 BY MR. HOROWITZ:  
 24 Q. In your mind you didn't believe that Jane  
 25 Doe No. 3 was 18 or older, correct?

1 arrange for her to come back to his house for more  
 2 sexual activity?  
 3 MR. RHEINHART: Standing objection to the  
 4 form of the question. Instruct the witness not  
 5 to answer.  
 6 THE WITNESS: On the instruction of my  
 7 lawyer I must invoke my Fifth Amendment right.  
 8 BY MR. HOROWITZ:  
 9 Q. Did Jeffrey Epstein instruct you to put  
 10 Jane Doe No. 3's name and telephone number into a  
 11 master journal or log in which you and he archived  
 12 the names and contact information for underage  
 13 girls?  
 14 MR. RHEINHART: Objection to the form,  
 15 standing objection. Otherwise compound and  
 16 ambiguous and instruct the witness not to  
 17 answer.  
 18 THE WITNESS: On the instruction of my  
 19 lawyer I must invoke the Fifth Amendment.  
 20 BY MR. HOROWITZ:  
 21 Q. Did you, in fact, put Jane Doe No. 3's  
 22 name and telephone number into a master journal or  
 23 log, in which you and Jeffrey Epstein had archived  
 24 the names and information of teenage girls?  
 25 MR. RHEINHART: Objection to the form,

1 standing objection and otherwise compound and  
 2 instruct the witness not to answer.  
 3 THE WITNESS: On the instruction of my  
 4 lawyer, I must exercise my Fifth Amendment  
 5 right.  
 6 BY MR. HOROWITZ:  
 7 Q. Okay. You've asserted a Fifth Amendment  
 8 objection and assertion of the privilege as to my  
 9 questions about Jane Doe No. 3. Is there any reason  
 10 why a jury should not infer from your assertion of  
 11 the privilege that you did, in fact, assist  
 12 Jeffrey Epstein in procuring minors for his sexual  
 13 pleasure?  
 14 MR. RHEINHART: Same objection I stated  
 15 the last time as to the other client. There  
 16 have been legal objections lodged to the  
 17 questions. If a judge rules as to the legality  
 18 of the questions and the propriety of the  
 19 answers, then the jury can draw whatever  
 20 inference the judge's instructs them to draw,  
 21 but until then we're not going to speculate on  
 22 what the jury ought to conclude based on  
 23 questions that haven't been ruled to be proper.  
 24 MR. HOROWITZ: So we're clear, you have  
 25 instructed her not to answer?

1 answer.  
 2 THE WITNESS: On the instruction of my  
 3 lawyer, I must invoke my Fifth Amendment right.  
 4 BY MR. HOROWITZ:  
 5 Q. Did you, in fact, communicate with  
 6 Haley Robson by telephone to arrange for Jane Doe  
 7 No. 4 to come to Jeffrey Epstein's home?  
 8 MR. RHEINHART: Standing objection as  
 9 previously stated. Instruct the witness not to  
 10 answer.  
 11 THE WITNESS: On the instruction of my  
 12 lawyer, I must invoke my Fifth Amendment right.  
 13 BY MR. HOROWITZ:  
 14 Q. Did Jeffrey Epstein inform you that the  
 15 massage Jane Doe No. 4 was to give him would be  
 16 sexual in nature?  
 17 MR. RHEINHART: Objection to the form.  
 18 Standing objection previously stated. Instruct  
 19 the witness not to answer.  
 20 THE WITNESS: On the instruction of my  
 21 lawyer, I must invoke my Fifth Amendment right.  
 22 BY MR. HOROWITZ:  
 23 Q. Did Jeffrey Epstein observe you speaking  
 24 with Haley Robson to arrange for Jane Doe No. 4 to  
 25 come to his home for sexual activity?

1 MR. RHEINHART: I've instructed her not to  
 2 answer, yes.  
 3 BY MR. HOROWITZ:  
 4 Q. Ms. Kellen, did you know a girl named Jane  
 5 Doe No. 4 when she was still a child?  
 6 A. On the instruction of my lawyer, I must invoke  
 7 my Fifth Amendment right.  
 8 Q. Did Jane Doe No. 4 come to  
 9 Jeffrey Epstein's Palm Beach home on multiple  
 10 occasions between 2003 and 2005?  
 11 MR. RHEINHART: Objection to the form,  
 12 standing objection. Otherwise compound and  
 13 instruct the witness not to answer based on her  
 14 Fifth Amendment privilege.  
 15 THE WITNESS: On the instruction of my  
 16 lawyer, I must choose to invoke my Fifth  
 17 Amendment right.  
 18 BY MR. HOROWITZ:  
 19 Q. At any time prior to May of 2005 did  
 20 Jeffrey Epstein instruct you to communicate with  
 21 Haley Robson by telephone to arrange for Jane Doe  
 22 No. 4 to come to his home?  
 23 MR. RHEINHART: Standing objection to the  
 24 form of the question. Otherwise ambiguous and  
 25 compound, and instruct the witness not to

1 MR. RHEINHART: Objection to the form.  
 2 Standing objection as previously stated, and  
 3 compound and ambiguous and instruct the witness  
 4 not to answer.  
 5 THE WITNESS: On the instruction of my  
 6 lawyer, I choose to invoke my Fifth Amendment  
 7 right.  
 8 BY MR. HOROWITZ:  
 9 Q. Prior to May of 2005, did you answer phone  
 10 calls at Jeffrey Epstein's home from Jane Doe No. 4  
 11 during which you arranged for Jane Doe No. 4 to come  
 12 to Jeffrey Epstein's home?  
 13 MR. RHEINHART: Objection to the form.  
 14 Standing objection previously stated. It's  
 15 compound, and instruct the witness not to  
 16 answer.  
 17 THE WITNESS: At the instruction of my  
 18 lawyer, I must invoke my Fifth Amendment right.  
 19 BY MR. HOROWITZ:  
 20 Q. Prior to May of 2005, did Jeffrey Epstein  
 21 observe you speaking with Jane Doe No. 4 by  
 22 telephone after your making arrangements for Jeff --  
 23 for Jane Doe No. 4 to come to his home?  
 24 MR. RHEINHART: Objection to the form,  
 25 standing objection, and instruct the witness

1 not to answer.  
 2 THE WITNESS: On the instruction of my  
 3 lawyer, I must invoke my Fifth Amendment right.  
 4 BY MR. HOROWITZ:  
 5 Q. Prior to May of 2005, did Jeffrey Epstein  
 6 instruct you to get Jane Doe No. 4's telephone  
 7 number so that you could communicate with her for  
 8 the purpose of scheduling future massages?  
 9 MR. RHEINHART: Objection to the form,  
 10 standing objection, otherwise compound and  
 11 instruct the witness not to answer.  
 12 THE WITNESS: On the instruction of my  
 13 lawyer, I must invoke my Fifth Amendment  
 14 privilege.  
 15 BY MR. HOROWITZ:  
 16 Q. Did you on multiple occasions tell Jeffrey  
 17 Epstein that you had confirmed by telephone that  
 18 Jane Doe No. 4 would be coming to his home for a --  
 19 at a specific time to give him a massage?  
 20 MR. RHEINHART: Objection to the form.  
 21 It's compound and standing objection as well,  
 22 and instruct the witness not to answer.  
 23 THE WITNESS: On the instruction of my  
 24 lawyer, I must invoke my Fifth Amendment  
 25 privilege.

1 Standing objection and instruct the witness not  
 2 to answer.  
 3 THE WITNESS: On the instruction of my  
 4 lawyer, I must invoke my Fifth Amendment right.  
 5 BY MR. HOROWITZ:  
 6 Q. Did Jane Doe No. 4 tell you and  
 7 Jeffrey Epstein that she attended Royal Palm Beach  
 8 High School?  
 9 MR. RHEINHART: Objection to the form,  
 10 standing objection, instruct the witness not to  
 11 answer.  
 12 THE WITNESS: On the instruction of my  
 13 lawyer, I must invoke my Fifth Amendment right.  
 14 BY MR. HOROWITZ:  
 15 Q. Did Jane Doe No. 4 regularly discuss her  
 16 life at Royal Palm Beach High School with you in the  
 17 presence of Jeffrey Epstein?  
 18 MR. RHEINHART: Objection to form,  
 19 standing objection as well as ambiguous as to  
 20 what "regularly" means. Instruct the witness  
 21 not to answer.  
 22 THE WITNESS: On the instruction of my  
 23 lawyer, I must invoke my Fifth Amendment right.  
 24 BY MR. HOROWITZ:  
 25 Q. Did Jane Doe No. 4 come to Jeffrey

1 BY MR. HOROWITZ:  
 2 Q. Did Jeffrey Epstein tell you it was his  
 3 intent during the course of Jane Doe No. 4's visits  
 4 to his home to induce her to engage in sexual  
 5 activity?  
 6 MR. RHEINHART: Objection to the form,  
 7 standing objection and instruct the witness not  
 8 to answer.  
 9 THE WITNESS: On the instruction of my  
 10 lawyer, I must invoke my Fifth Amendment right.  
 11 BY MR. HOROWITZ:  
 12 Q. Did Jeffrey Epstein tell you that, in  
 13 fact, during Jane Doe No. 4 -- 4's visits to his  
 14 home, he was able to induce her to engage in sexual  
 15 activity?  
 16 MR. RHEINHART: Objection to the form,  
 17 same objection as the previous questions.  
 18 Instruct the witness not to answer.  
 19 THE WITNESS: On the instruction of my  
 20 lawyer, I must invoke my Fifth Amendment right.  
 21 BY MR. HOROWITZ:  
 22 Q. Did both you and Jeffrey Epstein know that  
 23 Jane Doe No. 4 was younger than 18 when she came to  
 24 Jeffrey Epstein's home in 2003 and 2004?  
 25 MR. RHEINHART: Objection to the form.

1 Epstein's Palm Beach home on dozens of occasions  
 2 between 2003 and May of 2005, to give him massages  
 3 during which he engaged her in sexual activity?  
 4 MR. RHEINHART: Objection to the form,  
 5 standing objection. It's also otherwise  
 6 compound and instruct the witness not to  
 7 answer.  
 8 THE WITNESS: On the instruction of my  
 9 lawyer, I must invoke my Fifth Amendment right.  
 10 BY MR. HOROWITZ:  
 11 Q. Prior to May of 2005, did Jeffrey Epstein  
 12 instruct you to communicate with Jane Doe No. 4, via  
 13 telephone, to arrange for Jane Doe No. 4 to come to  
 14 his Palm Beach home so he could engage Jane Doe  
 15 No. 4 in sexual activity?  
 16 MR. RHEINHART: Objection to the form as  
 17 stated in the previous question. Same  
 18 instruction to the witness.  
 19 THE WITNESS: On the instruction of my  
 20 lawyer, I must invoke my Fifth Amendment right.  
 21 BY MR. HOROWITZ:  
 22 Q. Did Jeffrey Epstein instruct you to tell  
 23 Jane Doe No. 4 to lie to police investigators during  
 24 the course of their 2005 investigation?  
 25 MR. RHEINHART: Objection to the form as

1 stated to the last several questions and  
 2 instruct the witness not to answer.  
 3 THE WITNESS: On the instruction of my  
 4 lawyer, I must invoke my Fifth Amendment right.  
 5 BY MR. HOROWITZ:  
 6 Q. Did you, in fact, tell Jane Doe No. 4 to  
 7 lie to police invest, investigators during the  
 8 course of their 2005 investigation of Jeffrey  
 9 Epstein?  
 10 MR. RHEINHART: Object to the form because  
 11 it presumes knowledge of Jane Doe No. 4.  
 12 Instruct the witness not to answer.  
 13 THE WITNESS: Upon the instruction of my  
 14 lawyer, I must invoke my Fifth Amendment right.  
 15 BY MR. RHEINHART:  
 16 Q. Okay. You've asserted a Fifth Amendment  
 17 objection and privilege as to my questions about  
 18 Jane Doe No. 4, yourself, and Jeffrey Epstein. Is  
 19 there any reason in your mind why a jury should not  
 20 infer from your assertion of the privilege that you  
 21 did, in fact, assist Mr. Epstein in committing  
 22 sexual abuse upon Jane Doe No. 4?  
 23 MR. RHEINHART: I am going to instruct the  
 24 witness not to answer the question for the  
 25 reasons I stated at the last client that we

1 MR. RHEINHART: Objection to the form.  
 2 It's a compound question and standing objection  
 3 as well. Instruct the witness not to answer.  
 4 THE WITNESS: On the instruction of my  
 5 lawyer, I must invoke my Fifth Amendment right.  
 6 BY MR. HOROWITZ:  
 7 Q. Did you inform Jeffrey Epstein that you  
 8 had been provided Jane Doe No. 5's telephone number?  
 9 MR. RHEINHART: Same objection as the  
 10 previous question, same instruction.  
 11 THE WITNESS: Upon instruction of my  
 12 lawyer, I must invoke my Fifth Amendment right.  
 13 BY MR. HOROWITZ:  
 14 Q. Did Jeffrey Epstein instruct you to call  
 15 Jane Doe No. 5 to come to his home and give him a  
 16 massage in either 2001 or 2002?  
 17 MR. RHEINHART: Objection to the form,  
 18 same objection as the previous questions and  
 19 same instruction to the witness.  
 20 THE WITNESS: On the instruction of my  
 21 lawyer, I must invoke my Fifth Amendment right.  
 22 BY MR. HOROWITZ:  
 23 Q. Did Jeffrey Epstein inform you that the  
 24 massage Jane Doe No. 5 was to give him would be  
 25 sexual in nature?

1 discussed. The questions are legally not  
 2 proper in our view, and therefore the questions  
 3 and answers should not be held against her  
 4 until a judge rules on the propriety of the  
 5 questions. And we can address that another  
 6 day. I'm instructing her not to answer.  
 7 BY MR. HOROWITZ:  
 8 Q. Okay. Ms. Kellen, do you know a girl  
 9 named Jane Doe No. 5 when she was still a child  
 10 under the age of 18?  
 11 A. At the instruction my lawyer, I must invoke my  
 12 Fifth Amendment right.  
 13 Q. Did a child under the age of 18 named Jane  
 14 Doe No. 5 come to Jeffrey Epstein's Palm Beach home  
 15 in approximately 2001 or 2002?  
 16 MR. RHEINHART: Objection to the form.  
 17 Instruct the witness not to answer.  
 18 THE WITNESS: On the instruction of my  
 19 lawyer, I must invoke my Fifth Amendment right.  
 20 BY MR. HOROWITZ:  
 21 Q. In 2001 or 2002 did you inform  
 22 Jeffrey Epstein that you received a telephone call  
 23 in which you were referred to an underage girl named  
 24 Jane Doe No. 5 who would be willing to come to his  
 25 home to give him a massage for money?

1 MR. RHEINHART: Same objection previously  
 2 stated, standing objection and instruct the  
 3 witness not to answer.  
 4 THE WITNESS: Upon the instruction of my  
 5 lawyer, I must invoke my Fifth Amendment right.  
 6 BY MR. HOROWITZ:  
 7 Q. Did Jeffrey Epstein observe you speaking  
 8 with Jane Doe No. 5 on the telephone to arrange for  
 9 Jane Doe No. 5 to come to his home for a massage?  
 10 MR. RHEINHART: Same objection as previous  
 11 questions and same, to the form of the  
 12 question, and same instruction.  
 13 THE WITNESS: Upon the instruction of my  
 14 lawyer, I must invoke my Fifth Amendment right.  
 15 BY MR. HOROWITZ:  
 16 Q. Did you tell Jeffrey Epstein that you had  
 17 confirmed by telephone that Jane Doe No. 5 would be  
 18 at his home at a specific time to give him a  
 19 massage?  
 20 MR. RHEINHART: Objection to the form and  
 21 instruct the witness not to answer.  
 22 THE WITNESS: On the instruction of my  
 23 lawyer, I must invoke my Fifth Amendment right.  
 24 BY MR. HOROWITZ:  
 25 Q. Did Jeffrey Epstein tell you that it was

1 his intent, during the course of Jane Doe No. 5's  
2 visit to his home, to persuade her to engage in  
3 sexual activity?

4 MR. RHEINHART: Objection to the form,  
5 standing objection. Instruct the witness not  
6 to answer based on Fifth Amendment.

7 THE WITNESS: On the instruction of my  
8 lawyer, I must invoke my Fifth Amendment right.  
9 BY MR. HOROWITZ:

10 Q. Did Jeffrey Epstein tell you that during  
11 the course of Jane Doe No. 5's visit to his home in  
12 either 2001 or 2002 that he succeeded in persuading  
13 her to engage in sexual activity with him?

14 MR. RHEINHART: Objection to the form,  
15 standing objection. Otherwise compound and  
16 instruct the witness not to answer based on the  
17 Fifth Amendment.

18 THE WITNESS: On the instruction by my  
19 lawyer, I must invoke my Fifth Amendment right.  
20 BY MR. HOROWITZ:

21 Q. Did Jeffrey Epstein instruct you to take  
22 Jane Doe No. 5's name and telephone number down so  
23 that you and he could call Jane Doe No. 5 to come to  
24 his home for more sexual activity?

25 MR. RHEINHART: Objection to the form.

1 Amendment objection or privilege as to my questions  
2 about Jane Doe No. 5. Is there any reason in your  
3 mind why a jury should not infer that the reason  
4 you're asserting the Fifth Amendment is because you  
5 and Jeffrey Epstein committed a crime in inducing  
6 and enticing Jane Doe No. 5 to come to his home for  
7 sexual activity?

8 MR. RHEINHART: Once again, I instruct the  
9 witness not to answer. Legal basis is the  
10 question is not reasonably calculated to lead  
11 to admissible evidence. It's not otherwise  
12 proper discovery. And for the reasons I stated  
13 as to the prior witnesses, until the legality  
14 and propriety of the questions is ruled upon by  
15 the court, there should be no inference drawn.

16 BY MR. HOROWITZ:

17 Q. Ms. Kellen --

18 MR. RHEINHART: One second. Go ahead.  
19 I'm sorry.

20 MR. HOROWITZ: You're conferring about a  
21 privilege I trust?

22 MR. RHEINHART: Yes, privilege issue.

23 BY MR. HOROWITZ:

24 Q. Ms. Kellen, do, did you know a girl named  
25 Jane Doe No. 6 when she was still a child under the

1 Instruct the witness not to answer.

2 THE WITNESS: On the instruction of my  
3 lawyer, I must invoke my Fifth Amendment right.  
4 BY MR. HOROWITZ:

5 Q. After Jane Doe No. 5's first visit, did  
6 Jeffrey Epstein instruct you to call her on the  
7 telephone to arrange for her to come back for more  
8 sexual activity?

9 MR. RHEINHART: Objection to the form as  
10 previously stated, and form, standing objection  
11 and instruct the witness not to answer.

12 THE WITNESS: On the instruction of my  
13 lawyer, I must invoke my Fifth Amendment right.  
14 BY MR. HOROWITZ:

15 Q. Did you, in fact, call Jane Doe No. 5 on  
16 the telephone to arrange for her to come back to  
17 Jeffrey Epstein's home for more sexual activity?

18 MR. RHEINHART: Same objection previously  
19 stated, and standing objection, and instruct  
20 the witness not to answer and objection to  
21 form.

22 THE WITNESS: On the instruction of my  
23 lawyer, I must invoke my Fifth Amendment right.  
24 BY MR. HOROWITZ:

25 Q. Ms. Kellen, you have asserted a Fifth

1 age of 18?

2 A. At the advice of counsel, I must invoke my  
3 Fifth Amendment right.

4 Q. Ms. Kellen, did Jane Doe No. 6 come to  
5 Jeffrey Epstein's Palm Beach home in approximately  
6 August of 2004 when she was still a child?

7 MR. RHEINHART: Objection to the form,  
8 standing objection, and instruct the witness  
9 not to answer.

10 THE WITNESS: On the instruction of  
11 counsel, I must invoke my Fifth Amendment  
12 right.

13 BY MR. HOROWITZ:

14 Q. Ms. Kellen, were you aware that Jane Doe  
15 No. 6 was just 13 years old when she came to Jeffrey  
16 Epstein's home in August of 2004?

17 MR. RHEINHART: Objection to the form. It  
18 assumes multiple facts. It's therefore  
19 compound. Instruct the witness not to answer.

20 THE WITNESS: On the advice of counsel, I  
21 must invoke my Fifth Amendment right.

22 BY MR. HOROWITZ:

23 Q. In 2004 did you receive a phone call from  
24 a girl named E.W. wherein she stated she was  
25 bringing Jane Doe No. 6 to Jeffrey Epstein's home

1 for a massage?  
 2 MR. RHEINHART: Objection to the form.  
 3 Instruct the witness not to answer.  
 4 THE WITNESS: On the advice of counsel, I  
 5 must invoke my Fifth Amendment right.  
 6 BY MR. HOROWITZ:  
 7 Q. Did Jeffrey Epstein instruct you to  
 8 communicate by telephone with E.W. for the purpose  
 9 of under -- arranging for underage minor girls to  
 10 come to his home for a massage?  
 11 MR. RHEINHART: Objection to the form.  
 12 It's a compound question. Instruct the witness  
 13 not to answer.  
 14 THE WITNESS: On the advice of counsel, I  
 15 must invoke my Fifth Amendment right.  
 16 BY MR. HOROWITZ:  
 17 Q. Did you, in fact, communicate by telephone  
 18 with E.W. for the purpose of arranging for underage  
 19 minor girls to come to Jeffrey Epstein's home to  
 20 give him a massage?  
 21 MR. RHEINHART: Same objection stated to  
 22 the previous question. Same instruction to the  
 23 witness.  
 24 THE WITNESS: On the instruction of my  
 25 lawyer, I must invoke my Fifth Amendment right.

1 THE WITNESS: On the instruction of my  
 2 lawyer, I must invoke my Fifth Amendment right.  
 3 BY MR. HOROWITZ:  
 4 Q. Did Jeffrey Epstein observe you speaking  
 5 with E.W. by telephone to arrange for Jane Doe No. 6  
 6 to come to his home for a massage?  
 7 MR. RHEINHART: Objection to the form,  
 8 standing objection and otherwise compound  
 9 instruct the witness not to answer.  
 10 THE WITNESS: On the instruction of my  
 11 lawyer, I must invoke my Fifth Amendment right.  
 12 BY MR. HOROWITZ:  
 13 Q. Did Jeffrey Epstein confirm with you that  
 14 you had spoken with E.W. by telephone to confirm a  
 15 specific time that Jane Doe No. 6 would be at his  
 16 home?  
 17 MR. RHEINHART: Objection to the form,  
 18 standing objection. Instruct the witness not  
 19 to answer.  
 20 THE WITNESS: On the instruction of my  
 21 lawyer, I choose to invoke my Fifth Amendment  
 22 right.  
 23 BY MR. HOROWITZ:  
 24 Q. Did Jeffrey Epstein tell you that it was  
 25 his intention during the course of Jane Doe No. 6's

1 BY MR. HOROWITZ:  
 2 Q. In 2004 did Jeffrey Epstein instruct you  
 3 to communicate with E.W. by telephone to arrange for  
 4 Jane Doe No. 6 to give him, to give him a massage  
 5 for his own sexual gratification?  
 6 MR. RHEINHART: Objection to the form for  
 7 the same reasons stated to the previous  
 8 questions and instruct the witness not to  
 9 answer.  
 10 THE WITNESS: On the instruction of my  
 11 lawyer I must invoke my Fifth Amendment right.  
 12 BY MR. HOROWITZ:  
 13 Q. Did you, in fact, communicate with E.W. by  
 14 telephone to arrange for Jane Doe No. 6 to come to  
 15 Jeffrey Epstein's home for his sexual gratification?  
 16 MR. RHEINHART: Objection to the form.  
 17 Instruct the witness not to answer.  
 18 THE WITNESS: On the instruction of my  
 19 lawyer, I must invoke my Fifth Amendment right.  
 20 BY MR. HOROWITZ:  
 21 Q. Did Jeffrey Epstein inform you that the  
 22 massage Jane Doe No. 6 was to give him would be  
 23 sexual in nature?  
 24 MR. RHEINHART: Objection to the form.  
 25 Instruct the witness not to answer.

1 visit to his home to persuade her to engage in  
 2 sexual activity with him?  
 3 MR. RHEINHART: Objection to the form,  
 4 standing objection. Instruct the witness not  
 5 to answer.  
 6 THE WITNESS: At the instruction of my  
 7 lawyer, I must choose to invoke my Fifth  
 8 Amendment right.  
 9 BY MR. HOROWITZ:  
 10 Q. Did Jeffrey Epstein tell you that during  
 11 the course of Jane Doe No. 6's visit to his home he  
 12 succeeded in persuading her to engage in sexual  
 13 activity with him?  
 14 MR. RHEINHART: Same objection as stated  
 15 to the previous question to form. Instruct the  
 16 witness not to answer.  
 17 THE WITNESS: On the instruction of my  
 18 lawyer, I must invoke my Fifth Amendment right.  
 19 BY MR. HOROWITZ:  
 20 Q. Did Jeffrey Epstein instruct you to take  
 21 Jane Doe No. 6's name and telephone number to call  
 22 her to come to his home for more sexual activity  
 23 with him?  
 24 MR. RHEINHART: Objection to the form.  
 25 Instruct the witness not to answer.

1 THE WITNESS: On the instruction of my  
2 lawyer, I must invoke my Fifth Amendment right.  
3 BY MR. HOROWITZ:

4 Q. Did you, in fact, take Jane Doe No. 6's  
5 name and telephone number down so that you could  
6 call her to come to Jeffrey Epstein's home for more  
7 sexual activity?

8 MR. RHEINHART: Objection to form.  
9 Instruct the witness not to answer.

10 THE WITNESS: At the instruction of my  
11 lawyer, I must invoke my Fifth Amendment right.

12 BY MR. HOROWITZ:  
13 Q. Did Jeffrey Epstein instruct you to put  
14 Jane Doe No. 6's name and telephone number into a  
15 master journal or log in which he archived the names  
16 and contact information of teenage girls with whom  
17 he had sexual activity?

18 MR. RHEINHART: Objection to the form.  
19 Instruct the witness not to answer.

20 THE WITNESS: On the instruction of my  
21 lawyer, I must invoke my Fifth Amendment right.

22 BY MR. HOROWITZ:  
23 Q. Did you, in fact, put Jane Doe No. 6's  
24 name and telephone number into a master journal or  
25 log in which you and Jeffrey Epstein archived the

1 MR. RHEINHART: Instruct the witness not  
2 to answer the question for the legal reasons I  
3 previously stated. Also the Fifth Amendment is  
4 designed to protect both the innocent and the  
5 guilty, and I would just assert the same things  
6 I previously said, that until a judge rules on  
7 the propriety of the questions, there should be  
8 no negative inference drawn from the answer.

9 BY MR. HOROWITZ:

10 Q. Ms. Kellen, are you asserting your  
11 Fifth Amendment privilege today because you're an  
12 innocent person, or to conceal your criminal  
13 activity?

14 MR. RHEINHART: I am going to instruct her  
15 not to answer that question. That's not a  
16 proper question. She could invoke the Fifth  
17 Amendment for any reason. She doesn't have to  
18 explain why. If a judge wants to ask her that,  
19 she'll tell the judge.

20 If you're going to move to, if you're  
21 going to move to another person, could we maybe  
22 take a five-minute break?

23 MR. HOROWITZ: Sure.

24 MR. RHEINHART: -- before the next person,  
25 if you're done --

1 names and contact information of teenage girls who  
2 would had sexual activity with Jeffrey Epstein?

3 MR. RHEINHART: Objection to the form.  
4 Standing objection. It's compound. Instruct  
5 the witness not to answer.

6 THE WITNESS: At the instruction of my  
7 lawyer, I must invoke my Fifth Amendment right.

8 BY MR. HOROWITZ:  
9 Q. Did Jeffrey Epstein instruct you to call  
10 E.W. on the telephone to arrange for Jane Doe No. 6  
11 to come back and give him another massage for his  
12 sexual pleasure?

13 MR. RHEINHART: Objection to the form,  
14 Instruct the witness not to answer.

15 THE WITNESS: At the instruction of my  
16 lawyer, I must invoke my Fifth Amendment right.

17 BY MR. HOROWITZ:  
18 Q. Ms. Kellen, you have asserted a Fifth  
19 Amendment objection and privilege as to all my  
20 questions about Jane Doe No. 6 and Jeffrey Epstein.  
21 Is there any reason in your mind why a jury should  
22 not infer from your assertion of the privilege that,  
23 in fact, you and Jeffrey Epstein engaged in criminal  
24 conduct in inducing her to come to his home for his  
25 sexual pleasure?

1 MR. HOROWITZ: We've got lots more girls.

2 MR. RHEINHART: Okay. That's fine. But  
3 now a good breaking point?

4 MR. HOROWITZ: Sure.

5 MR. RHEINHART: Thanks.

6 THE VIDEOGRAPHER: We're now off video  
7 record. The time is 3:14 p.m.

8 (A brief recess was held.)

9 THE VIDEOGRAPHER: We're now on the video  
10 record. The time is 3:24 p.m.

11 MR. HOROWITZ: I've been told I can start  
12 my questions without Jack Goldberger in the  
13 room.

14 MR. RHEINHART: Absolutely.

15 BY MR. HOROWITZ:

16 Q. Ms. Kellen, did you know a, did you know a  
17 girl named Jane Doe No. 7 when she was still, still  
18 a child under the age of 18?

19 A. At the instruction of my lawyer I must invoke  
20 my Fifth Amendment privilege.

21 Q. Ms. Kellen, did a girl named Jane Doe  
22 No. 7 come to Jeffrey Epstein's Palm Beach home on  
23 multiple occasions between 2003 and May of 2005?

24 MR. RHEINHART: Objection to the form.  
25 Instruct, instruct the witness not to answer.

1 THE WITNESS: On the instruction of my  
 2 lawyer, I must invoke my Fifth Amendment  
 3 privilege.  
 4 BY MR. HOROWITZ:  
 5 Q. Prior to May of 2005, did you receive a  
 6 phone call from a girl named Haley Robson wherein  
 7 she told you she was bringing Jane Doe No. 7 to  
 8 Jeffrey Epstein's home to give him a massage?  
 9 MR. RHEINHART: Objection to the form.  
 10 THE WITNESS: At the instruction of my  
 11 lawyer, I must invoke my Fifth Amendment  
 12 privilege.  
 13 MR. RHEINHART: We're trying to speed  
 14 things along here.  
 15 MR. HOROWITZ: Fine.  
 16 BY MR. HOROWITZ:  
 17 Q. At any time prior to 2005, did  
 18 Jeffrey Epstein instruct you to communicate with  
 19 Haley Robson by telephone to arrange for Jane Doe  
 20 No. 7 to give him a massage?  
 21 MR. RHEINHART: Objection to the form.  
 22 THE WITNESS: At the instruction of my  
 23 lawyer, I must invoke my Fifth Amendment  
 24 privilege.  
 25

1 BY MR. HOROWITZ:  
 2 Q. Sure. At any time prior to May of 2005,  
 3 did Jeffrey Epstein confirm with you that you had  
 4 spoken to Jane Doe No. 7 by telephone and that Faith  
 5 would be coming to his home at a particular time to  
 6 give him a massage?  
 7 MR. RHEINHART: Object to form.  
 8 THE WITNESS: On the instruction of my  
 9 lawyer, I must invoke my Fifth Amendment  
 10 privilege.  
 11 BY MR. HOROWITZ:  
 12 Q. And did you, in fact, speak to Jane Doe  
 13 No. 7 by telephone and confirm that Jane Doe No. 7  
 14 would be coming to Jeffrey Epstein's home at a  
 15 particular time to give him a massage?  
 16 MR. RHEINHART: Object to the form.  
 17 THE WITNESS: On the instruction of my  
 18 lawyer, I must invoke my Fifth Amendment  
 19 privilege.  
 20 BY MR. HOROWITZ:  
 21 Q. Did Jeffrey Epstein tell you it was his  
 22 intention during the course of Jane Doe No. 7's  
 23 visits to his home to persuade or entice her to  
 24 engage in sexual activity?  
 25 MR. RHEINHART: Object to form.

1 BY MR. HOROWITZ:  
 2 Q. Did Jeffrey Epstein inform you that the  
 3 massage Jane Doe No. 7 was to give him would be  
 4 sexual in nature?  
 5 MR. RHEINHART: Objection to the form.  
 6 THE WITNESS: At the instruction of my  
 7 lawyer, I must invoke my Fifth Amendment  
 8 privilege.  
 9 BY MR. HOROWITZ:  
 10 Q. Did Jeffrey Epstein observe you speaking  
 11 with Haley Robson by telephone to arrange for Jane  
 12 Doe No. 7 to come to his home to give him a massage  
 13 that was sexual in nature?  
 14 MR. RHEINHART: Objection to the form.  
 15 THE WITNESS: At the instruction of my  
 16 lawyer, I must invoke my Fifth Amendment  
 17 privilege.  
 18 BY MR. HOROWITZ:  
 19 Q. At any time prior to May of 2005, did  
 20 Jeffrey Epstein confirm with you that she (sic) had  
 21 spoken to Jane Doe No. 7 by telephone and that Jane  
 22 Doe No. 7 would be coming to his home to give him a  
 23 massage?  
 24 MR. RHEINHART: I'm sorry. Can you  
 25 restate your question, Mr. Horowitz?

1 THE WITNESS: At the instruction of my  
 2 lawyer I must invoke my Fifth Amendment  
 3 privilege.  
 4 BY MR. HOROWITZ:  
 5 Q. Did Jeffrey Epstein ever tell you that  
 6 during the course of Jane Doe No. 7's visits to his  
 7 home that he succeeded in persuading her or enticing  
 8 her to engage in sexual activity?  
 9 MR. RHEINHART: Object to form.  
 10 THE WITNESS: At the instruction of my  
 11 lawyer I must invoke my Fifth Amendment  
 12 privilege.  
 13 BY MR. HOROWITZ:  
 14 Q. Ms. Kellen, did you ask Jane Doe No. 7 how  
 15 old she was when she came to Jeffrey Epstein's home?  
 16 MR. RHEINHART: Objection to form.  
 17 THE WITNESS: At the instruction of my  
 18 lawyer, I must invoke my Fifth Amendment  
 19 privilege.  
 20 BY MR. HOROWITZ:  
 21 Q. And Jane Doe No. 7 never told you that she  
 22 was 18 or older; is that correct?  
 23 MR. RHEINHART: Objection to form.  
 24 THE WITNESS: On the instruction of my  
 25 lawyer, I must invoke my Fifth Amendment



1 privilege.  
 2 BY MR. HOROWITZ:  
 3 Q. And when Jane Doe No. 7 came to Jeffrey  
 4 Epstein's home, she appeared to you to look younger  
 5 than 18, correct?  
 6 MR. RHEINHART: Object to form.  
 7 THE WITNESS: At the instruction of my  
 8 lawyer I must invoke my Fifth Amendment  
 9 privilege.  
 10 BY MR. HOROWITZ:  
 11 Q. Did Jane Doe No. 7 tell you that she was a  
 12 student at Royal Palm Beach High School?  
 13 MR. RHEINHART: Object to form.  
 14 THE WITNESS: At the instruction of my  
 15 lawyer, I must invoke my Fifth Amendment  
 16 privilege.  
 17 BY MR. HOROWITZ:  
 18 Q. Did Jeffrey Epstein instruct you to take  
 19 Jane Doe No. 7's name and telephone number down so  
 20 you can call Jane Doe No. 7 to come to his home for  
 21 more sexual activity?  
 22 MR. RHEINHART: Object to form.  
 23 THE WITNESS: On the instruction of my  
 24 lawyer, I must invoke my Fifth Amendment  
 25 privilege.

1 MR. RHEINHART: Object to form.  
 2 THE WITNESS: At the instruction of my  
 3 lawyer I must invoke my Fifth Amendment  
 4 privilege.  
 5 BY MR. HOROWITZ:  
 6 Q. Did Jeffrey Epstein instruct you to call  
 7 Jane Doe No. 7 to tell her to lie to police officers  
 8 investigating his criminal activity?  
 9 MR. RHEINHART: Object to form.  
 10 THE WITNESS: On the instruction of my  
 11 lawyer, I must invoke my Fifth Amendment  
 12 privilege.  
 13 BY MR. HOROWITZ:  
 14 Q. Did you, in fact, call Jane Doe No. 7 to  
 15 tell her to lie to police officers investigating  
 16 Jeffrey Epstein's criminal activity?  
 17 MR. RHEINHART: Object to form.  
 18 THE WITNESS: At the instruction of my  
 19 lawyer, I must invoke my Fifth Amendment  
 20 privilege.  
 21 BY MR. HOROWITZ:  
 22 Q. Okay. You've asserted a Fifth Amendment  
 23 objection or privilege as to all of my questions  
 24 concerning Jane Doe No. 7 and her visits to Jeffrey  
 25 Epstein. Is there any reason that you can think of

1 BY MR. HOROWITZ:  
 2 Q. Did you, in fact, take Jane Doe No. 7's  
 3 name and telephone number down so you could call  
 4 Jane Doe No. 7 to come to Jeffrey Epstein's home for  
 5 other sexual activity?  
 6 MR. RHEINHART: Object to form.  
 7 THE WITNESS: On the instruction of my  
 8 lawyer, I must invoke my Fifth Amendment  
 9 privilege.  
 10 BY MR. HOROWITZ:  
 11 Q. Did Jeffrey Epstein instruct you to put  
 12 Jane Doe No. 7's name and telephone number into a  
 13 master journal or log in which you and he archived  
 14 the names of, and telephone numbers of teenage girls  
 15 with whom he wanted to engage in sexual activity?  
 16 MR. RHEINHART: Object to form.  
 17 THE WITNESS: At the instruction of my  
 18 lawyer, I must invoke my Fifth Amendment  
 19 privilege.  
 20 BY MR. HOROWITZ:  
 21 Q. Did you, in fact, put Jane Doe No. 7's  
 22 name and telephone number into a master journal or  
 23 log in which you archived the names of teenage girls  
 24 with whom Jeffrey Epstein did engage in sexual  
 25 activity?

1 that a jury should not infer that you are asserting  
 2 the Fifth Amendment privilege to conceal the  
 3 criminal activity of yourself and Jeffrey Epstein?  
 4 MR. RHEINHART: As previously done, I will  
 5 instruct the witness not to answer that  
 6 question. I believe it calls for a legal  
 7 conclusion. It's also not designed to lead to  
 8 discoverable evidence, and whether or not any  
 9 inference should be drawn will be an issue for  
 10 the jury after the judge rules on the  
 11 objections to the questions.  
 12 MR. HOROWITZ: So, did you say you were --  
 13 MR. RHEINHART: I'm instructing her not to  
 14 answer.  
 15 MR. HOROWITZ: Thank you.  
 16 BY MR. HOROWITZ:  
 17 Q. Ms. Kellen, did you know a girl named Jane  
 18 Doe No. 8 when she was still a child under the age  
 19 of 18?  
 20 A. Upon the instruction of my lawyer, I must  
 21 invoke my Fifth Amendment right.  
 22 Q. Ms. Kellen, isn't it true that a girl  
 23 named Jane Doe No. 8 came to Jeffrey Epstein's Palm  
 24 Beach home in approximately 2001 or 2002 when she  
 25 was still a child under the age of 18?

1 MR. RHEINHART: Object to form.  
 2 THE WITNESS: On the instruction of my  
 3 lawyer, I must invoke my Fifth Amendment right.  
 4 BY MR. HOROWITZ:  
 5 Q. Ms. Kellen, did you receive a phone call  
 6 from a girl named Carolyn Andriano that she was  
 7 bringing Jane Doe No. 8 to Jeffrey Epstein's home  
 8 for the purpose of giving him a massage?  
 9 MR. RHEINHART: Object to form.  
 10 THE WITNESS: On the instruction of my  
 11 lawyer, I must invoke my Fifth Amendment right.  
 12 BY MR. HOROWITZ:  
 13 Q. Did Jeffrey Epstein instruct you to  
 14 communicate by telephone with Carolyn Andriano to  
 15 arrange for Carolyn to bring underage girls to his  
 16 home for sexual activity?  
 17 MR. RHEINHART: Object to form.  
 18 THE WITNESS: On the instruction of my  
 19 lawyer, I must invoke my Fifth Amendment right.  
 20 BY MR. HOROWITZ:  
 21 Q. Did Jeffrey Epstein pay Carolyn Andriano  
 22 to bring underage girls to his home for sexual  
 23 activity?  
 24 MR. RHEINHART: Object to form.  
 25 THE WITNESS: On the instruction of my

1 BY MR. HOROWITZ:  
 2 Q. Did you tell Jeffrey Epstein that you had  
 3 confirmed by telephone that Jane Doe No. 8 would, in  
 4 fact, be coming to his home at a particular time to  
 5 give him a massage?  
 6 MR. RHEINHART: Object to form.  
 7 THE WITNESS: On the instruction of my  
 8 lawyer, I must invoke my Fifth Amendment right.  
 9 BY MR. HOROWITZ:  
 10 Q. Did Jeffrey Epstein tell you that it was  
 11 his intention that, during the course of Jane Doe  
 12 No. 8's visit to his home, that he would persuade or  
 13 induce her to engage in sexual activity with him?  
 14 MR. RHEINHART: Object to form.  
 15 THE WITNESS: Upon the instruction of my  
 16 lawyer, I must invoke my Fifth Amendment right.  
 17 BY MR. HOROWITZ:  
 18 Q. Did Jeffrey Epstein tell you that, in  
 19 fact, during the course of Jane Doe No. 8's visit to  
 20 his home, he succeeded in persuading or inducing her  
 21 to engage in sexual activity?  
 22 MR. RHEINHART: Object to the form.  
 23 THE WITNESS: Upon instruction of my  
 24 lawyer, I must invoke my Fifth Amendment  
 25 privilege.

1 lawyer, I must invoke my Fifth Amendment right.  
 2 BY MR. HOROWITZ:  
 3 Q. Did Jeffrey Epstein instruct you to  
 4 communicate with Carolyn Andriano by telephone to  
 5 arrange for Jane Doe No. 8 to give him a massage  
 6 that was to be sexual in nature?  
 7 MR. RHEINHART: Object to form.  
 8 THE WITNESS: On the instruction of my  
 9 lawyer, I must invoke my Fifth Amendment right.  
 10 BY MR. HOROWITZ:  
 11 Q. Did Jeffrey Epstein inform you that the  
 12 massage that Jane Doe No. 8 was to give him would be  
 13 sexual in nature?  
 14 MR. RHEINHART: Object to form.  
 15 THE WITNESS: On the instruction of my  
 16 lawyer, I must invoke my Fifth Amendment right.  
 17 BY MR. HOROWITZ:  
 18 Q. Did Jeffrey Epstein observe you speaking  
 19 with Carolyn Andriano by telephone making  
 20 arrangements for Jane Doe No. 8 to come to his home  
 21 to give him a massage?  
 22 MR. RHEINHART: Object to form.  
 23 THE WITNESS: On the instruction of my  
 24 lawyer, I must invoke my Fifth Amendment right.  
 25

1 BY MR. HOROWITZ:  
 2 Q. Jane Doe No. 8 never told you that she was  
 3 18 years old or older; is that correct?  
 4 MR. RHEINHART: Object to form.  
 5 THE WITNESS: Upon the instruction of my  
 6 lawyer, I must invoke my Fifth Amendment right.  
 7 BY MR. HOROWITZ:  
 8 Q. And when you saw Jane Doe No. 8, she  
 9 appeared to you to be less than 18; is that correct?  
 10 MR. RHEINHART: Object to the form.  
 11 THE WITNESS: On the instruction of my  
 12 lawyer, I must invoke my Fifth Amendment right.  
 13 BY MR. HOROWITZ:  
 14 Q. Did Jeffrey Epstein instruct you to call  
 15 Carolyn Andriano on the telephone to arrange for  
 16 Jane Doe No. 8 to come back and give him another  
 17 massage that was to be sexual in nature?  
 18 MR. RHEINHART: Objection to the form.  
 19 THE WITNESS: On the instruction of my  
 20 lawyer, I must invoke my Fifth Amendment right.  
 21 BY MR. HOROWITZ:  
 22 Q. Ms. Kellen, you have asserted a Fifth  
 23 Amendment objection or privilege as to all of my  
 24 questions about Jane Doe No. 8. Is there any reason  
 25 in your mind why a jury should not infer that, in

1 fact, you and Jeffrey Epstein engaged in criminal  
 2 activity as it relates to Jane Doe No. 8?  
 3 MR. RHEINHART: Instruct the witness not  
 4 to answer the question.  
 5 MR. HOROWITZ: Do you have the premarked  
 6 Exhibit 5, by any chance?  
 7 MR. RHEINHART: I gave it back to  
 8 Mr. Kuvin.  
 9 MR. HOROWITZ: I'll hand it back to you.  
 10 Sorry.  
 11 BY MR. HOROWITZ:  
 12 Q. Let me ask Ms. Kellen to take a look at  
 13 what's been premarked as Exhibit 5.  
 14 MR. RHEINHART: Do you want us to look at  
 15 the whole thing?  
 16 MR. HOROWITZ: Well, if we're going to  
 17 take more than a -- yeah, we can go off record  
 18 if she's going to look at the whole thing.  
 19 MR. RHEINHART: If you want to ask her  
 20 about every page, we'll look at every page.  
 21 But if you want to just ask some general  
 22 questions, perhaps then we can just --  
 23 MR. HOROWITZ: Well, if you know that  
 24 you're going to assert the Fifth Amendment --  
 25 MR. RHEINHART: I doubt we're answering

1 MR. RHEINHART: Same instruction.  
 2 THE WITNESS: Upon the instruction of my  
 3 lawyer, I must invoke my Fifth Amendment right.  
 4 BY MR. RHEINHART:  
 5 Q. And did you place at least some of the  
 6 calls reflected on that phone bill with an eye  
 7 toward arranging for minor children under the age of  
 8 18 to come to Jeffrey Epstein's home for his sexual  
 9 pleasure?  
 10 MR. RHEINHART: Object to the form as  
 11 compound and a standing objection, and also  
 12 instruct the witness not to answer based on  
 13 Fifth Amendment.  
 14 THE WITNESS: Upon the instruction of my  
 15 lawyer, I must invoke my Fifth Amendment right.  
 16 BY MR. HOROWITZ:  
 17 Q. And with respect to the phone calls  
 18 reflected on the bill which you received, did you  
 19 answer some of those phone calls with an eye toward  
 20 arranging for procuring underage girls to come to  
 21 Jeffrey Epstein's home for his sexual pleasure?  
 22 MR. RHEINHART: Object to the, object to  
 23 the form. Instruct the witness not to answer,  
 24 based on Fifth Amendment privilege.  
 25 THE WITNESS: Upon the instruction of my

1 any questions about it, but go on ahead. And  
 2 if we need to take a break, we'll take a break.  
 3 BY MR. HOROWITZ:  
 4 Q. Okay. Have you had enough of a look at  
 5 those records to determine whether those are the  
 6 telephone records for the cellphone that you used  
 7 during the time periods set forth on those phone  
 8 bills?  
 9 MR. RHEINHART: Instruct the witness not  
 10 to answer the question based on the Fifth  
 11 Amendment.  
 12 THE WITNESS: Upon the instruction of my  
 13 lawyer, I must invoke my Fifth Amendment right.  
 14 BY MR. HOROWITZ:  
 15 Q. Are the phone calls that the telephone  
 16 bills reflect as having been made phone calls that  
 17 were placed by you?  
 18 MR. RHEINHART: Same instruction.  
 19 THE WITNESS: On the instruction of my  
 20 lawyer, I must invoke my Fifth Amendment right.  
 21 BY MR. HOROWITZ:  
 22 Q. Okay. Are the phone calls that the phone  
 23 bill reflects as having been received on that  
 24 telephone line phone calls that you, in fact,  
 25 received?

1 lawyer, I must invoke my Fifth Amendment right.  
 2 BY MR. HOROWITZ:  
 3 Q. Do, does the phone, does the premarked  
 4 Exhibit 5 reflect phone calls wherein you arranged  
 5 for Jeffrey Epstein to meet children under the age  
 6 of 18 for his sexual pleasure?  
 7 MR. RHEINHART: Objection to the form.  
 8 It's a compound question, instruct the witness  
 9 not to answer based on the Fifth Amendment.  
 10 THE WITNESS: Upon the instruction of my  
 11 lawyer, I must invoke my Fifth Amendment right.  
 12 BY MR. HOROWITZ:  
 13 Q. Would it be accurate to describe Jeffrey  
 14 Epstein's home between the years 2001 and 2006 as a  
 15 house of horrors?  
 16 MR. RHEINHART: Object to the form of the  
 17 question. Instruct the witness not to answer.  
 18 BY MR. HOROWITZ:  
 19 Q. Would you say that childhood sexual abuse  
 20 was committed at Jeffrey Epstein's home every day  
 21 that he was in Palm Beach County between the years  
 22 2001 and 2006?  
 23 MR. RHEINHART: Object to the form. It  
 24 assumes she knows anything about Jeffrey  
 25 Epstein or his home or when he is in Palm Beach

1 County, so instruct her not to answer the  
 2 question.  
 3 THE WITNESS: Upon the instruction of my  
 4 lawyer, I choose to assert my Fifth Amendment  
 5 right.  
 6 MR. HOROWITZ: No other questions.  
 7 MR. RHEINHART: Thank you. Who is next  
 8 up?  
 9 MR. KUVIN: Next? Do you want to go next?  
 10 MS. EZELL: Do you have a trial date? You  
 11 may want to go because you have a trial date.  
 12 MR. WEISSING: I do.  
 13 MR. KUVIN: Yeah, you do. Whenever you're  
 14 ready. Go ahead. After you.  
 15 MR. RHEINHART: Whenever you're ready. Is  
 16 our videographer ready.  
 17 THE VIDEOGRAPHER: Oh, yeah. We're all  
 18 good.  
 19 MR. RHEINHART: We're all good?  
 20 THE VIDEOGRAPHER: We never went off the  
 21 record.  
 22 CROSS (SARAH KELLEN)  
 23 BY MR. WEISSING:  
 24 Q. Ms. Kellen, Matt Weissing here. Do you  
 25 know E.W.?

1 compound and assumes facts not within the  
 2 knowledge of this witness. Instruct the  
 3 witness not to answer based on the Fifth  
 4 Amendment.  
 5 THE WITNESS: Upon the instruction of my  
 6 lawyer, I must invoke my Fifth Amendment right.  
 7 BY MR. WEISSING:  
 8 Q. Beginning in August of 2002, are you aware  
 9 that E.W. was coerced by Jeffrey Epstein into sexual  
 10 conduct?  
 11 MR. RHEINHART: Objection to form,  
 12 leading. Well, it's compound. Instruct the  
 13 witness not to answer based on the Fifth  
 14 Amendment. The question is also ambiguous as  
 15 to coercion.  
 16 THE WITNESS: Upon the instruction of my  
 17 lawyer, I must assert my Fifth Amendment right.  
 18 MR. WEISSING: Are you aware that between  
 19 August 2002 and September of 2005, E.W. had  
 20 sexual conduct with Jeffrey Epstein?  
 21 MR. RHEINHART: Object to the form,  
 22 standing objection. Instruct the witness not  
 23 to answer.  
 24 THE WITNESS: On the instruction of my  
 25 lawyer, I must invoke my Fifth Amendment right.

1 MR. RHEINHART: Instruct the witness not  
 2 to answer the question based on Fifth  
 3 Amendment.  
 4 THE WITNESS: On the instruction of my  
 5 lawyer, I must invoke my Fifth Amendment right.  
 6 BY MR. WEISSING:  
 7 Q. Have you ever met E.W.?  
 8 MR. RHEINHART: Object to the form. I  
 9 believe that's been asked and answered several  
 10 times. Well, not answered several times. But  
 11 I'll instruct her once again not to answer the  
 12 question.  
 13 BY MR. WEISSING:  
 14 Q. Are you aware that E.W. was 14 years of  
 15 age when she first came to Jeffrey Epstein's mansion  
 16 in 2002?  
 17 MR. RHEINHART: Object to the form.  
 18 Instruct the witness not to answer.  
 19 THE WITNESS: On the instruction of my  
 20 lawyer, I must invoke my Fifth Amendment right.  
 21 BY MR. WEISSING:  
 22 Q. Are you aware that at all times that --  
 23 from 2002 to 2005, when E.W. came to his mansion,  
 24 she was a minor child?  
 25 MR. RHEINHART: Object to the form. It's

1 BY MR. WEISSING:  
 2 Q. Okay. Are you aware that between August  
 3 2002 and September of 2005, Jeffrey Epstein engaged  
 4 in fondling and inappropriate illegal sexual  
 5 touching of E.W.?  
 6 MR. RHEINHART: Objection to the form,  
 7 standing objection and ambiguous as to  
 8 terminology. Instruct the witness not to  
 9 answer.  
 10 THE WITNESS: Upon the instruction of my  
 11 lawyer, I must invoke my Fifth Amendment right.  
 12 BY MR. WEISSING:  
 13 Q. Are you aware that during that same  
 14 period, that Jeffrey Epstein engaged in oral sex or  
 15 other sexual misconduct with E.W.?  
 16 MR. RHEINHART: Same objection as the  
 17 previous question and same instruction to the  
 18 witness.  
 19 THE WITNESS: On the instruction of my  
 20 lawyer, I must invoke my Fifth Amendment right.  
 21 BY MR. WEISSING:  
 22 Q. Are you aware that in that same time  
 23 period that Jeffrey Epstein masturbated in the  
 24 presence of E.W.?  
 25 MR. RHEINHART: Objection to the form,

1 standing objection and instruct the witness not  
 2 to answer.  
 3 THE WITNESS: Upon the instruction of my  
 4 lawyer, I must invoke my Fifth Amendment right.  
 5 BY MR. WEISSING:  
 6 Q. Are you aware that for all of her  
 7 behaviors with Jeffrey Epstein that E.W. was paid by  
 8 him?  
 9 MR. RHEINHART: Objection to the form,  
 10 leading, as well as the standing objection, and  
 11 instruct the witness not to answer.  
 12 THE WITNESS: Upon the instruction of my  
 13 lawyer, I must invoke my Fifth Amendment right.  
 14 BY MR. WEISSING:  
 15 Q. Did you pay E.W. for any of her work for  
 16 Jeffrey Epstein?  
 17 MR. RHEINHART: Objection to the form.  
 18 Instruct the witness not to answer.  
 19 THE WITNESS: On the instruction of my  
 20 lawyer, I must invoke my Fifth Amendment right.  
 21 BY MR. WEISSING:  
 22 Q. Are you aware that Jeffrey Epstein, during  
 23 the period of August 2nd -- 2002 and September of  
 24 2005 committed numerous criminal and sexual offenses  
 25 against a minor child?

1 answer as well as compound.  
 2 THE WITNESS: At the instruction of my  
 3 lawyer, I must invoke my Fifth Amendment right.  
 4 BY MR. WEISSING:  
 5 Q. At all times that E.W. was engaged with  
 6 the behaviors with Jeffrey Epstein, did he know that  
 7 she was a minor child?  
 8 MR. RHEINHART: Objection to the form,  
 9 calls for speculations as to Mr. Epstein's  
 10 mindset, also assumes she knows Mr. Epstein, so  
 11 I would object as compound and instruct her not  
 12 to answer.  
 13 THE WITNESS: At the instruction of my  
 14 lawyer, I must invoke my Fifth Amendment right.  
 15 BY MR. WEISSING:  
 16 Q. At all times during her interaction with  
 17 Jeffrey Epstein, did Jeffrey Epstein tell you that  
 18 he knew that E.W. was a minor child?  
 19 MR. RHEINHART: Objection to form.  
 20 THE WITNESS: At the instruction of my  
 21 lawyer, I must invoke my Fifth Amendment right.  
 22 BY MR. WEISSING:  
 23 Q. Did Jeffrey Epstein tell you that he  
 24 engaged in numerous sexual activities with E.W.  
 25 between the periods of August 2nd and September --

1 MR. RHEINHART: Objection to the form.  
 2 Calls for a legal conclusion. It's compound  
 3 and ambiguous and instruct the witness not to  
 4 answer.  
 5 THE WITNESS: Upon the instruction of my  
 6 lawyer, I must invoke my Fifth Amendment right.  
 7 BY MR. WEISSING:  
 8 Q. Are you aware that due to the influence of  
 9 Jeffrey Epstein's interaction with E.W., that it led  
 10 her to a delinquent lifestyle?  
 11 MR. RHEINHART: Objection to the form,  
 12 leading. Requires speculation, is ambiguous  
 13 and compound, and instruct the witness not to  
 14 answer.  
 15 THE WITNESS: On the instruction of my  
 16 lawyer, I must invoke my Fifth Amendment right.  
 17 BY MR. WEISSING:  
 18 Q. At all times when E.W. was engaged with  
 19 Jeffrey Epstein, he knew that she was a minor child.  
 20 MR. RHEINHART: Is that a question or a  
 21 statement?  
 22 BY MR. WEISSING:  
 23 Q. Correct?  
 24 MR. RHEINHART: Objection to the form,  
 25 leading. I'll instruct the witness not to

1 August 2002 and September 2005?  
 2 MR. RHEINHART: Objection to the form.  
 3 THE WITNESS: At the instruction of my  
 4 lawyer, I must invoke my Fifth Amendment right.  
 5 BY MR. WEISSING:  
 6 Q. Did Jeffrey Epstein tell you that he had  
 7 sexually exploited E.W. and contributed to her  
 8 delinquency?  
 9 MR. RHEINHART: Objection to form. It's  
 10 ambiguous, calls for legal conclusions, and  
 11 it's compound. Instruct the witness not to  
 12 answer based on Fifth Amendment privilege.  
 13 THE WITNESS: On the instruction of my  
 14 lawyer, I must assert my Fifth Amendment right.  
 15 BY MR. WEISSING:  
 16 Q. Did Jeffrey Epstein ever tell you that he  
 17 intentionally was harming E.W.?  
 18 MR. RHEINHART: Objection to the form. It  
 19 assumes knowledge of Jeffrey Epstein. Instruct  
 20 her not to answer.  
 21 THE WITNESS: On the instruction of my  
 22 lawyer, I must exert my Fifth Amendment right.  
 23 BY MR. WEISSING:  
 24 Q. Did you know that Jeffrey Epstein's  
 25 behavior was causing injury, pain and suffering, and

1 emotional trauma to E.W.?  
 2 MR. RHEINHART: Objection to the form,  
 3 calls for speculation and is otherwise a  
 4 standing objection.  
 5 THE WITNESS: At the instruction of my  
 6 lawyer, I must invoke my Fifth Amendment right.  
 7 BY MR. WEISSING:  
 8 Q. Were you aware that Jeffrey Epstein was  
 9 using his wealth and the proximity of his mansion to  
 10 lead young underage girls into having sexual  
 11 behaviors with him?  
 12 MR. RHEINHART: Objection to form,  
 13 standing objection and ambiguous.  
 14 THE WITNESS: At the instruction of my  
 15 lawyer I must invoke my Fifth Amendment right.  
 16 BY MR. WEISSING:  
 17 Q. Were you charged with scheduling girls to  
 18 meet with Jeffrey Epstein?  
 19 MR. RHEINHART: Objection to form,  
 20 standing objection.  
 21 THE WITNESS: At the instruction of my  
 22 lawyer, I must invoke my Fifth Amendment right.  
 23 BY MR. WEISSING:  
 24 Q. In scheduling girls to meet with  
 25 Jeffrey Epstein, did you ever call any escort

1 ambiguous as to "school children." Instruct  
 2 the witness not to answer.  
 3 THE WITNESS: At the instruction of my  
 4 lawyer, I must invoke my Fifth Amendment right.  
 5 BY MR. WEISSING:  
 6 Q. With regard to the young girls who you  
 7 contacted to set up sexual encounters with  
 8 Jeffrey Epstein, were they between the ages, school  
 9 girls between the ages of 13 and 17 years of age?  
 10 MR. RHEINHART: Objection to the form.  
 11 It's compound and instruct the witness not to  
 12 answer.  
 13 THE WITNESS: Upon the instruction of my  
 14 lawyer, I must invoke my Fifth Amendment right.  
 15 BY MR. WEISSING:  
 16 Q. Now, do you believe that Jeffrey Epstein  
 17 presents a clear danger to female children in this  
 18 community?  
 19 MR. RHEINHART: Objection to form,  
 20 standing objection.  
 21 THE WITNESS: On the instruction of my  
 22 lawyer, I must invoke my Fifth Amendment right.  
 23 BY MR. WEISSING:  
 24 Q. Did Jeffrey Epstein tell you that he was  
 25 intentionally engaging in sexual misconduct with

1 services?  
 2 MR. RHEINHART: Objection to form,  
 3 standing objection.  
 4 THE WITNESS: At the instruction of my  
 5 lawyer I must invoke my Fifth Amendment right.  
 6 BY MR. WEISSING:  
 7 Q. In scheduling sexual encounters for  
 8 Jeffrey Epstein, did you ever contact any, any known  
 9 prostitutes?  
 10 MR. RHEINHART: Objection to form.  
 11 THE WITNESS: At the instruction of my  
 12 lawyer, I must invoke my Fifth Amendment right.  
 13 BY MR. WEISSING:  
 14 Q. With regard to the girls who were  
 15 scheduled, these were basically school children,  
 16 correct?  
 17 MR. RHEINHART: Objection to form,  
 18 leading, and also a standing objection.  
 19 THE WITNESS: At the instruction of my  
 20 lawyer, I must invoke my Fifth Amendment right.  
 21 BY MR. WEISSING:  
 22 Q. Were the girls who you contacted on behalf  
 23 of Jeffrey Epstein, school children in this  
 24 community?  
 25 MR. RHEINHART: Objection to form and

1 E.W. in an effort to hurt her?  
 2 MR. RHEINHART: Objection to the form,  
 3 standing objection and also ambiguous.  
 4 THE WITNESS: On the instruction of my  
 5 lawyer, I must invoke my Fifth Amendment right.  
 6 BY MR. WEISSING:  
 7 Q. Did Jeffrey Epstein tell you that he knew  
 8 that his sexual behavior with E.W. was, in fact,  
 9 injuring her?  
 10 MR. RHEINHART: Objection to form.  
 11 THE WITNESS: At the instruction I must  
 12 invoke my Fifth Amendment right.  
 13 BY MR. WEISSING:  
 14 Q. Were you aware that Jeffrey Epstein  
 15 touched E.W. with -- in her, in the intimate areas  
 16 of her body?  
 17 MR. RHEINHART: Objection to the form,  
 18 both compound, standing objection and  
 19 ambiguous.  
 20 THE WITNESS: On the instruction of my  
 21 lawyer, I must invoke my Fifth Amendment right.  
 22 BY MR. WEISSING:  
 23 Q. Are you aware that Jeffrey Epstein  
 24 penetrated E.W.'s vagina?  
 25 MR. RHEINHART: Objection to the form,

1 standing objection.  
 2 THE WITNESS: At the instruction of my  
 3 lawyer, I must invoke my Fifth Amendment right.  
 4 BY MR. WEISSING:  
 5 Q. Are you aware that Jeffrey Epstein touched  
 6 E.W. in the intimate portions of her body on dozens  
 7 of occasions between August 2002 and September of  
 8 2005?  
 9 MR. RHEINHART: Objection to the form,  
 10 standing objection.  
 11 THE WITNESS: At the instruction of my  
 12 lawyer, I must invoke my Fifth Amendment right.  
 13 BY MR. WEISSING:  
 14 Q. Did Jeffrey Epstein tell you that he had  
 15 touched E.W. in the intimate portions of her body  
 16 and penetrated her body with a design to injure her  
 17 between August 2002 and September of 2005?  
 18 MR. RHEINHART: Objection to the form as  
 19 compound and instruct the witness not to  
 20 answer.  
 21 THE WITNESS: On the instruction of my  
 22 lawyer, I must invoke my Fifth Amendment right.  
 23 BY MR. WEISSING:  
 24 Q. Do you know who L.M. is?  
 25 MR. RHEINHART: Instruct the witness not

1 MR. RHEINHART: Objection to the form in  
 2 that assumes knowledge of Jeffrey Epstein or  
 3 where his mansion is or what goes on in his  
 4 mansion, so instruct her not to answer it.  
 5 THE WITNESS: On the instruction of my  
 6 lawyer, I must invoke my Fifth Amendment right.  
 7 BY MR. WEISSING:  
 8 Q. Between August 2002 and September of 2005,  
 9 did Jeffrey Epstein coerce or engage L.M. in sexual  
 10 activity at his mansion?  
 11 MR. RHEINHART: Objection to form and  
 12 ambiguous as to "coercion."  
 13 THE WITNESS: On the instruction of my  
 14 lawyer, I must invoke my Fifth Amendment right.  
 15 BY MR. WEISSING:  
 16 Q. Between August 2002 and September 2005,  
 17 did Jeffrey Epstein engage in sexual misconduct with  
 18 L.M.?  
 19 MR. RHEINHART: Objection to the form and  
 20 ambiguous as to "sexual misconduct."  
 21 THE WITNESS: At the instruction of my  
 22 lawyer, I must invoke my Fifth Amendment right.  
 23 BY MR. WEISSING:  
 24 Q. Between August 2002 and September of 2005,  
 25 did Jeffrey Epstein engage in conduct with L.M. for

1 to answer based on the Fifth Amendment.  
 2 THE WITNESS: On the instruction of my  
 3 lawyer, I must invoke my Fifth Amendment right.  
 4 BY MR. WEISSING:  
 5 Q. Were you aware when L.M. first came to  
 6 Jeffrey Epstein's mansion in 2002 that she was a,  
 7 she was a 14-year-old child?  
 8 MR. RHEINHART: Objection to the form,  
 9 standing objection.  
 10 THE WITNESS: At the instruction of my  
 11 lawyer, I must invoke my Fifth Amendment right.  
 12 BY MR. WEISSING:  
 13 Q. How many minor female children have been  
 14 brought to Jeffrey Epstein's mansion for the  
 15 purposes of his sexual gratification?  
 16 MR. RHEINHART: Objection to the form,  
 17 ambiguous as to time period and standing  
 18 objection.  
 19 THE WITNESS: On the instruction of my  
 20 lawyer, I must invoke my Fifth Amendment right.  
 21 BY MR. WEISSING:  
 22 Q. Between the years of 2001 and 2005, were  
 23 more less or less than 1,000 underage female  
 24 children brought to Jeffrey Epstein's mansion for  
 25 his sexual gratification?

1 his sexual gratification?  
 2 MR. RHEINHART: Objection to form.  
 3 THE WITNESS: At the instruction of my  
 4 lawyer I must invoke my Fifth Amendment right.  
 5 BY MR. WEISSING:  
 6 Q. Were you aware that between August 2002  
 7 and September of 2005, Jeffrey Epstein engaged in  
 8 sexual, engaged in behavior with L.M. for his sexual  
 9 gratification?  
 10 MR. RHEINHART: Objection to the form, the  
 11 standing objection previously stated and  
 12 ambiguous.  
 13 THE WITNESS: At the instruction of my  
 14 lawyer, I must invoke my Fifth Amendment right.  
 15 BY MR. WEISSING:  
 16 Q. Between August -- during that same period  
 17 of time, did Jeffrey Epstein engage in oral sex or  
 18 other misconduct with L.M.?  
 19 MR. RHEINHART: Standing objection to  
 20 form.  
 21 THE WITNESS: At the instruction of my  
 22 lawyer, I must invoke my Fifth Amendment right.  
 23 BY MR. WEISSING:  
 24 Q. During that same period of time, did  
 25 Jeffrey Epstein engage in masturbation and fondling

1 of the minor child's sexual organs?  
 2 MR. RHEINHART: Can you, can you clarify  
 3 what you said, "the minor child"?  
 4 MR. WEISSING: Yes. We're talking about  
 5 L.M.  
 6 MR. RHEINHART: I just want to make sure  
 7 you're limiting the question to L.M.  
 8 MR. WEISSING: All right.  
 9 MR. RHEINHART: On that basis, we're  
 10 objecting to the form, and standing objection.  
 11 It assumes multiple facts this witness does not  
 12 acknowledge she does have information about,  
 13 and therefore the question is compound and  
 14 ambiguous, and I instruct her not to answer.  
 15 THE WITNESS: On the instruction of my  
 16 lawyer I must invoke my Fifth Amendment right.  
 17 BY MR. WEISSING:  
 18 Q. You knew that during that period of time,  
 19 that Jeffrey Epstein was engaged in fondling and  
 20 penetrating the sexual organs of L.M.?  
 21 MR. RHEINHART: Objection to form,  
 22 leading, and also a standing objection.  
 23 THE WITNESS: At the instruction of my  
 24 lawyer I must invoke my Fifth Amendment right.  
 25

1 THE WITNESS: At the instruction of my  
 2 lawyer, I must invoke my Fifth Amendment right.  
 3 BY MR. WEISSING:  
 4 Q. During that same period did Jeffrey  
 5 Epstein tell you that he knew that L.M. was a minor  
 6 child?  
 7 MR. RHEINHART: Objection to the form, the  
 8 standing objection.  
 9 THE WITNESS: At the instruction of my  
 10 lawyer, I must invoke my Fifth Amendment right.  
 11 BY MR. WEISSING:  
 12 Q. Did Jeffrey Epstein tell you that he knew  
 13 that he was injuring L.M. through numerous sexual  
 14 encounters with her between August 2002 and  
 15 September of 2005?  
 16 MR. RHEINHART: Objection to the form, and  
 17 standing objection. Also compound question and  
 18 ambiguous, and instruct the witness not to  
 19 answer the question.  
 20 THE WITNESS: At the instruction of my  
 21 lawyer, I must invoke my Fifth Amendment right.  
 22 BY MR. WEISSING:  
 23 Q. Did you know that Jeffrey Epstein was  
 24 injuring L.M. through sexual contact with her during  
 25 that period of time?

1 BY MR. WEISSING:  
 2 Q. Did you know during that period of time  
 3 that Jeffrey Epstein was engaging in sexual  
 4 penetration of L.M.?  
 5 MR. RHEINHART: Objection to the form,  
 6 standing objection previously stated.  
 7 THE WITNESS: At the instruction of my  
 8 lawyer, I must invoke my Fifth Amendment right.  
 9 BY MR. WEISSING:  
 10 Q. During that period of time did you know  
 11 that L.M. was a minor child?  
 12 MR. RHEINHART: Objection to form,  
 13 standing objection and assumes multiple facts  
 14 and therefore can't be answered without,  
 15 because the question is too ambiguous.  
 16 Instruct the witness not to answer.  
 17 THE WITNESS: At the instruction of my  
 18 lawyer I must invoke my Fifth Amendment right.  
 19 BY MR. WEISSING:  
 20 Q. From August 2002 to September 2005, did  
 21 Jeffrey Epstein know that L.M. was a minor child?  
 22 MR. RHEINHART: Objection to the form,  
 23 calls for speculation and also a standing  
 24 objection as assuming knowledge of Jeffrey  
 25 Epstein. Instruct the witness not to answer.

1 MR. RHEINHART: Objection to the form. It  
 2 assumes knowledge of Jeffrey Epstein and L.M.  
 3 and instruct the witness not to answer.  
 4 THE WITNESS: At the instruction of my  
 5 lawyer, I must invoke my Fifth Amendment right.  
 6 BY MR. WEISSING:  
 7 Q. Did you know that the criminal conduct by  
 8 Jeffrey Epstein against L.M. was causing damage to  
 9 L.M.?  
 10 MR. RHEINHART: Objection to the form. It  
 11 calls for a legal conclusion that the witness  
 12 is not competent to give. Also calls for  
 13 speculation as to harm, if any, to a person she  
 14 hasn't even acknowledged that she knows, so  
 15 it's an improper question. I instruct her not  
 16 to answer based on the Fifth Amendment.  
 17 THE WITNESS: At the instruction of my  
 18 lawyer I must invoke my Fifth Amendment right.  
 19 BY MR. WEISSING:  
 20 Q. Are you aware that in the State of Florida  
 21 it is a crime to engage in sex, sexual activity with  
 22 a minor child?  
 23 A. Can you repeat the question, please?  
 24 Q. Yes. Are you aware that in the State of  
 25 Florida it is against, it is a crime to engage in



1 sexual activity with a minor child?  
 2 MR. RHEINHART: Can -- I'd just ask you to  
 3 clarify, when you say "sexual activity," are  
 4 you using a legal term of art, or do you have a  
 5 specific definition?  
 6 MR. WEISSING: Sexual activity.  
 7 MR. RHEINHART: Okay. You mean by an  
 8 adult with a minor child?  
 9 MR. WEISSING: Yes.  
 10 MR. RHEINHART: Okay. Hold on one second.  
 11 I'm going to object. It calls for a legal  
 12 conclusion. I'm going to instruct her not to  
 13 answer the question.  
 14 MR. WEISSING: No --  
 15 MR. RHEINHART: I'm instructing her not to  
 16 answer the question. It calls for a legal  
 17 conclusion. It's not a factual question that  
 18 is designed to lead to discoverable evidence.  
 19 BY MR. WEISSING:  
 20 Q. Did you know that L.M. was suffering  
 21 injury and emotional and psychological trauma as a  
 22 result of the behavior engaged in with her by  
 23 Jeffrey Epstein?  
 24 MR. RHEINHART: Objection to the form.  
 25 Assumes knowledge of the existence of a person

1 MR. RHEINHART: Objection to the form to  
 2 the extent it assumes knowledge of  
 3 Jeffrey Epstein or L.M.  
 4 THE WITNESS: At the instruction of my  
 5 lawyer, I must invoke my Fifth Amendment right.  
 6 BY MR. WEISSING:  
 7 Q. At all times that Jeffrey Epstein was  
 8 involved with L.M., she was a minor child, or was  
 9 she a minor child?  
 10 MR. RHEINHART: Objection to the form,  
 11 standing objection. It assumes facts that  
 12 there has been no admission this witness knows  
 13 anything about. Instruct her not to answer.  
 14 THE WITNESS: At the instruction of my  
 15 lawyer, I must invoke my Fifth Amendment right.  
 16 BY MR. WEISSING:  
 17 Q. Did Jeffrey Epstein intentionally  
 18 penetrate L.M. during his, while she was at his  
 19 mansion?  
 20 MR. RHEINHART: Same objection to the  
 21 form.  
 22 THE WITNESS: At the instruction of my  
 23 lawyer, I must invoke my Fifth Amendment right.  
 24 BY MR. WEISSING:  
 25 Q. Did Jeffrey Epstein engage in masturbation

1 by the name of L.M. which has not been  
 2 acknowledged. I instruct her not to answer.  
 3 THE WITNESS: On the advice of counsel, I  
 4 must invoke my Fifth Amendment right.  
 5 BY MR. WEISSING:  
 6 Q. Were you at the mansion the first time  
 7 that L.M. came to see Jeffrey Epstein?  
 8 MR. RHEINHART: Objection to the form.  
 9 Standing objection as to knowledge of  
 10 Jeffrey Epstein or any mansion.  
 11 THE WITNESS: On the advice of counsel, I  
 12 must invoke my Fifth Amendment right.  
 13 BY MR. WEISSING:  
 14 Q. Did Jeffrey Epstein tell you that he  
 15 intended to injure L.M. by engaging her in sexual  
 16 activity?  
 17 MR. RHEINHART: Object to the form.  
 18 Assumes knowledge of Jeffrey Epstein and L.M.,  
 19 Standing objection.  
 20 THE WITNESS: On the advice of my lawyer,  
 21 I must invoke my Fifth Amendment right.  
 22 BY MR. WEISSING:  
 23 Q. Did Jeffrey Epstein tell you that he  
 24 intended to cause severe emotional distress to L.M.  
 25 by engaging her in sexual activity?

1 in front of L.M. while she was a minor child at his  
 2 mansion?  
 3 MR. RHEINHART: Objection to the form.  
 4 THE WITNESS: At the instruction of my  
 5 lawyer, I must invoke my Fifth Amendment right.  
 6 BY MR. WEISSING:  
 7 Q. Did you know that Jeffrey Epstein was  
 8 engaging in sex, his sexual gratification in the  
 9 presence of L.M.?  
 10 MR. RHEINHART: Objection to the form.  
 11 THE WITNESS: On the instruction of my  
 12 lawyer, I must invoke my Fifth Amendment right.  
 13 BY MR. WEISSING:  
 14 Q. Did you know that Epstein touched L.M. in  
 15 the intimate portions of her body on numerous,  
 16 dozens of occasions between August of 2002 and  
 17 September of 2005?  
 18 MR. RHEINHART: Object to the form.  
 19 THE WITNESS: At the instruction of my  
 20 lawyer, I must invoke my Fifth Amendment right.  
 21 BY MR. WEISSING:  
 22 Q. Have you met Jane Doe?  
 23 A. At the instruction of my lawyer, I must invoke  
 24 my Fifth Amendment right.  
 25 Q. As part of your job, would you set up the

1 message table where minor children were escorted in  
2 Jeffrey Epstein's mansion?

3 MR. RHEINHART: Objection to the form.  
4 It's a compound question that assumes things  
5 about her job and other things that are not  
6 established and instruct her not to answer.

7 THE WITNESS: At the instruction of my  
8 lawyer, I must invoke my Fifth Amendment right.  
9 BY MR. WEISSING:

10 Q. Between 2001 and 2005 were you an employee  
11 of Jeffrey Epstein?

12 MR. RHEINHART: Instruct the witness not  
13 to answer based on Fifth Amendment privilege.

14 THE WITNESS: At the instruction of my  
15 lawyer, I must invoke my Fifth Amendment right.  
16 BY MR. WEISSING:

17 Q. As part of your employment, were you  
18 responsible for setting up a massage table in the  
19 mansion?

20 MR. RHEINHART: Objection to the form.

21 THE WITNESS: On the instruction of my  
22 lawyer, I must invoke my Fifth Amendment right.

23 BY MR. WEISSING:

24 Q. As part of your employment for, with  
25 Jeffrey Epstein, were you responsible for escorting

1 message table and order them to take their clothes  
2 off?

3 MR. RHEINHART: Objection to form.

4 THE WITNESS: At the instruction of my  
5 lawyer, I must invoke my Fifth Amendment right.

6 BY MR. WEISSING:

7 Q. After they disrobed, are you aware that he  
8 would allow them to massage him?

9 MR. RHEINHART: Are we talking about a  
10 specific person on a specific date, or are you  
11 asking a general practice and policy?

12 MR. WEISSING: General.

13 MR. RHEINHART: Object to the question as  
14 ambiguous, open ended, and instruct the witness  
15 not to answer.

16 THE WITNESS: On the instruction of my  
17 lawyer, I must invoke my Fifth Amendment right.

18 BY MR. WEISSING:

19 Q. Are you aware that Jeffrey Epstein  
20 routinely would turn on, turn onto his back and ask  
21 the girls to pinch his nipples?

22 MR. RHEINHART: Objection to the form.  
23 It's a compound question.

24 THE WITNESS: At the instruction of my  
25 lawyer, I must invoke my Fifth Amendment right.

1 underage girls to the massage table area in the  
2 mansion?

3 MR. RHEINHART: Objection to form.

4 THE WITNESS: At the instruction of my  
5 lawyer, I must invoke my Fifth Amendment right.

6 BY MR. WEISSING:

7 Q. After escorting underage girls to the  
8 massage area in the mansion, did you leave them  
9 alone?

10 MR. RHEINHART: Objection to form.

11 THE WITNESS: At the instruction of my  
12 lawyer, I must invoke my Fifth Amendment right.

13 BY MR. WEISSING:

14 Q. After the underage girls were left alone,  
15 are you aware that Jeffrey Epstein appeared either  
16 naked or, or wrapped in a towel?

17 MR. RHEINHART: Objection to form. Calls  
18 for speculation and compound question. Assumes  
19 facts that she's not acknowledged any personal  
20 knowledge of.

21 THE WITNESS: On the instruction of my  
22 lawyer, I must invoke my Fifth Amendment right.

23 BY MR. WEISSING:

24 Q. Are you aware that after appearing naked  
25 in front of underage girls, he would lay down on the

1 BY MR. WEISSING:

2 Q. After exposing his naked body to these  
3 girls, are you aware that he would then masturbate  
4 in their presence?

5 MR. RHEINHART: Object to the form. You  
6 keep asking questions about what  
7 Jeffrey Epstein did. She's not acknowledged  
8 she even knows a Jeffrey Epstein. You can ask  
9 her if Jeffrey Epstein went to the moon; she's  
10 not going to answer the question, but you can  
11 keeping asking.

12 THE WITNESS: On the instruction of my  
13 lawyer, I must invoke my Fifth Amendment right.

14 BY MR. WEISSING:

15 Q. The amount of, the amount of money given  
16 to these young girls was dependent upon the extent  
17 of behavior engaged in by Jeffrey Epstein; is that  
18 correct?

19 MR. RHEINHART: Objection to form, leading  
20 and otherwise objection to the form for the  
21 reasons previously stated.

22 THE WITNESS: On the instruction of my  
23 lawyer, I must invoke my Fifth Amendment right.

24 BY MR. WEISSING:

25 Q. Were the girls paid more if they used

1 vibrators or sexual toys?  
 2 MR. RHEINHART: Objection to the form.  
 3 THE WITNESS: On the instruction of my  
 4 lawyer, I must invoke my Fifth Amendment right.  
 5 BY MR. WEISSING:  
 6 Q. Regarding Jane Doe, when she was first  
 7 brought to Epstein's mansion in 2003, she was in  
 8 middle school, or was she in middle school?  
 9 MR. RHEINHART: Objection to form.  
 10 THE WITNESS: On the instruction of my  
 11 lawyer, I must invoke my Fifth Amendment right.  
 12 BY MR. WEISSING:  
 13 Q. Are you aware that in 2003 when Jane Doe  
 14 was brought to Epstein's mansion, she was in middle  
 15 school?  
 16 MR. RHEINHART: Objection to the form.  
 17 Once again to answer the question, she would  
 18 have to implicitly admit that she knows Jeffrey  
 19 Epstein or knows anything about Jeffrey Epstein  
 20 which she is not going to do, so to go onto the  
 21 second half of the question, it's a compound  
 22 question as to whatever happened with  
 23 Mr. Epstein. But you keep asking her. She's  
 24 not going to answer them. So, they're compound  
 25 and ambiguous.

1 lawyer, I must invoke my Fifth Amendment right.  
 2 BY MR. WEISSING:  
 3 Q. Were you aware that during that period of  
 4 time that Jane Doe was a minor child?  
 5 MR. RHEINHART: Objection to the form.  
 6 THE WITNESS: At the instruction of my  
 7 lawyer, I must invoke my Fifth Amendment right.  
 8 BY MR. WEISSING:  
 9 Q. Were you aware that during that period of  
 10 time that Jeffrey Epstein engaged in fondling and  
 11 sexual touching of Jane Doe?  
 12 MR. RHEINHART: Form.  
 13 THE WITNESS: At the instruction of my  
 14 lawyer, I must invoke my Fifth Amendment right.  
 15 BY MR. WEISSING:  
 16 Q. During that period of time, were you aware  
 17 that Jeffrey Epstein engaged in masturbation in the  
 18 presence of Jane Doe?  
 19 MR. RHEINHART: Objection to form.  
 20 THE WITNESS: The instruction of my  
 21 lawyer, I must invoke my Fifth Amendment right.  
 22 BY MR. WEISSING:  
 23 Q. During that period of time, are you aware  
 24 that Jeffrey Epstein engaged in sexual penetration  
 25 of Jane Doe?

1 THE WITNESS: On the instruction of my  
 2 lawyer, I must invoke my Fifth Amendment right.  
 3 BY MR. WEISSING:  
 4 Q. Are you aware that between February 2003  
 5 and June of 2005 that Jane Doe engaged in sexual  
 6 conduct with Jeffrey Epstein at his mansion?  
 7 MR. RHEINHART: Objection to the form.  
 8 THE WITNESS: At the instruction of my  
 9 lawyer, I must invoke my Fifth Amendment right.  
 10 BY MR. WEISSING:  
 11 Q. In 2003 she was only -- are you aware that  
 12 she was only 14 years of age when she first came to  
 13 the mansion?  
 14 MR. RHEINHART: Objection to form.  
 15 THE WITNESS: At the instruction of my  
 16 lawyer, I must invoke my Fifth Amendment right.  
 17 BY MR. WEISSING:  
 18 Q. Between February of 2003 and June 2005,  
 19 was Jeffrey Epstein aware that she was 14, 15, 16  
 20 years of age?  
 21 MR. RHEINHART: Objection to form. Calls  
 22 for her to speculate on the state of mind of a  
 23 person she's not admitting she has any  
 24 knowledge of.  
 25 THE WITNESS: At the instruction of my

1 MR. RHEINHART: Objection to form.  
 2 THE WITNESS: On the instruction of my  
 3 lawyer, I must invoke my Fifth Amendment right.  
 4 BY MR. WEISSING:  
 5 Q. During that period of time, are you aware  
 6 that Jeffrey Epstein perpetuated that kind of  
 7 behavior upon Jane Doe on dozens of occasions?  
 8 MR. RHEINHART: Objection to the form.  
 9 It's ambiguous and otherwise standing  
 10 objection.  
 11 THE WITNESS: On the instruction of my  
 12 lawyer, I must invoke my Fifth Amendment right.  
 13 BY MR. WEISSING:  
 14 Q. Are you aware that when he was engaging in  
 15 the sexual conduct with Jane Doe, that he was doing  
 16 so with the specific intent to cause her emotional  
 17 and psychological injury and damage?  
 18 MR. RHEINHART: Objection to the form.  
 19 Calls for a legal conclusion and is ambiguous  
 20 and is compound.  
 21 THE WITNESS: The instruction of my lawyer  
 22 I must invoke my Fifth Amendment right.  
 23 BY MR. WEISSING:  
 24 Q. Did Jeffrey Epstein tell you that when he  
 25 would engage in the sexual conduct with Jane Doe,

1 that he was intentionally and deliberately  
2 attempting to cause her psychological and emotional  
3 pain and suffering?

4 MR. RHEINHART: Objection to form for the  
5 reasons previously stated.

6 THE WITNESS: At the instruction of my  
7 lawyer, I must invoke my Fifth Amendment right.

8 BY MR. WEISSING:

9 Q. Did you see evidence that Jeffrey  
10 Epstein's sexual misconduct with her led to  
11 emotional distress on her behalf?

12 MR. RHEINHART: Objection to the form.

13 THE WITNESS: At the instruction of my  
14 lawyer, I must invoke my Fifth Amendment right.

15 BY MR. WEISSING:

16 Q. Are you aware that all of Jeffrey  
17 Epstein's behavior with the minor children were  
18 violations of numerous criminal laws?

19 MR. RHEINHART: Objection to the form. It  
20 calls for a legal conclusion. I will instruct  
21 her not to answer the question at all.

22 BY MR. WEISSING:

23 Q. Did you know that Jeffrey Epstein's  
24 behavior with these minor children was criminal in  
25 nature?

1 going to instruct the witness not to answer it  
2 at all.

3 BY MR. WEISSING:

4 Q. Okay. Did you engage in an agreement with  
5 Jeffrey Epstein that you would seek out underage  
6 female children for his sexual gratification?

7 MR. RHEINHART: Objection to the form.  
8 It's a compound question. Instruct the witness  
9 not to answer.

10 THE WITNESS: On the instruction of my  
11 lawyer, I must invoke my Fifth Amendment right.

12 BY MR. WEISSING:

13 Q. Are you aware that Jane Doe was injured as  
14 a result of sex trafficking committed against her?

15 MR. RHEINHART: Objection to form. Uses  
16 legal terminology like "sex trafficking," and  
17 presumes as part of the question that she knows  
18 a person by the name of Jane Doe, which she  
19 does not acknowledge. Therefore she's not  
20 going to answer the question in that form. I  
21 instruct her not to answer, based on Fifth  
22 Amendment because the answer would implicitly  
23 acknowledge that she knows these people or that  
24 she knows Mr. Epstein.

25 THE WITNESS: On the instruction of my

1 MR. RHEINHART: Objection to the form. It  
2 assumes she has knowledge of whatever conduct  
3 Jeffrey Epstein, whoever that may be, may have  
4 engaged in. So it requires her to speculate as  
5 to a legal conclusion that she's not going to  
6 give.

7 BY MR. WEISSING:

8 Q. Through the course of your employment with  
9 Jeffrey Epstein, were you paid bonuses or any kind  
10 of additional monies for bringing minor children for  
11 his sexual gratification to him?

12 MR. RHEINHART: Objection to form.

13 Assumes facts such as that she ever worked for  
14 Jeffrey Epstein or has any immediate knowledge,  
15 is otherwise compound and ambiguous, and  
16 instruct her not to answer.

17 THE WITNESS: At the instruction of my  
18 lawyer, I must exert my Fifth Amendment right.

19 BY MR. WEISSING:

20 Q. Did you conspire with Jeffrey Epstein to  
21 gain access to minor children for his sexual  
22 gratification?

23 MR. RHEINHART: It's a question that calls  
24 for a legal conclusion. It doesn't in any way  
25 lead to any discoverable evidence, and I am

1 lawyer, I must invoke my Fifth Amendment right.  
2 BY MR. WEISSING:

3 Q. Are you aware that Jane, Jane Doe suffered  
4 emotional and psychological trauma and injury as a  
5 result of the behavior engaged with her by  
6 Jeffrey Epstein?

7 MR. RHEINHART: Same objection as stated  
8 to the previous question and instruct the  
9 witness not to answer, because to attempt to  
10 answer that question would implicitly admit  
11 that she knows Jeffrey Epstein or knows  
12 anything about Jane Doe.

13 THE WITNESS: On the instruction of my  
14 lawyer, I must invoke my Fifth Amendment right.

15 BY MR. WEISSING:

16 Q. With regard to these girls who were being  
17 procured for Jeffrey Epstein, did you arrange for  
18 their travel to the mansion?

19 MR. RHEINHART: Objection to the form,  
20 ambiguous to the term "procurement," and for  
21 the reasons previously stated, and the standing  
22 objection, and instruct the witness not to  
23 answer the question.

24 THE WITNESS: At the instruction of my  
25 lawyer, I must invoke my Fifth Amendment right.

1 BY MR. WEISSING:

2 Q. In your work for Jeffrey Epstein, did you  
3 coordinate efforts with others in bringing minor  
4 female children to his mansion for his sexual  
5 gratification?

6 MR. RHEINHART: Objection to the form.  
7 Same objection previously made to the standing  
8 objection.

9 THE WITNESS: At the instruction of my  
10 lawyer, I must invoke my Fifth Amendment right.

11 BY MR. WEISSING:

12 Q. Were you aware that many of the girls  
13 brought to Epstein's were minor -- Epstein mansion  
14 were minors, under at age of 14 years of age?

15 MR. RHEINHART: Objection to the form.  
16 Instruct the witness not to answer.

17 THE WITNESS: At the instruction of my  
18 lawyer, I must invoke the Fifth Amendment  
19 right.

20 BY MR. WEISSING:

21 Q. Did you coordinate with some of the girls  
22 to bring other underage female children to Epstein  
23 for his sexual gratification?

24 MR. RHEINHART: Objection. Can we narrow  
25 down "other girls" and who we are talking

1 BY MR. WEISSING:

2 Q. Are you aware that Jeffrey Epstein engaged  
3 in sexual misconduct with Jane Doe at least 20 times  
4 between February 2003 and June 2005 while she was a  
5 minor child?

6 MR. RHEINHART: Objection to the form.

7 THE WITNESS: On the instruction of my  
8 lawyer, I must invoke my Fifth Amendment right.

9 BY MR. WEISSING:

10 Q. In the scheduling of girls for  
11 Jeffrey Epstein, did he have a particular interest  
12 in girls under the age of 14?

13 MR. RHEINHART: Objection to the form. It  
14 assumes she did scheduling for Jeffrey Epstein.  
15 In order to answer the question, she has to  
16 implicitly admit that which she's not  
17 admitting, and therefore she's not answering  
18 the question.

19 THE WITNESS: At the instruction of my  
20 lawyer, I must invoke my Fifth Amendment right.

21 BY MR. WEISSING:

22 Q. In procuring girls for Jeffrey Epstein,  
23 was he primarily interested in young, skinny and  
24 attractive girls?

25 MR. RHEINHART: Objection to the form and

1 about? We already have questioning from  
2 Mr. Horowitz about his clients and Mr. Kuvin  
3 about his clients. Can we narrow that down a  
4 little bit?

5 MR. WEISSING: I'm asking about whether or  
6 not she had someone she coordinated with to  
7 bring other girls. Okay?

8 MR. RHEINHART: And same form objection.

9 THE WITNESS: On the instruction of my  
10 lawyer, I must invoke my Fifth Amendment  
11 privilege.

12 BY MR. WEISSING:

13 Q. When you scheduled these girls to come to  
14 the mansion, you knew that they were coming for  
15 Jeffrey Epstein's sexual gratification, did you not?

16 MR. RHEINHART: Objection to the form.

17 It's a compound question that assumes she did  
18 scheduling, assumes she brought them to the  
19 mansion, assumes she knows what the mansion is,  
20 and assumes she knows who Jeffrey Epstein is.

21 So it's a compound question that she can't  
22 fairly answer without -- in the form that it's  
23 asked and instruct her not to answer.

24 THE WITNESS: At the instruction of my  
25 lawyer, I must invoke my Fifth Amendment right.

1 implicitly assumes that she procured girls for  
2 Jeffrey Epstein, which she has not admitted to  
3 or is not admitting to, so therefore she can't  
4 fairly answer the question as it's been asked,  
5 so therefore, I will instruct her not to answer  
6 it.

7 THE WITNESS: On the instruction of my  
8 lawyer, I must invoke my Fifth Amendment right.

9 BY MR. WEISSING:

10 Q. With regard to the amount paid to the  
11 girls for what they did with Jeffrey Epstein, would  
12 the standard payment be several hundred dollars?

13 MR. RHEINHART: Objection to the form,  
14 standard objection.

15 THE WITNESS: At the instruction of my  
16 lawyer, I must invoke my Fifth Amendment right.

17 BY MR. WEISSING:

18 Q. Did he have a standard escalation of the  
19 amount that he would pay depending upon the nature  
20 of the sexual acts that he performed with them?

21 MR. RHEINHART: Objection, objection. The  
22 question has been asked and answered in  
23 different forms several times, and again  
24 standing objection as to the form of the  
25 question.

1 THE WITNESS: At the instruction of my  
 2 lawyer, I must invoke my Fifth Amendment right.  
 3 BY MR. WEISSING:  
 4 Q. The engaging in sexual practices with  
 5 underage girls, was this something that went on for  
 6 a substantial period of time?  
 7 MR. RHEINHART: Objection to the form.  
 8 It's ambiguous. It assumes facts that she's  
 9 not conceding, and she can't fairly answer the  
 10 question based on the assumptions that are made  
 11 in it. I will therefore instruct her not to  
 12 answer the question.  
 13 THE WITNESS: At the instruction of my  
 14 lawyer I must exercise my Fifth Amendment  
 15 right.  
 16 BY MR. WEISSING:  
 17 Q. With regard to the payments made to the  
 18 girls, would he make bigger payments to these minor  
 19 girls depending upon the degree of force he used  
 20 towards them?  
 21 MR. RHEINHART: Objection to the form. It  
 22 assumes numerous facts that have not been  
 23 established nor that this witness is admitting.  
 24 So, I instruct her not to answer.  
 25 THE WITNESS: At the instruction of my

1 happen?  
 2 MR. RHEINHART: Objection to the form for  
 3 the same reasons previously stated.  
 4 THE WITNESS: At the instruction of my  
 5 lawyer, I must invoke my Fifth Amendment right.  
 6 BY MR. WEISSING:  
 7 Q. Are you aware that Epstein received sexual  
 8 gratification from sexually abusing minor children?  
 9 MR. RHEINHART: Object to the form. It  
 10 calls for a legal conclusion and it's  
 11 ambiguous, and the standing objection as to any  
 12 knowledge of Jeffrey Epstein or any abuse of  
 13 minor children.  
 14 THE WITNESS: At the instruction of my  
 15 lawyer, I must invoke my Fifth Amendment right.  
 16 BY MR. WEISSING:  
 17 Q. Did Jeffrey Epstein ever tell you that he  
 18 received sexual gratification from sexually abusing  
 19 minor children?  
 20 MR. RHEINHART: Objection to the form for  
 21 the same reasons previously stated.  
 22 THE WITNESS: At the instruction of my  
 23 lawyer, I must invoke my Fifth Amendment right.  
 24 MR. RHEINHART: Folks, it's 4:20. We've  
 25 been at this for a long, long time. This is

1 lawyer, I must invoke my Fifth Amendment right.  
 2 BY MR. WEISSING:  
 3 Q. Along that line, would he make greater  
 4 payments, larger payments to the girls if they -- if  
 5 he was more concerned about them reporting the  
 6 crimes committed against him?  
 7 MR. RHEINHART: Objection to the form. It  
 8 calls for speculation. It calls for a legal  
 9 conclusion. It assumes facts that have not  
 10 been admitted. Standing objection to the form.  
 11 THE WITNESS: At the instruction of my  
 12 lawyer, I must invoke my Fifth Amendment  
 13 privilege.  
 14 BY MR. WEISSING:  
 15 Q. Would you pay the girls more money because  
 16 of the amount of force used by Jeffrey Epstein  
 17 against them and feared that they would report the  
 18 crimes committed against them?  
 19 MR. RHEINHART: Objection to the form.  
 20 THE WITNESS: On the instruction of my  
 21 lawyer, I must invoke my Fifth Amendment right.  
 22 BY MR. WEISSING:  
 23 Q. Are you aware that after having unlawful  
 24 sex with these minor children, that Epstein would  
 25 tell them not to tell anyone or bad things would

1 now getting pointless, and we're terminating  
 2 the deposition at 5:00. So I suggest you pick  
 3 up the pace.  
 4 You can ask a million questions about what  
 5 Jeffrey Epstein knew, what Jeffrey Epstein did.  
 6 She doesn't know. She's not going to say, so  
 7 we've got 40 minute and we're out of here.  
 8 MR. GARCIA: I haven't asked any  
 9 questions.  
 10 MR. EDWARDS: There others of us that have  
 11 questions.  
 12 MR. RHEINHART: You can take that up with  
 13 the judge. We're done at 5:00.  
 14 MS. EZELL: For the record, there are some  
 15 filed cases who attorneys have not been able to  
 16 ask questions, and we certainly assert our  
 17 right to call Ms. Kellen again.  
 18 MR. RHEINHART: You can, you can certainly  
 19 take that up, but I am not, you know, how many,  
 20 how many times do we have to ask the same  
 21 question over and over and over again that it's  
 22 clear is a compound question that asks her to  
 23 assume facts that she's not admitted she knows  
 24 anything about and it's a hypothetical question  
 25 not designed to get us anywhere.

1 So can we focus on the specific questions  
2 that she can answer or from which you can draw  
3 an adverse inference if asked properly, and  
4 let's move it along.

5 MS. EZELL: Each young woman's case is an  
6 individual case, and we have the right to ask,  
7 ask whatever questions that we need to with  
8 regard to each one.

9 MR. RHEINHART: I --

10 MR. GOLDBERGER: Let's just go forward  
11 until 5:00 and see where we're at.

12 BY MR. WEISSING:

13 Q. Did you know that Jeffrey Epstein received  
14 sexual gratification from directing others to  
15 sexually abuse minor children?

16 MR. RHEINHART: Objection to the form.

17 THE WITNESS: On the instruction of my  
18 lawyer, I must invoke the Fifth Amendment  
19 right.

20 BY MR. WEISSING:

21 Q. Did you know that Jeffrey Epstein received  
22 sexual gratification from directing Marcinkova to  
23 sexually abuse minor children?

24 MR. RHEINHART: Objection to the form. It  
25 assumes knowledge of a person named Marcinkova.

1 It is otherwise compound and objectionable.

2 THE WITNESS: On the instruction of my  
3 lawyer, I must invoke my Fifth Amendment right.

4 MR. WEISSING: Let's go off the record for  
5 a moment.

6 THE VIDEOGRAPHER: Are we all good with  
7 going off the record?

8 MR. RHEINHART: Yeah, that's fine.

9 MR. HOROWITZ: Yes.

10 THE VIDEOGRAPHER: We're now off the  
11 record at 4:22 p.m.

12 (A brief recess was held.)

13 THE VIDEOGRAPHER: We are now on the  
14 record. It is 4:24 p.m.

15 BY MR. WEISSING:

16 Q. Do you know Nadia Marcinkova?

17 MR. KUVIN: Marcinkova.

18 THE WITNESS: On the instruction of my  
19 lawyer, I must invoke my Fifth Amendment  
20 privilege.

21 BY MR. WEISSING:

22 Q. Do you know -- have you procured minor  
23 children to have sexual relations with  
24 Nadia Marcinkova at Jeffrey Epstein's mansion?  
25 MR. RHEINHART: Objection to the form.

1 THE WITNESS: On the instruction of my  
2 lawyer, I must invoke my Fifth Amendment  
3 privilege.

4 BY MR. WEISSING:

5 Q. Do you know Alan Dershowitz?

6 MR. RHEINHART: The question was asked and  
7 answered about three-and-a-half hours ago.

8 THE WITNESS: On the instruction of my  
9 lawyer, I must invoke my Fifth Amendment  
10 privilege.

11 BY MR. WEISSING:

12 Q. Do you know David Copperfield?

13 MR. RHEINHART: That question was asked  
14 about three-and-a-half-hours ago.

15 THE WITNESS: On the instruction of my  
16 lawyer, I must invoke my Fifth Amendment  
17 privilege.

18 BY MR. WEISSING:

19 Q. In addition to his place at, in Palm  
20 Beach, are you aware that Jeffrey Epstein has an  
21 apartment located at 301 East 66th Street, Apartment  
22 14G through E in New York?

23 MR. RHEINHART: That question was asked  
24 about four hours ago. It's been asked and  
25 answered.

1 THE WITNESS: At the instruction of my  
2 lawyer, I invoke my Fifth Amendment privilege.

3 BY MR. WEISSING:

4 Q. While in New York, have you procured  
5 underage minor children to engage in sexual acts  
6 with Jeffrey Epstein at that location?

7 MR. RHEINHART: Object to the form.

8 THE WITNESS: On the instruction of my  
9 lawyer, I must invoke my Fifth Amendment  
10 privilege.

11 BY MR. WEISSING:

12 Q. With regard to the minor children procured  
13 for him at that location, were they school children  
14 in the New York area?

15 MR. RHEINHART: The previous question,  
16 objection to the form. The same as all the  
17 previous questions, it assumes a fact that's  
18 not been established. It can't fairly be  
19 answered.

20 THE WITNESS: On the instruction of my  
21 lawyer, I must invoke my Fifth Amendment  
22 privilege.

23 BY MR. WEISSING:

24 Q. Did Jeffrey Epstein have sexual encounters  
25 with underage people while at that apartment?

1 MR. RHEINHART: Objection to the form.  
 2 THE WITNESS: On the instruction of my  
 3 lawyer, I must invoke my Fifth Amendment  
 4 privilege.  
 5 BY MR. WEISSING:  
 6 Q. With regard to underage children that he  
 7 had sexual encounters with in New York, were those  
 8 school children in that area?  
 9 MR. RHEINHART: Objection to the form. No  
 10 factual basis for the question.  
 11 THE WITNESS: On the instruction of my  
 12 lawyer, I must invoke my Fifth Amendment  
 13 privilege.  
 14 BY MR. WEISSING:  
 15 Q. Are you aware of another location that he  
 16 has at 457 Madison Avenue, lower floor, New York?  
 17 MR. RHEINHART: Objection to the form.  
 18 THE WITNESS: At the instruction my lawyer  
 19 I must invoke my Fifth Amendment privilege.  
 20 BY MR. WEISSING:  
 21 Q. Are you aware of Jeffrey Epstein having  
 22 sexual encounters with underage children at that  
 23 location?  
 24 MR. RHEINHART: No factual basis for the  
 25 question. Objection to form.

1 privilege.  
 2 BY MR. WEISSING:  
 3 Q. Have you been to Jeffrey Epstein's  
 4 property at 6100 Red Hook Quarters, Suite 3-B, in  
 5 St. Thomas, the Virgin Islands?  
 6 A. On the instruction of my lawyer, I must invoke  
 7 my Fifth Amendment privilege.  
 8 Q. Over what period of time have you been to  
 9 that location?  
 10 MR. RHEINHART: Objection to the form.  
 11 THE WITNESS: On the instruction of my  
 12 lawyer, I must invoke my Fifth Amendment  
 13 privilege.  
 14 BY MR. WEISSING:  
 15 Q. Are you aware of Jeffrey Epstein engaging  
 16 in sexual encounters with underage persons at that  
 17 location?  
 18 MR. RHEINHART: Objection to the form.  
 19 THE WITNESS: On the instruction of my  
 20 lawyer, I must invoke my Fifth Amendment  
 21 privilege.  
 22 BY MR. WEISSING:  
 23 Q. With regard to the underage children he  
 24 engaged in sexual activity with at that location,  
 25 where were those children procured from?

1 THE WITNESS: On the instruction of my  
 2 lawyer, I must invoke my Fifth Amendment  
 3 privilege.  
 4 BY MR. WEISSING:  
 5 Q. Was it part of your employment to obtain  
 6 underage children for sexual encounters with him at  
 7 that location?  
 8 MR. RHEINHART: Objection to the form.  
 9 THE WITNESS: At the instruction of my  
 10 lawyer, I must invoke my Fifth Amendment  
 11 privilege.  
 12 BY MR. WEISSING:  
 13 Q. With regard to the underage children he  
 14 had sex with at that location, were those school  
 15 children from that area?  
 16 MR. RHEINHART: Can I ask what the good  
 17 faith basis is to ask the question if he  
 18 actually had sex with someone at that location?  
 19 Because I, I know no factual predicate that I  
 20 have heard today for asking the questions, so I  
 21 will instruct the witness not to answer it  
 22 because it presumes that she knows Jeffrey  
 23 Epstein.  
 24 THE WITNESS: On the instruction of my  
 25 lawyer, I must invoke my Fifth Amendment

1 MR. RHEINHART: Objection to the form. It  
 2 assumes facts that there has not been any basis  
 3 to assume this witness has any knowledge of.  
 4 THE WITNESS: On the instruction of my  
 5 lawyer, I must invoke my Fifth Amendment  
 6 privilege.  
 7 BY MR. WEISSING:  
 8 Q. Were you, were you engaged by Jeffrey  
 9 Epstein to procure school children from the Virgin  
 10 Islands area for sexual behavior at that location?  
 11 MR. RHEINHART: Objection to the form.  
 12 Standing objection, it assumes knowledge of  
 13 Jeffrey Epstein.  
 14 THE WITNESS: At the instruction of my  
 15 lawyer I must invoke my Fifth Amendment  
 16 privilege.  
 17 BY MR. WEISSING:  
 18 Q. Who is Story Cowles?  
 19 MR. RHEINHART: Objection to the form.  
 20 THE WITNESS: At the instruction of my  
 21 lawyer, I must invoke my Fifth Amendment  
 22 privilege.  
 23 BY MR. WEISSING:  
 24 Q. Did Mr. Cowles in your presence ever have  
 25 sexual encounters with underage persons at any of



1 Mr. Epstein's properties?  
 2 MR. RHEINHART: Objection to the form. It  
 3 assumes knowledge of Mr. Epstein.  
 4 THE WITNESS: At the instruction of my  
 5 lawyer, I must invoke my Fifth Amendment  
 6 privilege.  
 7 BY MR. WEISSING:  
 8 Q. Were you, did you participate in procuring  
 9 underage children for having sex with Mr. Cowles at  
 10 Mr. Epstein's properties?  
 11 MR. RHEINHART: Objection to the form. It  
 12 assumes knowledge of Mr. Epstein.  
 13 THE WITNESS: At the instruction of my  
 14 lawyer, I must invoke my Fifth Amendment  
 15 privilege.  
 16 BY MR. WEISSING:  
 17 Q. Have you ever heard of Sarah Kensington?  
 18 MR. RHEINHART: Objection to the form.  
 19 THE WITNESS: On the instruction of my  
 20 lawyer, I must invoke my Fifth Amendment  
 21 privilege.  
 22 MR. WEISSING: Okay. Let's you objected  
 23 to the form.  
 24 MR. RHEINHART: I'm sorry. I didn't mean  
 25 to object to form. That one I apologize. Just

1 MR. WEISSING: I have no other questions.  
 2 MR. RHEINHART: Okay. Ms. Ezell,  
 3 Mr. Garcia, do you want to go next?  
 4 MR. GARCIA: Is it okay if I go?  
 5 MS. EZELL: We were just discussing that.  
 6 I'm going to go quite a while, and I believe  
 7 you think you can finish in 30 or 40 minutes,  
 8 so...  
 9 MR. GARCIA: About 45. About 45 minutes.  
 10 MS. EZELL: It makes sense for Mr. Garcia  
 11 to go first.  
 12 MR. RHEINHART: Your decision. Do you  
 13 need a break or are you okay?  
 14 THE WITNESS: I'm okay.  
 15 MR. RHEINHART: I'll slide over.  
 16 THE VIDEOGRAPHER: Are we on a break?  
 17 MR. KUVIN: No, no breaks.  
 18 CROSS (SARAH KELLEN)  
 19 BY MR. GARCIA:  
 20 Q. Ms. Kellen, I think you've already  
 21 answered this question about your cell number. Are  
 22 you able to tell me if you have a new cell number  
 23 other than the one that was given to you which I  
 24 believe was (917)855-3363?  
 25 MR. RHEINHART: Instruct the witness not

1 instruct the witness not to answer the  
 2 question.  
 3 BY MR. WEISSING:  
 4 Q. Have you ever gone by the name  
 5 Sarah Kensington?  
 6 A. At the instruction of my lawyer, I must invoke  
 7 my Fifth Amendment privilege.  
 8 Q. Have you ever been paid by Jeffrey Epstein  
 9 to obtain underage children to have sex with  
 10 Jean-Luc Brunel?  
 11 MR. RHEINHART: Objection to the form. It  
 12 assumes knowledge of Jeffrey Epstein.  
 13 THE WITNESS: At the instruction of my  
 14 lawyer, I must invoke my Fifth Amendment  
 15 privilege.  
 16 BY MR. WEISSING:  
 17 Q. Other than the properties that we've  
 18 discussed, are you aware of any other properties  
 19 that Jeffrey Epstein owns?  
 20 A. At the instruction of my lawyer, I must invoke  
 21 my Fifth Amendment privilege.  
 22 Q. Are you aware of the financial assets of  
 23 Jeffrey Epstein?  
 24 A. On the instruction of my lawyer, I must invoke  
 25 my Fifth Amendment privilege.

1 to answer the question based on her Fifth  
 2 Amendment privilege.  
 3 THE WITNESS: At the instruction of my  
 4 lawyer, I must invoke my Fifth Amendment right.  
 5 BY MR. GARCIA:  
 6 Q. All right. Can you tell me who pays for  
 7 that cell number?  
 8 MR. RHEINHART: Same instruction.  
 9 THE WITNESS: On the instruction of my  
 10 lawyer, I must invoke my Fifth Amendment  
 11 privilege.  
 12 BY MR. GARCIA:  
 13 Q. Can you tell me how long you've had that  
 14 cell number?  
 15 MR. RHEINHART: Just --  
 16 THE WITNESS: On the instruction --  
 17 MR. RHEINHART: Just so I'm clear, when  
 18 you say "that" cell number --  
 19 MR. GARCIA: The (917)855-3363.  
 20 MR. RHEINHART: Thank you. Instruct the  
 21 witness not to answer based on Fifth Amendment.  
 22 THE WITNESS: At the instruction of my  
 23 lawyer, I must invoke my Fifth Amendment right.  
 24 BY MR. GARCIA:  
 25 Q. All right. Would you have any objection

1 to me dialing that number to see what the response  
 2 is?  
 3 MR. RHEINHART: Would she object to it?  
 4 MR. GARCIA: Yeah.  
 5 MR. RHEINHART: You can do whatever you  
 6 want to do.  
 7 MR. GARCIA: Okay.  
 8 MR. KUVIN: Just do it.  
 9 MR. GARCIA: Okay. Let's see if I can put  
 10 it on speaker. And I am dialing (917)855-3363.  
 11 (Telephone call being made: Please leave  
 12 a message. At the tone please record your  
 13 message.)  
 14 BY MR. GARCIA:  
 15 Q. Were you able to hear the voice that said,  
 16 "Please leave a message"?  
 17 A. Well, I heard what it said.  
 18 Q. All right. Do you recognize that voice?  
 19 A. My lawyer has instructed me to assert my Fifth  
 20 Amendment right.  
 21 Q. As to whether or not you recognize a  
 22 voice?  
 23 MR. RHEINHART: Yes.  
 24 THE WITNESS: Yes, he has.  
 25 THE VIDEOGRAPHER: And what's the

1 MR. RHEINHART: There's all sorts of facts  
 2 that you may be able to prove from other places  
 3 that she's doesn't have to admit to.  
 4 MR. GARCIA: I am not asking her for other  
 5 facts. I'm asking her if she files income tax  
 6 returns.  
 7 MR. RHEINHART: Correct. You asked her  
 8 that. She's answered your question.  
 9 MR. GARCIA: Even though the Government  
 10 has her income tax returns, if she files them,  
 11 you are -- you're still asserting a privilege  
 12 on information the Government already has?  
 13 MR. RHEINHART: Yes.  
 14 BY MR. GARCIA:  
 15 Q. Does Mr. Epstein pay you in cash or by  
 16 check?  
 17 MR. RHEINHART: Objection to the form of  
 18 the question. Assumes Mr. Epstein.  
 19 THE WITNESS: On the instruction of my  
 20 lawyer, I must assert my Fifth Amendment right.  
 21 BY MR. GARCIA:  
 22 Q. What is your place of birth?  
 23 MR. RHEINHART: Instruct the witness not  
 24 to answer the question.  
 25 THE WITNESS: On the instruction of my

1 good-faith basis for asserting that privilege?  
 2 MR. RHEINHART: I don't have to tell you  
 3 what the good-faith basis is. She's asserting  
 4 a privilege as to whether she recognizes a  
 5 voice or not. If you can identify the voice,  
 6 it could potentially lead back to other places  
 7 that could incriminate her in theory. So, she  
 8 has a good faith basis to invoke it.  
 9 BY MR. GARCIA:  
 10 Q. Do you have a job currently?  
 11 MR. RHEINHART: Instruct the witness not  
 12 to answer.  
 13 THE WITNESS: On the instruction of my  
 14 lawyer, I choose to assert my Fifth Amendment  
 15 right.  
 16 BY MR. GARCIA:  
 17 Q. Do you file income tax returns?  
 18 MR. RHEINHART: Same instruction.  
 19 THE WITNESS: On the instruction of my  
 20 lawyer, I choose to assert my Fifth Amendment  
 21 right.  
 22 MR. GARCIA: The Government, presumably,  
 23 has her income tax returns, so what is the  
 24 basis for asserting a privilege against  
 25 self-incrimination?

1 lawyer, I must invoke my Fifth Amendment right.  
 2 MR. GARCIA: How can that possibly  
 3 incriminate her?  
 4 MR. RHEINHART: I will answer that  
 5 question when a judge asks it to me.  
 6 MR. GARCIA: Do you have any case law that  
 7 supports that question as subject to a Fifth  
 8 Amendment objection?  
 9 MR. RHEINHART: I'll answer the question  
 10 when a judge asks it of me.  
 11 BY MR. GARCIA:  
 12 Q. Did you graduate from high school?  
 13 MR. RHEINHART: Same objection, same  
 14 instruction.  
 15 THE WITNESS: On the advice of my lawyer,  
 16 I must invoke my Fifth Amendment right.  
 17 BY MR. GARCIA:  
 18 Q. What states have you lived in other than  
 19 Florida and New York?  
 20 MR. RHEINHART: Same instruction.  
 21 THE WITNESS: On the instruction of my  
 22 lawyer, I must invoke my Fifth Amendment right.  
 23 BY MR. GARCIA:  
 24 Q. Did you attend college?  
 25 MR. RHEINHART: Same instruction.

1 THE WITNESS: On the instruction of my  
 2 lawyer, I must invoke my Fifth Amendment right.  
 3 BY MR. GARCIA:  
 4 Q. Have you ever been to New Mexico?  
 5 MR. RHEINHART: Same instruction.  
 6 THE WITNESS: On the instruction of my  
 7 lawyer, I must invoke my Fifth Amendment right.  
 8 BY MR. GARCIA:  
 9 Q. Do you have a passport?  
 10 MR. RHEINHART: Same instruction.  
 11 THE WITNESS: On the instruction of my  
 12 lawyer, I must invoke my Fifth Amendment right.  
 13 MR. GARCIA: The Government has access to  
 14 her passport, and you're saying that's, you can  
 15 object to whether or not she has a passport?  
 16 MR. RHEINHART: There's lots of things  
 17 that there may be evidence of from other  
 18 sources that she doesn't have to admit to. She  
 19 has a Constitutional right not to admit to.  
 20 BY MR. GARCIA:  
 21 Q. Have you ever traveled to Mexico?  
 22 MR. RHEINHART: Same instruction.  
 23 THE WITNESS: On the instruction of my  
 24 lawyer, I must invoke my Fifth Amendment right.  
 25

1 MR. KUVIN: So it's really kind of  
 2 comical, so I apologize for my laughing, but  
 3 it's just bordering --  
 4 MR. RHEINHART: Your --  
 5 MR. KUVIN: -- on absurd.  
 6 MR. RHEINHART: Look, I think most of the  
 7 questions that the rest of you-all asked today  
 8 were absurd, and we've answered your questions  
 9 respectfully. We didn't laugh. We didn't make  
 10 fun of you. It is unprofessional and  
 11 disrespectful of you to laugh at the witness  
 12 when she's asserting a Constitutional right.  
 13 And don't walk away from me when I'm  
 14 talking to you.  
 15 MR. KUVIN: I'm not walking away, I'm  
 16 listening. I'm not walking away at all. I'm  
 17 just throwing away my trash. I apologize if it  
 18 seemed like I was walking away.  
 19 MR. RHEINHART: Uh-huh, which you were.  
 20 Mr. Garcia, if you want to ask your questions,  
 21 you may ask them. She will answer them. If  
 22 you don't like the questions, you can certify  
 23 them to the judge and I will be happy to  
 24 discuss with the judge whether or not there is  
 25 a good-faith basis.

1 BY MR. GARCIA:  
 2 Q. Do you have a driver's license?  
 3 MR. RHEINHART: Same instruction.  
 4 THE WITNESS: On the instruction of my  
 5 lawyer, I must invoke my Fifth Amendment right.  
 6 BY MR. GARCIA:  
 7 Q. Do you have a driver's license in New  
 8 York?  
 9 MR. RHEINHART: Same instruction.  
 10 THE WITNESS: On the instruction of my  
 11 lawyer, I must invoke my Fifth Amendment right.  
 12 BY MR. GARCIA:  
 13 Q. Are you registered to vote?  
 14 MR. RHEINHART: Same instruction.  
 15 THE WITNESS: On the instruction of my  
 16 lawyer, I must invoke my Fifth Amendment right.  
 17 MR. RHEINHART: Mr. Kuvin, if you'd like  
 18 to keep laughing, feel free.  
 19 MR. KUVIN: I think it's absolutely absurd  
 20 that she's objecting to some of these questions  
 21 or taking the Fifth to some of these questions.  
 22 I mean, I want to Sid to ask her now if the sky  
 23 is blue. I think she's going to take the Fifth  
 24 as to that question, as well.  
 25 MR. RHEINHART: Look, I, I --

1 MR. GARCIA: Certify all those questions.  
 2 BY MR. GARCIA:  
 3 Q. Let me ask you, do you, do you deny that  
 4 you solicited a minor by the name of Jane Doe No. II  
 5 for the purposes of providing sexual services to  
 6 Jeffrey Epstein?  
 7 MR. RHEINHART: Instruct the witness not  
 8 to answer.  
 9 THE WITNESS: At the instruction of my  
 10 lawyer, I must assert my Fifth Amendment right.  
 11 BY MR. GARCIA:  
 12 Q. Do you deny that you solicited Jane Doe  
 13 No. 2 on multiple occasions by your cellphone in  
 14 order for her to provide sexual services for pay to  
 15 Mr. Epstein?  
 16 MR. RHEINHART: Same instruction, same  
 17 objection to the form previously stated.  
 18 THE WITNESS: At the instruction of my  
 19 lawyer, I must invoke my Fifth Amendment right.  
 20 BY MR. GARCIA:  
 21 Q. Do you know why Jeffrey Epstein is only  
 22 interested in minor girls?  
 23 MR. RHEINHART: Objection to the form,  
 24 standing objection. It assume she has some  
 25 knowledge of Jeffrey Epstein that's implicit in

1 the question.  
 2 THE WITNESS: On the instruction of my  
 3 lawyer, I must invoke my Fifth Amendment right.  
 4 BY MR. GARCIA:  
 5 Q. Do your parents approve of your  
 6 association with Mr. Epstein?  
 7 MR. RHEINHART: Objection to the form.  
 8 What's -- instruct the witness not to answer.  
 9 THE WITNESS: On the instruction of my  
 10 lawyer --  
 11 MR. GARCIA: To the form or is this some  
 12 constitutional issue that you're raising?  
 13 MR. RHEINHART: Object to the form of your  
 14 question as assuming facts that have not been  
 15 established, and also it's irrelevant to lead  
 16 to any admissible evidence. But to the extent  
 17 that you're asking any questions that could  
 18 relate to her parents, she is invoking the  
 19 Fifth Amendment as to that question.  
 20 THE WITNESS: At the instruction of my  
 21 lawyer, I must invoke my Fifth Amendment right.  
 22 BY MR. GARCIA:  
 23 Q. How did you meet Mr. Epstein?  
 24 MR. RHEINHART: Instruct the witness not  
 25 to answer.

1 compelled by her parents to do anything.  
 2 Move on. I will debate the legal issues  
 3 with the judge, not with you.  
 4 BY MR. GARCIA:  
 5 Q. Do you have any siblings?  
 6 MR. RHEINHART: Instruct the witness not  
 7 to answer. That was also asked and answered  
 8 many hours ago.  
 9 THE WITNESS: On the instruction of my  
 10 lawyer, I must invoke my Fifth Amendment right.  
 11 BY MR. GARCIA:  
 12 Q. Have you ever discussed your relationship  
 13 with Mr. Epstein with your siblings, assuming you  
 14 have any?  
 15 MR. RHEINHART: Instruct the witness not  
 16 to answer the question. Objection to the form.  
 17 THE WITNESS: At the instruction of my  
 18 lawyer, I must invoke my Fifth Amendment right.  
 19 BY MR. GARCIA:  
 20 Q. Do you have a fiance, boyfriend, or  
 21 significant other?  
 22 MR. RHEINHART: Objection to the form.  
 23 Instruct the witness not to answer as to the  
 24 Fifth Amendment.  
 25 THE WITNESS: On the instruction of my

1 THE WITNESS: At the instruction of my  
 2 lawyer, I must invoke my Fifth Amendment right.  
 3 BY MR. GARCIA:  
 4 Q. Did your parents know Mr. Epstein?  
 5 MR. RHEINHART: That question I think was  
 6 asked and answered several hours ago, and I'll  
 7 instruct the witness not to answer as to Fifth  
 8 Amendment privilege.  
 9 THE WITNESS: On the instruction of my  
 10 lawyer, I must invoke my Fifth Amendment right.  
 11 BY MR. GARCIA:  
 12 Q. Have you ever discussed your relationship  
 13 with Mr. Epstein with your parents?  
 14 MR. RHEINHART: Objection to the form.  
 15 Instruct the witness not to answer.  
 16 THE WITNESS: On the instruction of my  
 17 lawyer, I must invoke my Fifth Amendment right.  
 18 MR. GARCIA: Wouldn't that be a waiver if  
 19 she's discussed it with her parents?  
 20 MR. RHEINHART: Waiver of what?  
 21 MR. GARCIA: A waiver of any imagined or  
 22 real Fifth Amendment right against  
 23 self-incrimination.  
 24 MR. RHEINHART: It's only waived if it was  
 25 compelled, and you did it anyway. She wasn't

1 lawyer, I must invoke my Fifth Amendment right.  
 2 BY MR. GARCIA:  
 3 Q. Have you discussed your relationship with  
 4 Mr. Epstein with your boyfriend, fiance, or  
 5 significant other?  
 6 MR. RHEINHART: Objection to the form, the  
 7 standing objection, assumes knowledge of  
 8 Mr. Epstein, and I will instruct her not to  
 9 answer.  
 10 THE WITNESS: On the instruction of my  
 11 lawyer, I must invoke my Fifth Amendment right.  
 12 BY MR. GARCIA:  
 13 Q. Now, you were asked before if you visited  
 14 Mr. Epstein at the County jail; is that correct,  
 15 here in Palm Beach County? Do you recall those  
 16 questions?  
 17 A. I do recall being asked that.  
 18 Q. All right. And did you have to fill out  
 19 any type of log when you visited the Palm Beach  
 20 County jail and provide identification to the  
 21 Government as to what your name was, and provide  
 22 your name to the Government and who you were  
 23 visiting?  
 24 MR. RHEINHART: Objection to the form  
 25 because it assumes she went to the Palm Beach

1 County jail. When that question was asked  
 2 before, she invoked her Fifth Amendment  
 3 privilege, so she's not answering the question  
 4 this time either.  
 5 THE WITNESS: At the instruction of my  
 6 lawyer, I must invoke my Fifth Amendment right.  
 7 BY MR. GARCIA:  
 8 Q. Have you spoken to Jeffrey Epstein about  
 9 this deposition that you're giving today?  
 10 MR. RHEINHART: Instruct the witness not  
 11 to answer the question.  
 12 THE WITNESS: At the instruction of my  
 13 lawyer, I invoke my Fifth Amendment right.  
 14 BY MR. GARCIA:  
 15 Q. When is the last time you spoke with  
 16 Mr. Epstein?  
 17 MR. RHEINHART: Instruct the witness not  
 18 to answer the question.  
 19 THE WITNESS: On the instruction of my  
 20 lawyer, I invoke my Fifth Amendment right.  
 21 BY MR. GARCIA:  
 22 Q. Was anybody else in the room when you  
 23 spoke to Mr. Epstein besides the two of you?  
 24 MR. RHEINHART: Instruct the witness not  
 25 to answer the question. Object to the form

1 lawyer, I invoke my Fifth Amendment right.  
 2 BY MR. GARCIA:  
 3 Q. Why did you go see Jeffrey Epstein at the  
 4 County jail?  
 5 MR. RHEINHART: Objection to the form. It  
 6 assumes facts that have not been acknowledged  
 7 or admitted. Instruct the witness not to  
 8 answer.  
 9 THE WITNESS: At the instruction of my  
 10 lawyer, I invoke my Fifth Amendment right.  
 11 BY MR. GARCIA:  
 12 Q. Were your conversations monitored by  
 13 anyone?  
 14 MR. RHEINHART: Objection to the form. It  
 15 assumes facts that have not been admitted or  
 16 acknowledged and instruct the witness not to  
 17 answer.  
 18 THE WITNESS: At the instruction of my  
 19 lawyer, I invoke my Fifth Amendment right.  
 20 BY MR. GARCIA:  
 21 Q. Let me show you what's been filed on your  
 22 behalf as an answer with affirmative defenses. I  
 23 have some extra copies here. We'll mark her copy as  
 24 Exhibit --  
 25 THE COURT REPORTER: 15. Yes, 15.

1 because it assumes any knowledge of  
 2 Mr. Epstein.  
 3 THE WITNESS: At the instruction of my  
 4 lawyer, I invoke my Fifth Amendment right.  
 5 BY MR. GARCIA:  
 6 Q. Where are you currently staying?  
 7 MR. RHEINHART: Instruct the witness not  
 8 to answer.  
 9 BY MR. GARCIA:  
 10 Q. Are you currently engaged --  
 11 MR. RHEINHART: Hold on. Hold on. Let  
 12 her -- let her respond.  
 13 THE WITNESS: At the instruction of my  
 14 lawyer, I invoke my Fifth Amendment right.  
 15 BY MR. GARCIA:  
 16 Q. Are you currently engaged in any criminal  
 17 activity at the, wherever it is that you're staying?  
 18 MR. RHEINHART: Object to the form in that  
 19 it requires a legal conclusion. Second of all,  
 20 I believe it's meant more for harassment than  
 21 to lead to any discoverable evidence. Third of  
 22 all, she's instructed not to answer the  
 23 question based on her Fifth Amendment  
 24 privilege.  
 25 THE WITNESS: On the instruction of my

1 MR. GARCIA: What is it, 15?  
 2 THE COURT REPORTER: 15, yes.  
 3 (Plaintiff's Exhibit No. 15 was marked for  
 4 identification.)  
 5 BY MR. GARCIA:  
 6 Q. Could you please take a look at that  
 7 document.  
 8 A. Do you want me to read the whole thing?  
 9 Q. No, just take a look at it so I can ask  
 10 you if you've ever seen it before.  
 11 MR. RHEINHART: You can answer.  
 12 THE WITNESS: No, no.  
 13 BY MR. GARCIA:  
 14 Q. Were you aware that you were a Defendant  
 15 in a civil action filed by Jane Doe II, in the  
 16 United States District Court, Southern District of  
 17 Florida?  
 18 MR. RHEINHART: You can answer that other  
 19 than if it involves discussions, private  
 20 discussions you had with your lawyers.  
 21 THE WITNESS: I only would have if my  
 22 lawyer told me. I don't know for sure.  
 23 BY MR. GARCIA:  
 24 Q. Okay. Take a look at Page 5. Do you see  
 25 the section that begins with "Affirmative defenses"?

1 A. Uh-huh. Yes.  
 2 Q. Do you have any evidence to support the  
 3 first affirmative defense, and I'll tell you for the  
 4 record that Jane Doe II, is Jane Doe No. II, was a  
 5 willing participant in the acts alleged, and  
 6 therefore her claims are barred or her damages are  
 7 required to be reduced accordingly?  
 8 MR. RHEINHART: I'm sorry. Can you repeat  
 9 the question that you're asking?  
 10 MR. GARCIA: Can you read it back?  
 11 (The requested portion of the record was  
 12 read by the reporter.)  
 13 BY MR. GARCIA:  
 14 Q. Do you have any evidence to support that  
 15 affirmative defense?  
 16 A. I don't understand the question.  
 17 Q. Okay. This affirmative defense alleges on  
 18 your behalf by Mr. Rheinart claims that Jane Doe  
 19 No. II consented to and was a willing participant in  
 20 the acts alleged, and therefore her claims were  
 21 barred or her damages were required to be reduced.  
 22 Do you have any factual basis for  
 23 asserting that defense, and if so, what facts do you  
 24 have to support it?  
 25 MR. RHEINHART: Do you understand the

1 BY MR. GARCIA:  
 2 Q. Did you have any conversations with  
 3 Jane Doe No. II at any time in which she told you  
 4 that she was a, she consented and was a willing  
 5 participant in the acts that are alleged in the  
 6 complaint with Jeffrey Epstein?  
 7 MR. RHEINHART: Object to the form because  
 8 it assumes knowledge of Jane Doe No. II. And  
 9 the witness is going to her invoke her Fifth  
 10 Amendment privilege as to any evidence or any  
 11 knowledge of Jane Doe No. II.  
 12 THE WITNESS: At the instruction of my  
 13 lawyer, I must invoke my Fifth Amendment right.  
 14 BY MR. GARCIA:  
 15 Q. The second affirmative defense on the same  
 16 page it says, "As to Plaintiff's claim, Plaintiff  
 17 actually consented to and participated in conduct  
 18 similar and are identical to the acts alleged with  
 19 other persons which were the sole or contributing  
 20 cause of Plaintiff's alleged damages."  
 21 Do you have any facts to support the  
 22 second affirmative defense?  
 23 MR. RHEINHART: And once again to the  
 24 extent that, the, the question -- object to the  
 25 form to the extent the question requires her to

1 question?  
 2 THE WITNESS: Uh-uh.  
 3 THE COURT REPORTER: Is that a yes?  
 4 THE WITNESS: Yes, sorry.  
 5 MR. RHEINHART: You can answer if you can  
 6 answer.  
 7 THE WITNESS: I'm sorry. Do I have any  
 8 facts.  
 9 BY MR. GARCIA:  
 10 Q. Right. What, what evidence do you have to  
 11 support the claim that Jane Doe No. II consented to  
 12 and was a willing participant with Jeffrey Epstein  
 13 in the acts described in the complaint?  
 14 MR. RHEINHART: I am just consulting on  
 15 what might be a privilege issue.  
 16 (A discussion was held off the record.)  
 17 MR. RHEINHART: A portion of the truth of  
 18 that would require attorney-client privilege  
 19 information, so I am going to instruct her not  
 20 to answer that portion of it, and ask that --  
 21 MR. GARCIA: Okay.  
 22 MR. RHEINHART: Hold it. Okay. And as to  
 23 the rest, I'll instruct her not to answer the  
 24 question based on her Fifth Amendment  
 25 privilege.

1 acknowledge any knowledge of Jane Doe No. II or  
 2 Jane Doe No. II's activities she would invoke  
 3 her Fifth Amendment privilege. I would  
 4 instruct her to do so.  
 5 THE WITNESS: On the instruction of my  
 6 lawyer, I must invoke my Fifth Amendment right.  
 7 BY MR. GARCIA:  
 8 Q. So I don't waste any time with the court  
 9 on these issues, can you tell me at least a yes or  
 10 no as to whether or not you have any facts to  
 11 support, without telling me what the facts are,  
 12 whether or not you have any facts to support the  
 13 defenses?  
 14 MR. RHEINHART: Whether she personally  
 15 does?  
 16 MR. GARCIA: Yes, exactly, personally.  
 17 MR. RHEINHART: -- or has her defense team  
 18 acting on her behalf?  
 19 MR. GARCIA: No, just personally.  
 20 MR. RHEINHART: No, I am going to instruct  
 21 her not to answer based on her Fifth Amendment.  
 22 BY MR. GARCIA:  
 23 Q. Do you have any information to support  
 24 the, any facts to support the third affirmative  
 25 defense that the Plaintiff impliedly consented to

1 the acts alleged by not objecting, and therefore her  
2 claims are barred or her damages are required to be  
3 reduced accordingly?

4 MR. RHEINHART: Once again I would assert  
5 an attorney-client privilege as to -- this,  
6 this question that you have asked requires a  
7 legal conclusion which would require her to --

8 MR. GARCIA: I'm not asking for the legal  
9 conclusion. I'm asking what facts she has to  
10 support an affirmative defense which requires  
11 you to put on evidence of what that defense is.

12 MR. RHEINHART: Right. But you're asking  
13 her what evidence she has of legal conclusions,  
14 which is concepts such as consent, claims being  
15 barred, damages required to be reduced  
16 accordingly, those are legal concepts you're  
17 asking her to make, a lay person to give a  
18 statement as to what the factual evidence is  
19 there to support a legal conclusion. The only  
20 way she would know if they support the legal  
21 conclusion is based on conversations she's had  
22 with counsel.

23 MR. GARCIA: So, are you instructing her  
24 not to answer on that basis or --

25 MR. RHEINHART: Yes, that's right, yeah.

1 page?

2 A. What page, sir?

3 Q. Page 6. It says, "As to Plaintiff's  
4 claim, Defendant reasonably, reasonably believed or  
5 was told that the Plaintiff had attained the age of  
6 18 years old at the time of the alleged acts."

7 Who told you that the Plaintiff was 18 at  
8 the time of the acts involved in this case?

9 MR. RHEINHART: Again, I would instruct  
10 the witness not to answer the question based on  
11 both the attorney-client privilege and her  
12 Fifth Amendment privilege against  
13 self-incrimination.

14 THE WITNESS: At my lawyer's instruction,  
15 I must assert my Fifth Amendment right.

16 BY MR. GARCIA:

17 Q. At the time that Jane Doe No. II was  
18 involved in some sort of a relationship, if you can  
19 call it that, with Mr. Epstein, did you have  
20 counsel? Did you have a lawyer representing you?

21 MR. RHEINHART: Object to the form.

22 She -- the question assumes that there is any  
23 knowledge of any relationship between Jane Doe  
24 No. II and a person named Mr. Epstein. She's  
25 not going to answer the question based on the

1 MR. GARCIA: -- the Fifth Amendment  
2 privilege?

3 MR. RHEINHART: On, on that basis only.  
4 As to that question I am instructing her not to  
5 answer on the basis of the attorney-client  
6 privilege.

7 BY MR. GARCIA:

8 Q. Outside of your discussions with counsel,  
9 do you have any facts to support the third  
10 affirmative defense based upon your discussions with  
11 Jane Doe No. II or discussions with any other person  
12 or review independently of your counsel of any  
13 document that would support this third affirmative  
14 defense?

15 MR. RHEINHART: Object to the form to the  
16 extent that it requires any acknowledgment of  
17 any knowledge of Jane Doe No. II, I would  
18 instruct her not to answer the question based  
19 on the Fifth Amendment.

20 THE WITNESS: Upon my lawyer's  
21 instruction, I choose to exert my Fifth  
22 Amendment right.

23 BY MR. GARCIA:

24 Q. The fourth affirmative defense on Page 6  
25 of Exhibit 15, could you turn to that on the next

1 Fifth Amendment.

2 THE WITNESS: At the instruction of my  
3 lawyer, I assert my Fifth Amendment right.

4 BY MR. GARCIA:

5 Q. Did Jane Doe No. II ever tell you that she  
6 was 18 at the time of the alleged acts?

7 MR. RHEINHART: Object to the form.

8 Instruct the witness not to answer based on the  
9 Fifth Amendment.

10 THE WITNESS: On the instruction of my  
11 lawyer, I assert my Fifth Amendment right.

12 BY MR. GARCIA:

13 Q. I think the Fifth Affirmative Defense is  
14 pretty much similar, but it says, "As to Plaintiff's  
15 claim, Plaintiff's claims are barred as she said she  
16 was 18 years or older at the time," end quote. I  
17 assume that you're referring to yourself; she told  
18 you that she was 18 years old at the time?

19 MR. RHEINHART: Instruct the witness not  
20 to answer based on her Fifth Amendment  
21 privilege.

22 BY MR. GARCIA:

23 Q. Do you have any evidence to support that  
24 assertion; that is did you make any journal  
25 entries -- by the way, do you keep any type of

1 journal or diary?  
 2 MR. RHEINHART: Instruct the witness not  
 3 to answer based on the Fifth Amendment.  
 4 BY MR. GARCIA:  
 5 Q. Have you ever kept --  
 6 MR. RHEINHART: Hold on, please. Let her,  
 7 let her answer.  
 8 THE WITNESS: On the instruction of my  
 9 lawyer, I assert my Fifth Amendment right.  
 10 BY MR. GARCIA:  
 11 Q. Have you ever kept a journal or diary in  
 12 the past?  
 13 MR. RHEINHART: Same instruction.  
 14 THE WITNESS: At the instruction of my  
 15 lawyer, I assert my Fifth Amendment right.  
 16 BY MR. GARCIA:  
 17 Q. As to the sixth affirmative defense, what  
 18 evidence do you have that Plaintiff's alleged  
 19 damages were caused in whole or in part by events  
 20 and/or circumstances completely unrelated to the  
 21 incidents alleged in the complaint?  
 22 MR. RHEINHART: As to that, I would assert  
 23 an attorney-client privilege.  
 24 BY MR. GARCIA:  
 25 Q. Well, do you have a witness that you can

1 BY MR. GARCIA:  
 2 Q. I'm going to give you some dates here. If  
 3 you want to, I don't know if he wants to write them  
 4 down or take them one at a time: June 16th, 2003;  
 5 July 2nd, 2003; April 9th, 2004; June 7th, 2004;  
 6 July 30th, 2004; August 30th, 2004; October 9th,  
 7 2004; October 12th, 2004; October 30th, 2004; and  
 8 November 9th, 2004. Do you recall soliciting Jane  
 9 Doe No. II to come to Jeffrey Epstein's home on any  
 10 of those dates?  
 11 MR. RHEINHART: Objection to the form.  
 12 Standing objection as previously stated as to  
 13 any knowledge of Jeffrey Epstein or Jane Doe  
 14 No. II, and instruct the witness not to answer.  
 15 THE WITNESS: On the instruction --  
 16 MR. GARCIA: Okay. So your instruction is  
 17 not based on Fifth Amendment?  
 18 MR. RHEINHART: It is. I am instructing  
 19 her not to answer based on Fifth Amendment.  
 20 THE WITNESS: On the instruction of my  
 21 lawyer, I must exercise my Fifth Amendment  
 22 right.  
 23 BY MR. GARCIA:  
 24 Q. Do you contest, in any way, that Jane Doe  
 25 No. II was solicited by you on each of these dates

1 identify that will testify about this?  
 2 MR. RHEINHART: Instruct the witness not  
 3 to answer that based on the Fifth Amendment  
 4 privilege. She doesn't have to help you.  
 5 THE WITNESS: On the instruction of my  
 6 lawyer, I exert my Fifth Amendment right.  
 7 MR. GARCIA: All right. So your position  
 8 is that you don't have to answer any questions  
 9 about affirmative defenses, but yet you can  
 10 maintain them?  
 11 MR. RHEINHART: That's not what I said.  
 12 You asked to identify a particular witness. If  
 13 identifying a witness could potentially lead to  
 14 putting herself in jeopardy for criminal  
 15 prosecution, she doesn't have to answer.  
 16 MR. GARCIA: This would be a witness that  
 17 would support her defense, not, not cause her  
 18 criminal prosecution.  
 19 MR. RHEINHART: I, I understand your  
 20 point, and my point is if identifying such a  
 21 witness could also lead her potentially to  
 22 criminal prosecution by the Government, she  
 23 doesn't have to answer that question and she's  
 24 not going to. Witnesses can have many factual  
 25 purposes.

1 for the purposes of providing Jeffrey Epstein with  
 2 sexual massages and/or services.  
 3 MR. RHEINHART: Objection to form. It's a  
 4 compound question. It assumes facts that she's  
 5 not acknowledged or admitted. It is therefore  
 6 compound and ambiguous. I would instruct her  
 7 not to answer based on her Fifth Amendment  
 8 privilege.  
 9 BY MR. GARCIA:  
 10 Q. Where did you live in 2003?  
 11 MR. RHEINHART: Instruct the witness not  
 12 to answer based on the Fifth Amendment.  
 13 THE WITNESS: At the instruction of my  
 14 lawyer, I must exercise my Fifth Amendment  
 15 right.  
 16 BY MR. GARCIA:  
 17 Q. What cellphone number did you have in  
 18 2003?  
 19 MR. RHEINHART: Same instruction.  
 20 THE WITNESS: At the instruction of my  
 21 lawyer I must exert my Fifth Amendment right.  
 22 BY MR. GARCIA:  
 23 Q. Where did you live in 2004?  
 24 MR. RHEINHART: Same instruction.  
 25 THE WITNESS: At the instruction of my



1 lawyer I must exercise my Fifth Amendment  
 2 right.  
 3 BY MR. GARCIA:  
 4 Q. What cellphone number did you have in  
 5 2004?  
 6 MR. RHEINHART: Same instruction.  
 7 THE WITNESS: At the instruction of my  
 8 lawyer I just exercise my Fifth Amendment  
 9 right.  
 10 BY MR. GARCIA:  
 11 Q. Where did you first recruit Jane Doe  
 12 No. II for soliciting her to provide sexual services  
 13 to Jeffrey Epstein?  
 14 MR. RHEINHART: Objection to the form.  
 15 Standing objection previously stated. Instruct  
 16 the witness not to answer based on her Fifth  
 17 Amendment.  
 18 THE WITNESS: At the instruction of my  
 19 lawyer I must exercise my Fifth Amendment  
 20 right.  
 21 BY MR. GARCIA:  
 22 Q. Did you go to clubs where young women hung  
 23 out and approach them in order to solicit them for  
 24 Mr. Epstein?  
 25 MR. RHEINHART: Objection to the form. It

1 BY MR. GARCIA:  
 2 Q. There was some doctor that was -- you were  
 3 asked about earlier today. Do you recall his name?  
 4 MR. RHEINHART: The name that was asked of  
 5 her? If you remember --  
 6 MR. KUVIN: It's Dr. --  
 7 MR. GOLDBERGER: Feelgood?  
 8 MR. KUVIN: No, that's your doctor, Jack.  
 9 Dr. -- hang on. I'll get it for you.  
 10 MS. EZELL: Bard, it was Bard.  
 11 MR. KUVIN: Bard, B-a-r-d, I believe.  
 12 MR. GARCIA: Dr. Bard. I think that's  
 13 right.  
 14 BY MR. GARCIA:  
 15 Q. Do you know a Dr. Bard?  
 16 THE WITNESS: At the instruction of my  
 17 lawyer, I choose to exercise my Fifth Amendment  
 18 right.  
 19 BY MR. GARCIA:  
 20 Q. Did Dr. Bard ever provide any type of  
 21 dental services to you?  
 22 MR. RHEINHART: Objection to the form. It  
 23 assumes facts that have not been established  
 24 that she's ever seen by Dr. Bard. So, once  
 25 again, we assert a Fifth Amendment privilege.

1 assumes knowledge of Mr. Epstein, therefore I  
 2 instruct the witness not to answer based on the  
 3 Fifth Amendment privilege.  
 4 THE WITNESS: At the instruction of my  
 5 lawyer, I must exercise my Fifth Amendment  
 6 right.  
 7 BY MR. GARCIA:  
 8 Q. Did you ever pay Jane Doe No. II for  
 9 sexual services and/or sexual massages provided to  
 10 Mr. Epstein?  
 11 MR. RHEINHART: Objection to the form for  
 12 the reasons previously stated in the standing  
 13 objection. Instruct the witness not to answer,  
 14 based on the Fifth Amendment.  
 15 THE WITNESS: On the instruction of my  
 16 lawyer, I choose to exercise my Fifth Amendment  
 17 right.  
 18 BY MR. GARCIA:  
 19 Q. Did you pay in U.S. currency?  
 20 MR. RHEINHART: Same objection, same  
 21 instruction.  
 22 THE WITNESS: On the instruction of my  
 23 lawyer, I choose to exercise my Fifth Amendment  
 24 right.  
 25

1 THE WITNESS: At the instruction of my  
 2 lawyer, I must exercise my Fifth Amendment  
 3 right.  
 4 BY MR. GARCIA:  
 5 Q. Have you ever had any dental work done in  
 6 the past ten years? And I don't mean cavities. I'm  
 7 talking about cosmetic-type dental work.  
 8 A. Yes, sir.  
 9 Q. All right. What state was it in?  
 10 MR. RHEINHART: One second.  
 11 MR. GOLDBERGER: Excuse me.  
 12 MR. RHEINHART: You can answer. You can  
 13 answer as to what state it occurred.  
 14 THE WITNESS: In New York.  
 15 BY MR. GARCIA:  
 16 Q. Was the dental work paid for by anyone  
 17 other than yourself?  
 18 MR. RHEINHART: Instruct the witness not  
 19 to answer based on the Fifth Amendment  
 20 privilege.  
 21 THE WITNESS: At the instruction of my  
 22 lawyer, I must assert my Fifth Amendment right.  
 23 BY MR. GARCIA:  
 24 Q. What was the name of the doctor that  
 25 provided the cosmetic dental services?

1 MR. RHEINHART: You can answer. Sorry,  
 2 wait a minute.  
 3 Instruct the witness not to answer the  
 4 question based on the Fifth Amendment.  
 5 BY MR. GARCIA:  
 6 Q. Did Jeffrey Epstein --  
 7 MR. RHEINHART: Hold on. You have to let  
 8 her assert her privilege.  
 9 THE WITNESS: At the instruction of my  
 10 lawyer, I must assert my Fifth Amendment right.  
 11 BY MR. GARCIA:  
 12 Q. Did Jeffrey Epstein suggest that you get  
 13 the dental work done?  
 14 MR. RHEINHART: Instruct the witness not  
 15 to answer. Objection to the form, instruct the  
 16 witness not to answer.  
 17 THE WITNESS: On the instruction of my  
 18 lawyer, I must assert my Fifth Amendment right.  
 19 BY MR. GARCIA:  
 20 Q. Do you know Kevin Spacey?  
 21 MR. RHEINHART: Are you asking if she's  
 22 ever met Kevin Spacey?  
 23 MR. GARCIA: Yes, I'm sorry.  
 24 MR. KUVIN: There you go.  
 25 MR. RHEINHART: Instruct the witness not

1 any type of surgical procedure performed on his  
 2 penis?  
 3 MR. RHEINHART: Objection to the form to  
 4 the extent it assumes any knowledge of  
 5 Mr. Epstein and instruct the witness not to  
 6 answer.  
 7 THE WITNESS: On the instruction of my  
 8 lawyer, I must invoke my Fifth Amendment right.  
 9 BY MR. GARCIA:  
 10 Q. Has he ever told you that he's ever had a  
 11 penile implant added to his penis?  
 12 MR. RHEINHART: Same instruction, same  
 13 objection.  
 14 THE WITNESS: On the instruction of my  
 15 lawyer, I must invoke my Fifth Amendment right.  
 16 BY MR. GARCIA:  
 17 Q. Has Mr. Epstein -- have you ever observed  
 18 Mr. Epstein or has he ever told you that he takes  
 19 Viagra or Cialis?  
 20 MR. RHEINHART: Objection to the form.  
 21 Standing objection. It assumes knowledge of  
 22 Mr. Epstein, and therefore I would instruct the  
 23 witness not to answer.  
 24 THE WITNESS: On the instruction of my  
 25 lawyer, I must invoke my Fifth Amendment right.

1 to answer the question.  
 2 THE WITNESS: At the instruction of my  
 3 lawyer, I must invoke my Fifth Amendment right.  
 4 BY MR. GARCIA:  
 5 Q. Did you ever met Chris Tucker?  
 6 MR. RHEINHART: Same instruction.  
 7 THE WITNESS: At the instruction of my  
 8 lawyer I must invoke my Fifth Amendment  
 9 privilege.  
 10 BY MR. GARCIA:  
 11 Q. Did you ever meet Bill Clinton?  
 12 MR. RHEINHART: Same instruction.  
 13 THE WITNESS: On the instruction of my  
 14 lawyer, I must invoke my Fifth Amendment right.  
 15 BY MR. GARCIA:  
 16 Q. Did you ever fly with these three  
 17 gentlemen and Jeffrey Epstein to Africa on Jeffrey  
 18 Epstein's 727 airplane?  
 19 MR. RHEINHART: Objection to the form.  
 20 It's a compound question. Instruct the witness  
 21 not to answer based on the Fifth Amendment.  
 22 THE WITNESS: At the instruction of my  
 23 lawyer, I must invoke my Fifth Amendment right.  
 24 BY MR. GARCIA:  
 25 Q. Has Mr. Epstein ever told you that he had

1 BY MR. GARCIA:  
 2 Q. Did you ever meet Lewis or Dorothy  
 3 Cullman, C-u-l-l-m-a-n?  
 4 MR. GARCIA: I think the look means that  
 5 she's going to object.  
 6 MR. RHEINHART: Are you asking -- I just  
 7 want to clarify the question. Are you asking  
 8 if she has ever met a person she knows to have  
 9 that name or if she's ever --  
 10 MR. GARCIA: Yes.  
 11 MR. RHEINHART: You can answer the  
 12 question.  
 13 THE WITNESS: No.  
 14 MR. GARCIA: There were two people, Lewis,  
 15 L-e-w-i-s, and Dorothy Cullman.  
 16 MR. RHEINHART: So it's split it in two  
 17 questions. Do Lewis first and Dorothy second.  
 18 Have you met Lewis?  
 19 THE WITNESS: No.  
 20 MR. RHEINHART: Dorothy?  
 21 THE WITNESS: No.  
 22 BY MR. GARCIA:  
 23 Q. Have you had any other type of cosmetic  
 24 surgery other than the dental surgery that you  
 25 talked about?

1 MR. RHEINHART: What -- we're getting,  
 2 we're getting into personal privacy issues  
 3 here. Can we, can we get a little foundation  
 4 for why that's relevant?  
 5 MR. GARCIA: I don't think I have to  
 6 reveal that to you, but I would proffer this,  
 7 that if Mr. Epstein paid for it, it might lead  
 8 to perhaps bias on the part of the witness.  
 9 MR. RHEINHART: Well, why don't you ask it  
 10 that way? She's ever had any surgery that was  
 11 paid for by Mr. Epstein or otherwise funded by  
 12 Mr. Epstein.  
 13 MR. KUVIN: On behalf of the other -- on  
 14 behalf of the other Plaintiffs as well, I would  
 15 say that for identification purposes it becomes  
 16 imperative if some of the other girls have  
 17 alleged, as they have in their complaints that  
 18 they saw Ms. Kellen when they arrived at the  
 19 home if she's changed her physical appearance,  
 20 at the date that we go to trial, I believe that  
 21 any cosmetic surgery she has might be relevant  
 22 to the case.  
 23 MR. RHEINHART: I understand. I  
 24 understand. Hold on one second. No. You can  
 25 go ahead and ask.

1 Fifth Amendment on who this dentist was?  
 2 MR. RHEINHART: Yes, she did.  
 3 BY MR. GARCIA:  
 4 Q. Do you have a Facebook page?  
 5 A. No.  
 6 Q. Have you ever had one?  
 7 A. I may have started one, but I, for like ten  
 8 minutes.  
 9 Q. You started one for ten minutes. Did you  
 10 turn it off after ten minutes?  
 11 A. Yes.  
 12 Q. What year was this?  
 13 A. I don't remember.  
 14 Q. What prompted you to turn it off after ten  
 15 minutes?  
 16 A. I think it's a stupid site.  
 17 Q. How about a -- is it called MyFace or  
 18 MySpace? Sorry. MySpace.  
 19 MR. KUVIN: It's not YourFace, sorry, Sid.  
 20 MR. GARCIA: Trust me, you don't want to  
 21 get that on there.  
 22 BY MR. GARCIA:  
 23 Q. How about a MySpace page, have you ever  
 24 had one of those?  
 25 A. No.

1 BY MR. GARCIA:  
 2 Q. Okay. Have you ever had any other type of  
 3 cosmetic surgery that was financed by Mr. Epstein?  
 4 MR. RHEINHART: Objection to the form in  
 5 that it assumes Mr. Epstein, any knowledge of  
 6 Mr. Epstein. But if you want to ask her -- go  
 7 ahead and ask her the general question, has she  
 8 ever had it done by anybody, paid by anybody.  
 9 MR. GARCIA: All right.  
 10 BY MR. GARCIA:  
 11 Q. Have you ever had any other cosmetic  
 12 surgery?  
 13 A. No.  
 14 Q. What type of dental procedure did you have  
 15 done?  
 16 A. Invisalign.  
 17 Q. And what is that?  
 18 A. Straightens your teeth.  
 19 Q. Is it something that you wear?  
 20 A. Sometimes. Not all the time.  
 21 Q. You're still wearing it today?  
 22 A. No.  
 23 Q. And what year was the dental process done?  
 24 A. Started two years ago.  
 25 MR. GARCIA: I'm sorry. Did you take the

1 Q. No. what, what name did you use on the  
 2 Facebook page?  
 3 A. I don't remember.  
 4 Q. Did Jeffrey Epstein suggest that wouldn't  
 5 be such a good idea?  
 6 MR. RHEINHART: Objection to the form.  
 7 Standing objection. Instruct the witness not  
 8 to answer based on Fifth Amendment.  
 9 THE WITNESS: At the advice of my lawyer,  
 10 I must invoke my Fifth Amendment right.  
 11 BY MR. GARCIA:  
 12 Q. Where were you when you set up a Facebook  
 13 page for about ten minutes?  
 14 MR. RHEINHART: Objection to the form.  
 15 Sorry. Instruct the witness not to answer,  
 16 based on the Fifth Amendment.  
 17 THE WITNESS: At the instruction of my  
 18 lawyer, I must invoke my Fifth Amendment right.  
 19 BY MR. GARCIA:  
 20 Q. Do you know who Max Brockman,  
 21 B-r-o-c-k-m-a-n, is?  
 22 MR. RHEINHART: Instruct the witness not  
 23 to answer based on the Fifth Amendment.  
 24 THE WITNESS: At the instruction of my  
 25 lawyer, I must invoke my Fifth Amendment right.

1 BY MR. GARCIA:  
 2 Q. Do you know who Cindy Lopez is?  
 3 MR. RHEINHART: Same instruction.  
 4 THE WITNESS: At the instruction of my  
 5 lawyer, I must invoke my Fifth Amendment right.  
 6 BY MR. GARCIA:  
 7 Q. Do you hold any professional licenses  
 8 issued by any, any state?  
 9 MR. RHEINHART: Hold on a second. You can  
 10 answer.  
 11 THE WITNESS: No.  
 12 BY MR. GARCIA:  
 13 Q. Have you ever held a professional license?  
 14 A. No.  
 15 Q. Do you have any degrees?  
 16 A. No. Well --  
 17 Q. Well -- I'm sorry, go ahead.  
 18 A. College degrees or...  
 19 Q. Any type of degree, high school, college.  
 20 A. I have a high school degree.  
 21 Q. And what year did you receive that degree?  
 22 A. I'm really bad with years. I can't say for  
 23 sure.  
 24 Q. Okay. And what high school did you  
 25 receive it from?

1 lawyer, I must invoke my Fifth Amendment right.  
 2 BY MR. GARCIA:  
 3 Q. Were you home schooled by your parents or  
 4 one of your parents, or someone else?  
 5 A. Myself.  
 6 Q. Do you know what the name of the program  
 7 was that authorized you to home school yourself?  
 8 MR. RHEINHART: Instruct the witness not  
 9 to answer based on the Fifth Amendment.  
 10 THE WITNESS: On the advice of my counsel,  
 11 I must invoke my Fifth Amendment right.  
 12 BY MR. GARCIA:  
 13 Q. Have you ever been a licensed masseuse?  
 14 A. No.  
 15 Q. Have you ever taken any courses to become  
 16 a licensed masseuse?  
 17 A. No.  
 18 Q. Have you applied for any licenses and been  
 19 turned down for same?  
 20 A. No.  
 21 Q. Do you have any facts to deny that  
 22 Mr. Epstein digitally penetrated Jane Doe No. II on  
 23 each of the about ten occasions that I listed before  
 24 for you?  
 25 MR. RHEINHART: Objection to the form of

1 MR. RHEINHART: Instruct the witness not  
 2 to answer based on Fifth Amendment.  
 3 THE WITNESS: On the instruction of my  
 4 lawyer, I must invoke my Fifth Amendment right.  
 5 BY MR. GARCIA:  
 6 Q. Were you associated with Mr. Epstein at  
 7 the time that you attended high school?  
 8 MR. RHEINHART: Objection to the form.  
 9 Standing objection. Instruct the witness not  
 10 to answer.  
 11 THE WITNESS: At the instruction of my  
 12 lawyer, I must invoke my Fifth Amendment right.  
 13 BY MR. GARCIA:  
 14 Q. Was it a public or private high school?  
 15 MR. RHEINHART: You can answer that.  
 16 THE WITNESS: It was home school.  
 17 BY MR. GARCIA:  
 18 Q. But you still got a degree from some  
 19 entity; is that correct?  
 20 A. Yes.  
 21 Q. What was the entity that issued you a  
 22 degree?  
 23 MR. RHEINHART: Instruct the witness not  
 24 to answer based on the Fifth Amendment.  
 25 THE WITNESS: On the instruction of my

1 the question in that it assumes knowledge of  
 2 Mr. Epstein and Ms. Doe No. II. It's a  
 3 compound question. It's ambiguous. And I  
 4 instruct the witness not to answer based on the  
 5 Fifth Amendment.  
 6 THE WITNESS: On the instruction of my  
 7 lawyer, I must exercise my Fifth Amendment  
 8 right.  
 9 BY MR. GARCIA:  
 10 Q. Did you know that Mr. Epstein would  
 11 digitally penetrate Jane Doe No. II prior to  
 12 soliciting her for massages of Mr. Epstein?  
 13 MR. RHEINHART: Same objection as stated  
 14 to the previous question, the standing  
 15 objection to form and instruct the witness not  
 16 to answer.  
 17 MR. GARCIA: Did you --  
 18 MR. RHEINHART: Hold on.  
 19 THE WITNESS: On the instruction of my  
 20 lawyer, I must invoke my Fifth Amendment right.  
 21 BY MR. GARCIA:  
 22 Q. Did you discuss what type of activities  
 23 Mr. Epstein would engage in with Jane Doe No. II  
 24 prior to soliciting her for massages and sexual play  
 25 with Mr. Epstein?

1 MR. RHEINHART: Object to the form of the  
 2 question as ambiguous and standing objection as  
 3 well. Instruct the witness not to answer.  
 4 THE WITNESS: On the instruction of my  
 5 lawyer, I must invoke my Fifth Amendment right.  
 6 BY MR. GARCIA:  
 7 Q. Did Mr. Epstein ever tell you that he had  
 8 sought out psychological or psychiatric treatment  
 9 for any reason?  
 10 MR. RHEINHART: Instruct the witness not  
 11 to answer based on the standing objection.  
 12 Objection to form.  
 13 THE WITNESS: On the instruction of my  
 14 lawyer, I must invoke my Fifth Amendment right.  
 15 BY MR. GARCIA:  
 16 Q. Have you ever received any paychecks from  
 17 any enterprise associated or controlled by Jeffrey  
 18 Epstein?  
 19 MR. RHEINHART: Objection to the form, the  
 20 standing objection. Instruct the witness not  
 21 to answer.  
 22 THE WITNESS: At the instruction of my  
 23 lawyer, I must invoke my Fifth Amendment right.  
 24 BY MR. GARCIA:  
 25 Q. Do you own a home or some sort of a condo

1 lawyer, I invoke my Fifth Amendment right.  
 2 BY MR. GARCIA:  
 3 Q. Do you own an automobile?  
 4 MR. RHEINHART: Same instruction.  
 5 THE WITNESS: On the instruction of my  
 6 lawyer, I invoke my Fifth Amendment right.  
 7 BY MR. GARCIA:  
 8 Q. Who paid for your automobile?  
 9 MR. RHEINHART: Same instruction.  
 10 THE WITNESS: On the instruction of my  
 11 lawyer, I invoke my Fifth Amendment.  
 12 BY MR. GARCIA:  
 13 Q. Has Jeffrey Epstein ever purchased an  
 14 automobile for you?  
 15 MR. RHEINHART: Objection to the form  
 16 based upon the standing objection and instruct  
 17 the witness not to answer.  
 18 THE WITNESS: On the instruction of my  
 19 lawyer, I invoke my Fifth Amendment right.  
 20 BY MR. GARCIA:  
 21 Q. What limousine service do you use in New  
 22 York when you move from place to place?  
 23 MR. RHEINHART: Same instruction.  
 24 THE WITNESS: On the instruction of my  
 25 lawyer, I invoke my Fifth Amendment right.

1 or anything like that?  
 2 MR. RHEINHART: Instruct the witness not  
 3 to answer based on the Fifth Amendment  
 4 privilege.  
 5 THE WITNESS: On the instruction of my  
 6 lawyer, I must invoke my Fifth Amendment right.  
 7 BY MR. GARCIA:  
 8 Q. Do you pay rent to any landlord?  
 9 MR. RHEINHART: Same instruction.  
 10 THE WITNESS: On the instruction of my  
 11 lawyer, I must invoke my Fifth Amendment right.  
 12 BY MR. GARCIA:  
 13 Q. The place where you live, who owns it?  
 14 MR. RHEINHART: Same instruction.  
 15 THE WITNESS: At the instruction of my  
 16 lawyer, I must invoke my Fifth Amendment right.  
 17 BY MR. GARCIA:  
 18 Q. Do you exit a building in New York where  
 19 you exit from a different building's parking garage;  
 20 in other words, do you exit -- strike that.  
 21 Do you use a different parking garage to  
 22 exit the, from the building where you live?  
 23 MR. RHEINHART: Instruct the witness not  
 24 to answer based on the Fifth Amendment.  
 25 THE WITNESS: On the instruction of my

1 BY MR. GARCIA:  
 2 Q. Who pays for your limousine service?  
 3 MR. RHEINHART: Same instruction.  
 4 THE WITNESS: On the instruction of my  
 5 lawyer, I invoke my Fifth Amendment right.  
 6 BY MR. GARCIA:  
 7 Q. How do you spend your typical day in New  
 8 York?  
 9 MR. RHEINHART: Instruct the witness not  
 10 to answer based on the Fifth Amendment. Also  
 11 objection to the form as to what's a typical  
 12 day.  
 13 BY MR. GARCIA:  
 14 Q. Monday through Friday, typical work hours,  
 15 say 9:00 to 5:00, what do you typically do Monday  
 16 through Friday, 9:00 to 5:00 p.m.?  
 17 MR. RHEINHART: Instruct the witness not  
 18 to answer based on the Fifth Amendment.  
 19 THE WITNESS: At the instruction of my  
 20 lawyer, I must invoke my Fifth Amendment right.  
 21 BY MR. GARCIA:  
 22 Q. What is Financial Trust Company?  
 23 MR. RHEINHART: Instruct the witness not  
 24 to answer based on the Fifth Amendment.  
 25 THE WITNESS: At the instruction of my

1 lawyer, I must invoke my Fifth Amendment right.

2 MR. GARCIA: I'm just asking what it is.

3 MR. RHEINHART: Understood.

4 BY MR. GARCIA:

5 Q. Well, let me not waste any time. Do you  
6 know what it is, yes or no?

7 MR. RHEINHART: Instruct the witness not  
8 to answer based on the Fifth Amendment.

9 THE WITNESS: At the instruction of my  
10 lawyer, I invoke my Fifth Amendment right.

11 BY MR. GARCIA:

12 Q. Has Jeffrey Epstein ever told you that he  
13 is a government witness, otherwise known as a  
14 snitch, or confidential informant?

15 MR. RHEINHART: Objection to the form in  
16 that it assumes knowledge of Mr. Epstein.  
17 Instruct the witness not to answer.

18 THE WITNESS: On the instruction of my  
19 lawyer, I invoke my Fifth Amendment right.

20 BY MR. GARCIA:

21 Q. Has he ever told you that he is involved  
22 in a case involving, providing information  
23 concerning money laundering?

24 MR. RHEINHART: Same objection and same  
25 instruction.

1 THE WITNESS: At the instruction of my  
2 lawyer, I must invoke my Fifth Amendment right.

3 MR. GARCIA: That's all I have. Thank  
4 you.

5 MR. RHEINHART: Great. Should we take a  
6 break? I know you need to change the tape as  
7 well.

8 THE VIDEOGRAPHER: Yes. We're now going  
9 off the record. It is 5:18 p.m.

10 (A brief recess was held.)

11 \* \* \* \* \*

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UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA  
CASE NO. 08-CIV-80119-MARRA/JOHNSON

JANE DOE NO. 2,

Plaintiff,

-vs-

VOLUME III OF III

JEFFREY EPSTEIN,

Defendant.

---

Related cases:

08-80232, 08-08380, 08-80381, 08-80994  
08-80993, 08-80811, 08-80893, 09-80469  
09-80591, 09-80656, 09-80802, 09-81092

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VIDEOTAPED DEPOSITION OF  
SARAH KELLEN

Wednesday, March 24, 2010  
10:37 - 6:51 p.m.

250 Australian Avenue South  
Suite 1500  
West Palm Beach, Florida 33401

Reported By:  
Rachel W. Bridge, RPR, FPR  
Notary Public, State of Florida  
Prose Court Reporting Services  
Job No.: 1484

IN THE CIRCUIT COURT OF THE 15TH JUDICIAL CIRCUIT  
IN AND FOR PALM BEACH COUNTY, FLORIDA  
CASE NO. 502008CA028058XXXXMB AD

E.W.,

Plaintiff,

-vs-

VOLUME III OF III

JEFFREY EPSTEIN,

Defendant.

---

VIDEOTAPED DEPOSITION OF  
SARAH KELLEN

Wednesday, March 24, 2010  
10:37 - 6:51 p.m.

250 Australian Avenue South  
Suite 1500  
West Palm Beach, Florida 33401

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Rachel W. Bridge, RPR, FPR  
Notary Public, State of Florida  
Prose Court Reporting Services  
Job No.: 1484



IN THE CIRCUIT COURT OF THE 15TH JUDICIAL CIRCUIT  
IN AND FOR PALM BEACH COUNTY, FLORIDA  
CASE NO. 502008CA028051XXXXMB AB

L.M.,

Plaintiff,

-vs-

VOLUME III OF III

JEFFREY EPSTEIN,

Defendant.

---

VIDEOTAPED DEPOSITION OF  
SARAH KELLEN

Wednesday, March 24, 2010  
10:37 - 6:51 p.m.

250 Australian Avenue South  
Suite 1500  
West Palm Beach, Florida 33401

Reported By:  
Rachel W. Bridge, RPR, FPR  
Notary Public, State of Florida  
Prose Court Reporting Services  
Job No.: 1484

IN THE CIRCUIT COURT OF THE FIFTEENTH JUDICIAL CIRCUIT  
IN AND FOR PALM BEACH COUNTY, FLORIDA  
CASE No.502008CA037319XXXMB AB

B.B.

Plaintiff,

-vs-

VOLUME III OF III

JEFFREY EPSTEIN  
AND SARAH KELLEN,

Defendants.

---

VIDEOTAPED DEPOSITION OF  
SARAH KELLEN

Wednesday, March 24, 2010  
10:37 - 6:51 p.m.

250 Australian Avenue South  
Suite 1500  
West Palm Beach, Florida 33401

Reported By:  
Rachel W. Bridge, RPR, FPR  
Notary Public, State of Florida  
Prose Court Reporting Services  
Job No.: 1484

1 APPEARANCES:  
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 6  
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 Jane Doe:  
 8  
 9 MATTHEW WEISSING, ESQUIRE  
 FARMER, JAFFE, WEISSING, EDWARDS  
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 16 Miami, Florida 33160  
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 17 E-mail: Ahorowitz@sexabuseattorney.com  
 18 On behalf of the Plaintiffs, 101, 102 and 103:  
 19 KATHERINE W. EZELL, ESQUIRE  
 AMY JOSEFSBERG EDERI, ESQUIRE  
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 23 (Via telephone)  
 24  
 25

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1 Appearances continued...  
 2 On behalf of the Plaintiff, Jane Doe II:  
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 Suite 1400  
 10 West Palm Beach, Florida 33401-5012  
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 11  
 12  
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 14 BRUCE E. REINHART, ESQUIRE  
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 15 One Clearlake Center  
 250 South Australian Avenue, Suite 1400  
 16 West Palm Beach, Florida 33401  
 Phone: 561.202.6360  
 17  
 18  
 19  
 20 ALSO PRESENT:  
 21 Jessica Cadwell, Paralegal  
 Burman, Critton, Luttier & Coleman, P.A.  
 22  
 23 Joseph Kozak, Videographer  
 Prose Court Reporting Services  
 24  
 25

1 PROCEEDINGS  
 2 - - -  
 3 THE VIDEOGRAPHER: We are now on the record.  
 4 It is 5:42 p.m., and I'm on media number three.  
 5 MR. REINHART: If I could just put something  
 6 quickly on the record before we start.  
 7 I know Mr. Garcia said he had a couple of  
 8 additional questions, which I have no objection to  
 9 him asking, but it is 5:42 and we've been going  
 10 almost seven hours with Ms. Kellen.  
 11 And I know Ms. Ezell has questions and she has  
 12 got her one client she has to ask questions about.  
 13 I understand that, but I hope we can focus on going  
 14 forward to areas that have not already been covered  
 15 so we can actually get out of here tonight, because  
 16 at some point we really do have to go, and I would  
 17 like to get this over with today.  
 18 So with that, Mr. Garcia, if you have some  
 19 additional questions, I have no objection to you  
 20 asking that.  
 21 MR. GARCIA: Thank you.  
 22 CROSS - continued (SARAH KELLEN)  
 23 BY MR. GARCIA:  
 24 Q. Have you ever had a different hair color?  
 25 MR. REINHART: Asking if at any time in her

1 life she's ever dyed her hair a different hair  
 2 color?  
 3 MR. GARCIA: Yes, or if she's dyed her hair  
 4 now or if that's her natural color. Let's start  
 5 with that.  
 6 BY MR. GARCIA:  
 7 Q. Is that your natural color?  
 8 MR. REINHART: Answer that.  
 9 THE WITNESS: Yes.  
 10 BY MR. GARCIA:  
 11 Q. What is your natural color, so the transcript  
 12 will reflect it?  
 13 MR. REINHART: We have a video, so I think  
 14 it's pretty clear.  
 15 THE WITNESS: Brown.  
 16 BY MR. GARCIA:  
 17 Q. Have you ever dyed your hair or colored your  
 18 hair blonde or any type of shade of light, lighter  
 19 shade?  
 20 MR. REINHART: You mean at any time in her  
 21 life has she done that?  
 22 MR. GARCIA: Yes, sir.  
 23 THE WITNESS: Yes.  
 24 BY MR. GARCIA:  
 25 Q. For what period of time?

1 Q. And you are sure that you only had it up for  
 2 about ten minutes?  
 3 MR. REINHART: Did you mean literally ten  
 4 minutes or just for a brief period of time?  
 5 THE WITNESS: A very brief period of time.  
 6 MR. REINHART: You can answer Mr. Garcia's  
 7 question.  
 8 BY MR. GARCIA:  
 9 Q. Can you be more specific? Are we talking  
 10 about ten minutes for a day or ten minutes in a week or  
 11 a month?  
 12 A. Maybe a day. Maybe two days.  
 13 Q. Okay.  
 14 MR. GARCIA: Okay, that's all I have. Thanks.  
 15 CROSS (SARAH KELLEN)  
 16 BY MS. EZELL:  
 17 Q. Ms. Kellen, my name is Katherine Ezell. I'm  
 18 here with Amy Josefsberg Ederi. We represent Jane Doe  
 19 103. We also represent three clients who have not yet  
 20 filed. Some of the questions may be repetitive, but I  
 21 believe we have the right to ask them with regard to our  
 22 clients. So with that said, we'll move along as fast as  
 23 we can.  
 24 Why did you take down your Facebook page?  
 25 A. I think it's a stupid site. I don't

1 A. I don't recall.  
 2 Q. And how long have you gone back to your  
 3 natural color brown?  
 4 A. It's been a long time. I don't recall exactly  
 5 the dates.  
 6 Q. Do know somebody named Craig Greczyn, G-r-e-c,  
 7 as in cat, z as in Zorro, y-n?  
 8 A. No.  
 9 Q. He's a student at SUNY University, S-U-N-Y, in  
 10 Courtland.  
 11 A. No idea.  
 12 Q. Do you know Kofi Sansculotte, K-o-f-i,  
 13 S-a-n-s-c-u-l-o-t-t-e?  
 14 A. No.  
 15 Q. And Michael Daley?  
 16 A. No.  
 17 Q. I tried to see if I could Google your Facebook  
 18 page, and you thought you took it down after about ten  
 19 minutes. I did come up with three or four Sarah  
 20 Kellens. I'm not sure if it's the same one that you  
 21 are, but are you sure that you've taken it down?  
 22 A. Yes.  
 23 Q. And do you have any idea when you took it  
 24 down?  
 25 A. Maybe a year ago.

1 understand it. I don't understand the point of it.  
 2 Q. Do you have e-mail?  
 3 A. Yes.  
 4 Q. And what is your e-mail address?  
 5 MR. REINHART: Instruct the witness not to  
 6 answer based on Fifth Amendment privilege.  
 7 THE WITNESS: At the advice of counsel, I must  
 8 invoke my Fifth Amendment right.  
 9 BY MS. EZELL:  
 10 Q. Have you, have you done e-mail under the  
 11 address JKellens@Earthlink.net?  
 12 A. Can you repeat that? I'm sorry.  
 13 Q. Have you used e-mail with the address  
 14 JKellens@Earthlink.net?  
 15 A. No.  
 16 Q. Have you used e-mail with the address  
 17 Kellens@Earthlink.net?  
 18 MR. REINHART: Hold on a second. I'm going to  
 19 instruct the witness not to answer any questions  
 20 about any e-mail addresses that she may or may not  
 21 have had in the past based on her Fifth Amendment  
 22 privilege.  
 23 THE WITNESS: At the advice of my counsel, I  
 24 must invoke my Fifth Amendment right.  
 25

1 BY MS. EZELL:  
 2 Q. With regard to the Facebook page again, why  
 3 did you start it up if you thought it was a stupid site  
 4 and didn't know how to use it?  
 5 A. I was just curious.  
 6 Q. Did anyone help you do that?  
 7 A. No.  
 8 Q. Did anyone tell you to take it down?  
 9 A. No.  
 10 Q. You were asked about any licenses. Have you  
 11 never held a real estate license?  
 12 A. Never.  
 13 Q. Do you hold any licenses in any states other  
 14 than Florida?  
 15 MR. REINHART: When you say licenses, you mean  
 16 professional as opposed to a driver's license or  
 17 some other sort of a license?  
 18 MS. EZELL: Yes.  
 19 THE WITNESS: I don't have a license anywhere  
 20 for anything.  
 21 BY MS. EZELL:  
 22 Q. Do you have a driver's license?  
 23 A. Yes.  
 24 Q. And in what state?  
 25 MR. REINHART: I instruct her not to answer

1 THE VIDEOGRAPHER: Okay.  
 2 MS. EZELL: This is the second page.  
 3 THE VIDEOGRAPHER: Okay.  
 4 MS. EZELL: And here's the third page.  
 5 THE VIDEOGRAPHER: Okay.  
 6 MS. EZELL: And just for identification  
 7 purposes, those are Bates stamped SAO 496  
 8 through -- I'm sorry, 495 through 497. If you  
 9 would pass that down, please, to the witness.  
 10 BY MS. EZELL:  
 11 Q. Do you recognize this. Sorry?  
 12 MR. REINHART: Are you asking about all three  
 13 pages simultaneously or one page at a time?  
 14 MS. EZELL: All three simultaneous.  
 15 MR. REINHART: Okay.  
 16 BY MS. EZELL:  
 17 Q. This appears to be, the first page appears to  
 18 indicate that this was obtained from the driver's  
 19 license authority in Hawaii.  
 20 MR. REINHART: The first page we have looks  
 21 like it's a printed page.  
 22 MS. EZELL: Right.  
 23 MR. REINHART: From -- oh, I see. Okay, never  
 24 mind.  
 25

1 based on her Fifth Amendment privilege.  
 2 THE WITNESS: At the advice of counsel, I must  
 3 invoke my Fifth Amendment privilege.  
 4 MR. REINHART: You can roll your eyes all you  
 5 want, Mr. Horowitz. It's my client's right.  
 6 She'll invoke it if she needs to.  
 7 MR. HOROWITZ: I was shaking my head, not  
 8 rolling my eyes. The Fifth Amendment assertion as  
 9 to whether a person has a driver's license is  
 10 ridiculous. It is ridiculous.  
 11 MR. REINHART: You can have that opinion, and  
 12 if you want to bring that up to the judge, I'll be  
 13 happy to explain to the judge why it's a valid  
 14 invocation. I disagree with you.  
 15 MS. EZELL: It is certainly a record that the  
 16 government has and can be accessed.  
 17 MR. REINHART: That's true.  
 18 (The document was marked Exhibit 16 for  
 19 identification.)  
 20 BY MS. EZELL:  
 21 Q. I'm going to show you in a moment what I have  
 22 premarked as Exhibit 16.  
 23 MS. EZELL: Actually, it's Composite 16. It's  
 24 three pages. I'll show it before I give it to the  
 25 witness.

1 BY MS. EZELL:  
 2 Q. It's from the supervising driver license clerk  
 3 in the city and county of Honolulu. Do you see that?  
 4 A. Yes.  
 5 Q. Do you recognize that application, pages two  
 6 and three?  
 7 MR. REINHART: Page two is a printout of what  
 8 appears to be a driver's license. Page three  
 9 appears to be a fingerprint.  
 10 Is that what you are asking her, if she  
 11 recognizes this?  
 12 MS. EZELL: Yes, uh huh.  
 13 MR. REINHART: I instruct her not to answer  
 14 those questions.  
 15 THE WITNESS: At the instruction of my lawyer,  
 16 I must invoke my Fifth Amendment right.  
 17 BY MS. EZELL:  
 18 Q. Even though this is a public record?  
 19 MR. REINHART: Well, if it's a public record  
 20 or not, she doesn't have to admit or authenticate  
 21 it for you. You can prove it some other way. She  
 22 has a Constitutional right not to admit or  
 23 authenticate the document for you, and that's what  
 24 she is invoking.  
 25

1 BY MS. EZELL:  
 2 Q. Did you ever hold a Hawaii driver's license?  
 3 MR. REINHART: Same instruction. It's been  
 4 asked and answered.  
 5 THE WITNESS: At the instruction of my lawyer,  
 6 I must invoke my Fifth Amendment right.  
 7 BY MS. EZELL:  
 8 Q. Do you currently hold a Hawaii driver's  
 9 license?  
 10 MR. REINHART: It's been asked and answered,  
 11 same instruction.  
 12 THE WITNESS: At the instruction of my lawyer,  
 13 I must invoke my Fifth Amendment right.  
 14 BY MS. EZELL:  
 15 Q. Is that not your picture on the second page of  
 16 that exhibit?  
 17 MR. REINHART: Same instruction.  
 18 THE WITNESS: At the instruction of my lawyer,  
 19 I must invoke my Fifth Amendment right.  
 20 BY MS. EZELL:  
 21 Q. Do you see the name Kellen, Sarah Lynnelle?  
 22 MR. REINHART: She's just asking if you see  
 23 that on the document.  
 24 THE WITNESS: Yes.  
 25

1 BY MS. EZELL:  
 2 Q. Did you at one time hold a post office Box 833  
 3 in -- I won't pronounce it right, but Haliewa, Hawaii?  
 4 THE REPORTER: Could you spell --  
 5 MS. EZELL: It's H-a-l-i-e-w-a, I believe.  
 6 MR. REINHART: I instruct the witness not to  
 7 answer based on her Fifth Amendment privilege.  
 8 THE WITNESS: At the instruction of my lawyer,  
 9 I must invoke my Fifth Amendment right.  
 10 BY MS. EZELL:  
 11 Q. Were you born on May 25, 1979?  
 12 MR. REINHART: Same instruction.  
 13 THE WITNESS: At the instruction of my lawyer,  
 14 I must invoke my Fifth Amendment right.  
 15 BY MS. EZELL:  
 16 Q. Do you see a signature there for Sarah Kellen?  
 17 MR. REINHART: Just asking if she sees a  
 18 signature on the paper --  
 19 MS. EZELL: That says Sarah Kellen.  
 20 THE WITNESS: I see it.  
 21 BY MS. EZELL:  
 22 Q. Is that your signature?  
 23 MR. REINHART: Instruct the witness not to  
 24 answer based on her Fifth Amendment privilege.  
 25 THE WITNESS: At the instruction of my lawyer,

1 BY MS. EZELL:  
 2 Q. And haven't you testified today that that is  
 3 your name?  
 4 MR. REINHART: The testimony will speak for  
 5 itself. Next question.  
 6 BY MS. EZELL:  
 7 Q. You may answer.  
 8 MR. REINHART: Next question.  
 9 MS. EZELL: You are instructing her not to  
 10 answer that question?  
 11 MR. REINHART: I am.  
 12 BY MS. EZELL:  
 13 Q. What was your address at the time that that,  
 14 that you applied for a license then?  
 15 MR. REINHART: Object to the form, assumes  
 16 facts that she has not acknowledged, that she ever  
 17 applied for this license, and I'll instruct her not  
 18 to answer.  
 19 BY MS. EZELL:  
 20 Q. Is the post office box --  
 21 MR. REINHART: Hold on, let her answer or not  
 22 answer.  
 23 THE WITNESS: At the instruction of my lawyer,  
 24 I must invoke my Fifth Amendment right.  
 25

1 I must invoke my Fifth Amendment right.  
 2 BY MS. EZELL:  
 3 Q. Do you drive an automobile in Palm Beach  
 4 County?  
 5 MR. REINHART: Let me understand the question.  
 6 Are you asking if she ever drives a vehicle in the  
 7 county or if she drives a vehicle registered in the  
 8 county?  
 9 MS. EZELL: If she drives a vehicle in Palm  
 10 Beach County.  
 11 MR. REINHART: You can answer that. In other  
 12 words, did you drive a car here today?  
 13 THE WITNESS: Yes.  
 14 BY MS. EZELL:  
 15 Q. You were asked earlier if you have ever been  
 16 to Palm Beach as opposed to West Palm Beach where we are  
 17 today, and I believe you answered yes.  
 18 A. Uh huh.  
 19 Q. Where have you been in Palm Beach?  
 20 MR. REINHART: I instruct her not to answer  
 21 based on her Fifth Amendment privilege.  
 22 THE WITNESS: At the instruction of my lawyer,  
 23 I must invoke my Fifth Amendment right.  
 24 BY MS. EZELL:  
 25 Q. When was the last time you were on Palm Beach

1 island, if it's an island?  
 2 MR. REINHART: Objection, it's been asked  
 3 before, and I'll instruct her not to answer for the  
 4 same reason.  
 5 THE WITNESS: At the instruction of my lawyer,  
 6 I must invoke my Fifth Amendment right.  
 7 BY MS. EZELL:  
 8 Q. Have you ever heard of Jeffrey Epstein?  
 9 MR. REINHART: Objection, instruct the witness  
 10 not to answer based on her Fifth Amendment  
 11 privilege.  
 12 THE WITNESS: At the instruction of my lawyer,  
 13 I must invoke my Fifth Amendment right.  
 14 MR. REINHART: It's also been asked and  
 15 answered.  
 16 BY MS. EZELL:  
 17 Q. Do you read the newspapers?  
 18 A. Not really.  
 19 Q. Have you read any newspapers in the last four  
 20 years in Palm Beach County?  
 21 A. I'm sure I have.  
 22 Q. Have you read the Palm Beach Post?  
 23 A. No, I don't.  
 24 Q. What newspapers do you read?  
 25 A. New York Times, New York Post. That's about

1 BY MS. EZELL:  
 2 Q. Do you know Glenn Dubin?  
 3 MR. REINHART: It's also asked and answered,  
 4 but I'll let her answer it again.  
 5 THE WITNESS: At the instruction of my lawyer,  
 6 I must invoke my Fifth Amendment right.  
 7 BY MS. EZELL:  
 8 Q. Do you know that they have two daughters?  
 9 MR. REINHART: Same instruction, objection to  
 10 the form, assumes facts that she has not  
 11 acknowledged, so there is no foundation for the  
 12 question.  
 13 THE WITNESS: At the instruction of my lawyer,  
 14 I must invoke my Fifth Amendment right.  
 15 BY MS. EZELL:  
 16 Q. Have you ever seen pictures of the little  
 17 girls?  
 18 MR. REINHART: Which little girls?  
 19 MS. EZELL: The Dubins' children.  
 20 MR. REINHART: Objection to form. Once again,  
 21 assumes facts that she has not acknowledged, that  
 22 there is no foundation. Instruct her not to answer  
 23 the question.  
 24 THE WITNESS: At the instruction of my lawyer,  
 25 I must invoke my Fifth Amendment right.

1 it, on occasion.  
 2 Q. And have you ever -- do you watch the news on  
 3 TV, local news?  
 4 A. No.  
 5 Q. When you did your Facebook page, whose  
 6 computer did you use?  
 7 A. My own.  
 8 Q. What kind of computer do you own?  
 9 A. An Apple computer.  
 10 Q. Is it a laptop?  
 11 A. Yes.  
 12 Q. How long have you had that computer?  
 13 A. I don't recall.  
 14 Q. Do you know Eva Andersson?  
 15 MR. REINHART: Objection, it's been asked and  
 16 answered.  
 17 MS. EZELL: I think it was asked whether or  
 18 not she had been on a plane with her.  
 19 MR. REINHART: I believe she was asked if she  
 20 knew who Eva Andersson was, but she can go ahead  
 21 and respond to the question. I instruct her not to  
 22 answer.  
 23 THE WITNESS: At the instruction of my lawyer,  
 24 I must invoke my Fifth Amendment right.  
 25

1 BY MS. EZELL:  
 2 Q. Are you an only child?  
 3 MR. REINHART: It's been asked and answered or  
 4 responded to, and I'll instruct her once again to  
 5 respond.  
 6 THE WITNESS: At the instruction of my lawyer,  
 7 I must invoke my Fifth Amendment right.  
 8 BY MS. EZELL:  
 9 Q. I believe you stated that you had changed your  
 10 hair color at some point in your life.  
 11 Have you changed it in the last five years?  
 12 A. I don't recall exact years and dates.  
 13 Q. I'm sorry?  
 14 A. I don't recall exact years and dates that I  
 15 have.  
 16 Q. Have you been a blonde at some point in the  
 17 last, in the last eight years?  
 18 A. Most likely.  
 19 Q. At more than one time? In other words, have  
 20 you gone back and forth between being a brunette and a  
 21 blonde or were you a blonde for a certain period of  
 22 time?  
 23 A. I think I went back and forth at one point.  
 24 Q. Have you ever either had an office or worked  
 25 at an office in this building, which is One Clearlake

1 Centre?  
 2 MR. REINHART: Instruct the witness not to  
 3 answer based on her Fifth Amendment privilege.  
 4 THE WITNESS: At the advice of counsel, I must  
 5 invoke my Fifth Amendment right.  
 6 BY MS. EZELL:  
 7 Q. Have you ever gone to that office on a daily  
 8 basis with Jeffrey Epstein?  
 9 MR. REINHART: Objection to form. There is no  
 10 foundation, because she hasn't acknowledged going  
 11 to an office in this building.  
 12 Also objection as to the implied knowledge of  
 13 Mr. Epstein. Instruct her not to answer.  
 14 THE WITNESS: At the instruction of my lawyer,  
 15 I must invoke my Fifth Amendment right.  
 16 BY MS. EZELL:  
 17 Q. Have you ever had anything to do with a  
 18 company called the Florida Science Foundation?  
 19 MR. REINHART: Instruct the witness not to  
 20 answer based on Fifth Amendment.  
 21 THE WITNESS: At the instruction of my lawyer,  
 22 I must invoke my Fifth Amendment right.  
 23 BY MS. EZELL:  
 24 Q. Your middle name is Lynnelle; is that correct?  
 25 A. Correct.

1 BY MS. EZELL:  
 2 Q. Do you consider yourself a citizen of the  
 3 United States?  
 4 MR. REINHART: You can answer that.  
 5 THE WITNESS: Yes.  
 6 BY MS. EZELL:  
 7 Q. And of what state do you consider yourself to  
 8 be a citizen?  
 9 MR. REINHART: That was just asked and  
 10 answered.  
 11 MS. EZELL: I asked about residency.  
 12 MR. REINHART: I apologize.  
 13 THE WITNESS: What's the difference?  
 14 MR. REINHART: Instruct the witness not to  
 15 answer the question based on Fifth Amendment.  
 16 THE WITNESS: At the instruction of my lawyer,  
 17 I must invoke my Fifth Amendment right.  
 18 BY MS. EZELL:  
 19 Q. Have you changed your residency in the last  
 20 three years?  
 21 MR. REINHART: Residency for which? I just  
 22 want to be clear, Ms. Ezell. You mean legal  
 23 residency or where she actually lives residency?  
 24 MS. EZELL: Well, let's do both.  
 25

1 Q. L-y-n-e-l-l-e?  
 2 MR. REINHART: It's been asked and answered  
 3 twice. You can answer it again.  
 4 THE WITNESS: L-y-n-n-e-l-l-e.  
 5 BY MS. EZELL:  
 6 Q. Thank you.  
 7 Where do you, of what state are you a  
 8 resident?  
 9 MR. REINHART: Instruct the witness not to  
 10 answer based on Fifth Amendment.  
 11 THE WITNESS: At the instruction of my lawyer,  
 12 I must invoke my Fifth Amendment right.  
 13 BY MS. EZELL:  
 14 Q. Where do you vote?  
 15 MR. REINHART: Same instruction.  
 16 THE WITNESS: At the instruction of my lawyer,  
 17 I must invoke my Fifth Amendment right.  
 18 BY MS. EZELL:  
 19 Q. Are you registered to vote?  
 20 MR. REINHART: It's been asked and answered.  
 21 I'll instruct her not to answer again, or to answer  
 22 it, to respond to it, I should say.  
 23 THE WITNESS: At the instruction of my lawyer,  
 24 I must invoke my Fifth Amendment right.  
 25

1 BY MS. EZELL:  
 2 Q. Have you changed your legal residency in the  
 3 last five years?  
 4 A. I don't think so.  
 5 Q. Have you changed the place you live in the  
 6 last five years?  
 7 MR. REINHART: Instruct her not to answer that  
 8 question based on Fifth Amendment.  
 9 THE WITNESS: At the advice of counsel, I must  
 10 invoke my Fifth Amendment right.  
 11 BY MS. EZELL:  
 12 Q. Have you changed your citizenship, your state  
 13 citizenship in the last five years?  
 14 MR. REINHART: Again, for purposes of voting  
 15 and other things or just --  
 16 MS. EZELL: Yes, whatever things citizenship  
 17 entitles one to do.  
 18 MR. REINHART: If you understand the question,  
 19 you can answer it.  
 20 THE WITNESS: I don't recall really ever  
 21 changing -- I didn't know that you could change  
 22 your citizenship of a state.  
 23 BY MS. EZELL:  
 24 Q. Well, if you move from one state to another,  
 25 you might change your voter's registration. Have you



1 done that?

2 MR. REINHART: You can answer.

3 THE WITNESS: No.

4 BY MS. EZELL:

5 Q. Are you a resident of or citizen of the US

6 Virgin Islands currently?

7 MR. REINHART: Do you understand? You can

8 answer it.

9 THE WITNESS: No.

10 BY MS. EZELL:

11 Q. Do you pay taxes in any state?

12 MR. REINHART: Answer that yes or no.

13 THE WITNESS: Yes.

14 BY MS. EZELL:

15 Q. In what states do you pay taxes?

16 MR. REINHART: Instruct her not to answer that

17 question based on Fifth Amendment.

18 THE WITNESS: At the instruction of my lawyer,

19 I must invoke my Fifth Amendment right.

20 BY MS. EZELL:

21 Q. Do you own property in any state?

22 MR. REINHART: It's a yes or no question. You

23 can answer that.

24 THE WITNESS: No.

25

1 THE WITNESS: At the advice of my lawyer, I

2 must invoke my Fifth Amendment right.

3 BY MS. EZELL:

4 Q. What kind of modeling did you do at 18?

5 A. Very little. I did a job for Champion

6 Sportswear, a couple of hair shows. That's about it

7 really.

8 Q. Have you ever been involved in modeling for MC

9 Squared?

10 MR. REINHART: Instruct the witness --

11 objection to the form, assumes knowledge of an

12 entity by the name of MC Squared which the witness

13 has not acknowledged or have any knowledge of, so

14 there is no foundation for the question.

15 I'd instruct her not to answer based on her

16 Fifth Amendment privilege.

17 THE WITNESS: At the instruction of my lawyer,

18 I must invoke my Fifth Amendment right.

19 BY MS. EZELL:

20 Q. Have you ever been photographed nude or

21 partially nude?

22 MR. REINHART: When you say partially nude,

23 can you clarify?

24 MS. EZELL: With either, without a top or

25 without a bottom or with something draped across

1 BY MS. EZELL:

2 Q. Is that a no?

3 A. No.

4 Q. Have you owned property in any state in the

5 last five years?

6 A. No.

7 Q. Are you taking any prescribed medication at

8 this time?

9 MR. REINHART: You can answer the question.

10 THE WITNESS: Yasmin.

11 BY MS. EZELL:

12 Q. I'm sorry?

13 A. Yasmin. It's a birth control pill.

14 Q. Anything else?

15 A. No.

16 Q. You didn't take anything before this

17 deposition today?

18 A. No.

19 Q. At what age did you first model

20 professionally?

21 A. I believe I was 18.

22 Q. And for what company or organization did you

23 model at 18?

24 MR. REINHART: Instruct her not to answer the

25 question based on her Fifth Amendment privilege.

1 part of a body, but not all parts of her body.

2 THE WITNESS: My boyfriend took pictures of me

3 one time.

4 BY MS. EZELL:

5 Q. And what happened to those, where are those

6 pictures?

7 A. I have them.

8 Q. And who is your boyfriend?

9 MR. REINHART: Hold on a second.

10 Instruct the witness not to answer based on

11 her Fifth Amendment privilege.

12 BY MS. EZELL:

13 Q. Is that your current boyfriend who took the

14 pictures?

15 MR. REINHART: You can answer that.

16 THE WITNESS: No.

17 BY MS. EZELL:

18 Q. In those pictures were you nude or partially

19 nude?

20 MR. REINHART: At this point this is getting

21 into her privacy rights beyond the scope of

22 anything I think that's relevant to this case. I'm

23 going to ask you to move on.

24 MS. EZELL: Are you instructing her not to

25 answer?

1 MR. REINHART: I am. I am.  
 2 BY MS. EZELL:  
 3 Q. Do you have all copies of those pictures or  
 4 have they been distributed?  
 5 A. I hope I have all copies.  
 6 Q. Would you please -- I have a little difficulty  
 7 hearing you.  
 8 A. Sorry.  
 9 Q. Would you please tell me again all the  
 10 companies that you have modeled for?  
 11 A. I don't remember their names. It was so long  
 12 ago.  
 13 Q. One was a sporting --  
 14 A. Oh, I got a job for Champion Sportswear.  
 15 Q. And what did you model for Champion?  
 16 A. Athletic wear.  
 17 Q. And then you said some hair shows?  
 18 A. Right. Just where they cut and color your  
 19 hair in different styles and you do a little runway  
 20 show.  
 21 Q. Have you ever done a runway show for, for  
 22 clothes, clothing?  
 23 A. No.  
 24 Q. Who introduced you to Jeffrey Epstein?  
 25 MR. REINHART: Instruct the witness not to

1 THE WITNESS: I don't -- I don't get it. It's  
 2 vague. I don't understand the question.  
 3 BY MS. EZELL:  
 4 Q. Are you not aware of an organization that  
 5 limits its membership to billionaires?  
 6 A. No, I'm not.  
 7 Q. At some point did you become an employee of  
 8 Jeffrey Epstein?  
 9 MR. REINHART: Instruct the witness not to  
 10 answer based on her Fifth Amendment privilege, and  
 11 that's also been asked and answered several times.  
 12 THE WITNESS: At the instruction of my lawyer,  
 13 I must invoke my Fifth Amendment right.  
 14 BY MS. EZELL:  
 15 Q. By whom are you currently employed?  
 16 MR. REINHART: Objection, also been asked and  
 17 answered several times. Instruct her not to  
 18 answer.  
 19 THE WITNESS: At the instruction of my lawyer,  
 20 I must invoke my Fifth Amendment right.  
 21 BY MS. EZELL:  
 22 Q. Are you employed by an individual or by a  
 23 corporation?  
 24 MR. REINHART: Same instruction.  
 25 THE WITNESS: At the instruction of my lawyer,

1 answer based on her Fifth Amendment privilege.  
 2 THE WITNESS: At the instruction of my lawyer,  
 3 I must invoke my Fifth Amendment right.  
 4 BY MS. EZELL:  
 5 Q. Have you ever been to a social event in New  
 6 York that is restricted to billionaires?  
 7 A. Sorry, can you repeat that?  
 8 Q. Yes. Have you ever been to a social event  
 9 that's held annually in New York restricted to  
 10 billionaires?  
 11 A. I've never heard of such an event, no.  
 12 Q. Have you ever been to such an organization in  
 13 California?  
 14 A. No. I, I have never heard of such an event  
 15 like that, so I don't know.  
 16 Q. Have you never seen your picture taken and  
 17 displayed in print media at such an event?  
 18 MR. REINHART: Objection to the form. It's  
 19 not established she has any idea what event or what  
 20 kind of event this would be.  
 21 BY MS. EZELL:  
 22 Q. An annual event involving millionaires --  
 23 billionaires, excuse me.  
 24 MR. REINHART: Objection to the form. There  
 25 is a lack of foundation for the question.

1 I must invoke my Fifth Amendment right.  
 2 BY MS. EZELL:  
 3 Q. Do you receive a W2?  
 4 MR. REINHART: Same instruction.  
 5 THE WITNESS: At the instruction of my lawyer,  
 6 I must invoke my Fifth Amendment right.  
 7 BY MS. EZELL:  
 8 Q. Do you receive a 1099?  
 9 MR. REINHART: Same instruction.  
 10 THE WITNESS: At the instruction of my lawyer,  
 11 I must invoke my Fifth Amendment right.  
 12 BY MS. EZELL:  
 13 Q. Does anyone claim you as a dependent on their  
 14 tax returns?  
 15 MR. REINHART: Anyone other than herself?  
 16 MS. EZELL: Yes.  
 17 THE WITNESS: No.  
 18 BY MS. EZELL:  
 19 Q. Have you ever signed a confidentiality  
 20 agreement?  
 21 MR. REINHART: With anyone?  
 22 MS. EZELL: Yes.  
 23 MR. HOROWITZ: Instruct the witness not to  
 24 answer based on her Fifth Amendment privilege.  
 25 THE WITNESS: At the instruction of my lawyer,

1 I must invoke my Fifth Amendment right.  
 2 BY MS. EZELL:  
 3 Q. Have you stated that you consider yourself a  
 4 loyal employee?  
 5 A. Have I what? I'm sorry.  
 6 Q. Have you ever stated that you consider  
 7 yourself a loyal employee?  
 8 A. I don't recall ever saying those words.  
 9 Q. Is it true that you will do anything Jeffrey  
 10 Epstein asks?  
 11 MR. REINHART: Objection to the form, compound  
 12 question. Assumes knowledge of Jeffrey Epstein, so  
 13 I instruct the witness not to answer.  
 14 THE WITNESS: At the instruction of my lawyer,  
 15 I must invoke my Fifth Amendment privilege.  
 16 BY MS. EZELL:  
 17 Q. In 2005 and '6, did you have a designated  
 18 computer in Mr. Epstein's home on El Brillo Way?  
 19 MR. REINHART: Objection to form, it's  
 20 compound and assumes knowledge of Mr. Epstein and  
 21 of a location on El Brillo Way, so I instruct the  
 22 witness not to answer.  
 23 THE WITNESS: At the instruction of my lawyer,  
 24 I must invoke my Fifth Amendment right.  
 25

1 implicitly. Instruct the witness not to answer.  
 2 THE WITNESS: At the instruction of my lawyer,  
 3 I must invoke my Fifth Amendment right.  
 4 BY MS. EZELL:  
 5 Q. Do you know Juan Alessi?  
 6 THE WITNESS: At the instruction of my lawyer,  
 7 I must invoke my Fifth Amendment right.  
 8 BY MS. EZELL:  
 9 Q. Do you know Alfredo Rodriguez?  
 10 MR. REINHART: It's been asked and answered.  
 11 Go ahead and answer it again.  
 12 THE WITNESS: At the instruction of my lawyer,  
 13 I must invoke my Fifth Amendment right.  
 14 BY MS. EZELL:  
 15 Q. I think you also might have been asked if you  
 16 know Janusz Banasiak.  
 17 THE WITNESS: At the instruction of my lawyer,  
 18 I must invoke my Fifth Amendment right.  
 19 BY MS. EZELL:  
 20 Q. Are you a photographer?  
 21 MR. REINHART: Objection to the form, it's  
 22 ambiguous. Amateur photographer? Professional  
 23 photographer? Can you clarify?  
 24 BY MS. EZELL:  
 25 Q. Do you enjoy photography?

1 BY MS. EZELL:  
 2 Q. Did you have on a computer at El Brillo Way a  
 3 list of contact information and pictures of numerous  
 4 young women?  
 5 MR. REINHART: Objection to the form, it's  
 6 compound and it is lack of foundation based on the  
 7 prior question and answer.  
 8 Instruct the witness not to answer.  
 9 THE WITNESS: At the instruction of my lawyer,  
 10 I must invoke my Fifth Amendment right.  
 11 BY MS. EZELL:  
 12 Q. Did you and Ghislaine Maxwell share that  
 13 information on both of your computers?  
 14 MR. REINHART: Objection to form, assumes  
 15 knowledge of a person by the name of Ghislaine;  
 16 Maxwell.  
 17 Also lack of foundation based on the prior two  
 18 answers. Instruct the witness not to answer.  
 19 THE WITNESS: At the instruction of my lawyer,  
 20 I must invoke my Fifth Amendment privilege.  
 21 BY MS. EZELL:  
 22 Q. Would you consider your role in the Epstein  
 23 household to be that of assistant to Mr. Epstein?  
 24 MR. REINHART: Objection to form, lack of  
 25 foundation, assumes knowledge of Mr. Epstein

1 A. Yes.  
 2 Q. What kind of camera do you have?  
 3 MR. REINHART: Instruct the witness not to  
 4 answer the question.  
 5 THE WITNESS: At the instruction of my lawyer,  
 6 I must invoke my Fifth Amendment right.  
 7 BY MS. EZELL:  
 8 Q. Do you know Maria Alessi?  
 9 THE WITNESS: At the instruction of my lawyer,  
 10 I must invoke my Fifth Amendment right.  
 11 BY MS. EZELL:  
 12 Q. Have you ever known Jeffrey Epstein to give  
 13 cameras to young women who come to his home to give him  
 14 massages?  
 15 MR. REINHART: Objection to the form, standing  
 16 objection, lack of foundation as to Mr. Epstein and  
 17 to his home. Instruct the witness not to answer.  
 18 THE WITNESS: At the instruction of my lawyer,  
 19 I must invoke my Fifth Amendment right.  
 20 BY MS. EZELL:  
 21 Q. Have you been encouraged in your pursuit of  
 22 photography by Mr. Epstein?  
 23 MR. REINHART: Same objection previously  
 24 stated.  
 25 THE WITNESS: At the instruction of my lawyer,

1 I must invoke my Fifth Amendment right.  
 2 BY MS. EZELL:  
 3 Q. Have you ever taken pictures of any of the  
 4 young women who have visited the Epstein mansion to  
 5 provide massages?  
 6 MR. REINHART: Objection to form, compound,  
 7 lack of foundation. Instruct the witness not to  
 8 answer.  
 9 THE WITNESS: At the instruction of my lawyer,  
 10 I must invoke my Fifth Amendment right.  
 11 BY MS. EZELL:  
 12 Q. Are you aware of any hidden cameras on the  
 13 premises?  
 14 MR. REINHART: Which premises?  
 15 MS. EZELL: At the El Brillo Way address of  
 16 Mr. Epstein.  
 17 MR. REINHART: Objection to form, lack of  
 18 foundation, compound. Instruct the witness not to  
 19 answer.  
 20 THE WITNESS: At the instruction of my lawyer,  
 21 I must invoke my Fifth Amendment right.  
 22 BY MS. EZELL:  
 23 Q. Did you ever meet a young woman named A.D.?  
 24 A. At the instruction of my lawyer, I must invoke  
 25 my Fifth Amendment right.

1 THE WITNESS: At the instruction of my lawyer,  
 2 I must invoke my Fifth Amendment right.  
 3 BY MS. EZELL:  
 4 Q. Have you, have you ever photographed any of  
 5 the young women who visited or visit the Epstein home to  
 6 provide massages to Mr. Epstein?  
 7 MR. REINHART: Objection to form, it's been  
 8 asked and answered.  
 9 Also lack of foundation and standing  
 10 objection. Same instruction.  
 11 THE WITNESS: At the instruction of my lawyer,  
 12 I must invoke my Fifth Amendment right.  
 13 BY MS. EZELL:  
 14 Q. Have you ever photographed any minor girls who  
 15 are either partially nude or nude?  
 16 MR. REINHART: That's also been asked and  
 17 answered. I instruct her once again not to answer  
 18 the question.  
 19 THE WITNESS: At the instruction of my lawyer,  
 20 I must invoke my Fifth Amendment right.  
 21 BY MS. EZELL:  
 22 Q. Have you ever been aware of something called  
 23 the Edge Group?  
 24 MR. REINHART: Consult.  
 25 THE WITNESS: At the advice of my lawyer, I

1 Q. Were you sometimes designated or requested by  
 2 Mr. Epstein to buy gifts for the young women who would  
 3 come to the home to give him massages?  
 4 MR. REINHART: Objection to form, lack of  
 5 foundation. Instruct the witness not no answer.  
 6 THE WITNESS: At the instruction of my lawyer,  
 7 I must invoke my Fifth Amendment right.  
 8 BY MS. EZELL:  
 9 Q. Were you aware that Mr. Epstein gave A.D. a  
 10 digital camera and encouraged her in her pursuit of  
 11 photography?  
 12 MR. REINHART: Same objection stated to the  
 13 previous question and same instruction.  
 14 THE WITNESS: At the instruction of my lawyer,  
 15 I must invoke my Fifth Amendment right.  
 16 BY MS. EZELL:  
 17 Q. Have you ever met a young woman named M.D.?  
 18 A. At the instruction of my lawyer, I must invoke  
 19 my Fifth Amendment right.  
 20 Q. Were you ever aware that Mr. Epstein gave M.D.  
 21 a regular camera and encouraged her in her pursuit of  
 22 photography?  
 23 MR. REINHART: Objection to form, assumes  
 24 certain facts, lack of foundation, compound.  
 25 Instruct the witness not to answer.

1 must invoke the Fifth Amendment right.  
 2 BY MS. EZELL:  
 3 Q. Is that the name of a group that's, whose  
 4 membership is made up of billionaires?  
 5 MR. REINHART: Objection to form, lack of  
 6 foundation. Instruct the witness not to answer.  
 7 THE WITNESS: At the instruction of my lawyer,  
 8 I must invoke my Fifth Amendment right.  
 9 BY MS. EZELL:  
 10 Q. Did you attend a function of the Edge Group in  
 11 February of 1902 -- I'm sorry, 2002?  
 12 MR. REINHART: Object to form, there is a lack  
 13 of foundation. Instruct the witness not to answer.  
 14 THE WITNESS: At the instruction of my lawyer,  
 15 I must invoke my Fifth Amendment right.  
 16 BY MS. EZELL:  
 17 Q. Have you attended several functions since 2002  
 18 of the Edge Group?  
 19 MR. REINHART: Objection to the form, because  
 20 there is no foundation for her having any knowledge  
 21 of an entity called the Edge Group, so I'll  
 22 instruct her not to answer.  
 23 THE WITNESS: At the instruction of my lawyer,  
 24 I must invoke my Fifth Amendment right.  
 25

1 BY MS. EZELL:  
 2 Q. Are you a member of the Edge Group or do you  
 3 go as the guest of Mr. Epstein?  
 4 MR. REINHART: Again, there is no foundation  
 5 for the question because there is no, there is no  
 6 connection of her to this organization, and I'd  
 7 instruct her not to answer. Form objection.  
 8 THE WITNESS: At the instruction of my lawyer,  
 9 I must invoke my Fifth Amendment right.  
 10 BY MS. EZELL:  
 11 Q. Do you know Ghislaine Maxwell's e-mail  
 12 address?  
 13 MR. REINHART: Instruct the witness not to  
 14 answer, objection to form, lack of foundation as to  
 15 her knowledge of anyone named Ghislaine Maxwell.  
 16 THE WITNESS: At the instruction of my lawyer,  
 17 I must invoke my Fifth Amendment right.  
 18 BY MS. EZELL:  
 19 Q. Do you know a Nicole Hesse or Hesse,  
 20 H-e-s-s-e?  
 21 A. At the instruction of my lawyer, I must invoke  
 22 my Fifth Amendment right.  
 23 Q. Did you participate in a sort of routine  
 24 involving young women who would come to the house,  
 25 Mr. Epstein's house on El Brillo Way to provide

1 is a lack of foundation of her having any  
 2 interaction with anyone at any home owned by  
 3 Mr. Epstein, whoever he may be. Instruct her not  
 4 to answer.  
 5 THE WITNESS: At the instruction of my lawyer,  
 6 I must invoke my Fifth Amendment right.  
 7 BY MS. EZELL:  
 8 Q. Were you the one who routinely would get out  
 9 the lotion, towels, and massage equipment once you  
 10 arrived at the massage room with the girl?  
 11 MR. REINHART: Same objection to the form,  
 12 same objection stated to the previous question.  
 13 It's been asked and answered as well.  
 14 THE WITNESS: At the instruction of my lawyer,  
 15 I must invoke my Fifth Amendment right.  
 16 BY MS. EZELL:  
 17 Q. Does Mr. Epstein particularly like any  
 18 particular massage oils?  
 19 MR. REINHART: Objection to the form, standard  
 20 objection, no foundation as to her knowledge of  
 21 anything relating to Jeffrey Epstein. Instruct her  
 22 not to answer.  
 23 THE WITNESS: At the instruction of my lawyer,  
 24 I must invoke my Fifth Amendment right.  
 25

1 massages?  
 2 MR. REINHART: That's been asked and answered  
 3 several times, object to the form, lack of  
 4 foundation as to any knowledge relating to Epstein  
 5 or El Brillo Way. Instruct her not to answer.  
 6 THE WITNESS: At the instruction of my lawyer,  
 7 I must invoke my Fifth Amendment right.  
 8 BY MS. EZELL:  
 9 Q. Was it routine practice for you to come and  
 10 meet the girl after she arrived at El Brillo Way to  
 11 provide a massage for the sexual gratification of  
 12 Mr. Epstein?  
 13 MR. REINHART: Objection to form, it's  
 14 compound. There is a lack of foundation. Instruct  
 15 the witness not to answer. It's been asked and  
 16 answered several times.  
 17 THE WITNESS: At the instruction of my lawyer,  
 18 I must invoke my Fifth Amendment right.  
 19 BY MS. EZELL:  
 20 Q. Was it your practice to then lead the young  
 21 woman who had come to give Mr. Epstein a massage up a  
 22 stairway that is behind a door in the kitchen of the  
 23 home on El Brillo Way?  
 24 MR. REINHART: Objection to the form, it's  
 25 compound, assuming many facts. It's not, and there

1 BY MS. EZELL:  
 2 Q. Was it your general practice to leave the girl  
 3 alone either just before or when Mr. Epstein would come  
 4 into the room?  
 5 MR. REINHART: Objection to the form, again  
 6 assuming multiple facts and the same question, none  
 7 of which have any foundation. Instruct her not to  
 8 answer.  
 9 THE WITNESS: At the instruction of my lawyer,  
 10 I must invoke my Fifth Amendment right.  
 11 BY MS. EZELL:  
 12 Q. Who paid the girls who came to El Brillo Way  
 13 to provide massages and other sexual favors for  
 14 Mr. Epstein?  
 15 MR. REINHART: Same objection as to form as  
 16 previously stated to the last three or four  
 17 questions. Same instruction to the witness.  
 18 THE WITNESS: At the instruction of my lawyer,  
 19 I must invoke my Fifth Amendment right.  
 20 BY MS. EZELL:  
 21 Q. Who was responsible for keeping the supply of  
 22 cash in the house from which the girls were paid?  
 23 MR. REINHART: Same objection as to form and  
 24 lack of foundation. Instruct the witness not to  
 25 answer.

1 THE WITNESS: At the instruction of my lawyer,  
 2 I must invoke my Fifth Amendment right.  
 3 BY MS. EZELL:  
 4 Q. Was it your practice or habit to get the  
 5 telephone numbers and contact information of each girl  
 6 before she left El Brillo Way?  
 7 MR. REINHART: Same objection as to form as  
 8 stated to the last series of questions. Same  
 9 instruction.  
 10 THE WITNESS: At the instruction of my lawyer,  
 11 I must invoke my Fifth Amendment right.  
 12 BY MS. EZELL:  
 13 Q. Going back to that stairway that led from the  
 14 kitchen up to the massage room, was there a time when  
 15 there were photos of nude girls all the way up that  
 16 stairway?  
 17 MR. REINHART: Same objection as to form and  
 18 lack of foundation as to any basis to question this  
 19 witness on anything having to do with a home owned  
 20 by Mr. Epstein or any staircase or any pictures on  
 21 a staircase. So instruct her not to answer.  
 22 THE WITNESS: At the instruction of my lawyer,  
 23 I must invoke my Fifth Amendment right.  
 24 BY MS. EZELL:  
 25 Q. Do you recall a time when all those

1 MR. REINHART: Objection to the form, lack of  
 2 foundation. Instruct the witness not to answer.  
 3 THE WITNESS: At the instruction of my lawyer,  
 4 I must invoke my Fifth Amendment right.  
 5 BY MS. EZELL:  
 6 Q. Did you ever text with Jane No. 103 about her  
 7 coming to Mr. Epstein's house?  
 8 MR. REINHART: Same instruction, same  
 9 objection.  
 10 THE WITNESS: At the instruction of my lawyer,  
 11 I must invoke my Fifth Amendment right.  
 12 BY MS. EZELL:  
 13 Q. Were you aware that Jeffrey Epstein was  
 14 helping Jane No. 103 with her college application?  
 15 MR. REINHART: Objection to the form, lack of  
 16 foundation as to any knowledge as to Jeffrey  
 17 Epstein, so therefore it's compound and ambiguous.  
 18 Instruct you not to answer.  
 19 THE WITNESS: At the instruction of my lawyer,  
 20 I must invoke my Fifth Amendment right.  
 21 BY MS. EZELL:  
 22 Q. Did you ever hear Mr. Epstein tell Jane No.  
 23 103 that he would help her even with the financing of  
 24 her college, of her education?  
 25 MR. REINHART: Same objection stated to the

1 photographs were removed?  
 2 MR. REINHART: Objection to the form, lack of  
 3 foundation, same objection as the previous series  
 4 of questions. Same instruction.  
 5 THE WITNESS: At the instruction of my lawyer,  
 6 I must invoke my Fifth Amendment right.  
 7 BY MS. EZELL:  
 8 Q. Did you ever text girls about coming to  
 9 provide massages for Jeffrey Epstein?  
 10 MR. REINHART: Objection as to form, lack of  
 11 foundation as to any knowledge of Jeffrey Epstein.  
 12 Instruct her not to answer.  
 13 THE WITNESS: At the instruction of my lawyer,  
 14 I must invoke my Fifth Amendment right.  
 15 BY MS. EZELL:  
 16 Q. Do you know how to text?  
 17 A. Yes.  
 18 Q. And how long have you been texting?  
 19 A. Twelve years.  
 20 Q. Twelve years? That's great. You are way  
 21 ahead of me. I still don't know how.  
 22 Do you know a young woman named Jane No. 103?  
 23 A. At the advice of my counsel, I must invoke my  
 24 Fifth Amendment right.  
 25 Q. Did you ever drive Jane No. 103 anywhere?

1 previous question. Objection to form and lack of  
 2 foundation. Instruct the witness not to answer.  
 3 THE WITNESS: At the instruction of my lawyer,  
 4 I must invoke my Fifth Amendment right.  
 5 BY MS. EZELL:  
 6 Q. Do you recall -- and I believe it's in  
 7 Exhibit 4, if we could pull Exhibit 4, please. If I  
 8 could just look at it for a moment, please.  
 9 MR. REINHART: Certainly.  
 10 MS. EZELL: Thanks. Oh, good, it's on the  
 11 front.  
 12 BY MS. EZELL:  
 13 Q. The first page of Exhibit 4, I'd ask you to  
 14 look at that. Do you recognize that handwriting?  
 15 MR. REINHART: That was asked and answered  
 16 about six hours ago. She said no.  
 17 You can answer it again.  
 18 THE WITNESS: No.  
 19 BY MS. EZELL:  
 20 Q. Were you aware that Mr. Epstein ordered roses  
 21 to be delivered to Jane No. 103 at the stage of her high  
 22 school after a play?  
 23 MR. REINHART: Objection to the form, lack of  
 24 foundation, standing objection.  
 25 THE WITNESS: At the instruction of my lawyer,

1 I must exercise my Fifth Amendment right.  
 2 BY MS. EZELL:  
 3 Q. Do you recall telling -- no, sorry.  
 4 Did you and Jane No. 103 become friendly?  
 5 MR. REINHART: Object to the form, lack of  
 6 foundation as to any relationship with Jane No. 103  
 7 or knowledge of a person named Jane No. 103.  
 8 Instruct the witness not to answer.  
 9 THE WITNESS: At the instruction of my lawyer,  
 10 I must invoke my Fifth Amendment right.  
 11 BY MS. EZELL:  
 12 Q. Do you remember that Jane No. 103 came to  
 13 Mr. Epstein's home on or about July 23rd, 2004?  
 14 MR. REINHART: Object to the form, leading, as  
 15 well as previously stated objection to the last  
 16 question.  
 17 BY MS. EZELL:  
 18 Q. And do you remember --  
 19 MR. REINHART: Hold on.  
 20 MS. EZELL: Sorry.  
 21 THE WITNESS: At the instruction of my lawyer,  
 22 I wish to invoke my Fifth Amendment right.  
 23 BY MS. EZELL:  
 24 Q. Do you remember that Jane No. 103 continued to  
 25 come to Mr. Epstein's house and indeed came over 100

1 MR. REINHART: Same instruction, same  
 2 objection.  
 3 THE WITNESS: At the instruction of my lawyer,  
 4 I must invoke my Fifth Amendment right.  
 5 BY MS. EZELL:  
 6 Q. Did, did you give yourself Jane No 103 any  
 7 gifts?  
 8 MR. REINHART: I'm sorry, can you rephrase?  
 9 BY MS. EZELL:  
 10 Q. Did you yourself give Jane No 103 any gifts?  
 11 MR. REINHART: Objection to the form.  
 12 Instruct the witness not to answer the question.  
 13 THE WITNESS: At the instruction of my lawyer,  
 14 I must invoke my Fifth Amendment right.  
 15 BY MS. EZELL:  
 16 Q. Did you ever buy gifts for Jeffrey Epstein to  
 17 give to Jane No 103?  
 18 MR. REINHART: Objection to form.  
 19 THE WITNESS: At the instruction of my lawyer,  
 20 I must invoke my Fifth Amendment right.  
 21 BY MS. EZELL:  
 22 Q. Did you ever receive massages at the El Brillo  
 23 Way house?  
 24 MR. REINHART: Objection to form, lack of  
 25 foundation. Same instruction.

1 times over about a year and a half?  
 2 MR. REINHART: Object to the form for reasons  
 3 previously stated in the last several questions.  
 4 Instruct her not to answer.  
 5 THE WITNESS: At the instruction of my lawyer,  
 6 I must invoke my Fifth Amendment right.  
 7 BY MS. EZELL:  
 8 Q. Do you remember calling to tell Jane No. 103  
 9 that Mr. Epstein would be coming in town and would like  
 10 to see her?  
 11 MR. REINHART: Objection to form, instruct the  
 12 witness not to answer.  
 13 THE WITNESS: At the instruction of my lawyer,  
 14 I must invoke my Fifth Amendment right.  
 15 BY MS. EZELL:  
 16 Q. Did you overhear Mr. Epstein himself call Jane  
 17 No. 103 at her home?  
 18 MR. REINHART: Objection to the form, lack of  
 19 foundation as to any knowledge of Jeffrey Epstein.  
 20 Instruct her not to answer.  
 21 THE WITNESS: At the instruction of my lawyer,  
 22 I must invoke my Fifth Amendment right.  
 23 BY MS. EZELL:  
 24 Q. Did you and Jane No. 103 ever go shopping  
 25 together?

1 THE WITNESS: At the instruction of my lawyer,  
 2 I must invoke my Fifth Amendment right.  
 3 BY MS. EZELL:  
 4 Q. Did you receive massages given by Johanna  
 5 Sjoberg?  
 6 MR. REINHART: Objection to the form, lack of  
 7 foundation as to any knowledge of a person named  
 8 Johanna Sjoberg. Lack of knowledge as to any, lack  
 9 of foundation as to any connection to El Brillo  
 10 Way. Instruct the witness not to answer.  
 11 THE WITNESS: At the instruction of my lawyer,  
 12 I must invoke my Fifth Amendment right.  
 13 BY MS. EZELL:  
 14 Q. Did you go to an Edge Science dinner on  
 15 February 27, 2003, in Monterey, California?  
 16 MR. REINHART: It's been asked and answered,  
 17 objection to form.  
 18 MS. EZELL: No, I didn't ask about Monterey,  
 19 California.  
 20 MR. REINHART: You asked about any Edge Group  
 21 meetings in California, and she said she has no  
 22 idea what the Edge Group is.  
 23 MR. GARCIA: I thought she took the Fifth on  
 24 that.  
 25 MR. REINHART: I thought she said she didn't

1 know what the Edge Group was, but whatever, you can  
 2 answer the question.  
 3 THE WITNESS: At the instruction of my lawyer,  
 4 I must choose to invoke my Fifth Amendment right.  
 5 BY MS. EZELL:  
 6 Q. Do you know Max Brockman?  
 7 MR. REINHART: I'm sorry, can you repeat?  
 8 BY MS. EZELL:  
 9 Q. Do you know a Max Brockman?  
 10 MR. REINHART: I believe that was asked and  
 11 answered already, but --  
 12 THE WITNESS: At the instruction of my lawyer,  
 13 I must invoke my Fifth Amendment right.  
 14 BY MS. EZELL:  
 15 Q. Have you ever been photographed with Max  
 16 Brockman at an Edge Science dinner?  
 17 A. At the instruction of my lawyer, I must invoke  
 18 my Fifth Amendment right.  
 19 MR. REINHART: You should let me -- I need to  
 20 object to the form of the question first, but go  
 21 ahead. I know we all want to get out of here. Go  
 22 ahead.  
 23 THE WITNESS: Say it again.  
 24 MR. REINHART: No, you are okay. Go ahead,  
 25 Ms. Ezell. Thank you.

1 BY MS. EZELL:  
 2 Q. Do you want to respond? I didn't give you  
 3 time.  
 4 MR. REINHART: I've instructed her not to  
 5 answer the question. Let's move on.  
 6 BY MS. EZELL:  
 7 Q. Do you recall a dinner at El Brillo Way  
 8 attended by David Copperfield where Jane No. 103 was a  
 9 guest?  
 10 MR. REINHART: Objection to the form, lack of  
 11 foundation, and a standing objection as to her  
 12 knowledge of anything involving El Brillo Way or  
 13 Jeffrey Epstein. Instruct her not to answer.  
 14 THE WITNESS: At the instruction of my lawyer,  
 15 I must invoke my Fifth Amendment right.  
 16 BY MS. EZELL:  
 17 Q. What is the relationship between Jeffrey  
 18 Epstein and David Copperfield?  
 19 MR. REINHART: Objection to form, lack of  
 20 foundation as to her knowledge of either one of  
 21 those people. Instruct her not to answer.  
 22 THE WITNESS: At the instruction of my lawyer,  
 23 I must invoke my Fifth Amendment right.  
 24 BY MS. EZELL:  
 25 Q. To your knowledge, do they recruit girls for

1 BY MS. EZELL:  
 2 Q. Do you know whether Jeffrey Epstein attended  
 3 the Edge Science dinner in Monterey, California?  
 4 MR. REINHART: Objection to the form, lack of  
 5 foundation. Instruct the witness not to answer.  
 6 THE WITNESS: At the instruction of my lawyer,  
 7 I must invoke my Fifth Amendment right.  
 8 BY MS. EZELL:  
 9 Q. You testified a moment ago that you were  
 10 photographed nude by your boyfriend or a former  
 11 boyfriend and that you hoped there are no photographs  
 12 disseminated elsewhere.  
 13 At what age were those photographs taken?  
 14 MR. REINHART: I'm going to instruct her not  
 15 to answer that. It has nothing to do with  
 16 anything. It's not reasonably calculated to lead  
 17 to discoverable evidence. We can move on.  
 18 BY MS. EZELL:  
 19 Q. Were you in any way damaged by that  
 20 experience?  
 21 MR. REINHART: Same instruction. Let's move  
 22 on.  
 23 BY MS. EZELL:  
 24 Q. Do you have any regrets?  
 25 MR. REINHART: Same instruction. Move on.

1 one another?  
 2 MR. REINHART: Object to the form, compound,  
 3 and again, lack of foundation. Instruct her not to  
 4 answer.  
 5 THE WITNESS: At the instruction of my lawyer,  
 6 I must invoke my Fifth Amendment right.  
 7 BY MS. EZELL:  
 8 Q. To your knowledge, are they involved in any  
 9 sexual trafficking of young women?  
 10 MR. REINHART: Object to the form for the  
 11 reasons previously stated. Also calls for a legal  
 12 conclusion as to what sexual trafficking is.  
 13 Instruct her not to answer.  
 14 THE WITNESS: At the instruction of my lawyer,  
 15 I must invoke my Fifth Amendment right.  
 16 BY MS. EZELL:  
 17 Q. I believe you asked about Allen Dershowitz  
 18 earlier.  
 19 MR. REINHART: Twice.  
 20 BY MS. EZELL:  
 21 Q. And were instructed not to answer.  
 22 MR. REINHART: Twice.  
 23 BY MS. EZELL:  
 24 Q. All right. I'm going to ask again on behalf  
 25 of my client. Are you aware of the friendship between



1 Allen Dershowitz and Jeffrey Epstein?

2 MR. REINHART: And for the third time, I'll  
3 object to the form and instruct her not to answer  
4 the question.

5 THE WITNESS: For the third time, I take the  
6 advice of my lawyer and invoke my Fifth Amendment  
7 right.

8 BY MS. EZELL:

9 Q. When Allen Dershowitz comes to Palm Beach, he  
10 stays at the El Brillo mansion, doesn't he?

11 MR. REINHART: Objection to the form. There  
12 is no foundation for her having any knowledge of  
13 anything having to do with a person by the name of  
14 Allen Dershowitz. I instruct her not to answer.

15 THE WITNESS: At the instruction of my lawyer,  
16 I must invoke my Fifth Amendment right.

17 BY MS. EZELL:

18 Q. When Allen Dershowitz, or has Allen Dershowitz  
19 ever been there when young ladies came to give massages?

20 MR. REINHART: Same objection stated to the  
21 previous question. Same instruction.

22 THE WITNESS: At the instruction of my lawyer,  
23 I must invoke my Fifth Amendment right.

24 BY MS. EZELL:

25 Q. Has Allen Dershowitz ever been the beneficiary

1 BY MS. EZELL:

2 Q. Do you know that when David Copperfield is in  
3 town, he gives Jeffrey Epstein tickets and Jeffrey gives  
4 some to young women to attend those shows?

5 MR. REINHART: Object to the form, multiple,  
6 compound question, and a complete lack of  
7 foundation. Instruct the witness not to answer.

8 THE WITNESS: At the instruction of my lawyer,  
9 I must invoke my Fifth Amendment right.

10 BY MS. EZELL:

11 Q. And do you know that those girls are invited  
12 back stage after the show?

13 MR. REINHART: Same objection, complete lack  
14 of foundation, and standing objection previously  
15 stated.

16 THE WITNESS: At the instruction of my lawyer,  
17 I must invoke my Fifth Amendment right.

18 BY MS. EZELL:

19 Q. Do you remember on or about, in or about March  
20 of 2005 having conversations with one of the young women  
21 who came to the house to give massages about her  
22 conversations with Jane No. 103?

23 MR. REINHART: Objection to the form, standing  
24 objection, lack of foundation. Instruct the  
25 witness not to answer, because the question implies

1 of those massages?

2 MR. REINHART: Same objection and same  
3 instruction.

4 THE WITNESS: At the instruction of my lawyer,  
5 I must invoke my Fifth Amendment right.

6 BY MS. EZELL:

7 Q. Do you know John Casablanca?

8 A. Never heard that name before.

9 Q. Have you ever heard of a world-famous  
10 illusionist whose stage name is David Copperfield?

11 MR. REINHART: That's also been asked at least  
12 three times. I'll instruct her again not to answer  
13 the question.

14 THE WITNESS: At the instruction of my lawyer,  
15 I must invoke my Fifth Amendment right.

16 BY MS. EZELL:

17 Q. Have you ever gone to one of David  
18 Copperfield's shows?

19 MR. REINHART: Objection to form, lack of  
20 foundation as to knowledge of any person by the  
21 name of David Copperfield. Instruct her not to  
22 answer.

23 THE WITNESS: At the instruction of my lawyer,  
24 I must invoke my Fifth Amendment right.  
25

1 that she has any knowledge at all of El Brillo Way.

2 BY MS. EZELL:

3 Q. Same question -- sorry.

4 A. At the instruction of my lawyer, I must choose  
5 to invoke my Fifth Amendment privilege.

6 Q. Same question as to March of 2006.

7 MR. REINHART: Same objection and same  
8 instruction.

9 THE WITNESS: At the instruction of my lawyer,  
10 I must choose to invoke my Fifth Amendment  
11 privilege.

12 BY MS. EZELL:

13 Q. Do you have any recollection of a conversation  
14 in which one of the young women told Jane No. 103 that  
15 those girls who, those girls who would help Jeffrey in  
16 regard to the investigation would be compensated and  
17 those who would not or who would hurt him in the  
18 investigation would be dealt with?

19 MR. REINHART: Objection to the form, lack of  
20 foundation, compound question. Instruct the  
21 witness not to answer, because the question implies  
22 some knowledge of anything relating to a person by  
23 the name of Jeffrey Epstein.

24 THE WITNESS: At the instruction of my lawyer,  
25 I must invoke my Fifth Amendment right.

1 BY MS. EZELL:  
 2 Q. Do you know John Brockman?  
 3 A. At the instruction of my lawyer, I must invoke  
 4 my Fifth Amendment right.  
 5 Q. Do you know of someone named Brockman being  
 6 the editor and publisher of a publication of the Edge  
 7 Foundation?  
 8 MR. REINHART: Object to the form. There is  
 9 no foundation that she has any knowledge of any  
 10 entity by the name of the Edge Foundation, and I  
 11 would instruct her not to answer the question based  
 12 on her Fifth Amendment privilege.  
 13 THE WITNESS: At the instruction of my lawyer,  
 14 I must invoke my Fifth Amendment right.  
 15 BY MS. EZELL:  
 16 Q. Did you participate in a scheme by Jeffrey  
 17 Epstein to recruit underage girls to come to his  
 18 residence to provide massages?  
 19 MR. REINHART: Objection to the form, calls  
 20 for a legal conclusion. Also has no foundation as  
 21 to any knowledge of a person by the name of Jeffrey  
 22 Epstein, and because it calls for a legal  
 23 conclusion, I'll simply instruct her not to answer  
 24 the question at all. Move on.  
 25

1 BY MS. EZELL:  
 2 Q. Did you escort those underage girls to the  
 3 massage room where the defendant would enter and urge  
 4 the girls to remove their clothes?  
 5 MR. REINHART: Objection to the form, asks a  
 6 compound question, several questions within one.  
 7 Also assumes knowledge of a person by the name  
 8 of Jeffrey Epstein and a massage room, so there is  
 9 no foundation. Instruct the witness not to answer.  
 10 THE WITNESS: At the instruction of my lawyer,  
 11 I must invoke my Fifth Amendment right.  
 12 BY MS. EZELL:  
 13 Q. Did you ever tell the girls to remove their  
 14 clothes?  
 15 MR. REINHART: Same objection and the same  
 16 instruction.  
 17 THE WITNESS: At the instruction of my lawyer,  
 18 I must invoke my Fifth Amendment right.  
 19 BY MS. EZELL:  
 20 Q. And did you sometimes deliver cash from the  
 21 defendant to the underage girls after they performed the  
 22 massage?  
 23 MR. REINHART: That's been asked at least  
 24 three or four other times.  
 25 MS. EZELL: I'm asking on behalf of my client.

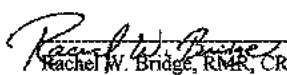
1 BY MS. EZELL:  
 2 Q. Did you assist, support, and facilitate  
 3 Jeffrey Epstein's child exploitation enterprise?  
 4 MR. REINHART: Once again, objection the  
 5 question, calls for a legal conclusion as to what  
 6 is an enterprise, which is a term of art in the  
 7 criminal law about which this witness has no  
 8 knowledge, and it's a legal conclusion not likely  
 9 to lead to discoverable evidence. So I would  
 10 instruct her not to answer the question at all.  
 11 BY MS. EZELL:  
 12 Q. Did you arrange times for underage girls to  
 13 come to Jeffrey Epstein's residence?  
 14 MR. REINHART: Objection to form, standing  
 15 objection previously stated.  
 16 THE WITNESS: At the instruction of my lawyer,  
 17 I must invoke my Fifth Amendment privilege.  
 18 BY MS. EZELL:  
 19 Q. Did you arrange, transport, or yourself  
 20 transport underage girls to or from Jeffrey Epstein's  
 21 residence?  
 22 MR. REINHART: Same objection, same  
 23 instruction as the last question.  
 24 THE WITNESS: At the instruction of my lawyer,  
 25 I must invoke my Fifth Amendment privilege.

1 MR. REINHART: I understand, but we've been  
 2 here for over an hour, and we can't just keep going  
 3 over. If they have been asked in the deposition,  
 4 your clients can have the benefit of the answer,  
 5 but we've been here now for almost eight hours and  
 6 you still --  
 7 THE WITNESS: At the instruction of my lawyer,  
 8 I must invoke my Fifth Amendment right.  
 9 BY MS. EZELL:  
 10 Q. Did you ever take part in delivering cash from  
 11 the defendant to the procurers of the underage girls who  
 12 came for the massage appointments?  
 13 MR. REINHART: Objection to the form. The  
 14 term procure is a legal term of art, and I'll  
 15 instruct the witness not to respond to the question  
 16 at all.  
 17 BY MS. EZELL:  
 18 Q. Did you, did you by using the telephone assist  
 19 Jeffrey Epstein in enabling himself to commit sexual  
 20 battery on, and acts of lewdness in the presence of  
 21 young women?  
 22 MR. REINHART: Same as the previous  
 23 instruction. Instruct the witness not to answer  
 24 the question at all, because it results in a legal  
 25 question, not a factual question, so it's not

1 reasonably designed to lead to discoverable  
 2 evidence.  
 3 BY MS. EZELL:  
 4 Q. Did you facilitate these acts as well as  
 5 assisting Mr. Epstein in avoiding police detection?  
 6 MR. REINHART: Same instruction.  
 7 BY MS. EZELL:  
 8 Q. Do you know when and by whom the computers  
 9 were removed from the El Brillo mansion?  
 10 MR. REINHART: Objection to the form, lack of  
 11 foundation, and it also assumes knowledge of a  
 12 place known as the El Brillo mansion. So instruct  
 13 the witness not to answer the question based on the  
 14 Fifth Amendment.  
 15 THE WITNESS: At the instruction of my lawyer,  
 16 I must invoke my Fifth Amendment right.  
 17 BY MS. EZELL:  
 18 Q. Was Jane No. 103 invited to just come and hang  
 19 out at the El Brillo mansion?  
 20 MR. REINHART: Objection to the form, same as  
 21 the previous question. It assumes knowledge of a  
 22 place known as the El Brillo mansion and a person  
 23 by the name of Jane No. 103. It is compound and  
 24 lacking in foundation.  
 25 THE WITNESS: at the instruction of my lawyer,

1 deposition or you may waive reading and allow the  
 2 court reporter to simply type it up and distribute  
 3 it to the lawyers who order it.  
 4 Do you choose to read or waive?  
 5 THE WITNESS: Waive.  
 6 MS. EZELL: Thank you.  
 7 MR. REINHART: Thank you.  
 8 THE VIDEOGRAPHER: Okay, this concludes  
 9 today's videotape deposition of Sarah Kellen. The  
 10 time is 18:51.  
 11 (Witness excused.)  
 12 (Deposition was concluded.)  
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1 I must invoke my Fifth Amendment right.  
 2 BY MS. EZELL:  
 3 Q. Have you called any girls under the age of 18  
 4 in Palm Beach or West Palm Beach in the last six years?  
 5 MR. REINHART: For any purpose?  
 6 MS. EZELL: Yes.  
 7 THE WITNESS: Can you repeat the question?  
 8 BY MS. EZELL:  
 9 Q. Have you called any girls under the age of 18  
 10 in Palm Beach or West Palm Beach in the last six years?  
 11 MR. REINHART: You can answer that yes or no,  
 12 if you know.  
 13 THE WITNESS: I don't think so.  
 14 MS. EZELL: I don't have any other questions.  
 15 Thank you.  
 16 THE VIDEOGRAPHER: All set?  
 17 MR. REINHART: Yes.  
 18 THE VIDEOGRAPHER: This concludes today's  
 19 videotape deposition of Sarah Kellen.  
 20 MR. REINHART: Hold on, I'm sorry, one last  
 21 thing. Since you're the last defense person or  
 22 plaintiff's lawyer standing, I guess you need to  
 23 advise her she has the right to read or waive on  
 24 the record.  
 25 MS. EZELL: You do have the right to read this

1 CERTIFICATE  
 2 THE STATE OF FLORIDA  
 3 COUNTY OF PALM BEACH  
 4  
 5 I, Rachel W. Bridge, Registered Professional  
 6 Reporter, Florida Professional Reporter and Notary  
 7 Public in and for the State of Florida at large, do  
 8 hereby certify that I was authorized to and did report  
 9 said deposition in stenotype; and that the foregoing  
 10 pages are a true and correct transcription of my  
 11 shorthand notes of said deposition.  
 12 I further certify that said deposition was  
 13 taken at the time and place hereinabove set forth and  
 14 that the taking of said deposition was commenced and  
 15 completed as hereinabove set out.  
 16  
 17 I further certify that I am not attorney or  
 18 counsel of any of the parties, nor am I a relative or  
 19 employee of any attorney or counsel of party connected  
 20 with the action, nor am I financially interested in the  
 21 action.  
 22  
 23 The foregoing certification of this transcript  
 24 does not apply to any reproduction of the same by any  
 25 means unless under the direct control and/or direction  
 of the certifying reporter.  
 Dated this 9th day of April, 20  
  
 Rachel W. Bridge, RMR, CRR, FPR

*DEFENDANT BRADLEY J. EDWARDS'S STATEMENT OF UNDISPUTED FACTS*

*Epstein v. Edwards, et al.*

*Case No.: 50 2009 CA 040800XXXXMBAG*

# ATTACHMENT 13

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IN THE CIRCUIT COURT OF THE 15th  
JUDICIAL CIRCUIT IN AND FOR  
PALM BEACH COUNTY, FLORIDA

CASE NO.:50 2008 CA020614XXXXMBAF

JANE DOE, II  
Plaintiff,  
vs.  
JEFFREY EPSTEIN, and SARAH KELLEN  
Defendant.

---

DEPOSITION OF THE WITNESS  
JEFFREY EPSTEIN  
TAKEN BY THE Plaintiff  
ON May 7, 2009

APPEARANCES:

ON BEHALF OF THE PLAINTIFF  
GARCIA LAW FIRM  
224 Datura Street, St. 900  
West Palm Beach, FL 33401  
BY: ISIDRO M. GARCIA  
TARA A. FINNIGAN, P.A.  
224 Datura Street, Suite 990  
West Palm Beach, FL 33401  
ON BEHALF OF THE DEFENDANT  
ATTERBURY GOLDBERGER & WEISS, P.A.  
250 Australian Ave, South  
West Palm Beach, FL 33401  
BY: JACK A. GOLDBERGER, ESQ.  
BURMAN, CRITTON, et al.  
515 North Flagler Dr., St. 400  
West Palm Beach, FL 33401  
BY: J. MICHAEL BURMAN

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I N D E X

DEPO. EPSTEIN

JEFFREY EPSTEIN

Direct by Mr. Garcia 4

QUESTIONS MARKED FOR CERTIFICATION  
(Identified with an asterisk on the following pages.)

PAGE NO.	LINE NO.
46	20
49	21
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0005

Deposition of JEFFREY EPSTEIN, a witness herein, taken on behalf of the Plaintiff herein, for the purpose of discovery and for use as evidence in the above-entitled cause, before JULIE ANDOLPHO, Court Reporter and Notary Public in and for the State of Florida at Large, at 250 Australian Avenue, West Palm Beach, State of Florida, on May 7, 2009, commencing at or about 10:00 a.m..

whereupon:

JEFFREY EPSTEIN,  
a witness herein being of lawful age, and being first duly sworn in the above cause, testified on his oath as follows:

DEPO.EPSTEIN  
DIRECT EXAMINATION

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BY MR. GARCIA:

Q Please state your full name.

A Jeffrey Edward Epstein.

Q Where do you live, Sir?

A United States Virgin Islands.

Q What is your home address?

A I intend to respond to all relevant questions regarding this lawsuit, however, at the present time my attorneys have counseled me I cannot

provided any questions relevant to this lawsuit. I must accept this advise or risk losing my 6th amendment right to effective representation. Accordingly, I assert my federal constitutional rights as guaranteed by the 5th, 6th and 14th amendment of the United States Constitution.

Q Does that mean you are not going to answer my question about your home address?

MR. GOLDBERGER: He just answered it, Sid.

MR. GARCIA: To all questions -- I mean

-- MR. GOLDBERGER: -- let's go off the record a second.

MR. GARCIA: Let's put it on the record -- we can go off, I guess. Go ahead.  
(Whereupon there is a discussion off the record.) I

BY MR. GARCIA: (CONT'D)

Q Do you have a home that you own in Palm Beach, the Town of Palm Beach?

A As I have said in my previous questions and I will repeat it. I intend to respond to all relevant questions regarding this lawsuit, however, at the present time my attorneys have counseled me I cannot provide answers to any questions relevant to

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this lawsuit. I must accept this advise or risk losing my 6th amendment right to effective representation. Accordingly, I assert my federal constitutional rights as guaranteed by the 5th, 6th and 14th amendment of the United States Constitution.

MR. GOLDBERGER: Can we go off the record one second?

MR. GARCIA: Let me ask on the record. Can we have a stipulation that his answer would be the same to each question I pose?

MR. GOLDBERGER: It's okay that the question be asked, but rather than you read that.

THE WITNESS: I'll read it.

MR. GOLDBERGER: All right. We'll read it to you.

Q Do you know Dainya Nida?

A As I've said in response to all questions asked of me so far, I intend to respond to all relevant questions regarding this lawsuit, however, at the present time my attorneys have counseled me I cannot provide answers to any questions relevant to this lawsuit. I must accept this advise or risk losing my 6th amendment right to effective

0008

1 representation. Accordingly, I assert my federal  
2 constitutional rights as guaranteed by the 5th, 6th  
3 and 14th amendment of the United States  
4 Constitution.

5 Q Who is Sarah Kellen?

6 A As I've said in response to all questions  
7 previously asked of me, I intend to respond to all  
8 relevant questions regarding this lawsuit, however,  
9 at the present time my attorneys have counseled me I  
10 cannot provide answers to any questions relevant to  
11 this lawsuit. I must accept this advise or risk  
12 losing my 6th amendment right to effective  
13 representation. Accordingly, I assert my federal  
14 constitutional rights as guaranteed by the 5th, 6th  
15 and 14th amendment of the United States  
16 Constitution.

17 Q Did you ever -- strike that.

18 Did Dainya Nida ever come to your  
19 house in the Town of Palm Beach for any reason?

20 A As I've said previously to questions asked  
21 of me, I intend to respond to all relevant questions  
22 regarding this lawsuit, however, at the present time  
23 my attorneys have counseled me I cannot provide  
24 answers to any questions relevant to this lawsuit.  
25 I must accept this advise or risk losing my 6th

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1 amendment right to effective representation.  
2 Accordingly, I assert my federal constitutional  
3 rights as guaranteed by the 5th, 6th and 14th  
4 amendment of the United States Constitution.

5 Q When Dainya Nida came to your house, did  
6 she ever -- did you ever ask her to engage in sexual  
7 acts with you?

8 A Can you repeat the question?

9 Q Yes. Did you ever, when Dainya Nida came  
10 to your house, did you ever ask her to engage in any  
11 sexual acts with you?

12 A As I've said in response to your other  
13 questions I intend to respond to all relevant  
14 questions regarding this lawsuit, however, at the  
15 present time my attorneys have counseled me I cannot  
16 provide answers to any questions relevant to this  
17 lawsuit. I must accept this advise or risk losing  
18 my 6th amendment right to effective representation.  
19 Accordingly, I assert my federal constitutional  
20 rights as guaranteed by the 5th, 6th and 14th  
21 amendment of the United States Constitution.

22 Q Mr. Epstein, I note for the record you're  
23 reading from a script, are you reading from a  
24 script?

25 A As I've said in response to all questions

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1 asked of me, I intend to respond to all relevant  
2 questions regarding this lawsuit, however, at the  
3 present time my attorneys have counseled me I cannot  
4 provide answers to any questions relevant to this  
5 lawsuit. I must accept this advise or risk losing  
6 my 6th amendment right to effective representation.  
7 Accordingly, I assert my federal constitutional  
8 rights as guaranteed by the 5th, 6th and 14th  
9 amendment of the United States Constitution.

10 MR. GARCIA: All right. Well, for the



11 record, since he is reading from the script I'm  
12 entitled to have a copy of what he's reading  
13 from and make it a deposition exhibit so I'd  
14 like to make that document, at some point,  
15 exhibit 1. I see handwriting on it also, I  
16 don't know if you claim that to be an attorney  
17 client communication, I just want a copy of the  
18 script he's reading from.

19 MR. GOLDBERGER: The whole document is  
20 attorney client privilege and we're not giving  
21 it to you. If you want to file a motion, we'll  
22 have a hearing on it.

23 MR. GARCIA: I will.

24 DIRECT BY MR. GARCIA: (CONT'D)

25 Q what is your present age?

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1 A 56.

2 Q what is your date of birth?

3 A January 20, 1953.

4 Q Did you know the age of Dainya Nida when  
5 she came to your house in the Town of Palm Beach?

6 A Can you repeat the question?

7 Q Did you know the age of Dainya Nida when  
8 she came to your house in the Town of Palm Beach?

9 A As I've said in response to your other  
10 questions, I intend to respond to all relevant  
11 questions regarding this lawsuit, however, at the  
12 present time my attorneys have counseled me I cannot  
13 provide answers to any questions relevant to this  
14 lawsuit. I must accept this advise or risk losing  
15 my 6th amendment right to effective representation.  
16 Accordingly, I assert my federal constitutional  
17 rights as guaranteed by the 5th, 6th and 14th  
18 amendment of the United States Constitution.

19 Q Did you ever pay Daiyna Nida any money for  
20 any services that she rendered to you?

21 A As I've said in response to your other  
22 questions, I intend to respond to all relevant  
23 questions regarding this lawsuit, however, at the  
24 present time my attorneys have counseled me I cannot  
25 provide answers to any questions relevant to this

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1 lawsuit. I must accept this advise or risk losing  
2 my 6th amendment right to effective representation.  
3 Accordingly, I assert my federal constitutional  
4 rights as guaranteed by the 5th, 6th and 14th  
5 amendment of the United States Constitution.

6 Q In the answer in affirmative defenses that  
7 were filed on your behalf in the case of Jane Doe,  
8 II vs. Jeffrey Epstein and Sarah Kellen, case number  
9 502008CA20614XXXXMBAB pending before Judge Hafele  
10 you claim as your second affirmative defense the  
11 following, quote, "As to all counts alleged,  
12 plaintiff consented to and participated in conduct  
13 similar and/or identical to the acts alleged with  
14 other persons which was the sole and contributing  
15 cause of plaintiff's alleged damages." what  
16 evidence if any do you have plaintiff consented to  
17 or participated in conduct similar and/or identical  
18 to the acts alleged with other persons and who are  
19 the other persons?

20 A Can you repeat that question?

21 MR. GARCIA: Before you read it back, let

22 me put this on the record, that question can in  
23 no way invoke a 5th or 6th amendment privilege  
24 because it's not asking about his contact it's  
25 asking about what evidence he has that she

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1 engaged in acts with other persons of a similar  
2 nature.

3 MR. GOLDBERGER: It could lead to  
4 incriminating evidence and, therefore, the  
5 question, once it's read back, I anticipate the  
6 question not being answered.

7 MR. GARCIA: Why would it lead --

8 MR. GOLDBERGER: -- I'm not going to  
9 engage in that, I'm telling you I have a good  
10 faith basis invoking the 5th amendment.

11 MR. GARCIA: Unless he alleged that he  
12 participated with the third persons. Anyway,  
13 read it back to him.

14 (whereupon the last question is read back.)

15 A As I've said in response to your other  
16 questions, I intend to respond to all relevant  
17 questions regarding this lawsuit, however, at the  
18 present time my attorneys have counseled me I cannot  
19 provide answers to any questions relevant to this  
20 lawsuit. I must accept this advise or risk losing  
21 my 6th amendment right to effective representation.

22 Q Where were you born?

23 A Excuse me, I didn't finish.

24 Q I'm sorry.

25 A Accordingly, I assert my federal

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1 constitutional rights as guaranteed by the 5th, 6th  
2 and 14th amendment of the United States  
3 Constitution.

4 Q Where were you born?

5 A In New York.

6 Q What part?

7 A Brooklyn.

8 Q What neighborhood in Brooklyn?

9 A I don't understand the question.

10 Q Canarsie, Bay Shore?

11 A Where was I born?

12 Q Yeah. Where did you grow up in Brooklyn,  
13 did you grow up in Brooklyn?

14 A Yes.

15 Q What part of Brooklyn did you grow up in  
16 -- let me ask you this, what high school did you  
17 attend?

18 A Lafayette.

19 Q And where did you live through -- in high  
20 school, was there a particular neighborhood name?

21 A As I've said in response to all questions  
22 asked of me so far, I intend to respond to all  
23 relevant questions regarding this lawsuit, however

24 --

25 Q -- let me withdraw that question. Did you

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1 attend college?

2 A Yes.

3 Q Where did you attend college?

4 A As I've said in response to your other  
5 questions, I intend to respond to all relevant  
6 questions regarding this lawsuit, however, at the

7 present time my attorneys have counseled me I cannot  
8 provide answers to any questions relevant to this  
9 lawsuit. I must accept this advise or risk losing  
10 my 6th amendment right to effective representation.  
11 Accordingly, I assert my federal constitutional  
12 rights as guaranteed by the 5th, 6th and 14th  
13 amendment of the United States Constitution.

14 MR. GOLDBERGER: Go off the record a  
15 second.

16 (Discussion off the record.)

17 DIRECT BY MR. GARCIA: (CONT'D)

18 Q Let me ask this, did you graduate from  
19 college?

20 A No.

21 Q All right. Can you tell me what years you  
22 attended college, if you did attend?

23 A As I've said in response to your other  
24 questions, I intend to respond to all relevant  
25 questions regarding this lawsuit, however, at the

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1 present time my attorneys have counseled me I cannot  
2 provide answers to any questions relevant to this  
3 lawsuit. I must accept this advise or risk losing  
4 my 6th amendment right to effective representation.

5 Q All right.

6 A Accordingly --

7 Q -- I'm sorry.

8 A Should I go back to the beginning?

9 Q You paused, I thought you were done.

10 A I assert my federal constitutional rights  
11 as guaranteed by the 5th, 6th and 14th amendment of  
12 the United States Constitution.

13 Q Did you graduate from Lafayette High  
14 School?

15 A Yes.

16 Q And what year did you graduate?

17 A '69.

18 Q Were you in the military service at any  
19 point?

20 A No.

21 Q As to the third affirmative defense raised  
22 in the answer to affirmative defenses to this  
23 particular case you allege, or your lawyer on your  
24 behalf alleges, quote, "As to all counts, defendant  
25 reasonably believed the plaintiff had attained the

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1 age of 18 years old at the time of the alleged  
2 acts." End quote. What made you reasonably believe  
3 that the plaintiff had alleged 18 years of age at  
4 the time of the alleged acts?

5 A As I've said in response to your other  
6 questions, I intend to respond to all relevant  
7 questions regarding this lawsuit, however, at the  
8 present time my attorneys have counseled me I cannot  
9 provide answers to any questions relevant to this  
10 lawsuit. I must accept this advise or risk losing  
11 my 6th amendment right to effective representation.  
12 Accordingly, I assert my federal constitutional  
13 rights as guaranteed by the 5th, 6th and 14th  
14 amendment of the United States Constitution.

15 Q What states, besides the State of Florida,  
16 do you presently own a home in, if any?

17 A As I've said in response to your other

DEPO. EPSTEIN

18 questions, I intend to respond to all relevant  
19 questions regarding this lawsuit, however, at the  
20 present time my attorneys have counseled me I cannot  
21 provide answers to any questions relevant to this  
22 lawsuit. I must accept this advise or risk losing  
23 my 6th amendment right to effective representation.  
24 Accordingly, I assert my federal constitutional  
25 rights as guaranteed by the 5th, 6th and 14th

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1 amendment of the United States Constitution.  
2 Q Are you currently residing in the Palm  
3 Beach County Jail?  
4 A Yes.  
5 Q Are you scheduled to be released at some  
6 future date from the Palm Beach County Jail?  
7 A Yes.  
8 Q Do you know when that date is?  
9 A No.  
10 Q Are you on some sort of furlough or home  
11 release program, I don't know what it's called  
12 exactly, where you get to leave the Palm Beach  
13 County Jail every morning and return at night?  
14 MR. GOLDBERGER: You have to rephrase the  
15 question. If you're asking if he's on house  
16 arrest the answer is no.  
17 Q I don't know what it's called --  
18 MR. GOLDBERGER: -- ask him if he's on  
19 work release.  
20 Q Are you on work release?  
21 A Yes.  
22 Q What time do you leave the Palm Beach  
23 County Jail each morning?  
24 A 8 a.m.  
25 Q what time are you required to be back?

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1 A 8 p.m.  
2 Q where do you work during these hours?  
3 A As I've said in response to your other  
4 questions, I intend to respond to all relevant  
5 questions regarding this lawsuit, however, at the  
6 present time my attorneys have counseled me I cannot  
7 provide answers to any questions relevant to this  
8 lawsuit. I must accept this advise or risk losing  
9 my 6th amendment right to effective representation.  
10 Accordingly, I assert my federal constitutional  
11 rights as guaranteed by the 5th, 6th and 14th  
12 amendment of the United States Constitution.  
13 Can we take a restroom break?  
14 Q Sure.  
15 (whereupon a break is taken.)  
16 DIRECT BY MR. GARCIA: (CONT'D)  
17 Q Can you tell me what days you are  
18 participating in this work release program, whether  
19 Monday through Friday or is it every day of the  
20 week?  
21 A Monday through Saturday.  
22 Q Do you have an office somewhere for your  
23 business that is separate from your home?  
24 A As I've said in response to your other  
25 questions, I intend to respond to all relevant

0020

1 questions regarding this lawsuit, however, at the  
2 present time my attorneys have counseled me I cannot

DEPO. EPSTEIN

3 provide answers to any questions relevant to this  
4 lawsuit. I must accept this advise or risk losing  
5 my 6th amendment right to effective representation.  
6 Accordingly, I assert my federal constitutional  
7 rights as guaranteed by the 5th, 6th and 14th  
8 amendment of the United States Constitution.

9 Q Have you ever been charged with a criminal  
10 offense?

11 MR. GOLDBERGER: You can answer that.

12 A Yes.

13 Q And where were you charged with a criminal  
14 offense?

15 A Palm Beach.

16 Q And was it a charge brought by the state  
17 or the federal prosecutor?

18 A State.

19 Q Do you know what the charged crime was?

20 A Yes.

21 Q What was it?

22 A Soliciting prostitutes.

23 Q Did you take a plea in that case?

24 A Yes.

25 Q And what did you plead guilty to -- or did

0021 you plead guilty?

1 A I already answered that question.

2 Q You did plead guilty?

3 A Yes.

4 Q Did you plead guilty to that specific  
5 crime?

6 A Yes.

7 Q And what sentence -- was there a sentence  
8 that was agreed upon or was it imposed by the court  
9 without agreement?

10 A It was agreed.

11 Q And what was the sentence?

12 A Twelve months in the county jail.

13 Q Any other conditions?

14 A No.

15 Q And was work release part of the  
16 agreement?

17 A No.

18 Q You applied for work release after you  
19 started serving time in the county jail?

20 A Yes, Sir.

21 Q And was that agreed to by the state  
22 prosecutors office?

23 A I don't know.

24 Q Any other conditions besides 12 months in  
0022 the county jail?

1 MR. GOLDBERGER: As the question is  
2 phrased that was a sentence to the  
3 solicitation.

4 Q I'm sorry?

5 A That was the sentence to the solicitation  
6 of prostitution.

7 Q And was it a single count or multiple  
8 counts?

9 A Single.

10 Q Who was the alleged victim?

11 A As I've said in response to your other  
12 questions, I intend to respond to all relevant

14 questions regarding this lawsuit, however, at the  
15 present time my attorneys have counseled me I cannot  
16 provide answers to any questions relevant to this  
17 lawsuit. I must accept this advise or risk losing  
18 my 6th amendment right to effective representation.  
19 Accordingly, I assert my federal constitutional  
20 rights as guaranteed by the 5th, 6th and 14th  
21 amendment of the United States Constitution.

22 Q Were you, if you know, were you indicted  
23 by a grand jury or was the charge direct filed by  
24 the state attorney?

25 A Indicted by a grand jury.

0023

1 Q Did the grand jury, if you know, consider  
2 any other charges?

3 A I don't know.

4 Q Did you testify before the grand jury?  
5 MR. GOLDBERGER: Go ahead and answer that.

6 A No.

7 Q Were you asked to testify -- let me ask  
8 this, were you offered the opportunity to testify?

9 A I don't know.

10 Q When is the first time that you met Daiyna  
11 Nida?

12 A As I've said in response to your other  
13 questions, I intend to respond to all relevant  
14 questions regarding this lawsuit, however, at the  
15 present time my attorneys have counseled me I cannot  
16 provide answers to any questions relevant to this  
17 lawsuit. I must accept this advise or risk losing  
18 my 6th amendment right to effective representation.  
19 Accordingly, I assert my federal constitutional  
20 rights as guaranteed by the 5th, 6th and 14th  
21 amendment of the United States Constitution.

22 Q Have you ever been charged in any other  
23 court of the United States or abroad for any crime?

24 MR. GOLDBERGER: You have to rephrase the  
25 question. Other than solicitation for

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1 prostitution?

2 MR. GARCIA: Other than this one case  
3 that he talked about in Palm Beach County.

4 MR. GOLDBERGER: What one case are you  
5 talking about?

6 MR. GARCIA: Where he said the grand jury  
7 indicted him for solicitation of prostitution.

8 A Could you repeat the question?

9 Q Have you ever been charged of a crime in  
10 any other court in the United States or abroad  
11 besides the charge that you discussed solicitation  
12 of prostitution?

13 A I don't understand the question. What's a  
14 crime, is that a traffic ticket?

15 Q No.

16 A Is it since I'm 18?

17 Q Yeah, since you're 18.

18 MR. GOLDBERGER: Condense the question. I  
19 want to make sure he answers the question  
20 accurately so ask the question one more time  
21 and then we'll get an answer.

22 Q Ever been charged with a misdemeanor or a  
23 felony level criminal offense in any court in the  
24 United States or abroad besides the one you've

25 already discussed?

0025

1 A Not that I remember.  
2 MR. GOLDBERGER: He's going to clarify  
3 that answer.  
4 A Another charge in Palm Beach.  
5 Q What was the other charge?  
6 A Procuring minors for prostitution.  
7 Q And what agency or what prosecutors office  
8 charged you with that crime?  
9 A State attorney.  
10 Q Did you plead guilty to that as well?  
11 A Yes.  
12 Q So did you plead guilty to two separate  
13 offenses?  
14 A Yes.  
15 Q Is that with a single minor or multiple  
16 minors in terms of what you plead guilty to?  
17 A I intend to respond to all relevant  
18 questions regarding this lawsuit, however, at the  
19 present time my attorneys have counseled me I cannot  
20 provide answers to any questions relevant to this  
21 lawsuit. I must accept this advise or risk losing  
22 my 6th amendment right to effective representation.  
23 Accordingly, I assert my federal constitutional  
24 rights as guaranteed by the 5th, 6th and 14th  
25 amendment of the United States Constitution.

0026

1 Q Are you a registered sex offender?  
2 A Yes.  
3 Q Was that part of the plea agreement that  
4 you made with the State Attorneys Office?  
5 MR. GOLDBERGER: If you know.  
6 A Yes.  
7 Q I had asked you before if there were any  
8 other conditions of your plea, you didn't mention  
9 that, is that -- is there anything else that you  
10 haven't mentioned that's part of your plea  
11 agreement?  
12 MR. GOLDBERGER: You asked him what the  
13 conditions were of the solicitation of the  
14 prostitution charge that he pled guilty to and  
15 he answered that question.  
16 MR. GARCIA: I see. He hadn't revealed he  
17 pled guilty to a different charge which is  
18 procuring the minor for prostitution.  
19 MR. GOLDBERGER: You didn't ask him that.  
20 DIRECT BY MR. GARCIA: (CONT'D)  
21 Q Are there any other conditions for either  
22 crime that you apparently pled guilty to in Palm  
23 Beach County, any other conditions besides the 12  
24 months or whatever period of time you mentioned in  
25 the county jail and being a registered sex offender?

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1 A An additional six months in the county  
2 jail.  
3 Q An additional six months?  
4 A Yes.  
5 Q The total sentence is 18 months, yes?  
6 A That's 12 plus 6.  
7 Q Okay. And what else?  
8 A One year of community control.  
9 Q Community control in Palm Beach County or

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somewhere else?  
A Community control.  
Q Are you allowed to leave the county during that one year?  
A I don't know.  
Q Have you made any agreement with the United States Attorneys Office concerning a deferred prosecution or pretrial intervention-type of program?  
MR. GOLDBERGER: You know, I'm kind of -- Mike is feeling the same way I am -- I'm kind of giving you leeway to ask some questions here that may be arguably relevant but we're getting into areas that are not relevant and it appears to me that you're just asking the questions to embarrass Mr. Epstein so I'm going to give you a little more leeway but at some point I'm going to cut it off if you go too far. I'll let him answer that.  
MR. GARCIA: I'm just asking about any agreements he made if he made an agreement.  
Q Have you made any agreements with the U.S. Attorneys Office to avoid being prosecuted for any federal offenses?  
MR. GOLDBERGER: The way that question was phrased, Sid --  
MR. GARCIA: -- let's go back to the previous question, there was no objection to it. Read that back.  
(Whereupon the following question is read back:)  
Q Have you made any agreement with the United States Attorneys Office concerning a deferred prosecution or pretrial intervention-type of program?"  
A Yes.  
Q And do you know what the agreement is?  
A Yes.  
Q What does the agreement call for?  
A The agreement states what it states.  
Q Well, can you summarize it for me?  
A No.  
MR. BURMAN: Object to the form.  
Q Do you have an understanding of the agreement?  
MR. BURMAN: Object to the form.  
Q What is your understanding of the agreement?  
MR. BURMAN: Object to the form of the question.  
Q You can answer it.  
MR. GOLDBERGER: Can you give me a hint as to why you think that's arguably relevant?  
MR. GARCIA: We may move to seek to enforce the agreement. We may add a count for just a third party beneficiary of that agreement for breach of contract claim. The possibilities are endless here.  
MR. GOLDBERGER: That's fine, if you want to do that you can do that but Mr. Epstein's understanding of what the agreement is -- legally you can do what you can --



21 MR. GARCIA: -- he's a party of the  
22 agreement, his understanding of what the  
23 agreement is is crucial to whether or not there  
24 is a agreement and what the agreement and terms  
25 are.

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1  
2 DIRECT BY MR. GARCIA: (CONT'D)

3 Q Unless they instruct you not to answer,  
4 you have to answer the question and that question  
5 does not violate anybody's privilege against  
6 self-incrimination.

7 MR. GOLDBERGER: Go ahead and answer.  
8 A Repeat the question.

9 Q Sure. What is your understanding of the  
10 agreement made with the U.S. Attorneys Office?

11 A That if I abide by all the terms and  
12 conditions of the agreement I will not be  
13 prosecuted.

14 Q All right. Did you sign that agreement?

15 A Yes.

16 Q Did you have a opportunity to reflect on  
17 the terms of the agreement before you signed it?

18 A Yes.

19 Q Did you have advice of counsel before you  
20 signed it?

21 A Yes.

22 Q All right. Was the agreement ever  
23 modified?

24 A Yes.

25 Q Why was it modified, if you know?

0031

1 A (Nodding).

2 Q You don't know? You're shaking your head,  
3 but I don't know what that means.

4 MR. GOLDBERGER: I think that would call  
5 for Mr. Epstein to kind of reveal attorney  
6 client privilege so I'll advise him not to  
7 answer the question.

8 MR. GARCIA: All right.

9 Q Who is Gerald Lefcourt, L-E-F-C-O-U-R-T?

10 MR. GOLDBERGER: It would involve attorney  
11 client privilege. He's not answering that  
12 question.

13 MR. GARCIA: I just want to know who he  
14 is.

15 MR. GOLDBERGER: He's a lawyer.

16 Q Did he represent you in these  
17 negotiations?

18 THE WITNESS: How does he have a copy of  
19 that agreement?

20 MR. GOLDBERGER: I don't know.

21 MR. GARCIA: Is he not going to answer  
22 who Gerald Lefcourt is?

23 MR. GOLDBERGER: Correct.

24 Q Who is Lilliann Sanchez?

25 MR. GOLDBERGER: He's not going to answer

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1 any questions that would involve revealing  
2 attorney client privilege.

3 THE WITNESS: Can I have a second with  
4 you?

5 MR. GARCIA: Just to save some time, I

6 signed the nondisclosure agreement that's why I  
7 have this, if that's what his question is.

8 MR. GOLDBERGER: what nondisclosure  
9 agreement?

10 MR. GARCIA: Apparently there is something  
11 the U.S. Attorney requires before turning over  
12 this document, you have to sign some sort of  
13 agreement not to disclose, if that's his  
14 concern.

15 MR. GOLDBERGER: It is of concern so let  
16 me clarify this. You signed some sort of  
17 nondisclosure agreement with the U.S. Attorney?

18 MR. GARCIA: Yes.

19 MR. GOLDBERGER: What U.S. Attorney?

20 MR. GARCIA: whoever is handling this  
21 case.

22 MR. GOLDBERGER: who would that be?

23 MR. GARCIA: I believe it's -- she's the  
24 one who signed the agreement. There is some  
25 sort of protective order, if I understand, that

0033

1 was entered by Judge Mara requiring any party  
2 who is given this agreement to sign the  
3 agreement not to disclose it to anyone, Marie  
4 Veafona (phonetic).

5 MR. GOLDBERGER: So you contacted Ms.  
6 Veafona and she had you sign a nondisclosure  
7 agreement?

8 MR. GARCIA: That's why I don't want to  
9 make it an exhibit to this deposition because I  
10 don't want the court reporter to see it. I  
11 want to show it to the witness so he can  
12 identify it for me --

13 MR. GOLDBERGER: -- let me see what you're  
14 going to show him?

15 (Handing)

16 MR. GARCIA: Its got the addendum, too.

17 MR. GOLDBERGER: So what's your question?

18 MR. GARCIA: My question is did he sign  
19 the original agreement, did he sign the  
20 addendum to it and what dates did he sign  
21 those. I believe they're dated.

22 MR. GOLDBERGER: I don't know how you can  
23 ask questions about a document that is not to  
24 be produced and make it part of a deposition  
25 without violating the non --

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1 MR. GARCIA: -- well, I assume it can be  
2 produced to him and to his lawyers.

3 MR. GOLDBERGER: By acknowledging the  
4 existence of a agreement it violates the terms  
5 of the secrecy of the document, correct?

6 MR. GARCIA: I don't think so.

7 MR. GOLDBERGER: I think it does.

8 MR. GARCIA: I think it restricts  
9 disclosures to third parties.

10 MR. GOLDBERGER: I'm going to instruct him  
11 not to answer any questions about the  
12 agreement. If you want to see the judge on  
13 this, we can. If you're right, you're right;  
14 if you're not, you're not. Out of an abundance  
15 of caution I'm not going to have him answer any  
16 questions about it right now.

17 BY MR. GARCIA: (CONT'D)

18 Q Can you give me an exemplar of how you  
19 sign your name?

20 A (No response).

21 MR. GARCIA: Come on, that doesn't  
22 incriminate him.

23 MR. GOLDBERGER: Yes --

24 MR. GARCIA: -- for a crime, his  
25 signature?

0035

1 A I intend to respond to all relevant  
2 questions regarding this lawsuit, however, at the  
3 present time my attorneys have counseled me I cannot  
4 provide answers to any questions relevant to this  
5 lawsuit. I must accept this advise or risk losing  
6 my 6th amendment right to effective representation.  
7 Accordingly, I assert my federal constitutional  
8 rights as guaranteed by the 5th, 6th and 14th  
9 amendment of the United States Constitution.

10 Q Do you have a preference for women under  
11 the age of 18?

12 A As I've said in response to all questions  
13 previously asked of me, I intend to respond to all  
14 relevant questions regarding this lawsuit, however,  
15 at the present time my attorneys have counseled me I  
16 cannot provide answers to any questions relevant to  
17 this lawsuit. I must accept this advise or risk  
18 losing my 6th amendment right to effective  
19 representation. Accordingly, I assert my federal  
20 constitutional rights as guaranteed by the 5th, 6th  
21 and 14th amendment of the United States  
22 Constitution.

23 Q Have you ever been married?

24 A No.

25 Q Have you ever been engaged?

0036

1 MR. BURMAN: Go ahead and answer it.

2 A No.

3 Q Do you have any employees?

4 A Excuse me?

5 Q Do you have any employees?

6 A Employees?

7 Q Yes.

8 A I intend to respond to all relevant  
9 questions regarding this lawsuit, however, at the  
10 present time my attorneys have counseled me I cannot  
11 provide answers to any questions relevant to this  
12 lawsuit. I must accept this advise or risk losing  
13 my 6th amendment right to effective representation.  
14 Accordingly, I assert my federal constitutional  
15 rights as guaranteed by the 5th, 6th and 14th  
16 amendment of the United States Constitution.

17 Q Do you have a company that is incorporated  
18 anywhere?

19 MR. GOLDBERGER: That's kind of a vague  
20 question.

21 Q Do you own -- are you involved in any  
22 business, any type of enterprise where your business  
23 is incorporated in any state?

24 A As I've said in response to all questions  
25 previously asked of me, I intend to respond to all

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1 relevant questions regarding this lawsuit, however,

DEPO. EPSTEIN

2 at the present time my attorneys have counseled me I  
3 cannot provide answers to any questions relevant to  
4 this lawsuit. I must accept this advise or risk  
5 losing my 6th amendment right to effective  
6 representation. Accordingly, I assert my federal  
7 constitutional rights as guaranteed by the 5th, 6th  
8 and 14th amendment of the United States  
9 Constitution.

10 Q when you are on work release Monday  
11 through Saturday pursuant to your agreement with  
12 either the Sheriff's Office and/or the Prosecutor's  
13 Office here locally, do you actually do any work?

14 MR. GOLDBERGER: We're not going to answer  
15 that question. Bring that to the judge.

16 MR. GARCIA: Why?

17 MR. GOLDBERGER: It's just to embarrass  
18 him. What's the possible purpose of that  
19 relevant to your lawsuit, it just really serves  
20 no purpose, Mr. Garcia.

21 MR. GARCIA: Why would working embarrass  
22 him?

23 MR. GOLDBERGER: I don't know the  
24 relevance of it. I'm really going be flexible  
25 and allow you to ask any questions even

0038

1 marginally relevant --

2 MR. GARCIA: -- I just want to know how  
3 he's spending him time out of jail.

4 MR. GOLDBERGER: Why is that of issue to  
5 you?

6 MR. GARCIA: It may lead to the discovery  
7 of admissible evidence.

8 A Then that's an easy answer. As I've said  
9 in response to all questions previously asked of me,  
10 I intend to respond to all relevant questions  
11 regarding this lawsuit, however, at the present time  
12 my attorneys have counseled me I cannot provide  
13 answers to any questions relevant to this lawsuit.  
14 I must accept this advise or risk losing my 6th  
15 amendment right to effective representation.  
16 Accordingly, I assert my federal constitutional  
17 rights as guaranteed by the 5th, 6th and 14th  
18 amendment of the United States Constitution.

19 Q where does Sarah Kellen presently live?

20 A As I've said in response to some of your  
21 other questions, I intend to respond to all relevant  
22 questions regarding this lawsuit, however, at the  
23 present time my attorneys have counseled me I cannot  
24 provide answers to any questions relevant to this  
25 lawsuit. I must accept this advise or risk losing

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1 my 6th amendment right to effective representation.  
2 Accordingly, I assert my federal constitutional  
3 rights as guaranteed by the 5th, 6th and 14th  
4 amendment of the United States Constitution.

5 Q Has Sarah Kellen visited you during your  
6 stay at the Palm Beach County Jail?

7 A Yes.

8 Q How many times?

9 A I don't know.

10 Q Do you know when she visited you last?

11 A No.

12 Q What did you discuss with her?

13 A As I've said in response to all questions  
14 previously asked of me, I intend to respond to all  
15 relevant questions regarding this lawsuit, however,  
16 at the present time my attorneys have counseled me I  
17 cannot provide answers to any questions relevant to  
18 this lawsuit. I must accept this advise or risk  
19 losing my 6th amendment right to effective  
20 representation. Accordingly, I assert my federal  
21 constitutional rights as guaranteed by the 5th, 6th  
22 and 14th amendment of the United States  
23 Constitution.

24 Q Have you --

25 A -- one second -- can you grab my iPhone?

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1 Q Have you discussed with Ms. Kellen  
2 providing, at your expense, legal representation for  
3 any claims made against her?

4 MR. GOLDBERGER: Go ahead.

5 A As I've said in response to all questions  
6 previously asked of me, I intend to respond to all  
7 relevant questions regarding this lawsuit, however,  
8 at the present time my attorneys have counseled me I  
9 cannot provide answers to any questions relevant to  
10 this lawsuit. I must accept this advise or risk  
11 losing my 6th amendment right to effective  
12 representation. Accordingly, I assert my federal  
13 constitutional rights as guaranteed by the 5th, 6th  
14 and 14th amendment of the United States  
15 Constitution.

16 Q Did you hire David Spicer at one time to  
17 represent you in this case?

18 MR. GOLDBERGER: You can answer that.

19 A Yes.

20 Q Is he --

21 A -- what was the question again, sorry?

22 (Whereupon there is a ringing sound.)

23 THE WITNESS: I have to take this outside.

24 (Whereupon a break is taken.)

25 DIRECT BY MR. GARCIA: (CONT'D)

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1 Q David Spicer, I think I was asking you  
2 about him, is he representing you now?

3 A No, he's not.

4 Q Do you know why he represented you at  
5 least for a brief time in this case?

6 A I considered hiring him and decided not  
7 to.

8 Q Did you hire him for any other case  
9 besides this case?

10 A This case meaning what?

11 Q The case that we're here on today Dainya  
12 Nida.

13 MR. GOLDBERGER: I think during the  
14 discussions there would have been an attorney  
15 client relationship.

16 MR. GARCIA: No -- let me ask it this way.

17 Q Did he file an appearance in any other  
18 case other than this case involving Dainya Nida?

19 A I don't know.

20 Q But he's no longer representing you?

21 A Correct.

22 Q Were you ever interviewed by the Town of  
23 Palm Beach Police Department concerning any alleged

24 criminal wrongdoing on your part?

25 A (No response).

0042

1 MR. GARCIA: I just want to know if he  
2 was interviewed, not the contents of the  
3 interview at this point.

4 A Please rephrase the question, you talk  
5 about only in certain -- traffic tickets again?

6 Q No. No. Forget the traffic tickets, just  
7 these cases involving the alleged sexual misconduct  
8 on your part.

9 A No.

10 Q Were you ever interviewed by the Federal  
11 Bureau of Investigation in any of these cases?

12 A No.

13 Q Do you own a home at 358 El Brillo Way in  
14 Palm Beach, Florida?

15 MR. BURMAN: In addition to what he's  
16 going to read, I'm going to object on the  
17 grounds that this deposition is being taken in  
18 a state case and that there's been no approval  
19 of a claim for punitive damages and that  
20 question would be directed towards financial  
21 worth.

22 MR. GARCIA: I'm trying to find out if --  
23 that is alleged to be the scene of the events,  
24 I'm trying to establish whether or not it was  
25 or it wasn't.

0043

1 A Was it the scene of the events in  
2 question?

3 Q No. I think my question -- I was  
4 explaining to your lawyer why I'm asking the  
5 question. The question is -- let me ask this way.  
6 Have you ever resided at a home at 358 El Brillo  
7 way?

8 THE COURT REPORTER: I need to go off the  
9 record due to computer difficulties.

10 MR. GARCIA: Sure.

11 (Whereupon a break is taken.)

12 MR. GARCIA: Back on the record.

13 DIRECT BY MR. GARCIA: (CONT'D)

14 Q Did you keep any sex toys at that home?

15 A As I've said in response to some of your  
16 other questions, I intend to respond to all relevant  
17 questions regarding this lawsuit, however, at the  
18 present time my attorneys have counseled me I cannot  
19 provide answers to any questions relevant to this  
20 lawsuit. I must accept this advise or risk losing  
21 my 6th amendment right to effective representation.  
22 Accordingly, I assert my federal constitutional  
23 rights as guaranteed by the 5th, 6th and 14th  
24 amendment of the United States Constitution.

25 Q Did you ever penetrate Dainya Nida's

0044

1 vagina using your fingers?

2 A I intend to respond to all relevant  
3 questions regarding this lawsuit, however, at the  
4 present time my attorneys have counseled me I cannot  
5 provide answers to any questions relevant to this  
6 lawsuit. I must accept this advise or risk losing  
7 my 6th amendment right to effective representation.  
8 Accordingly, I assert my federal constitutional

9 rights as guaranteed by the 5th, 6th and 14th  
10 amendment of the United States Constitution.

11 Q When do you intend to answer these  
12 questions?

13 A I intend to respond to all relevant  
14 questions regarding this lawsuit, however, at the  
15 present time my attorneys have counseled me I cannot  
16 provide answers to any questions relevant to this  
17 lawsuit. I must accept this advise or risk losing  
18 my 6th amendment right to effective representation.  
19 Accordingly, I assert my federal constitutional  
20 rights as guaranteed by the 5th, 6th and 14th  
21 amendment of the United States Constitution.

22 Q Did you ever tell Dainya Nida that she  
23 should be a model?

24 A I intend to respond to all relevant  
25 questions regarding this lawsuit, however, at the

0045  
1 present time my attorneys have counseled me I cannot  
2 provide answers to any questions relevant to this  
3 lawsuit. I must accept this advise or risk losing  
4 my 6th amendment right to effective representation.  
5 Accordingly, I assert my federal constitutional  
6 rights as guaranteed by the 5th, 6th and 14th  
7 amendment of the United States Constitution.

8 Q Did you ever offer Dainya Nida help in  
9 becoming a model?

10 MR. GARCIA: For the record, the witness  
11 has been shaking his head and smiling in  
12 response to the last few questions.

13 MR. GOLDBERGER: I disagree with that  
14 assertion that that is what is happening, but  
15 you can say what you want for the record.

16 MR. BURMAN: I didn't see it.

17 A I intend to respond to all relevant  
18 questions regarding this lawsuit, however, at the  
19 present time my attorneys have counseled me I cannot  
20 provide answers to any questions relevant to this  
21 lawsuit. I must accept this advise or risk losing  
22 my 6th amendment right to effective representation.  
23 Accordingly, I assert my federal constitutional  
24 rights as guaranteed by the 5th, 6th and 14th  
25 amendment of the United States Constitution.

0046  
1 Q Did you ever tell Dainya Nida you could  
2 not wait until she was 18 so you could fly her to  
3 Paris?

4 A As I've said in response to some of the  
5 questions previously asked of me, I intend to  
6 respond to all relevant questions regarding this  
7 lawsuit, however, at the present time my attorneys  
8 have counseled me I cannot provide answers to any  
9 questions relevant to this lawsuit. I must accept  
10 this advise or risk losing my 6th amendment right to  
11 effective representation. Accordingly, I assert my  
12 federal constitutional rights as guaranteed by the  
13 5th, 6th and 14th amendment of the United States  
14 Constitution.

15 Q Did you always pay the same amount for  
16 sexual services for Dainya Nida?

17 MR. GOLDBERGER: Form.

18 A I intend to respond to all relevant  
19 questions regarding this lawsuit, however, at the

DEPO. EPSTEIN

20 present time my attorneys have counseled me I cannot  
21 provide answers to any questions relevant to this  
22 lawsuit. I must accept this advise or risk losing  
23 my 6th amendment right to effective representation.  
24 Accordingly, I assert my federal constitutional  
25 rights as guaranteed by the 5th, 6th and 14th

0047

1 amendment of the United States Constitution.

2 Q Did you ever offer Dainya Nida additional  
3 monies if she had sexual intercourse with you?

4 A I intend to respond to all relevant  
5 questions regarding this lawsuit, however, at the  
6 present time my attorneys have counseled me I cannot  
7 provide answers to any questions relevant to this  
8 lawsuit. I must accept this advise or risk losing  
9 my 6th amendment right to effective representation.  
10 Accordingly, I assert my federal constitutional  
11 rights as guaranteed by the 5th, 6th and 14th  
12 amendment of the United States Constitution.

13 Let me explain and put on the record this is about

14 MR. GARCIA: Let me explain and put on the  
15 record that this is about the second conference  
16 during the deposition. In a civil case if a  
17 witness confers during a deposition with his  
18 counsel I'm entitled to find out what that  
19 discussion was about.

20 Q \*I'm going to go ahead and ask what did  
21 you just discuss with your counsel?

22 MR. BURMAN: I disagree with that, it's  
23 attorney client privilege and I instruct him  
24 not to answer that.

25 MR. GARCIA: Okay. Certify that question

0048

1 and print it up right away.

2 Q Did you ever give Dainya Nida any gifts  
3 besides cash?

4 MR. GOLDBERGER: Object to the form.

5 Q You can answer.

6 A AS I've said in response to some of your  
7 other questions previously asked of me, I intend to  
8 respond to all relevant questions regarding this  
9 lawsuit, however, at the present time my attorneys  
10 have counseled me I cannot provide answers to any  
11 questions relevant to this lawsuit. I must accept  
12 this advise or risk losing my 6th amendment right to  
13 effective representation. Accordingly, I assert my  
14 federal constitutional rights as guaranteed by the  
15 5th, 6th and 14th amendment of the United States  
16 Constitution.

17 Q Do you know a Detective Silvestri?

18 A No.

19 Q Do you know any officer with the Town of  
20 Palm Beach either through a traffic citation they  
21 may have written for you or maybe you called them  
22 out for some issue at your home?

23 A Not that I recall.

24 Q Has the Town of Palm Beach Police ever  
25 been to your home on Brillo Way?

0049

1 A I intend to respond to all relevant  
2 questions regarding this lawsuit, however, at the  
3 present time my attorneys have counseled me I cannot  
4 provide answers to any questions relevant to this



5 lawsuit. I must accept this advise or risk losing  
6 my 6th amendment right to effective representation.  
7 Accordingly, I assert my federal constitutional  
8 rights as guaranteed by the 5th, 6th and 14th  
9 amendment of the United States Constitution. May we  
10 take a break?

11 Q Absolutely. I want to put on the record  
12 that any discussion had with counsel during a break  
13 in the deposition --

14 A -- he's not coming with me.

15 Q Okay.

16 MR. GOLDBERGER: I'm going to check my  
17 messages, you want to send a monitor with me?

18 MR. GARCIA: No.

19 (whereupon a break is taken.)

20 DIRECT BY MR. GARCIA: (CONT'D)

21 Q Do you have any escort from the Palm Beach  
22 County Sheriff's Office when you go on your work  
23 release program?

24 A I don't understand the question.

25 Q Does anybody from the Sheriff's Office

0050

1 transport you when you're on work release?

2 A No.

3 Q No. So you travel on your own?

4 A No.

5 Q How do you get to wherever you go when  
6 you're released for work?

7 A As I've said in response to many of your  
8 questions asked of me, I intend to respond to all  
9 relevant questions regarding this lawsuit, however,  
10 at the present time my attorneys have counseled me I  
11 cannot provide answers to any questions relevant to  
12 this lawsuit. I must accept this advise or risk  
13 losing my 6th amendment right to effective  
14 representation. Accordingly, I assert my federal  
15 constitutional rights as guaranteed by the 5th, 6th  
16 and 14th amendment of the United States  
17 Constitution.

18 Q Are you housed at the Palm Beach County  
19 stockade or at the main jail on Gun Club Road?

20 A Housed, stockade.

21 Q \*Are you with the general population?

22 MR. GOLDBERGER: I'm just not going to  
23 answer any more questions about where he's  
24 living at the Palm Beach County stockade, it's  
25 got zero relevance. I respect your rights to

0051

1 ask the questions, if you want a judge to tell  
2 us he's got to answer them I'd be happy to but  
3 honestly, Mr. Garcia, it's irrelevant to  
4 anything you're doing.

5 MR. GARCIA: All right, certify the  
6 question.

7 MR. GOLDBERGER: Okay.

8 MR. GARCIA: Your basis is relevance?

9 MR. GOLDBERGER: No, it's -- the purpose  
10 of this is to embarrass Mr. Epstein and to  
11 humiliate him.

12 DIRECT BY MR. GARCIA: (CONT'D)

13 Q \*Do you have a written agreement  
14 concerning your work release program in terms of  
15 where you can go, what time you get to leave, what

16 time you get to come back?  
17 MR. BURMAN: Tell him not to answer.  
18 Object to the form. Don't answer it.  
19 MR. GARCIA: Certify that question.  
20 MR. BURMAN: We'll assert his privilege to  
21 privacy.  
22 Q Who is Robert Josephsberg?  
23 A He's an attorney.  
24 Q What was his role in terms of, if any --  
25 did he have any role in terms of the agreement

0052

1 between the U.S. Attorney's Office and yourself?  
2 MR. GOLDBERGER: Object to the form.  
3 A What's his --  
4 MR. GOLDBERGER: -- object to the form and  
5 invoke attorney client privilege on behalf of  
6 Mr. Epstein.  
7 MR. GARCIA: I'm not asking him to  
8 disclose what he discussed with you or any  
9 other attorneys.  
10 MR. GOLDBERGER: That's the only way he  
11 can answer that.  
12 MR. GARCIA: That's a speaking objection  
13 --  
14 MR. GOLDBERGER: -- I don't want to --  
15 you're right.  
16 MR. GARCIA: I want to know if he has an  
17 understanding on his own without your  
18 interpretation of the understanding as to what  
19 Mr. Josephsberg's role was or is in terms of  
20 your agreement with the U.S. Attorney's office.  
21 A I'm unclear.  
22 Q Okay. Are you able to testify in terms of  
23 how many times Ms. Nida came to your house in the  
24 Town of Palm Beach?  
25 MR. GOLDBERGER: Object to the form.

0053

1 A As I have responded to some of your  
2 previous questions, I intend to respond to all  
3 relevant questions regarding this lawsuit, however,  
4 at the present time my attorneys have counseled me I  
5 cannot provide answers to any questions relevant to  
6 this lawsuit. I must accept this advise or risk  
7 losing my 6th amendment right to effective  
8 representation. Accordingly, I assert my federal  
9 constitutional rights as guaranteed by the 5th, 6th  
10 and 14th amendment of the United States  
11 Constitution.  
12 Q At any point did any law enforcement  
13 authorities seize your home and/or business  
14 computers?  
15 A I intend to respond to all relevant  
16 questions regarding this lawsuit, however, at the  
17 present time my attorneys have counseled me I cannot  
18 provide answers to any questions relevant to this  
19 lawsuit. I must accept this advise or risk losing  
20 my 6th amendment right to effective representation.  
21 Accordingly, I assert my federal constitutional  
22 rights as guaranteed by the 5th, 6th and 14th  
23 amendment of the United States Constitution.  
24 Q I note for the record you have some sort  
25 of telephone device and you've been receiving phone

0054

1 calls and --  
2 A -- I have not received any phone calls.  
3 Q Or messages.  
4 A No, I haven't received anything.  
5 Q You haven't received anything during the  
6 deposition?  
7 A No, Sir.  
8 Q Are you allowed to have -- is it a  
9 telephone?  
10 A Yes.  
11 Q All right. Are you allowed to have this  
12 telephone during your work release hours?  
13 A I've been using it as a clock, Sir.  
14 Q Okay. I want to know if you -- if you're  
15 allowed to have a telephone during work release  
16 hours?  
17 A Yes.  
18 Q Is this a telephone, is it a smart phone?  
19 A I'm sorry, I don't know what that means.  
20 Q Is it a Blackberry?  
21 A I'm not very familiar with these things.  
22 Sorry.  
23 Q What's the brand of it?  
24 MR. GOLDBERGER: Don't answer this.  
25 THE WITNESS: Okay.

0055

1 Q \*Do you have access to the internet on  
2 that phone?  
3 MR. GOLDBERGER: Don't answer.  
4 MR. GARCIA: On what grounds?  
5 MR. GOLDBERGER: On grounds that it's none  
6 of your business.  
7 MR. GARCIA: You can't do that in a civil  
8 case, you can't say it's none of your business,  
9 it's not a legal objection.  
10 MR. BURMAN: He's correct. I'm telling  
11 him not to answer on the grounds it's a privacy  
12 privilege.  
13 MR. GARCIA: Certify the question.  
14 DIRECT BY MR. GARCIA: (CONT'D)  
15 Q Are you allowed to have this device,  
16 whatever it may be, in jail?  
17 A No.  
18 MR. BURMAN: Same objection. Don't  
19 answer, it's privacy privilege.  
20 MR. GARCIA: Okay.  
21 Q Are you able to receive email  
22 transmissions on the phone?  
23 MR. BURMAN: Same objection. Don't answer  
24 it, privilege, privacy.  
25 Q Have you received any email communications

0056

1 from Sarah Kellen in the past -- let me ask this,  
2 when were you first incarcerated at the Palm Beach  
3 County Jail, when was --  
4 A -- June 30.  
5 Q June 30 of what year?  
6 A This year, sorry, 08.  
7 Q Have you received any email transmissions  
8 from Sarah Kellen since June 30 of 2008?  
9 MR. BURMAN: Same objection. Don't answer  
10 on the basis of privilege of privacy he has  
11 under the Florida Constitution.

12 A I intend to respond to all relevant  
13 questions regarding this lawsuit, however, at the  
14 present time my attorneys have counseled me I cannot  
15 provide answers to any questions relevant to this  
16 lawsuit. I must accept this advise or risk losing  
17 my 6th amendment right to effective representation.  
18 Accordingly, I assert my federal constitutional  
19 rights as guaranteed by the 5th, 6th and 14th  
20 amendment of the United States Constitution.

21 Q who is your service provider for that  
22 phone?

23 MR. BURMAN: Same objection, privacy,  
24 privilege. Don't answer it.

25 MR. GOLDBERGER: Also form.

0057

1 Q All right. You can answer.

2 MR. BURMAN: Could I just inquire for the  
3 record, is there some allegation that  
4 Mr. Epstein has tried to make contact with your  
5 client?

6 MR. GARCIA: No.

7 MR. BURMAN: Okay. Thank you.

8 BY MR. GARCIA: (CONT'D)

9 Q You can answer the question.

10 A I don't know.

11 Q \*You don't know who your service provider  
12 is?

13 MR. GOLDBERGER: You just invoked  
14 privacy --

15 MR. GARCIA: -- he didn't instruct him not  
16 to answer.

17 MR. BURMAN: I'm telling him now. Thanks  
18 for reminding me.

19 MR. GARCIA: Certify the question.

20 Q \*what's the phone number associated with  
21 this particular phone?

22 MR. BURMAN: Same objection, privacy  
23 privilege. Don't answer.

24 MR. GARCIA: Certify the question.

25 Q \*How long have you had this particular

0058

1 phone?

2 MR. BURMAN: Same objection, privilege of  
3 privacy. Don't answer.

4 Q \*How long have you had this particular  
5 phone number?

6 MR. BURMAN: Same objection, privacy,  
7 privilege. Don't answer.

8 MR. GARCIA: Certify all those questions  
9 as well.

10 Q Did you ever tell Dainya Nida that you  
11 wanted the encounter with her to be like a, quote,  
12 "a porn video," end quote?

13 MR. GOLDBERGER: Object to the form.

14 A AS I have previously responded to many of  
15 your other questions, I intend to respond to all  
16 relevant questions regarding this lawsuit, however,  
17 at the present time my attorneys have counseled me I  
18 cannot provide answers to any questions relevant to  
19 this lawsuit. I must accept this advise or risk  
20 losing my 6th amendment right to effective  
21 representation. Accordingly, I assert my federal  
22 constitutional rights as guaranteed by the 5th, 6th

23 and 14th amendment of the United States  
24 Constitution.

25 Q You can answer.  
0059

1 A As I've said in response to some of your  
2 other questions asked of me, I intend to respond to  
3 all relevant questions regarding this lawsuit,  
4 however, at the present time my attorneys have  
5 counseled me I cannot provide answers to any  
6 questions relevant to this lawsuit. I must accept  
7 this advise or risk losing my 6th amendment right to  
8 effective representation. Accordingly, I assert my  
9 federal constitutional rights as guaranteed by the  
10 5th, 6th and 14th amendment of the United States  
11 Constitution.

12 Q Have you been involved in any other  
13 personal litigation where you are a party to a  
14 lawsuit aside from these cases, and I'm including  
15 Dainya Nida and the other cases that have made  
16 similar allegations, have you ever been a party to  
17 any other type of lawsuit personally?

18 A Yes.

19 Q All right. Any in Palm Beach County?

20 A Maybe.

21 Q There's something in the paper about a  
22 contractor suing you for building a dock or  
23 something, are you familiar with that case?

24 A Somewhat, not very much.

25 Q Anything besides that, any other cases in  
0060

1 Palm Beach County besides the unpaid dock case?

2 A Not that I recall.

3 Q How about in New York?

4 A You have to rephrase the question.

5 Q Have you ever been sued individually as a  
6 person as opposed to your corporate entity, if you  
7 have one which we don't know because you haven't  
8 answered that question, in your personal capacity  
9 individually in the State of New York?

10 A Ever?

11 Q Yes.

12 A I believe so.

13 Q You believe so. How many times?

14 A I have no idea.

15 Q You know what the nature of the claim was,  
16 was it a breach of --

17 MR. GOLDBERGER: -- object to the form.

18 MR. BURMAN: Object to the form.

19 MR. GOLDBERGER: Let me just -- we've gone  
20 almost two hours now, I'd like to stop at 12  
21 for lunch if we can.

22 THE WITNESS: Can we stop at one for  
23 lunch?

24 MR. GARCIA: I think we'll be done before  
25 that, before 1:00 for sure.

0061

1 MR. GOLDBERGER: Okay.

2 DIRECT BY MR. GARCIA: (CONT'D)

3 Q What was your answer?

4 A You have to repeat the question.  
5 (Whereupon the following question is read back:)  
6 "Q You know what the nature of the claim  
7 was, was it a breach of --"

DEPO.EPSTEIN

8 MR. GOLDBERGER: Object to the form.  
9 Q In other words, what kind of lawsuit was  
10 it in New York, or lawsuits, plural, that was filed  
11 against you in New York?  
12 A I don't understand the question.  
13 Q You cannot answer the question?  
14 A I don't understand the question.  
15 Q I asked you if you had ever been sued in  
16 the State of New York, I think your answer was yes,  
17 and now I'm asking for what kind of a lawsuit was it  
18 that was filed against you?  
19 A Again, I don't understand the question.  
20 If I was sued over the past 20 years in ten  
21 different cases -- I'm not sure of what case you're  
22 referring to.  
23 Q I'm not referring to any particular case.  
24 I'm asking you to tell me what kind of suit was  
25 brought against you. In other words, at some point  
0062  
1 in time you were served with a lawsuit, presumably  
2 you opened it up and had taken a look at it and  
3 possibly given depositions in the suit just like you  
4 are giving your deposition today, so I'm asking you  
5 do you know what kind of lawsuit was filed against  
6 you, or lawsuits, were filed against you in the  
7 State of New York?  
8 A No, I don't.  
9 Q You don't know?  
10 A No.  
11 Q Have you ever given a deposition before  
12 today?  
13 A Yes.  
14 Q In what type of case?  
15 MR. GOLDBERGER: As best as you can  
16 recall.  
17 A A securities case, I believe.  
18 Q Okay. And were you sued or were you suing  
19 someone?  
20 A Both.  
21 Q Who brought the suit originally you --  
22 -- I don't know.  
23 Q Where was the deposition taken?  
24 A My best recollection is New York.  
25 Q And what year was this lawsuit?  
0063  
1 A I don't remember. Ten years ago.  
2 Q More than ten years, less than ten years?  
3 A Ten years, maybe more than ten years.  
4 Q And was that the only deposition you've  
5 ever given?  
6 A That I recall.  
7 Q Have you ever given a deposition in any of  
8 these cases involving allegations such as were made  
9 by Dainya Nida?  
10 MR. BURMAN: Object to the form.  
11 A What are the allegations made by Dainya  
12 Nida?  
13 Q Well, I'm talking about the cases where  
14 you took a deferred plea agreement with the U.S.  
15 Attorney's office, the six or seven young women that  
16 you allegedly performed sexual acts with.  
17 A That's not the case.  
18 Q What's that?

19 MR. GOLDBERGER: -- I have no idea what  
20 the question is but out of an abundance of  
21 caution, please --

22 Q I'm just asking if you've given a  
23 deposition in any of these cases?

24 MR. GOLDBERGER: What cases?

25 MR. GARCIA: You want me to read the names  
0064 of the alleged victims?

1 MR. GOLDBERGER: Sure. Sure.

2 Q Well, I can't find my list, I do have a  
3 list somewhere but I'm talking about these cases  
4 where it is alleged that you solicited or had others  
5 solicit for you young women under the age of 18 to  
6 come to your house on Brillo way and for them and  
7 you to perform certain sexual acts, and I realize  
8 that you have every right to contest whether any of  
9 that occurred, but my question is have you given a  
10 deposition involving those issues in any of those  
11 cases that have been brought against you?

12 MR. GOLDBERGER: The form of the question  
13 is -- I want him to answer the question but the  
14 form makes it very difficult.

15 MR. GARCIA: Why?

16 MR. GOLDBERGER: Because you're suggesting

17 --  
18 MR. GARCIA: -- I am not suggesting  
19 anything. I'm asking him has he given a  
20 deposition in any of the cases involving  
21 similar allegations.

22 MR. GOLDBERGER: I need you to ask a  
23 specific case and then we will be happy to --

24 MR. GARCIA: -- I'm not going to be able

0065 to give you a specific case. He can answer the  
1 question.

2 MR. GOLDBERGER: Under the circumstances,  
3 I need you to invoke your privileges.

4 A I intend to respond to all relevant  
5 questions regarding this lawsuit, however, at the  
6 present time my attorneys have counseled me I cannot  
7 provide answers to any questions relevant to this  
8 lawsuit. I must accept this advise or risk losing  
9 my 6th amendment right to effective representation.  
10 Accordingly, I assert my federal constitutional  
11 rights as guaranteed by the 5th, 6th and 14th  
12 amendment of the United States Constitution.

13 Q All right. Have you given a deposition in  
14 the past two years?

15 A Yes.

16 Q In what case?

17 MR. GOLDBERGER: You can answer that.

18 A E.W.

19 Q E.W.?

20 A Yes.

21 Q What are the allegations in that case  
22 against you?

23 A I don't know.

24 Q You were never served with a complaint?

0066 1 A I'm sure I was.

2 Q Did you read the complaint?

3 A No.

4 Q Who is the attorney that took your  
5 deposition?

6 MR. GOLDBERGER: Do you know?

7 THE WITNESS: No.

8 Q Where did the deposition take place?

9 A Here.

10 Q At this office?

11 A Yes.

12 Q Did you ever ask Dainya Nida to bring  
13 other young women to your home on Brillo way?

14 A As I've said in response to some of your  
15 other questions, I intend to respond to all relevant  
16 questions regarding this lawsuit, however, at the  
17 present time my attorneys have counseled me I cannot  
18 provide answers to any questions relevant to this  
19 lawsuit. I must accept this advise or risk losing  
20 my 6th amendment right to effective representation.  
21 Accordingly, I assert my federal constitutional  
22 rights as guaranteed by the 5th, 6th and 14th  
23 amendment of the United States Constitution.

24 Q In the past three years, have you  
25 destroyed any computer files of computers that you

0067 used or controlled?

1 A As I've said in response to all questions  
2 -- many of the questions asked of me, I intend to  
3 respond to all relevant questions regarding this  
4 lawsuit, however, at the present time my attorneys  
5 have counseled me I cannot provide answers to any  
6 questions relevant to this lawsuit. I must accept  
7 this advise or risk losing my 6th amendment right to  
8 effective representation. Accordingly, I assert my  
9 federal constitutional rights as guaranteed by the  
10 5th, 6th and 14th amendment of the United States  
11 Constitution.

12 Q Who is Adriana Ross?

13 A As I've said in response to many of your  
14 questions asked of me, I intend to respond to all  
15 relevant questions regarding this lawsuit, however,  
16 at the present time my attorneys have counseled me I  
17 cannot provide answers to any questions relevant to  
18 this lawsuit. I must accept this advise or risk  
19 losing my 6th amendment right to effective  
20 representation. Accordingly, I assert my federal  
21 constitutional rights as guaranteed by the 5th, 6th  
22 and 14th amendment of the United States  
23 Constitution.

24 Q Who is Leslie Groff (phonetic)?

0068 1 A As I've said in response to the questions  
2 asked of me, I intend to respond to all relevant  
3 questions regarding this lawsuit, however, at the  
4 present time my attorneys have counseled me I cannot  
5 provide answers to any questions relevant to this  
6 lawsuit. I must accept this advise or risk losing  
7 my 6th amendment right to effective representation.  
8 Accordingly, I assert my federal constitutional  
9 rights as guaranteed by the 5th, 6th and 14th  
10 amendment of the United States Constitution.

11 Q Who is Nadia Marcinkova?

12 MR. GOLDBERGER: Here's the problem,  
13 Mr. Garcia, to the extent that you are  
14 reviewing this agreement that was not to be



15 made public, one of the main reasons why it was  
16 not to be made public is so that the names are  
17 not revealed and you are violating the spirit  
18 of the non-disclosure agreement by asking  
19 questions that come off the document that you  
20 have for very limited purposes. You can ask,  
21 go ahead, but I caution you that you very, very  
22 well may be violating the nondisclosure  
23 provision of the agreement and I note when you  
24 showed me the agreement you had received  
25 earlier from the U.S. Attorney there's an email

0069

1 attachment to that that very, very carefully  
2 cautions you that it's a privileged document  
3 and for your use only and not to be published  
4 anywhere.

5 MR. GARCIA: Okay.

6 DIRECT BY MR. GARCIA: (CONT'D)

7 Q Answer my question, Sir.

8 A I intend to respond to all relevant  
9 questions regarding this lawsuit, however, at the  
10 present time my attorneys have counseled me I cannot  
11 provide answers to any questions relevant to this  
12 lawsuit. I must accept this advise or risk losing  
13 my 6th amendment right to effective representation.  
14 Accordingly, I assert my federal constitutional  
15 rights as guaranteed by the 5th, 6th and 14th  
16 amendment of the United States Constitution.

17 Q Have you ever asked Sarah Kellen, Adriana  
18 Ross, Leslie Groff or Nadia Marcinkova to find and  
19 solicit on your behalf young women to provide  
20 prostitution services for you?

21 MR. BURMAN: Object to the form.

22 Q You can answer.

23 A As I've said in response to some of your  
24 other questions, I intend to respond to all relevant  
25 questions regarding this lawsuit, however, at the

0070

1 present time my attorneys have counseled me I cannot  
2 provide answers to any questions relevant to this  
3 lawsuit. I must accept this advise or risk losing  
4 my 6th amendment right to effective representation.  
5 Accordingly, I assert my federal constitutional  
6 rights as guaranteed by the 5th, 6th and 14th  
7 amendment of the United States Constitution.

8 Q I may have asked you this already, I  
9 apologize if I'm being a little bit repetitive, has  
10 Sarah Kellen, Adriana Ross, Leslie Groff or Nadia  
11 Marcinkova ever been employed by you or any other  
12 business entity you own or control?

13 A I intend to respond to all relevant  
14 questions regarding this lawsuit, however, at the  
15 present time my attorneys have counseled me I cannot  
16 provide answers to any questions relevant to this  
17 lawsuit. I must accept this advise or risk losing  
18 my 6th amendment right to effective representation.  
19 Accordingly, I assert my federal constitutional  
20 rights as guaranteed by the 5th, 6th and 14th  
21 amendment of the United States Constitution.

22 Q \*For the record, this is the second  
23 conference you've had with counsel which I can't  
24 hear so I'm going to ask you again the last two  
25 conferences during this period of questioning tell

0071

1 me what you discussed with counsel.

2 MR. BURMAN: Object, attorney client  
3 privilege also work product privilege and  
4 instruct him not to answer.

5 MR. GARCIA: Certify those questions.

6 MR. GOLDBERGER: And I have no obligation  
7 to tell you based on those privileges being  
8 invoked.

9 MR. GARCIA: You're wrong. I can tell you  
10 there's case law right on point and I'd be  
11 happy to show it to you.

12 MR. GOLDBERGER: We can deal with that at  
13 another time but if you really must know the  
14 concern is that you continue to violate the  
15 nondisclosure provisions of the non-prosecution  
16 agreement in direct contravention of what the  
17 agreement was as to what use you can make of  
18 it.

19 MR. GARCIA: He's not a third party, he's  
20 an actual party to the agreement and my client  
21 is a third party beneficiary to the agreement  
22 and I have not provided the agreement to any  
23 third party in accordance with my agreement  
24 with the U.S. Attorney's Office.

25 Let me have a couple of minutes, I'm

0072

1 almost wrapped up. I just have to find  
2 something, it will be a couple of minutes.

3 (whereupon a break is taken.)

4 DIRECT BY MR. GARCIA: (CONT'D)

5 Q Did you ever solicit or have someone  
6 solicit on your behalf a young woman named Britt to  
7 perform sexual services for you at your home on  
8 Brillo way in Palm Beach?

9 MR. GOLDBERGER: Object to form.

10 A As I've said in response to some of your  
11 other questions, I intend to respond to all relevant  
12 questions regarding this lawsuit, however, at the  
13 present time my attorneys have counseled me I cannot  
14 provide answers to any questions relevant to this  
15 lawsuit. I must accept this advise or risk losing  
16 my 6th amendment right to effective representation.  
17 Accordingly, I assert my federal constitutional  
18 rights as guaranteed by the 5th, 6th and 14th  
19 amendment of the United States Constitution.

20 Q Did you ever solicit or have someone  
21 solicit on your behalf a young woman whose first  
22 name is Alexis for the purposes of performing  
23 prostitution services for you in your home on Brillo  
24 Way in Palm Beach?

25 MR. BURMAN: Object to the form.

0073

1 A As I've said in response to some of your  
2 other questions, I intend to respond to all relevant  
3 questions regarding this lawsuit, however, at the  
4 present time my attorneys have counseled me I cannot  
5 provide answers to any questions relevant to this  
6 lawsuit. I must accept this advise or risk losing  
7 my 6th amendment right to effective representation.  
8 Accordingly, I assert my federal constitutional  
9 rights as guaranteed by the 5th, 6th and 14th  
10 amendment of the United States Constitution.

11 Q All right. Did you ever solicit or have  
12 someone solicit on your behalf a young woman by the  
13 name of Rhianin (phonetic) to perform prostitution  
14 services for you in your home on Brillo Way in Palm  
15 Beach?

16 MR. BURMAN: Object to the form.

17 A As I've said in response to other  
18 questions of a similar nature, I intend to respond  
19 to all relevant questions regarding this lawsuit,  
20 however, at the present time my attorneys have  
21 counseled me I cannot provide answers to any  
22 questions relevant to this lawsuit. I must accept  
23 this advise or risk losing my 6th amendment right to  
24 effective representation. Accordingly, I assert my  
25 federal constitutional rights as guaranteed by the

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1 5th, 6th and 14th amendment of the United States  
2 Constitution.

3 MR. GARCIA: I'll just note for the record  
4 Mr. Epstein just passed a note that he wrote  
5 while answering the question to his defense  
6 counsel which again I consider to be  
7 communications during the deposition, I would  
8 ask you to tell me what you wrote in that note.

9 MR. GOLDBERGER: Will we be able to have  
10 lunch at 1:00.

11 MR. GARCIA: Okay.

12 DIRECT BY MR. GARCIA: (CONT'D)

13 Q I was up to Rhianin, let me move on to  
14 Sherry. Did you ever solicit or have someone  
15 solicit on your behalf a young woman by the name of  
16 Sherry, spelled with an S, to provide prostitution  
17 services for you at your home on Brillo Way in Palm  
18 Beach?

19 MR. BURMAN: Object to the form.

20 MR. GOLDBERGER: Object to the form and  
21 for clarification purposes do you have a last  
22 name?

23 MR. GARCIA: No.

24 A I intend to respond to all relevant  
25 questions regarding this lawsuit, however, at the

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1 present time my attorneys have counseled me I cannot  
2 provide answers to any questions relevant to this  
3 lawsuit. I must accept this advise or risk losing  
4 my 6th amendment right to effective representation.  
5 Accordingly, I assert my federal constitutional  
6 rights as guaranteed by the 5th, 6th and 14th  
7 amendment of the United States Constitution.

8 Q I'm going to assume, and you tell me if  
9 I'm wrong, your answers would be the same for  
10 Nicole, Hailey and Joanna if I asked you the same  
11 question?

12 MR. BURMAN: I would object to the form,  
13 if you specified each person, because you're  
14 not giving us last names, object to form and I  
15 think you can probably stipulate his answer  
16 would be the same.

17 MR. GOLDBERGER: That's correct. Is that  
18 okay with you?

19 MR. GARCIA: Yes.

20 DIRECT BY MR. GARCIA: (CONT'D)

21 Q Do you know someone named Hailey Robson?

22 A As I've said in response to some of your  
23 other questions, Mr. Garcia, I intend to respond to  
24 all relevant questions regarding this lawsuit,  
25 however, at the present time my attorneys have

0076

1 counseled me I cannot provide answers to any  
2 questions relevant to this lawsuit. I must accept  
3 this advise or risk losing my 6th amendment right to  
4 effective representation. Accordingly, I assert my  
5 federal constitutional rights as guaranteed by the  
6 5th, 6th and 14th amendment of the United States  
7 Constitution.

8 Q Do you know someone by the name of -- I'll  
9 read the same names again, not with the question  
10 about whether or not you solicited them for  
11 prostitution at Brillo Way, I want to know if you  
12 know these people and if you're going to assert the  
13 same right maybe we can have the same stipulation.  
14 Do you know any young women by the name of Britt,  
15 Alexis, Rhianin, Sherry, Nicole, Hailey or Joanna?

16 MR. BURMAN: My objection is the same. If  
17 you are referring to a different person other  
18 than Hailey Robson, I really can't object on  
19 form because you did give a last name. Is the  
20 Hailey you're referring to in this question a  
21 different individual or the same individual?

22 MR. GARCIA: I assume the same individual,  
23 it's the same article which I produced to your  
24 firm which is available on a public site.

25 MR. BURMAN: To the extent you have asked

0077

1 this question with regard to -- and not  
2 specified a last name, I would object to form  
3 and we would -- Mr. Epstein would answer the  
4 question in the same fashion invoking his  
5 constitutional privileges and if we can have  
6 that stipulation it will save us some time.

7 MR. GARCIA: That's fine. Agreed?

8 MR. GOLDBERGER: Yes, that's fine.

9 DIRECT BY MR. GARCIA: (CONT'D)

10 Q Do you have any agreement with the U.S.  
11 Attorney's office to preserve your computer records?

12 A Yes.

13 Q All right. Have you abided by that  
14 agreement?

15 MR. GOLDBERGER: I'm going to invoke  
16 attorney client privilege on that question.

17 Q Can you tell me who has control or who has  
18 the actual equipment?

19 MR. GOLDBERGER: Attorney client.

20 Q Who is Alexander Lian, L-I-A-N?

21 A I don't know.

22 Q Who is Palm Beach Marine?

23 MR. BURMAN: Is that a person?

24 MR. GARCIA: No, it's a company.

25 Q You know who they are?

0078

1 A No. I believe it's the lawsuit --

2 Q -- is that the name of the company?

3 A I don't really know.

4 Q Is that case still pending?

5 A I don't really know.

6 Q Who is Douglas Shottle, S-H-O-T-T-L-E?

DEPO.EPSTEIN

7 A As I've said in response to some of your  
8 other questions, I intend to respond to all relevant  
9 questions regarding this lawsuit, however, at the  
10 present time my attorneys have counseled me I cannot  
11 provide answers to any questions relevant to this  
12 lawsuit. I must accept this advise or risk losing  
13 my 6th amendment right to effective representation.  
14 Accordingly, I assert my federal constitutional  
15 rights as guaranteed by the 5th, 6th and 14th  
16 amendment of the United States Constitution.

17 Q \*Do you have any close personal friends?

18 MR. BURMAN: Object to the form and also  
19 assert his privilege as far as privacy,  
20 instruct him not to answer.

21 MR. GARCIA: Certify the question.

22 Q Have you discussed any of your alleged  
23 sexual encounters with Dainya Nida with any close  
24 personal friends?

25 MR. GOLDBERGER: Object to the form, the

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1 same privilege as Mr. Burman invoked as far as  
2 privacy and then I'd ask you to invoke the  
3 Fifth.

4 A As I've said in response to some of your  
5 other questions, I intend to respond to all relevant  
6 questions regarding this lawsuit, however, at the  
7 present time my attorneys have counseled me I cannot  
8 provide answers to any questions relevant to this  
9 lawsuit. I must accept this advise or risk losing  
10 my 6th amendment right to effective representation.  
11 Accordingly, I assert my federal constitutional  
12 rights as guaranteed by the 5th, 6th and 14th  
13 amendment of the United States Constitution.

14 Q All right. Just to refresh your  
15 recollection, he is, according to a published  
16 article, not involved in these cases, he allegedly  
17 is the person who represented you when you signed a  
18 contract for having a dock put into your home.

19 MR. GOLDBERGER: Who are you talking  
20 about?

21 MR. GARCIA: Douglas Shottle.

22 Q Does that refresh your recollection as to  
23 who he might be?

24 A I intend to respond to all relevant  
25 questions regarding this lawsuit, however, at the

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1 present time my attorneys have counseled me I cannot  
2 provide answers to any questions relevant to this  
3 lawsuit. I must accept this advise or risk losing  
4 my 6th amendment right to effective representation.  
5 Accordingly, I assert my federal constitutional  
6 rights as guaranteed by the 5th, 6th and 14th  
7 amendment of the United States Constitution.

8 Q Okay. That's all I have.

9 A Great. Thank you.

10 MR. GOLDBERGER: Thanks for coming over.  
11 (Whereupon the deposition is concluded at 12:20  
12 p.m.)  
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1 THE STATE OF FLORIDA  
2 COUNTY OF PALM BEACH

3  
4 I, the undersigned authority, certify that  
5 the aforementioned witness personally appeared  
6 before me and was duly sworn.

7  
8 WITNESS my hand and official seal this  
9 12th day of May, 2009.

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14 JULIE ANDOLPHO, COURT REPORTER  
15 Notary Public State of Florida  
16 My Commission Expires:12/14/09  
17 My Commission # DD499509

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3 C E R T I F I C A T E  
4 THE STATE OF FLORIDA, COUNTY OF PALM BEACH

5  
6 I, Julie Andolpho, Professional Reporter,  
7 do hereby certify that I was authorized to and did  
8 report said deposition in stenotype; and the  
9 forgoing pages numbered 1 to , inclusive, are a  
10 true and correct transcription of my shorthand notes  
11 of said deposition.

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

17 The foregoing certification of this  
18 transcript does not apply to any reproduction of the  
19 same by any means unless under the direct control  
20 and/or direction of the certifying reporter.

21 IN WITNESS WHEREOF, I have hereunto set my  
22 hand this 12th day of May, 2009.

23  
24 JULIE ANDOLPHO, COURT REPORTER  
25 Notary Public in and for the STATE OF FLORIDA  
My Commission Expires:12/14/09, # DD499509

DEPO. EPSTEIN

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# ATTACHMENT 12



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IN THE CIRCUIT COURT OF THE FIFTEENTH  
JUDICIAL CIRCUIT, IN AND FOR  
PALM BEACH COUNTY, FLORIDA

E.W.,

Plaintiff,

vs.

No. 502008CA028058XXXXMBAD

JEFFREY EPSTEIN and SARAH  
KELLEN,

Defendants.

**COPY**

West Palm Beach, Florida

April 30th, 2009

10:08 o'clock A.M.

-----  
VIDEOTAPED DEPOSITION

OF

JEFFREY EPSTEIN  
-----

1 APPEARANCES:

2 For The Plaintiff:

3 ROTHSTEIN, ROSENFELDT, ADLER  
4 401 East Las Olas Boulevard, Suite 1650  
5 Fort Lauderdale, Florida, 33301-4252  
6 By BRADLEY JAMES EDWARD, ESQUIRE and  
7 WILLIAM J. BERGER, ESQUIRE and  
8 RUSSELL ADLER, ESQUIRE

9 For The Defendant:

10 BURMAN, CRITTON, LUTTIER & COLEMAN  
11 515 North Flagler Drive, Suite 400  
12 West Palm Beach, Florida 33401-4349  
13 By JOHN MICHAEL BURMAN, ESQUIRE

14 Also for the Defendant:

15 ATTERBURY, GOLDBERGER & WEISS, P.A.  
16 250 Australian Ave. South, Suite 1400  
17 West Palm Beach, Florida 33401  
18 By JACK A. GOLDBERGER, ESQUIRE

19 Also Present:

20 Jeff Abbott, Videographer, Visual Evidence  
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I N D E X

Direct Examination by Mr. Edwards 4

E X H I B I T I N D E X

Plaintiff's Exhibit Number 1 marked for I.D. 24  
(Exhibit held by Attorney Edwards.)

+ + + + +

Deposition of JEFFREY EPSTEIN, a witness  
of lawful age, taken by the Plaintiff, for the  
purpose of discovery and for use as evidence in the  
above entitled cause, wherein: E.W. is the  
Plaintiff, and JEFFREY EPSTEIN and SARAH KELLEN are  
the Defendants, in the Circuit Court in and for Palm  
Beach County, Florida, pursuant to notice heretofore  
filed, before LINDA P. AUKAMP, a Registered  
Professional Reporter and Notary Public in and for  
the State of Florida at Large, at 250 Australian  
Avenue South, Suite 1400, West Palm Beach, Palm  
Beach County, Florida, on the 30th day of April,  
2009, commencing at 10:08 o'clock A.M.

1 THEREUPON,

2           **THE VIDEOGRAPHER:** This is the 30th day of  
3           April, 2009. The time is 10:08 a.m. This is  
4           videotaped deposition of Jeffrey Epstein in the  
5           matter of L.M. versus Epstein. This deposition  
6           is being held at 250 Australian Avenue South,  
7           West Palm Beach, Florida. My name is Jeff  
8           Abbott, I am the videographer representing  
9           Visual Evidence, Incorporated.

10           Would the attorneys please announce their  
11           appearances for the record.

12           **MR. EDWARDS:** Brad Edwards on behalf of  
13           the plaintiff. And this deposition was set in  
14           the case of E.W., not L.M.

15           **THE VIDEOGRAPHER:** Oh.

16           **MR. EDWARDS:** That is a separate client of  
17           mine, but that's not the case.

18           **THE VIDEOGRAPHER:** Okay, that's what I  
19           had. Sorry.

20           **MR. BERGER:** And I'm William J. Berger,  
21           for the plaintiff, also.

22           **MR. GOLDBERGER:** Jack Goldberger on behalf  
23           of Jeffrey Epstein.

24           **MR. BURMAN:** Michael Burman on behalf of  
25           Jeffrey Epstein.

1     **THEREUPON,**

2                             **JEFFREY EPSTEIN,**

3                     Being a witness in the notice heretofore  
4     filed, being of lawful age, and being first duly  
5     sworn in the above cause, testified on his oath as  
6     follows:

7                     **THE WITNESS:** Yes, I do.

8                             **DIRECT EXAMINATION**

9                     **Q. (By Mr. Edwards)** Can you tell us your  
10    full name for the record?

11                    **A.** Jeffrey Edward Epstein.

12                    **Q.** And what's your date of birth?

13                    **A.** January 20th, 1953.

14                    **Q.** And your social security number?

15                    **A.** 090-44-3348.

16                    **Q.** And your current address in West Palm  
17    Beach?

18                    **A.** I intend to respond to all relevant  
19    questions regarding this lawsuit. However, at the  
20    present time my attorneys have counseled me that I  
21    cannot provide answers to any questions relevant to  
22    this lawsuit, and I must accept the advice or risk  
23    losing my Sixth Amendment right to effective  
24    representation.

25                    Accordingly, I assert my Fifth, Federal

1 Constitutional rights as guaranteed by the Fifth,  
2 Sixth, and Fourteenth Amendments to the United  
3 States Constitution.

4 Q. So you're unwilling to give us your  
5 address of your house in Palm Beach County?

6 A. I intend to respond to all relevant  
7 questions regarding this lawsuit. However, at the  
8 present time my attorneys have counseled me that I  
9 cannot provide answers to any questions relevant to  
10 this lawsuit or risk losing my Sixth Amendment right  
11 to effective representation.

12 MR. EDWARDS: Mr. Goldberger, can we enter  
13 into an agreement so that we all know that he's  
14 reading off of that piece of paper, we know  
15 what the whole spiel is, but maybe he can just  
16 say fifth or same answer or something like  
17 that, so we can continue to move on, rather  
18 than read that paper the entire time? We'll be  
19 here for days.

20 MR. GOLDBERGER: I think out of an  
21 abundance of caution it's probably appropriate  
22 that whatever we feel is the proper response  
23 is, so that our invocation of our Fifth  
24 Amendment privileges is properly protected,  
25 so I think we're going to have to give the full

1 length --

2 **MR. BURMAN:** Obviously we can't tell what  
3 you're going to play to a jury without the  
4 entire spiel, what questions you might play to  
5 a jury if you decide to do that when this case  
6 is tried, so we're going to go with the entire  
7 spiel to every question you ask. If -- that's  
8 Mr. Goldberger's representation, or  
9 recommendation.

10 **MR. EDWARDS:** Okay.

11 **MR. GOLDBERGER:** We will go question by  
12 question, and we may or may not invoke Fifth  
13 Amendment privileges and there may be times  
14 where I'm going to have to think about it,  
15 discuss it with Mr. Burman whether we're going  
16 to invoke on any particular question, but on  
17 those questions that we do invoke Fifth  
18 Amendment privileges, I think we have no choice  
19 but, as you say, do the entire spiel.

20 **Q. (By Mr. Edwards)** Can you tell me the  
21 addresses of other homes that you own outside of  
22 West Palm Beach?

23 **A.** I intend to respond to all relevant  
24 questions regarding this lawsuit. However, in the  
25 present my attorneys have counseled me that I cannot

1 provide answers to any questions relevant to this  
2 lawsuit, and I must accept the advice or risk losing  
3 my Sixth Amendment right to effective  
4 representation.

5 Q. Have you seen any --

6 MR. GOLDBERGER: And, excuse me, and your  
7 Fifth Amendment privileges.

8 THE WITNESS: Yes.

9 Accordingly, I, excuse me, I assert my  
10 Federal Constitutional rights as guaranteed by  
11 the Fifth, Sixth and Fourteen Amendments of the  
12 United States Constitution.

13 Q. (By Mr. Edwards) Have you seen any  
14 psychologists or psychiatrists in your life?

15 MR. GOLDBERGER: Go ahead.

16 THE WITNESS: I intend to respond to all  
17 relevant questions regarding this lawsuit.  
18 However, at the present time my attorneys have  
19 counseled me that I cannot provide answers to  
20 any questions relevant to this lawsuit, and I  
21 must accept this advice or risk losing my Sixth  
22 Amendment right to effective representation.

23 Accordingly, I assert my constitutional  
24 rights as guaranteed by the Fifth, Sixth and  
25 Fourteenth Amendment of that constitution.



1 Q. (By Mr. Edwards) Tell me the names of all  
2 the businesses in which you are affiliated in any  
3 way?

4 A. I intend to respond to all relevant  
5 questions regarding this lawsuit. However, at the  
6 present time my attorneys have counseled me that I  
7 cannot provide answers to any questions relevant to  
8 this lawsuit, and I must accept this advice or risk  
9 losing my Sixth Amendment right to effective  
10 representation.

11 I also assert my Federal Constitutional  
12 Rights as guaranteed by the Fifth, Sixth, and  
13 Fourteenth Amendments to the United States  
14 Constitution.

15 Q. My understanding is you're currently  
16 serving a 12-month jail sentence, is that correct?

17 MR. GOLDBERGER: You can answer, but --

18 THE WITNESS: No.

19 Q. (By Mr. Edwards) You were currently, you  
20 were initially sentenced to 18 months in jail, is  
21 that correct?

22 MR. GOLDBERGER: Go ahead.

23 THE WITNESS: Yes.

24 Q. (By Mr. Edwards) And at the present  
25 moment are you still under the supervision of that

1 jail sentence?

2 A. Yes.

3 Q. Do you know what your release date will  
4 be?

5 A. No.

6 Q. You have not been told the date of your  
7 release?

8 A. Not yet.

9 Q. Where do you plan to reside when you're  
10 released from jail?

11 A. I intend to respond to all relevant  
12 questions regarding this lawsuit. However, at the  
13 present time my attorneys have advised me that I  
14 must accept the advice, advised me not to answer  
15 those questions. I must accept their advice or risk  
16 losing my Sixth Amendment right to effective  
17 representation.

18 Accordingly, I assert my Federal  
19 Constitutional right as guaranteed by the Fifth,  
20 Sixth, and Fourteenth Amendment of the constitution.

21 Q. Mr. Epstein, I have a videotaped copy of  
22 the plea colloquy where you pled guilty and told  
23 that judge you would be residing in West Palm Beach,  
24 Florida. Are you saying now that the statement you  
25 made to that judge is no longer true?

1           A.    Sorry, could you repeat the question?

2           Q.    Sure.

3                    I have a videotaped copy of the plea  
4 colloquy --

5           A.    No, the question before that.  That's --  
6 okay.

7           Q.    The question is, where do you intend to  
8 reside once you are released from jail?

9           A.    I intend to respond to all relevant  
10 questions regarding this lawsuit.  However, at the  
11 present time my attorneys have counseled me that I  
12 cannot provide answers to any questions relevant to  
13 this lawsuit, and I must accept their advice or risk  
14 losing my Sixth Amendment right to effective  
15 representation.

16                    Accordingly, I assert my Federal  
17 Constitutional right as guaranteed by the Fifth,  
18 Sixth, and Fourteenth Amendment of the United States  
19 Constitution.

20           Q.    As you know, that question was asked to  
21 you when you pled guilty last June in 2008, and you  
22 responded to the judge that you planned to reside in  
23 West Palm Beach, Florida.  Is that no longer your  
24 intent?

25           A.    I intend to respond to all relevant

1 questions regarding this lawsuit. However, at the  
2 present time my attorneys have counseled me that I  
3 cannot provide answers to any questions relevant to  
4 this lawsuit, and I must accept this advice or risk  
5 losing my Sixth Amendment right to effective  
6 representation.

7 Accordingly, I assert my Federal  
8 Constitutional right as guaranteed by the Fifth,  
9 Sixth, and Fourteenth Amendment of the constitution.

10 Q. This deposition is not being taken in the  
11 county jail, but rather in your attorney, Jack  
12 Goldberger's office, so can you please inform the  
13 jury as to your current schedule as it is exists  
14 today?

15 MR. GOLDBERGER: Let me hold off on that.

16 Okay.

17 THE WITNESS: I don't understand the  
18 schedule, the question.

19 MR. GOLDBERGER: Yeah, if you can just, if  
20 you can rephrase the question, I think we can  
21 answer it for you.

22 Q. (By Mr. Edwards) Okay. Currently you  
23 described that you're under the supervision of the  
24 jail sentence at this point in time, you're within  
25 the 18 months of your jail sentence. But this isn't

1 a jail setting, so obviously you're outside of the  
2 jail setting.

3 I am asking you just to tell the jury your  
4 current schedule; you wake up, are you released from  
5 jail at some time, do you have to report back to  
6 jail on a daily basis?

7 A. Yes, I report back to jail at 8:00 p.m.

8 Q. Every single day?

9 A. Yes.

10 Q. And is it seven days a week that you're  
11 out on work release?

12 A. No, sir.

13 Q. How many days a week are you out on work  
14 release?

15 A. Six.

16 Q. And of those six days, how many hours per  
17 day are you out on work release?

18 A. Twelve.

19 Q. And what are the hours that you're out on  
20 work release versus the hours that you are confined  
21 to the jail?

22 A. Repeat the question, please.

23 Q. What are the hours that you are out on  
24 work release outside the jail versus the hours that  
25 you are inside the jail, meaning if you report back

1 to the jail at 8:00 and stay there until 8:00 in the  
2 morning, tell me that.

3 A. I just did.

4 Q. And is that the schedule?

5 A. I just did. Yes, that's the schedule.

6 Q. Okay. So from 8:00 p.m. until 8:00 a.m.  
7 you're in the jail?

8 A. Yes.

9 Q. And then from 8:00 a.m. to 8:00 p.m.  
10 you're out on work release?

11 A. Is that a question?

12 Q. Yes.

13 A. Yes.

14 Q. And where do you, where do you work?

15 **MR. GOLDBERGER:** Objection.

16 **THE WITNESS:** I intend to respond to all  
17 relevant questions to this lawsuit. However,  
18 at the present time my attorneys have counseled  
19 me that I cannot provide answers to any  
20 questions relevant to this lawsuit, and I must  
21 accept this advice or risk losing my Sixth  
22 Amendment right to effective representation.

23 Therefore, I assert my Federal  
24 Constitutional right as guaranteed by the  
25 Fifth, Sixth, and Fourteenth Amendment of the

1 constitution.

2 Q. (By Mr. Edwards) Are you saying that  
3 providing me an answer as to where you currently  
4 work, would somehow incriminate you?

5 MR. GOLDBERGER: Let's not be  
6 argumentative. He responded to the question on  
7 advice of counsel, and if you think that was an  
8 improper invocation, then you have a remedy,  
9 but don't argue with the witness, which is what  
10 we did. Okay.

11 Q. (By Mr. Edwards) Do you have any plans to  
12 leave the country once you're released from jail?

13 A. I intend to respond to all relevant  
14 questions regarding this lawsuit. However, at the  
15 present time my attorneys have counseled me that I  
16 cannot provide answers to any questions relevant to  
17 this lawsuit, and must accept the advice or risk  
18 losing my Sixth Amendment right to effective  
19 representation.

20 Accordingly, I assert my Federal  
21 Constitutional right as guaranteed by the Fifth,  
22 Sixth, and Fourteenth Amendment of the constitution.

23 Q. Do you currently own any jets or  
24 airplanes?

25 A. I intend to respond to all relevant

1 questions regarding this lawsuit. However, at the  
2 present time my attorneys have counseled me that I  
3 cannot provide answers to any questions relevant to  
4 this lawsuit, and must accept the advice or risk  
5 losing my Sixth Amendment right to effective  
6 representation.

7 Accordingly, I assert my constitutional  
8 right as guaranteed by the Fifth, Sixth, and  
9 Fourteenth Amendment of the constitution.

10 MR. BURMAN: Is A.W. a state or federal  
11 case?

12 MR. EDWARDS: State.

13 MR. BURMAN: Okay. I am going to, in  
14 addition to my client's assertion of his  
15 rights, also object on the grounds that  
16 punitive damages hasn't been allowed in this  
17 case yet. That's clearly a financial-type  
18 question and, therefore, we object on those  
19 grounds, as well.

20 MR. EDWARDS: Thank you.

21 Q. (By Mr. Edwards) Who are the pilots that  
22 are employed by you or work for you or fly your  
23 airplanes?

24 A. I intend to respond to all relevant  
25 questions regarding this lawsuit. However, at the



1 present time my attorneys have counseled me that I  
2 cannot provide answers to any questions relevant to  
3 this lawsuit, and must accept their advice or risk  
4 losing my Sixth Amendment right to effective  
5 representation.

6 Accordingly, I assert my Federal  
7 Constitutional rights guaranteed by the Fifth,  
8 Sixth, and Fourteenth Amendment to the United States  
9 Constitution.

10 Q. What person or persons make your travel  
11 arrangements when you travel?

12 A. I intend to respond to all relevant  
13 questions regarding this lawsuit. However, at the  
14 present time my attorneys have advised me that I  
15 cannot provide answers to any questions relevant to  
16 this lawsuit, and must accept this advice or risk  
17 losing my Sixth Amendment right to effective  
18 representation.

19 Accordingly, I would have to assert my  
20 Federal Constitutional right as guaranteed by the  
21 Fifth, Sixth, and Fourteenth Amendment of the  
22 constitution.

23 Q. Once you are released from jail, are you  
24 under an obligation to report to probation?

25 A. Yes.

1 Q. Do you intend to do so?

2 A. Yes.

3 Q. And once you are released, do you,  
4 according to your sentence, are you scheduled to  
5 serve one year community control or house arrest?

6 MR. GOLDBERGER: That's a compound  
7 question. Please rephrase it.

8 THE WITNESS: Yes.

9 Q. (By Mr. Edwards) When you're released  
10 from jail, do you intend to serve one year community  
11 control as a part of your sentence?

12 A. Yes.

13 Q. And under that provision, will you be able  
14 to continue working or will you be strictly confined  
15 to your house?

16 MR. GOLDBERGER: That calls for a legal  
17 interpretation on the part of my client that  
18 he's just not, he's just not competent to  
19 answer. So, if you know, fine, but I can't  
20 imagine you would know.

21 THE WITNESS: I don't know.

22 Q. (By Mr. Edwards) Who are the people that  
23 will be living or working in your house once you are  
24 released from jail?

25 A. I intend to respond to all relevant

1 questions regarding this lawsuit. However, at the  
2 present time my attorneys have advised me that I  
3 cannot provide answers to any questions currently.  
4 Therefore, I must accept this advice or risk losing  
5 my Sixth Amendment right to effective  
6 representation.

7           Accordingly, I assert my Federal  
8 Constitutional right as guaranteed by the Fifth,  
9 Sixth, and Fourteenth Amendment to the constitution.

10           Q. Are you currently working with the Florida  
11 Science Foundation?

12           MR. GOLDBERGER: Umm, okay.

13           THE WITNESS: Yes.

14           Q. (By Mr. Edwards) And that is a, a  
15 business that operates just next door to your  
16 attorney, Jack Goldberger's office, is that correct?

17           A. No.

18           Q. The Florida Science Foundation does not  
19 have an office on this floor right next door to your  
20 attorney, Jack Goldberger's office?

21           A. Is that a question?

22           Q. Yes.

23           A. You have to rephrase the question, please?

24           Q. Does the Florida Science Foundation have  
25 an office right next door to your attorney, Jack

1 Goldberger's office?

2 A. No.

3 Q. What is your role with the Florida Science  
4 Foundation?

5 A. I intend to respond to all relevant  
6 questions regarding this lawsuit. However, at the  
7 present time my attorneys have advised me that I  
8 cannot answer questions relevant to this lawsuit and  
9 must accept their advice, or risk losing my Sixth  
10 Amendment right to effective representation.

11 Therefore, I must assert my Federal  
12 Constitutional right under the Fifth, Sixth, and  
13 Fourteenth Amendment to the constitution.

14 Q. What does the Florida Science Foundation  
15 do?

16 A. I intend to respond to all relevant  
17 questions to this, regarding this lawsuit. However,  
18 at the present time my attorneys have counseled me  
19 that I cannot provide answers to any questions  
20 relevant to this lawsuit. I must accept their  
21 advice or risk losing my Sixth Amendment right to  
22 effective representation.

23 Accordingly, I assert my Federal  
24 Constitutional rights guaranteed by the Fifth,  
25 Sixth, and Fourteenth Amendment to that

1 constitution.

2 Q. Have you procured minors for the purposes  
3 of prostitution?

4 A. I intend to respond to all relevant  
5 questions to this, regarding this lawsuit. However,  
6 at the present time my attorneys have counseled me  
7 that I cannot provide answers to any questions  
8 relevant to this lawsuit, and must accept their  
9 advice or risk losing my Sixth Amendment right to  
10 effective representation.

11 Accordingly, I assert my Federal  
12 Constitutional right as guaranteed by the Fifth,  
13 Sixth and Fourteenth Amendment of the United States  
14 Constitution.

15 Q. Isn't it true that you did plead guilty to  
16 two felonies related to prostitution with minors?

17 MR. GOLDBERGER: Wait a minute, let me  
18 just hold off a second.

19 (Thereupon, a discussion was had off  
20 the record.)

21 MR. GOLDBERGER: You can answer the  
22 question.

23 THE WITNESS: Could you repeat the  
24 question?

25 Q. (By Mr. Edwards) Isn't it true that you

1   pled guilty to two felony counts related to  
2   procurement of a minor for prostitution and/or  
3   solicitation of a minor for prostitution?

4       A.   No.

5       Q.   What counts did you plead guilty to?

6       A.   Procuring a minor for prostitution and  
7   soliciting prostitution.

8       Q.   Have you had sex with minor girls?

9       A.   I intend to respond to all relevant  
10   questions regarding this lawsuit. However, at the  
11   present time my attorneys have advised me that I  
12   cannot provide answers to any questions relevant to  
13   this lawsuit at the present time, and I must accept  
14   that advice or risk losing my Sixth Amendment right  
15   to effective representation.

16               Accordingly, I assert my Federal  
17   Constitutional right under the Fifth, Sixth, and the  
18   Fourteenth Amendment to the Constitution.

19       Q.   Have you engaged in sex acts with girls  
20   who at the time you engaged in those sex acts were  
21   minors?

22       A.   I intend to respond to all relevant  
23   questions to this lawsuit. At the present time my  
24   attorneys have counseled me that I cannot respond,  
25   I'm sorry, provide answers to any questions relevant

1 to this lawsuit, and I must accept that advice or  
2 risk losing their representation.

3 Accordingly, I assert my Federal  
4 Constitutional right as guaranteed by the Fifth,  
5 Sixth, and Fourteenth Amendment.

6 Q. Did you intentionally touch my client,  
7 E.W.?

8 A. I don't understand the question, sorry.

9 Q. For the purpose of this lawsuit, we have  
10 used the pseudonym to describe my client. Do you  
11 know who I'm talking about when I refer to E.W.?

12 A. I intend to respond to all relevant  
13 questions to those, this lawsuit. However, at the  
14 present time my attorneys have advised me that I  
15 cannot accept, answer any questions relevant to this  
16 lawsuit, and must accept their advice, or risk  
17 losing my Sixth Amendment right to effective  
18 representation.

19 Q. Did you --

20 A. Accordingly -- excuse me -- I assert my  
21 Federal Constitutional right as guaranteed by the  
22 Fifth, Sixth, and Fourteenth Amendment to the United  
23 States Constitution.

24 **MR. BURMAN:** We further object on the  
25 ground that E.W.'s name has not been disclosed

1 and you've objected to that.

2 MR. EDWARDS: Thanks.

3 Q. (By Mr. Edwards) Did you touch my client,  
4 E.W., against her will?

5 A. We don't know who E.W. is. You haven't  
6 told me who E.W. is.

7 Q. Okay.

8 MR. EDWARDS: Do you have an exhibit  
9 sticker?

10 (Thereupon, Plaintiff's Exhibit  
11 Number 1 was marked for Identification by  
12 Attorney Edwards.)

13 Q. (By Mr. Edwards) I'm going to show you an  
14 exhibit that I have marked for identification  
15 purposes as Plaintiff's Exhibit 1.

16 Do you recognize the girl on the left in  
17 the photograph?

18 A. I intend to respond to all relevant  
19 questions regarding --

20 THE WITNESS: Excuse me one second.

21 (Thereupon, a discussion was had off  
22 the record.)

23 THE WITNESS: I intend to respond to all  
24 relevant questions regarding this lawsuit.

25 However, at the present time my attorneys have



1           counseled me that I cannot provide answers to  
2           any questions relevant to this lawsuit. I must  
3           accept their advice or risk losing my Sixth  
4           Amendment right to effective representation.

5                     Accordingly, I assert my Federal  
6           Constitutional right as given by the Fifth,  
7           Sixth -- as provided by the Fifth, Sixth, and  
8           Fourteenth Amendment to the constitution.

9           Q.    (By Mr. Edwards) Do you know somebody by  
10          the name of Courtney Wild?

11          A.    I intend to respond to all relevant  
12          questions regarding this lawsuit. However, at the  
13          present time my attorneys have counseled me that I  
14          cannot provide answers to any questions relevant to  
15          this lawsuit, and must accept their advice or risk  
16          losing my Sixth Amendment right to effective  
17          representation.

18                     Accordingly, I assert my Federal  
19          Constitutional right as guaranteed by the Fifth,  
20          Sixth and Fourteenth Amendment to the constitution.

21          Q.    For the purposes of this deposition, when  
22          I refer to E.W., I'm speaking of Courtney Wild.

23                     Back to my initial question. Did you  
24          touch my client, E.W., against her will?

25          A.    I intend to respond to all relevant

1 questions regarding this lawsuit. However, at the  
2 present time my attorneys have advised me that I  
3 cannot provide answers to any questions relevant to  
4 this lawsuit, and must accept their advice or risk  
5 losing my Sixth Amendment right to effective  
6 representation.

7 Accordingly, I assert my Fifth, Sixth, and  
8 Fourteenth -- Fifth, Sixth and Fourteenth Amendment  
9 of the constitution.

10 Q. Did you engage in sex or sex acts with my  
11 client, E.W., against her will?

12 A. I intend to respond to all relevant  
13 questions regarding this lawsuit. However, at the  
14 present time my attorneys have advised me that I  
15 cannot provide any questions relevant to this  
16 lawsuit, and must accept their advice or risk losing  
17 my Sixth Amendment right to effective  
18 representation.

19 Accordingly, I assert my Federal  
20 Constitutional right as guaranteed by the Fifth,  
21 Sixth, and Fourteenth Amendment to that  
22 constitution.

23 Q. Isn't it true that when you touched E.W.  
24 against her will, you knew her to be a minor at the  
25 time?

1           A. I intend to respond to all relevant  
2 questions regarding this lawsuit. However, at the  
3 present time my attorneys have counseled me that I  
4 cannot provide answers to any questions relevant to  
5 this lawsuit, and I must accept this advice or risk  
6 losing my Sixth Amendment right to effective  
7 representation.

8                         Accordingly, I assert my Federal  
9 Constitutional right as guaranteed by the Fifth,  
10 Sixth, and Fourteenth Amendment to the United States  
11 Constitution.

12           Q. Did you engage in sex or sex acts with a  
13 female named Hailey Robson, (phonetic)?

14           A. I intend to respond to all relevant  
15 questions regarding this lawsuit. However, at the  
16 present time my attorneys have counseled me that I  
17 cannot provide answers to any questions relevant to  
18 this lawsuit, and I must accept this advice or risk  
19 losing my Sixth Amendment right to effective  
20 representation.

21                         Accordingly, I assert my Federal  
22 Constitutional right under the Fifth, Sixth, and  
23 Fourteenth Amendment of the constitution.

24           Q. Between 2001 and 2005 did you engage in  
25 sex or sex acts with a minor female named Brittney,

1 (phonetic)?

2 A. I intend to respond to all relevant  
3 questions regarding this lawsuit. However, at the  
4 present time my attorneys have counseled me that I  
5 cannot provide answers to any questions relevant to  
6 this lawsuit, and I must accept this advice or risk  
7 losing my Sixth Amendment right to effective  
8 representation.

9 Accordingly, I assert my Federal  
10 Constitutional rights as guaranteed by the Fifth,  
11 Sixth, and Fourteenth Amendment to the United States  
12 Constitution.

13 Q. Between 2001 and 2005 did you engage in  
14 sex or sex acts with a minor named Sage (phonetic)?

15 A. I intend to respond to all relevant  
16 questions regarding this lawsuit. However, at the  
17 present time my attorneys have counseled me that I  
18 cannot provide answers to any questions relevant to  
19 this lawsuit, and I must accept this advice or risk  
20 losing my Sixth Amendment right to effective  
21 representation.

22 Accordingly, I assert my Federal  
23 Constitutional right as guaranteed by the Fifth,  
24 Sixth, and Fourteenth Amendment to the United States  
25 Constitution.

1 Q. Between 2001 and 2005 did you engage in  
2 sex or sex acts with a minor female named Carolyn  
3 Casey (phonetic)?

4 A. I intend to respond to all relevant  
5 questions regarding this lawsuit. However, at the  
6 present time my attorneys have counseled me that I  
7 cannot provide answers to any questions relevant to  
8 this lawsuit, and must accept their advice or risk  
9 losing my Sixth Amendment right to effective  
10 representation.

11 Accordingly, I assert my Federal  
12 Constitutional right as guaranteed by the Fifth,  
13 Sixth, and Fourteenth Amendment to the United States  
14 Constitution.

15 MR. BURMAN: Mr. Edwards, can I inquire of  
16 you one thing? Do you have a RICO count in  
17 E.W.'s case?

18 MR. EDWARDS: Yes.

19 MR. BURMAN: Okay. These other girls, are  
20 any of them your clients, as well?

21 MR. EDWARDS: Some may be.

22 MR. BURMAN: Okay. Thank you.

23 MR. EDWARDS: Some are not.

24 MR. BURMAN: Okay.

25 Q. (By Mr. Edwards) Between 2001 and 2005

1 did you engage in sex or sex acts with a minor  
2 female named Carolyn Adriamo (phonetic)?

3 A. I intend to respond to all relevant  
4 questions regarding this lawsuit. However, at the  
5 present time my attorneys have counseled me that I  
6 cannot provide answers to any questions relevant to  
7 this lawsuit, and must accept this advice or risk  
8 losing my Sixth Amendment right to effective  
9 representation.

10 Accordingly, I assert my Federal  
11 Constitutional rights as guaranteed by the Fifth,  
12 Sixth, and Fourteenth Amendment to the constitution.

13 Q. Between 2001 and 2005 did you engage in  
14 sex or sex acts with a minor female named Amy  
15 (phonetic)?

16 A. I intend to respond to all relevant  
17 questions regarding this lawsuit. However, at the  
18 present time my attorneys have counseled me that I  
19 cannot provide answers to any questions relevant to  
20 this lawsuit, and I must accept this advice or risk  
21 losing my Sixth Amendment right to effective  
22 representation.

23 Accordingly, I assert my Federal  
24 Constitutional right as guaranteed by the Fifth,  
25 Sixth, and Fourteenth Amendment to the constitution.

1           Q.    Between 2001 and 2005 did you engage in  
2 sex or sex acts with a minor female named Melissa  
3 (phonetic)?

4           A.    I intend to respond to all relevant  
5 questions regarding this lawsuit. However, at this  
6 time my attorneys have counseled me that I cannot  
7 provide answers to any questions relevant to this  
8 lawsuit, and I must accept this advice or risk  
9 losing my Sixth Amendment right to effective  
10 representation.

11                         Accordingly, I assert my Federal  
12 Constitutional right as guaranteed by the Fifth,  
13 Sixth, and Fourteenth Amendment of the United States  
14 Constitution.

15           Q.    Between 2001 and 2005 did you engage in  
16 sex or sex acts with a minor female named Dara  
17 (phonetic)?

18           A.    I intend to respond to all relevant  
19 questions regarding this lawsuit. However, at the  
20 present time my attorneys have counseled me that I  
21 cannot provide answers to any questions relevant to  
22 this lawsuit, and must accept this advice or risk  
23 losing my Sixth Amendment right to effective  
24 representation.

25                         Accordingly, I assert my Federal

1 Constitutional rights as guaranteed by the Fifth,  
2 Sixth, and Fourteenth Amendment to the United States  
3 Constitution.

4 Q. Between 2001 and 2005 did you engage in  
5 sex or sex acts with a minor female named Janine  
6 (phonetic)?

7 A. I intend to respond to all relevant  
8 questions regarding this lawsuit. However, at the  
9 present time my attorneys have counseled me that I  
10 cannot provide answers to any questions relevant to  
11 this lawsuit. I must accept this advice or risk  
12 losing my Sixth Amendment right to effective  
13 representation.

14 Accordingly, I assert my Federal  
15 Constitutional right under the Fifth, Sixth, and  
16 Fourteenth Amendment to the constitution.

17 Q. Between 2001 and 2005 did you engage in  
18 sex or sex acts with a minor female named Amanda  
19 (phonetic)?

20 A. I intend to respond to all relevant  
21 questions regarding this lawsuit. However, at the  
22 present time my attorneys have counseled me that I  
23 cannot provide answers to any questions relevant to  
24 this lawsuit, and must accept this advice or risk  
25 losing my Sixth Amendment right to effective



1 representation.

2 Accordingly, I assert my Federal  
3 Constitutional right as guaranteed by the Fifth,  
4 Sixth, and Fourteenth Amendment to the United States  
5 Constitution.

6 **THE WITNESS:** Can we take a break for, a  
7 bathroom break, is that okay?

8 **THE VIDEOGRAPHER:** We're off the record at  
9 10:39.

10 (Thereupon, a discussion was had off  
11 the record.)

12 **THE VIDEOGRAPHER:** We're back on the  
13 record at 10:44.

14 **Q. (By Mr. Edwards)** Between 2001 and 2005  
15 did you engage in sex or sex acts with a minor  
16 female named Holly (phonetic)?

17 **A.** I intend to respond to all relevant  
18 questions regarding this lawsuit. However, at the  
19 present time my attorneys have counseled me that I  
20 cannot provide answers to questions relevant to this  
21 lawsuit, and I must accept their advice or risk  
22 losing my Sixth Amendment right to effective  
23 representation.

24 Accordingly, I assert my Federal  
25 Constitutional right as guaranteed by the Fifth,

1 Sixth and the Fourteenth Amendment to the United  
2 States Constitution.

3 **THE WITNESS:** Can I see you a second,  
4 Mike?

5 **MR. BURMAN:** Sure.

6 **THE VIDEOGRAPHER:** We're off the record at  
7 10:45.

8 (Thereupon, a brief break was taken.)

9 **THE VIDEOGRAPHER:** Back on the record at  
10 10:46.

11 Q. (By Mr. Edwards) Between the year 2001  
12 and 2005 did you engage in sex or sex acts with a  
13 minor female named Eva (phonetic)?

14 **MR. BURMAN:** Object to form, form vague  
15 and indefinite. Last name, please.

16 **MR. EDWARDS:** You can answer the question.

17 **THE WITNESS:** I intend to respond to all  
18 relevant questions regarding this lawsuit.  
19 However, at the present time my attorneys have  
20 counseled me that I cannot provide answers to  
21 any questions relevant to this lawsuit, and  
22 must accept this advice or risk losing my Sixth  
23 Amendment right to effective representation.

24 Accordingly, I assert my Federal  
25 Constitutional right as guaranteed by the

1 Fifth, Sixth, and Fourteenth Amendment to the  
2 United States Constitution.

3 Q. (By Mr. Edwards) Between the year 2001  
4 and 2005 did you engage in sex or sex acts with a  
5 minor female named Riannen (phonetic)?

6 MR. BURMAN: Object to form, vague and  
7 indefinite. Last name, please.

8 MR. EDWARDS: You can answer.

9 THE WITNESS: I intend to respond to all  
10 relevant questions regarding this lawsuit.  
11 However, at the present time my attorneys have  
12 counseled me that I cannot provide answers to  
13 any questions relevant to this lawsuit. I must  
14 accept this advice or risk losing my Sixth  
15 Amendment right to effective representation.

16 Accordingly, I assert my Federal  
17 Constitutional rights as guaranteed by the  
18 Fifth, Sixth and Fourteenth Amendment to the  
19 United States Constitution.

20 Q. (By Mr. Edwards) Between 2001 and 2005  
21 did you engage in sex or sex acts with a minor  
22 female named Nicole (phonetic)?

23 MR. BURMAN: Object to form, vague and  
24 indefinite. Last name, please.

25 MR. EDWARDS: You may answer.

1           **THE WITNESS:** I intend to respond to all  
2 relevant questions regarding this lawsuit.  
3 However, at the present time my attorneys have  
4 counseled me that I cannot provide answers to  
5 any questions relevant to this lawsuit, and  
6 must accept this advice or risk losing my Sixth  
7 Amendment right to effective representation.

8           Accordingly, I assert my Federal  
9 Constitutional right as guaranteed by the  
10 Fifth, Sixth and Fourteenth Amendment to the  
11 United States constitution.

12           **Q. (By Mr. Edwards)** Between 2001 and 2005  
13 did you engage in sex or sex acts with a minor  
14 female named Tatum (phonetic)?

15           **MR. BURMAN:** Object to the form, vague and  
16 indefinite. Last name, please.

17           **MR. EDWARDS:** You can answer if --

18           **THE WITNESS:** I intend to respond to all  
19 relevant questions regarding this lawsuit.  
20 However, at the present time my attorneys have  
21 counseled me that I cannot provide answers to  
22 any questions relevant to this lawsuit. I must  
23 accept this advice or risk losing my Sixth  
24 Amendment right to effective representation.

25           Accordingly, I assert my Federal

1 Constitutional right as guaranteed by the  
2 Fifth, Sixth and Fourteenth Amendment to the  
3 United States Constitution.

4 Q. (By Mr. Edwards) Between 2001 and 2005  
5 did you engage in sex or sex acts with a minor  
6 female named Shawna (phonetic)?

7 MR. BURMAN: Object to form, vague and  
8 indefinite. Last name, please.

9 MR. EDWARDS: You can answer, if you know.

10 THE WITNESS: I intend to respond to all  
11 relevant questions regarding this lawsuit.  
12 However, at the present time my attorneys have  
13 counseled me that I cannot provide answers to  
14 any questions relevant to this lawsuit. I must  
15 accept this advice or risk losing my Sixth  
16 Amendment right to effective representation.

17 Accordingly, I assert my Federal  
18 Constitutional right as guaranteed by the  
19 Fifth, Sixth, and Fourteenth Amendment to the  
20 United States Constitution.

21 Q. (By Mr. Edwards) Between 2001 and 2005  
22 did you engage in sex or sex acts with a minor  
23 female named Vivian (phonetic)?

24 MR. BURMAN: Object to form, vague and  
25 indefinite. Last name, please.

1           **MR. EDWARDS:** You can answer.

2           **THE WITNESS:** I intend to respond to all  
3 relevant questions regarding this lawsuit.  
4 However at the present time my attorneys have  
5 counseled me that I cannot provide answers to  
6 any questions relevant to this lawsuit, and  
7 must accept this advice or risk losing my Sixth  
8 Amendment right to effective representation.

9           Accordingly, I assert my Federal  
10 Constitutional right as guaranteed by the  
11 Fifth, Sixth, and Fourteenth Amendment to the  
12 United States Constitution.

13           **Q. (By Mr. Edwards)** Between 2001 and 2005  
14 did you engage in sex or sex acts with a minor  
15 female named Danielle (phonetic)?

16           **MR. BURMAN:** Object to form, vague and  
17 indefinite. Last name, please.

18           **MR. EDWARDS:** You can answer.

19           **THE WITNESS:** I intend to respond to all  
20 relevant questions regarding this lawsuit.  
21 However, at the present time my attorneys have  
22 counseled me that I cannot provide answers to  
23 any questions relevant to this lawsuit, and  
24 must accept this advice or risk losing my Sixth  
25 Amendment right to effective representation.

1                   Accordingly, I assert my Federal  
2                   Constitutional right as guaranteed by the  
3                   Fifth, Sixth, and Fourteenth Amendment to the  
4                   United States Constitution.

5                   Q.    (By Mr. Edwards) Between 2001 and 2005  
6                   did you engage in sex or sex acts with a minor  
7                   female that you referred to as Courtney Ice Cream,  
8                   (phonetic)?

9                   MR. BURMAN: Object to form, vague and  
10                  indefinite. Last name, please.

11                  MR. EDWARDS: You can answer.

12                  MR. BURMAN: Or flavor.

13                  THE WITNESS: I intend to respond to all  
14                  relevant questions regarding this lawsuit.  
15                  However, at the present time my attorneys have  
16                  counseled me that I cannot provide answers to  
17                  any questions relevant to this lawsuit, and  
18                  must accept this advice or risk losing my Sixth  
19                  Amendment right to effective representation.

20                  Accordingly, I assert my Federal  
21                  Constitutional right as guaranteed by the  
22                  Fifth, Sixth, and Fourteenth Amendment to the  
23                  constitution.

24                  Q.    (By Mr. Edwards) Between 2001 and 2005  
25                  did you engage in sex or sex acts with a minor

1 female named Tamika (phonetic)?

2 MR. BURMAN: Object to form, vague and  
3 indefinite. Last name, please.

4 MR. EDWARDS: You can answer.

5 THE WITNESS: I intend to respond to all  
6 relevant questions regarding this lawsuit.  
7 However, at the present time my attorneys have  
8 counseled me that I cannot provide answers to  
9 any questions relevant to this lawsuit, and  
10 must accept this advice or risk losing my Sixth  
11 Amendment right to effective representation.

12 Q. (By Mr. Edwards) Between --

13 THE WITNESS: Sorry?

14 MR. EDWARDS: I didn't realize you weren't  
15 finished.

16 THE WITNESS: Accordingly, I assert my  
17 Federal Constitutional right as guaranteed by  
18 the Fifth, Sixth and Fourteenth Amendment to  
19 the United States Constitution.

20 Q. (By Mr. Edwards) Between 2001 and 2005  
21 did you engage in sex or sex acts with a 12-year-old  
22 girl named Virginia (phonetic)?

23 MR. BURMAN: Object to form, vague and  
24 indefinite. Last name, please.

25 MR. EDWARDS: You can answer.



1           **THE WITNESS:** I intend to respond to all  
2 relevant questions regarding this lawsuit.  
3 However, at the present time my attorneys have  
4 counseled me that I cannot provide answers to  
5 any questions relevant to this lawsuit, and  
6 must accept this advice or risk losing my Sixth  
7 Amendment right to effective representation.

8           Accordingly, I assert my Federal  
9 Constitutional right as guaranteed by the  
10 Fifth, Sixth, and Fourteenth Amendment to the  
11 constitution.

12           **Q.** (By Mr. Edwards) Between 2001 and 2005  
13 did you engage in sex or sex acts with a minor  
14 female named Alisha (phonetic)?

15           **MR. BURMAN:** Object to form, vague and  
16 indefinite. Last name, please.

17           **MR. EDWARDS:** You can answer.

18           **THE WITNESS:** I intend to respond to all  
19 relevant questions regarding this lawsuit.  
20 However, at the present time my attorneys have  
21 counseled me that I cannot provide answers to  
22 any questions relevant to this lawsuit. I must  
23 accept their advice or risk losing my Sixth  
24 Amendment right to effective representation.

25           Accordingly, I assert my Federal

1 Constitutional right as guaranteed by the  
2 Fifth, Sixth and the Fourteenth Amendment to  
3 the constitution.

4 Q. (By Mr. Edwards) Between 2001 and 2005  
5 did you engage in sex or sex acts with a minor  
6 female named Cara (phonetic)?

7 MR. BURMAN: Object to form, vague and  
8 indefinite. Last name, please.

9 THE WITNESS: I intend to respond to all  
10 relevant questions regarding this lawsuit.  
11 However, at the present time my attorneys have  
12 counseled me that I cannot provide answers to  
13 any questions relevant to this lawsuit, and  
14 must accept their advice or risk losing my  
15 Sixth Amendment right to effective  
16 representation.

17 Accordingly, I assert my Federal  
18 Constitutional right as guaranteed by the  
19 Fifth, Sixth, and Fourteenth Amendment to the  
20 United States Constitution.

21 Q. (By Mr. Edwards) Between 2001 and 2005  
22 did you engage in sex or sex acts with a minor  
23 female named Mary (phonetic)?

24 MR. BURMAN: Object to form, vague and  
25 indefinite. Last name, please.

1           **MR. EDWARDS:** You can answer.

2           **THE WITNESS:** I intend to respond to all  
3 relevant questions regarding this lawsuit.  
4 However, at the present time my attorneys have  
5 counseled me that I cannot provide answers to  
6 any questions relevant to this lawsuit, and  
7 must accept this advice or risk losing my Sixth  
8 Amendment right to effective representation.

9           Accordingly, I assert my Federal  
10 Constitutional right as guaranteed by the  
11 Fifth, Sixth, and Fourteenth Amendment to the  
12 United States Constitution.

13           **Q. (By Mr. Edwards)** Between 2001 and 2005  
14 did you engage in sex or sex acts with a minor  
15 female named Shelby (phonetic)?

16           **MR. BURMAN:** Object to form, vague and  
17 indefinite. Last name, please.

18           **MR. EDWARDS:** You may answer.

19           **THE WITNESS:** I intend to respond to all  
20 relevant questions regarding this lawsuit.  
21 However, at the present time my attorneys have  
22 counseled me that I cannot provide answers to  
23 any questions relevant to this lawsuit, and  
24 must accept this advice or risk losing my Sixth  
25 Amendment right to effective representation.

1                   Accordingly, I assert my Federal  
2                   Constitutional right as guaranteed by the  
3                   Fifth, Sixth, and Fourteenth Amendment of the  
4                   United States Constitution.

5                   Q.     (By Mr. Edwards) Between 2001 and 2005  
6                   did you engage in sex or sex acts with a minor  
7                   female named Ashley (phonetic)?

8                   MR. BURMAN: Object to form, vague and  
9                   indefinite. Last name, please.

10                  MR. EDWARDS: You can answer.

11                  THE WITNESS: I intend to respond to all  
12                  relevant questions regarding this lawsuit.  
13                  However, at the present time my attorneys have  
14                  counseled me that I cannot provide answers to  
15                  any questions relevant to this lawsuit, and I  
16                  must accept this advice or risk losing my Sixth  
17                  Amendment right to effective representation.

18                  Accordingly, I assert my Federal  
19                  Constitutional right as guaranteed by the  
20                  Fifth, Sixth, and Fourteenth Amendment to the  
21                  United States Constitution.

22                  MR. GOLDBERGER: One moment.

23                                 (Thereupon, a discussion was had off  
24                                 the record.)

25                                 (Thereupon, Attorney Adler entered

1 the deposition room.)

2 MR. EDWARDS: We're back on.

3 Q. (By Mr. Edwards) Between 2001 and 2005  
4 did you engage in sex or sex acts with a minor  
5 female named Sherry (phonetic)?

6 MR. BURMAN: Object to form, vague and  
7 indefinite. Last name, please.

8 MR. EDWARDS: You can answer.

9 THE WITNESS: I intend to respond to all  
10 relevant questions regarding this lawsuit.  
11 However, at the present time my attorneys have  
12 counseled me that I cannot provide answers to  
13 any questions relevant to this lawsuit, and  
14 must accept this advice or risk losing my Sixth  
15 Amendment right to effective representation.

16 Accordingly, I assert my Federal  
17 Constitutional right as guaranteed by the  
18 Fifth, Sixth, and Fourteenth Amendment to the  
19 constitution.

20 Q. (By Mr. Edwards) Between 2001 and 2005  
21 did you engage in sex or sex acts with a minor  
22 female named Colleen (phonetic)?

23 MR. BURMAN: Object to form, vague and  
24 indefinite. Last name, please.

25 MR. EDWARDS: You may answer.

1           **THE WITNESS:** I intend to respond to all  
2 relevant questions regarding this lawsuit.  
3 However, at the present time my attorneys have  
4 counseled me that I cannot provide answers to  
5 any questions relevant to this lawsuit, and  
6 must accept this advice or risk losing my Sixth  
7 Amendment right to effective representation.

8           Accordingly, I assert my Federal  
9 Constitutional rights as guaranteed by the  
10 Fifth, Sixth, and the Fourteenth Amendment to  
11 the United States Constitution.

12           **Q. (By Mr. Edwards)** Between 2001 and 2005  
13 did you engage in sex or sex acts with a minor  
14 female named Julie (phonetic)?

15           **MR. BURMAN:** Object to form, vague and  
16 indefinite. Last name, please.

17           **MR. EDWARDS:** You may answer.

18           **THE WITNESS:** I intend to respond to all  
19 relevant questions regarding this lawsuit.  
20 However, at the present time my attorneys have  
21 counseled me that I cannot provide answers to  
22 any questions relevant to this lawsuit, and I  
23 must accept this advice or risk losing my Sixth  
24 Amendment right to effective representation.

25           Accordingly, I assert my Federal

1 Constitutional rights as guaranteed by the  
2 Fifth, Sixth, and Fourteenth Amendment to the  
3 United States Constitution.

4 Q. (By Mr. Edwards) Between 2001 and 2005  
5 did you engage in sex or sex acts with a minor  
6 female named Vanessa (phonetic)?

7 MR. BURMAN: Object to the form, vague and  
8 indefinite. Last name, please.

9 MR. EDWARDS: You can answer.

10 THE WITNESS: I intend to respond to all  
11 relevant questions regarding this lawsuit.  
12 However, at the present time my attorneys have  
13 counseled me that I cannot provide answers to  
14 any questions relevant to this lawsuit, and  
15 must accept this advice or risk losing my Sixth  
16 Amendment right to effective representation.

17 Accordingly, I assert my Federal  
18 Constitutional right as guaranteed by the  
19 Fifth, Sixth, and Fourteenth Amendment to the  
20 United States Constitution.

21 Q. (By Mr. Edwards) Between 2001 and 2005  
22 did you engage in sex or sex acts with a minor  
23 female named April (phonetic)?

24 MR. BURMAN: Object to form, vague and  
25 indefinite. Last name, please.

1           **MR. EDWARDS:** You can answer.

2           **THE WITNESS:** I intend to respond to all  
3 relevant questions regarding this lawsuit.  
4 However, at the present time my attorneys have  
5 counseled me that I cannot provide answers to  
6 any questions relevant to this lawsuit, and  
7 must accept this advice or risk losing my Sixth  
8 Amendment right to effective representation.

9           Accordingly, I assert my Federal  
10 Constitutional right as guaranteed by the  
11 Fifth, Sixth, and Fourteenth Amendment to the  
12 United States Constitution.

13           **Q. (By Mr. Edwards)** Between 2001 and 2005  
14 did you engage in sex or sex acts with a minor  
15 female named Alexandra (phonetic)?

16           **MR. BURMAN:** Object to form, vague and  
17 indefinite. And last name, please?

18           **MR. GOLDBERGER:** Is that Alexander or  
19 Alexandra?

20           **MR. EDWARDS:** -- dra.

21           **THE WITNESS:** I intend to respond to all  
22 relevant questions regarding this lawsuit.  
23 However, at the present time my attorneys have  
24 counseled me that I cannot provide answers to  
25 any questions relevant to this lawsuit, and



1 must accept this advice or risk losing my Sixth  
2 Amendment right to effective representation.

3 Accordingly, I assert my Federal  
4 Constitutional right as guaranteed by the  
5 Fifth, Sixth, and Fourteenth Amendment to the  
6 United States Constitution.

7 Q. (By Mr. Edwards) Between 2001 and 2005  
8 did you engage in sex or sex acts with a minor  
9 female named Michelle (phonetic)?

10 MR. BURMAN: Object to form, vague and  
11 indefinite. Last name, please.

12 MR. EDWARDS: You can answer.

13 THE WITNESS: I intend to respond to all  
14 relevant questions regarding this lawsuit.  
15 However, at the present time my attorneys have  
16 counseled me that I cannot provide answers to  
17 any questions relevant to this lawsuit, and I  
18 must accept this advice or risk losing my Sixth  
19 Amendment right to effective representation.

20 Accordingly, I assert my Federal  
21 Constitutional rights as guaranteed by the  
22 Fifth, Sixth, and Fourteenth Amendment to the  
23 United States Constitution.

24 Q. (By Mr. Edwards) Between 2001 and 2005  
25 did you engage in sex or sex acts with a minor

1 female named Yolanda (phonetic)?

2 **MR. BURMAN:** Object to form, vague and  
3 indefinite. Last name, please.

4 **MR. EDWARDS:** You can answer.

5 **THE WITNESS:** I intend to respond to all  
6 relevant questions regarding this lawsuit.  
7 However, at the present time my attorneys have  
8 counseled me that I cannot provide answers to  
9 any questions relevant to this lawsuit, and I  
10 must accept this advice or risk losing my Sixth  
11 Amendment right to effective representation.

12 Accordingly, I assert my Federal  
13 Constitutional right as guaranteed by the  
14 Fifth, Sixth, and Fourteenth Amendment to the  
15 United States Constitution.

16 **Q. (By Mr. Edwards)** Between 2001 and 2005  
17 did you engage in sex or sex acts with a minor  
18 female named Angelique (phonetic)?

19 **MR. BURMAN:** Object to form, vague and  
20 indefinite. Last name, please.

21 **MR. EDWARDS:** You can answer.

22 **THE WITNESS:** I intend to respond to all  
23 relevant questions regarding this lawsuit.  
24 However, at the present time my attorneys have  
25 counseled me that I cannot provide answers to

1 any questions relevant to this lawsuit, and  
2 must accept this advice or risk losing my Sixth  
3 Amendment right to effective representation.

4 Accordingly, I assert my Federal  
5 Constitutional right as guaranteed by the  
6 Fifth, Sixth, and Fourteenth Amendment to the  
7 United States Constitution.

8 Q. (By Mr. Edwards) Between 2001 and 2005  
9 did you engage in sex or sex acts with a minor  
10 female named Faith (phonetic)?

11 MR. BURMAN: Object to form, vague and  
12 indefinite. Last name, please.

13 MR. EDWARDS: You can answer.

14 THE WITNESS: I intend to respond to all  
15 relevant questions regarding this lawsuit.  
16 However, at the present time my attorneys have  
17 counseled me that I cannot provide answers to  
18 any questions relevant to this lawsuit, and I  
19 must accept this advice or risk losing my Sixth  
20 Amendment right to effective representation.

21 Accordingly, I assert my Federal  
22 Constitutional right as guaranteed by the  
23 Fifth, Sixth, and Fourteenth Amendment to the  
24 United States Constitution.

25 Q. (By Mr. Edwards) Between 2001 and 2005

1 did you engage in sex or sex acts with a minor  
2 female named Molly (phonetic)?

3 **MR. BURMAN:** Object to form, vague and  
4 indefinite. Last name, please.

5 **MR. EDWARDS:** You can answer.

6 **THE WITNESS:** I intend to respond to all  
7 relevant questions regarding this lawsuit.  
8 However, at the present time my attorneys have  
9 counseled me that I cannot provide answers to  
10 any questions relevant to this lawsuit, and I  
11 must accept this advice or risk losing my Sixth  
12 Amendment right to effective representation.

13 Accordingly, I assert my Federal  
14 Constitutional right as guaranteed by the  
15 Fifth, Sixth, and Fourteenth Amendment of the  
16 United States Constitution.

17 **Q. (By Mr. Edwards)** Between 2001 and 2005  
18 did you engage in sex or sex acts with a minor  
19 female named Felicia (phonetic)?

20 **MR. BURMAN:** Object to form, vague and  
21 indefinite. Last name, please.

22 **MR. EDWARDS:** You can answer.

23 **THE WITNESS:** I intend to respond to all  
24 relevant questions regarding this lawsuit.  
25 However, at the present time my attorneys have

1 counseled me that I cannot provide answers to  
2 any questions relevant to this lawsuit, and I  
3 must accept this advice or risk losing my Sixth  
4 Amendment right to effective representation.

5 Accordingly, I assert my Federal  
6 Constitutional right as guaranteed by the  
7 Fifth, Sixth, and Fourteenth Amendment to the  
8 United States Constitution.

9 Q. (By Mr. Edwards) Between 2001 and 2005  
10 did you engage in sex or sex acts with a minor  
11 female named Leigh, L-E-I-G-H?

12 MR. BURMAN: Object to form, vague and  
13 indefinite. Last name, please.

14 MR. EDWARDS: You can answer.

15 THE WITNESS: I intend to respond to all  
16 relevant questions regarding this lawsuit.  
17 However, at the present time my attorneys have  
18 counseled me that I cannot provide answers to  
19 any questions relevant to this lawsuit, and I  
20 must accept this advice or risk losing my Sixth  
21 Amendment right to effective representation.

22 Accordingly, I assert my Federal  
23 Constitutional right as guaranteed by the  
24 Fifth, Sixth, and Fourteenth Amendment to the  
25 constitution.

1           **Q.**    **(By Mr. Edwards)**  Isn't it true that at  
2 the time you engaged in sex or sex acts with each of  
3 the people we have just discussed, you knew they  
4 were minors?

5           **MR. BURMAN:**  Object to form.

6           **THE WITNESS:**  I intend to respond to all  
7 relevant questions regarding this lawsuit.  
8 However, at the present time my attorneys have  
9 counseled me that I cannot provide answers to  
10 any questions relevant to this lawsuit, and  
11 must accept this advice or risk losing my Sixth  
12 Amendment right to effective representation.

13                   Accordingly, I assert my Federal  
14 Constitutional right under the Fifth, Sixth,  
15 and Fourteenth Amendment to the United States  
16 Constitution.

17           **Q.**    **(By Mr. Edwards)**  With each of these  
18 girls, isn't it true that you used someone else to  
19 recruit them to your house?

20           **MR. BURMAN:**  Object to form, vague and  
21 indefinite.

22           **THE WITNESS:**  I intend to respond to all  
23 relevant questions regarding this lawsuit.  
24 However, at the present time my attorneys have  
25 counseled me that I cannot provide answers to

1           any questions relevant to this lawsuit, and  
2           must accept this advice or risk losing my Sixth  
3           Amendment right to effective representation.

4                     Accordingly, I assert my Federal  
5           Constitutional right as guaranteed by the  
6           Fifth, Sixth, and Fourteenth Amendment to the  
7           United States Constitution.

8           **Q. (By Mr. Edwards)** For the purposes of  
9           these next questions, when I refer to "the minor  
10          girls" I'm referring to Hailey Robson, Brittney,  
11          Sage, Carolyn Casey, Carolyn Adriamo, Amy, Melissa,  
12          Dara, Janine, Amanda, Holly, Eva, Riannen, Nicole,  
13          Tatum, Shawna, Tamika, Vivian, Danielle, Jennifer,  
14          Virginia, Alisha, Alexandra, Sarah, Courtney Ice  
15          Cream, Lauren, Melissa, Dana, April, Cara, Mary,  
16          Shelby, Ashley, Sherry, Colleen, Julie, Vanessa,  
17          Michelle, Yolanda, Angelique, Faith, Molly, Felicia,  
18          Leigh or Leigh, and Courtney, my client, which is  
19          the plaintiff in this lawsuit.

20                     My question is --

21           **MR. GOLDBERGER:** You've identified that  
22          Courtney as Courtney Wild, correct?

23           **MR. EDWARDS:** Correct.

24           **Q. (By Mr. Edwards)** With each of these  
25          girls, isn't it true that you paid somebody else to

1 bring them to your house?

2 **MR. BURMAN:** Object to the form, vague and  
3 indefinite.

4 **THE WITNESS:** I intend to respond to all  
5 relevant questions regarding this lawsuit.  
6 However, at the present time my attorneys have  
7 counseled me that I cannot provide answers to  
8 any questions relevant to this lawsuit, and  
9 must accept this advice or risk losing my Sixth  
10 Amendment right to effective representation.

11 Accordingly, I assert my Federal  
12 Constitutional right as guaranteed by the  
13 Fifth, Sixth, and Fourteenth Amendment to the  
14 United States Constitution.

15 **Q. (By Mr. Edwards)** For each of these minor  
16 girls, isn't it true that you paid each of them for  
17 sex or sex acts?

18 **MR. BURMAN:** Object to form, vague and  
19 indefinite. Further explaining that to the  
20 extent that no last names have been identified  
21 for most of the girls.

22 **MR. EDWARDS:** You can answer.

23 **THE WITNESS:** I intend to respond to all  
24 relevant questions regarding this lawsuit.  
25 However, at the present time my attorneys have



1           counseled me that I cannot provide answers to  
2           any questions relevant to this lawsuit, and  
3           must accept this advice or risk losing my Sixth  
4           Amendment right to effective representation.

5                     Accordingly, I assert my Federal  
6           Constitutional right as guaranteed by the  
7           Fifth, Sixth, and Fourteenth Amendment to the  
8           United States Constitution.

9           Q.    (By Mr. Edwards)  Isn't it true that in  
10          order to recruit each of these minor girls to your  
11          house, you had someone tell them, "A rich guy in  
12          Palm Beach will pay you cash to go to his house and  
13          give him a massage"?

14                    MR. BURMAN:  Object to form, vague and  
15          indefinite, to the extent last names of the  
16          girls have not been identified.

17                    THE WITNESS:  I intend to respond to all  
18          relevant questions regarding this lawsuit.  
19          However, at the present time my attorneys have  
20          counseled me that I cannot provide answers to  
21          any questions relevant to this lawsuit.  I must  
22          accept this advice or risk losing my Sixth  
23          Amendment right to effective representation.

24                    Accordingly, I assert my Federal  
25          Constitutional right as guaranteed by the

1 Fifth, Sixth, and Fourteenth Amendment of the  
2 United States Constitution.

3 Q. (By Mr. Edwards) Each of these minor  
4 girls, when arriving at your house, was greeted at  
5 the door by one of your employees at your mansion,  
6 isn't that correct?

7 MR. BURMAN: Object to form, vague and  
8 indefinite. No description of last names of  
9 the alleged minor girls.

10 THE WITNESS: I intend to respond to all  
11 relevant questions regarding this lawsuit.  
12 However, at the present time my attorneys have  
13 advised me that I cannot provide answers to any  
14 questions relevant to this lawsuit, and I must  
15 accept this advice or risk losing my Sixth  
16 Amendment right to effective representation.

17 Accordingly, I assert my Federal  
18 Constitutional right as guaranteed by the  
19 Fifth, Sixth, and Fourteenth Amendment to the  
20 United States Constitution.

21 Q. (By Mr. Edwards) Each of these minor  
22 girls was escorted up to your bedroom by one of your  
23 employees, isn't that correct?

24 MR. BURMAN: Object to the form, vague and  
25 indefinite.

1           **THE WITNESS:** I intend to respond to all  
2 relevant questions regarding this lawsuit.  
3 However, at the present time my attorneys have  
4 counseled me that I cannot provide answers to  
5 any questions relevant to this lawsuit, and I  
6 must accept this advice or risk losing my Sixth  
7 Amendment right to effective representation.

8           Accordingly, I assert my Federal  
9 Constitutional rights as guaranteed by the  
10 Fifth, Sixth, and Fourteenth Amendment to the  
11 United States Constitution.

12           May I just ask, step outside for a second,  
13 I want to just ask a question.

14           **MR. BURMAN:** Sure.

15           **THE VIDEOGRAPHER:** Going off the record at  
16 11:11.

17           (Thereupon, a brief break was taken.)

18           **THE VIDEOGRAPHER:** Okay, we're back on the  
19 record at 11:16.

20           **Q. (By Mr. Edwards)** Previously I named, or I  
21 gave you the names of 49 minor girls. Isn't it true  
22 that you engaged in sex or sex acts with each of  
23 them?

24           **MR. BURMAN:** Object to the form, vague and  
25 indefinite. Last names weren't provided for

1 most of them.

2 **THE WITNESS:** I intend to respond to all  
3 relevant questions regarding this lawsuit.  
4 However, at the present time my attorneys have  
5 counseled me that I cannot provide answers to  
6 any questions relevant to this lawsuit, and  
7 must accept that advice or risk losing my Sixth  
8 Amendment right to effective representation.

9 Accordingly, I assert my Federal  
10 Constitutional right as guaranteed by the  
11 Fifth, Sixth, and Fourteenth Amendment to the  
12 constitution.

13 **Q. (By Mr. Edwards)** With respect to each of  
14 the minor girls that was taken into your bedroom by  
15 one of your employees, isn't it true that you  
16 entered the room wearing only a towel?

17 **MR. BURMAN:** Object to form, vague and  
18 indefinite, last names of the alleged minor  
19 girls weren't provided.

20 **THE WITNESS:** I intend to respond to all  
21 relevant questions regarding this lawsuit.  
22 However, at the present time my attorneys have  
23 counseled me that I cannot provide answers to  
24 any questions relevant to this lawsuit, and  
25 must accept this advice or risk losing my Sixth

1 Amendment right to effective representation.

2 Accordingly, my federal, I have to assert  
3 my Federal Constitutional rights as guaranteed  
4 by the Fifth, Sixth, and Fourteenth Amendment  
5 to the United States Constitution.

6 Q. (By Mr. Edwards) With respect to each of  
7 these minor girls, isn't it true that you ordered  
8 each of them to get naked to give you a massage?

9 MR. BURMAN: Object to form, vague and  
10 indefinite with regard to the alleged minor  
11 girls, the names weren't provided. Last names  
12 weren't provided.

13 MR. EDWARDS: You can answer.

14 THE WITNESS: I intend to respond to all  
15 relevant questions regarding this lawsuit.  
16 However, at the present time my attorneys have  
17 counseled me that I cannot provide answers to  
18 any questions relevant to this lawsuit, and I  
19 must accept this advice or risk losing my Sixth  
20 Amendment right to effective representation.

21 Accordingly, I assert my Federal  
22 Constitutional right as guaranteed by the  
23 Fifth, Sixth, and Fourteenth Amendment to the  
24 United States Constitution.

25 Q. (By Mr. Edwards) With respect to each of

1 the 49 named minor girls, isn't it true that you  
2 masturbated in front of each of them?

3 **MR. BURMAN:** Object to the form, vague and  
4 indefinite with regard to the alleged minor  
5 girls, their last names weren't provided.

6 **THE WITNESS:** I intend to respond to all  
7 relevant questions regarding this lawsuit.  
8 However, at the present time my attorneys have  
9 counseled me that I cannot provide answers to  
10 any questions relevant to this lawsuit, and I  
11 must accept their advice or risk losing my  
12 Sixth Amendment right to effective  
13 representation.

14 Accordingly, I assert my Federal  
15 Constitutional rights as guaranteed by the  
16 Fifth, Sixth, and Fourteenth Amendment to the  
17 United States Constitution.

18 **Q. (By Mr. Edwards)** Isn't it true that you  
19 asked each of the minor girls to do similar things  
20 to you, such as rub your nipples?

21 **MR. BURMAN:** Object to the form, vague and  
22 indefinite with regard to the alleged minor  
23 girls, the last names weren't provided.

24 **THE WITNESS:** I intend to respond to all  
25 relevant questions regarding this lawsuit.

1           However, at the present time my attorneys have  
2           counseled me that I cannot provide answers to  
3           any questions relevant to this lawsuit, and I  
4           must accept this advice or risk losing my Sixth  
5           Amendment right to effective representation.

6                       Accordingly, I assert my Federal  
7           Constitutional rights as guaranteed by the  
8           Fifth, Sixth, and Fourteenth Amendment to the  
9           United States Constitution.

10           Q.    (By Mr. Edwards) With respect to all of  
11           the named 49 minor girls, isn't it true that you  
12           tried to touch each of them in a sexual way?

13                       MR. BURMAN: Object to form, vague and  
14           indefinite with regard to the alleged minor  
15           girls, last names weren't provided.

16                       THE WITNESS: I intend to respond to all  
17           relevant questions regarding this lawsuit.  
18           However, at the present time my attorneys have  
19           counseled me that I cannot provide answers to  
20           any questions relevant to this lawsuit. I must  
21           accept this advice or risk losing my Sixth  
22           Amendment right to effective representation.

23                       Accordingly, I assert my Federal  
24           Constitutional rights as guaranteed by the  
25           Fifth, Sixth, and Fourteenth Amendment to the

1 United States Constitution.

2 Q. (By Mr. Edwards) With respect to each of  
3 the 49 minor girls, isn't it true that you touched  
4 their bare breasts?

5 MR. BURMAN: Object to form, vague and  
6 indefinite with regard to the alleged minor  
7 girls, last names weren't provided.

8 THE WITNESS: I intend to respond to all  
9 relevant questions regarding this lawsuit.  
10 However, at the present time my attorneys have  
11 counseled me that I cannot provide answers to  
12 any questions relevant to this lawsuit. And I  
13 must accept this advice or risk losing my Sixth  
14 Amendment right to effective representation.

15 Accordingly, I assert my Federal  
16 Constitutional right as guaranteed by the  
17 Fifth, Sixth, and Fourteenth Amendment to the  
18 United States Constitution.

19 Q. (By Mr. Edwards) With respect to each of  
20 these 49 minor girls, isn't it true that you  
21 inserted your fingers into their vaginas?

22 MR. BURMAN: Object to form of the  
23 question, vague and indefinite with regard to  
24 the alleged minor girls, last names weren't  
25 provided.



1           **THE WITNESS:** I intend to respond to all  
2 relevant questions regarding this lawsuit.  
3 However, at the present time my attorneys have  
4 counseled me that I cannot provide answers to  
5 any questions relevant to this lawsuit, and I  
6 must accept this advice or risk losing my Sixth  
7 Amendment right to effective representation.

8           Accordingly, I assert my Federal  
9 Constitutional rights as guaranteed by the  
10 Fifth, Sixth, and Fourteenth Amendment to the  
11 United States Constitution.

12           **Q. (By Mr. Edwards)** With respect to the 49  
13 named minor girls, isn't it true that you attempted  
14 to use vibrators on each of them?

15           **MR. BURMAN:** Object to the form of the  
16 question, vague and indefinite with regard to  
17 the alleged minor girls, last names weren't  
18 provided.

19           **MR. EDWARDS:** You can answer.

20           **THE WITNESS:** I intend to respond to all  
21 relevant questions regarding this lawsuit.  
22 However, at the present time my attorneys have  
23 counseled me that I cannot provide answers to  
24 any questions relevant to this lawsuit, and I  
25 must accept this advice or risk losing my Sixth

1 Amendment right to effective representation.

2 Accordingly, I assert my Federal  
3 Constitutional rights as guaranteed by the  
4 Fifth, Sixth, and Fourteenth Amendment to the  
5 United States Constitution.

6 Q. (By Mr. Edwards) Between 2001 and 2005  
7 did you have a woman named Nadia Marcinkova living  
8 at your Palm Beach house with you?

9 A. I intend to respond to all relevant  
10 questions regarding this lawsuit. However, at the  
11 present time my attorneys have counseled me that I  
12 cannot provide answers to any questions relevant to  
13 this lawsuit, and I must accept this advice or risk  
14 losing my Sixth Amendment right to effective  
15 representation.

16 Accordingly, I assert my Federal  
17 Constitutional right as guaranteed by the Fifth,  
18 Sixth, and Fourteenth Amendment to the United States  
19 Constitution.

20 Q. Is it true that you considered Nadia  
21 Marcinkova your Yugoslavian lesbian sex slave?

22 A. I intend to respond to all relevant  
23 questions regarding this lawsuit. However, at the  
24 present time my attorneys have counseled me that I  
25 cannot provide answers to any questions relevant to

1 this lawsuit, and I must accept this advice or risk  
2 losing my Sixth Amendment right to effective  
3 representation.

4           Accordingly, I assert my Federal  
5 Constitutional rights as guaranteed by the Fifth,  
6 Sixth, and Fourteenth Amendment to the United States  
7 Constitution.

8           Q. Can you tell me why it is that you just  
9 smiled when I asked you the last question about  
10 Nadia Marcinkova?

11           MR. GOLDBERGER: Don't answer that.

12           Q. (By Mr. Edwards) Did you think the  
13 question was funny?

14           MR. BURMAN: Object to form.

15           MR. GOLDBERGER: You can answer.

16           THE WITNESS: No.

17           Q. (By Mr. Edwards) Do you know Nadia  
18 Marcinkova?

19           A. I intend to respond to all relevant  
20 questions regarding this lawsuit. However, at the  
21 present time my attorneys have counseled me that I  
22 cannot provide answers to any questions relevant to  
23 this lawsuit, and I must accept this advice or risk  
24 losing my Sixth Amendment right to effective  
25 representation.

1                   Accordingly, I assert my Federal  
2 Constitutional rights as guaranteed by the Fifth,  
3 Sixth, and Fourteenth Amendment to the United States  
4 Constitution.

5           Q.    Isn't it true that you brought Nadia into  
6 the room to have threesome sex with you and many of  
7 these minor female girls?

8           **MR. BURMAN:** Object to the form of the  
9 question, vague and indefinite with regard to  
10 the word "may" and with regard to the fact that  
11 last names haven't been described, or  
12 disclosed.

13           **THE WITNESS:** I intend to respond to all  
14 relevant questions regarding this lawsuit.  
15 However, at the present time my attorneys have  
16 counseled me that I cannot provide answers to  
17 any questions relevant to this lawsuit, and I  
18 must accept this advice or risk losing my Sixth  
19 Amendment right to effective representation.

20                   Accordingly, I assert Federal  
21 Constitutional rights as guaranteed by the  
22 Fifth, Sixth, and Fourteenth Amendment to the  
23 United States Constitution.

24           Q.    **(By Mr. Edwards)** Isn't it true that you  
25 ejaculated in front of each of these minor girls?

1           **MR. BURMAN:** Object to form, vague and  
2 indefinite. Last names were not provided of  
3 the alleged minor girls.

4           **THE WITNESS:** I intend to respond to all  
5 relevant questions regarding this lawsuit.  
6 However, at the present time my attorneys have  
7 counseled me that I cannot provide answers to  
8 any questions relevant to this lawsuit, and I  
9 must accept this advice or risk losing my Sixth  
10 Amendment right to effective representation.

11           Accordingly, I assert my Federal  
12 Constitutional rights as guaranteed by the  
13 Fifth, Sixth, and Fourteenth Amendment to the  
14 United States Constitution.

15           **Q. (By Mr. Edwards)** With respect to each of  
16 these 49 minor girls, isn't it true that you paid  
17 each of them for sex?

18           **MR. BURMAN:** Object to the form, vague and  
19 indefinite. Last names of the many of the  
20 minor girls were not provided, alleged minor  
21 girls.

22           **THE WITNESS:** I intend to respond to all  
23 relevant questions regarding this lawsuit.  
24 However, at the present time my attorneys have  
25 counseled me that I cannot provide answers to

1 any questions relevant to this lawsuit, and I  
2 must accept this advice or risk losing my Sixth  
3 Amendment right to effective representation.

4 Accordingly, I assert my Federal  
5 Constitutional rights as guaranteed by the  
6 Fifth, Sixth, and Fourteenth Amendment to the  
7 United States Constitution.

8 Q. (By Mr. Edwards) Isn't it true that you  
9 offered each of the 49 minor girls money if she  
10 would bring you more minor girls for you to engage  
11 in sex or sex acts with?

12 MR. BURMAN: Object to the form, vague and  
13 indefinite. Last names of many of the alleged  
14 minor girls weren't provided.

15 THE WITNESS: I intend to respond to all  
16 relevant questions regarding this lawsuit.  
17 However, at the present time my attorneys have  
18 counseled me that I cannot provide answers to  
19 any questions relevant to this lawsuit, and  
20 must accept their advice or risk losing my  
21 Sixth Amendment right to effective  
22 representation.

23 Accordingly, I assert my Federal  
24 Constitutional rights as guaranteed by the  
25 Fifth, Sixth, and Fourteenth Amendment to the

1 United States Constitution.

2 Q. (By Mr. Edwards) With respect to each of  
3 the 49 named minor girls, isn't it true that the sex  
4 or sex acts occurred in your bedroom?

5 MR. BURMAN: Object to form of the  
6 question, vague and indefinite with regard to  
7 the alleged minor girls, the last names weren't  
8 provided.

9 THE WITNESS: I intend to respond to all  
10 relevant questions regarding this lawsuit.  
11 However, at the present time my attorneys have  
12 counseled me that I cannot provide answers to  
13 any questions relevant to this lawsuit, and  
14 must accept this advice or risk losing my Sixth  
15 Amendment right to effective representation.

16 Accordingly, I assert my Federal  
17 Constitutional right as guaranteed by the  
18 Fifth, Sixth, and Fourteenth Amendment to the  
19 United States Constitution.

20 Q. (By Mr. Edwards) With respect to each of  
21 these minor girls, isn't it true that certain other  
22 employees of yours played a role in furthering your  
23 sexual contact with these minors?

24 MR. BURMAN: Object to the form of the  
25 question, vague and indefinite with regard to

1 the alleged minors, last names weren't  
2 provided.

3 THE WITNESS: Could you repeat the  
4 question? Sorry.

5 Q. (By Mr. Edwards) Sure.

6 With respect to the 49 minor girls whose  
7 names I provided, isn't it true that certain  
8 employees of yours played a role in furthering  
9 sexual contact between you and these minors?

10 MR. BURMAN: Same objection.

11 THE WITNESS: I intend to respond to all  
12 relevant questions regarding this lawsuit.  
13 However, at the present time my attorneys have  
14 counseled me that I cannot provide answers to  
15 any questions relevant to this lawsuit, and I  
16 must accept this advice or risk losing my Sixth  
17 Amendment right to effective representation.

18 Accordingly, I assert my Federal  
19 Constitutional rights as guaranteed by the  
20 Fifth, Sixth, and Fourteenth Amendment to the  
21 United States Constitution.

22 Q. (By Mr. Edwards) Some of your employees  
23 were delegated the responsibility of cleaning your  
24 sex toys after you engaged in sex with minor girls,  
25 isn't that true?



1           **MR. BURMAN:** Are you referring to the 49  
2           alleged minors that you just identified, or is  
3           this a generic question?

4           **MR. EDWARDS:** Yes, the 49, that --

5           **THE WITNESS:** Can you repeat the question  
6           please?

7           **MR. EDWARDS:** -- are known to us.

8           **MR. BURMAN:** Okay. Object to the form,  
9           vague and indefinite with regard to the alleged  
10          minors, last names weren't provided.

11          **THE WITNESS:** I intend to respond to all  
12          relevant questions regarding this lawsuit.  
13          However, at the present time my attorneys have  
14          counseled me that I cannot provide answers to  
15          any questions relevant to this lawsuit, and I  
16          must accept this advice or risk losing my Sixth  
17          Amendment right to effective representation.

18          Accordingly, I assert my Federal  
19          Constitutional right as guaranteed by the  
20          Fifth, Sixth, and Fourteenth Amendment to the  
21          United States Constitution.

22          **Q. (By Mr. Edwards)** Isn't it true that you  
23          hired employees to work for you for the sole purpose  
24          of scheduling minor girls to come to your house for  
25          sex?

1           **MR. BURMAN:** Once again, are you referring  
2 to the 49 you identified, or just generic?

3           **MR. EDWARDS:** General question.

4           **MR. BURMAN:** General question?

5           **MR. EDWARDS:** Right.

6           **THE WITNESS:** I intend to respond to all  
7 relevant questions regarding this lawsuit.  
8 However, at the present time my attorneys have  
9 counseled me that I cannot provide answers to  
10 any questions relevant to this lawsuit, and I  
11 must accept this advice or risk losing my Sixth  
12 Amendment right to effective representation.

13                   Accordingly, I assert my Federal  
14 Constitutional rights as guaranteed by the  
15 Fifth, Sixth, and Fourteenth Amendment to the  
16 United States Constitution.

17           **Q. (By Mr. Edwards)** Isn't it true that you  
18 hired employees that were delegated responsibilities  
19 in order to assist you in avoiding detection of your  
20 actions by law enforcement?

21           **THE WITNESS:** What's the question?

22           **MR. BURMAN:** Object to the form, vague and  
23 indefinite.

24           **THE WITNESS:** Could you repeat it again?

25           **MR. EDWARDS:** Sure, I'll clean it up.

1           **Q.** (By Mr. Edwards) Isn't it true that you  
2 had employees working for you with a purpose of  
3 helping you to avoid detection of your criminal  
4 activities by law enforcement?

5           **MR. BURMAN:** Object to form, vague an  
6 indefinite.

7           **THE WITNESS:** I intend to respond to all  
8 relevant questions regarding this lawsuit.  
9 However, at the present time my attorneys have  
10 counseled me that I cannot provide answers to  
11 any questions relevant to this lawsuit, and I  
12 must accept this advice or risk losing my Sixth  
13 Amendment right to effective representation.

14           Accordingly, I assert my Federal  
15 Constitutional rights as guaranteed by the  
16 Fifth, Sixth, and Fourteenth Amendment to the  
17 United States Constitution.

18           **Q.** (By Mr. Edwards) Did you have operable  
19 surveillance equipment inside your house from 2001  
20 through 2006 in your Palm Beach house?

21           **MR. BURMAN:** Objection, vague and  
22 indefinite.

23           **THE WITNESS:** I intend to respond to all  
24 relevant questions regarding this lawsuit.  
25 However, at this present time my attorney has

1 counseled me that I cannot provide answers to  
2 any questions relevant to this lawsuit, and I  
3 must accept this advice or risk losing my Sixth  
4 Amendment right to effective representation.

5 Accordingly, I assert my Federal  
6 Constitutional rights as guaranteed by the  
7 Fifth, Sixth, and Fourteenth Amendment to the  
8 United States Constitution.

9 Q. (By Mr. Edwards) Did you destroy or  
10 tamper with evidence, including computer images,  
11 computer equipment, surveillance equipment, photos,  
12 notes, diaries, or photocopy records as a result of  
13 the criminal investigation of you between 2001 and  
14 2006?

15 MR. GOLDBERGER: Let me object on the  
16 form. Are you asking, are you suggesting that  
17 there is a criminal investigation that went on  
18 between 2001 and 2006? Is that the question?

19 MR. EDWARDS: Well, at some time, at some  
20 point in time there was, since he pled guilty.

21 MR. GOLDBERGER: But what's the purpose of  
22 the 2001 to 2006? Maybe you can rephrase the  
23 question.

24 MR. EDWARDS: Okay.

25 Q. (By Mr. Edwards) How about this. Have

1 you ever at any time destroyed or tampered with any  
2 evidence of your involvement with minor girls?

3 A. I intend to respond to all relevant  
4 questions regarding this lawsuit. However, at the  
5 present time my attorneys have counseled me that I  
6 cannot answer questions with respect to this  
7 lawsuit, and must accept their advice or risk losing  
8 my Sixth Amendment right to effective  
9 representation.

10 Accordingly, I assert my Federal  
11 Constitutional Rights as guaranteed by the Fifth,  
12 Sixth, and Fourteenth Amendments to the United  
13 States Constitution.

14 Q. Have you ever destroyed computer images or  
15 computer equipment because of a fear it would be  
16 used against you in a prosecution for your sexual  
17 involvement with minor girls?

18 A. I intend to respond to all relevant  
19 questions regarding this lawsuit. However, at the  
20 present time my attorneys have counseled me that I  
21 cannot provide answers to any questions relevant to  
22 this lawsuit, and I must accept this advice or risk  
23 losing my Sixth Amendment right to effective  
24 representation.

25 Accordingly, I assert my Federal

1 Constitutional rights as guaranteed by the Fifth,  
2 Sixth, and Fourteenth Amendment to the United States  
3 Constitution.

4 Q. Did you ever, at any time, destroy  
5 photographs, notes, or diaries in an effort to avoid  
6 detection by law enforcement?

7 A. I intend to respond to all relevant  
8 questions regarding this lawsuit. However, at the  
9 present time my attorneys have counseled me that I  
10 cannot provide answers to any questions relevant to  
11 this lawsuit, and I must accept this advice or risk  
12 losing my Sixth Amendment right to effective  
13 representation.

14 Accordingly, I assert my Federal  
15 Constitutional rights as guaranteed by the Fifth,  
16 Sixth, and Fourteenth Amendment to the United States  
17 Constitution.

18 Q. Did other people hired by you destroy or  
19 tamper with evidence in an effort to avoid detection  
20 of criminal activities or prosecution?

21 A. I intend to respond to all relevant  
22 questions regarding this lawsuit. However, at the  
23 present time my attorneys have counseled me that I  
24 cannot provide answers to any questions relevant to  
25 this lawsuit, and I must accept this advice or risk

1 losing my Sixth Amendment right to effective  
2 representation.

3 Accordingly, I assert my Federal  
4 Constitutional rights as guaranteed by the Fifth,  
5 Sixth, and Fourteenth Amendment to the United States  
6 Constitution.

7 Q. Was your house at some point in time in  
8 Palm Beach burglarized by a former housekeeper named  
9 Juan Allessee (phonetic)?

10 A. Yes.

11 Q. In relation to that burglary, did you  
12 provide the Palm Beach Police Department with  
13 surveillance video from the inside of your house?

14 A. I intend to respond to all relevant  
15 questions regarding this lawsuit. However, at the  
16 present time my attorneys have counseled me that I  
17 cannot provide answers to any questions relevant to  
18 this lawsuit, and I must accept this advice or risk  
19 losing my Sixth Amendment right to effective  
20 representation.

21 Accordingly, I assert my Federal  
22 Constitutional rights as guaranteed by the Fifth,  
23 Sixth, and Fourteenth Amendment to the United States  
24 Constitution.

25 Q. At the time your house was burglarized,

1 how many operable surveillance cameras were inside  
2 your house?

3 A. I intend to respond to all relevant  
4 questions regarding this lawsuit. However, at the  
5 present time my attorneys have counseled me that I  
6 cannot provide answers to any questions relevant to  
7 this lawsuit, and I must accept this advice or risk  
8 losing my Sixth Amendment right to effective  
9 representation.

10 Accordingly, I assert my Federal  
11 Constitutional rights as guaranteed by the Fifth,  
12 Sixth, and Fourteenth Amendment to the United States  
13 Constitution.

14 Q. How long have you been on work release?

15 MR. GOLDBERGER: Hang on. Yeah, he can --  
16 that's fine.

17 THE WITNESS: A little over six months.

18 Q. (By Mr. Edwards) You know the date that  
19 you started work release?

20 A. No.

21 Q. If the court records indicate that your  
22 guilty plea occurred on June 30th, 2008, is that  
23 something you'd quarrel with?

24 A. No.

25 Q. How long did you, do you believe you were



1 in the county jail after that June 30th, 2008 plea  
2 before you were granted work release?

3 MR. GOLDBERGER: If you know.

4 THE WITNESS: Couple of months.

5 Q. (By Mr. Edwards) Do you know if any of  
6 your victims were informed of your petition for work  
7 release?

8 A. I do not know.

9 Q. When was the Florida Science Foundation  
10 created?

11 A. I intend to respond to all relevant  
12 questions regarding this lawsuit. However, at the  
13 present time my attorneys have counseled me that I  
14 cannot provide answers to any questions relevant to  
15 this lawsuit, and must accept this advice or risk  
16 losing my Sixth Amendment right to effective  
17 representation.

18 Accordingly, I assert my Federal  
19 Constitutional rights as guaranteed by the Fifth,  
20 Sixth, and Fourteenth Amendment to the United States  
21 Constitution.

22 Q. Isn't it true that you created the Florida  
23 Science Foundation months before pleading guilty  
24 knowing that you would eventually be on work release  
25 in an office right next to your attorney's office?

1           **MR. BURMAN:** Object to the form.

2           **THE WITNESS:** I intend to respond to all  
3 relevant questions regarding this lawsuit.  
4 However, at the present time my attorneys have  
5 counseled me that I cannot provide answers to  
6 any questions relevant to this lawsuit, and  
7 must accept this advice or risk losing my Sixth  
8 Amendment right to effective representation.

9           Accordingly, I assert my Federal  
10 Constitutional rights as guaranteed by the  
11 Fifth, Sixth, and Fourteenth Amendment to the  
12 constitution.

13          **Q. (By Mr. Edwards)** Since being sentenced in  
14 June of 2008, have you had contact with any minors?

15           **MR. GOLDBERGER:** You can answer that.

16           **THE WITNESS:** I intend to respond to all  
17 relevant questions regarding this lawsuit.  
18 However, at the present time my attorneys have  
19 counseled me that I cannot provide answers to  
20 any questions relevant to this lawsuit, and  
21 must accept this advice or risk losing my Sixth  
22 Amendment right to effective representation.

23           Accordingly, I assert my Federal  
24 Constitutional rights as guaranteed by the  
25 Fifth, Sixth and Fourteenth Amendment to the

1 constitution.

2 Q. (By Mr. Edwards) Do you currently have  
3 access to a computer that you use?

4 A. I intend to respond to all relevant  
5 questions regarding this lawsuit. However, at the  
6 present time my attorneys have counseled me that I  
7 cannot provide answers to any questions relevant to  
8 this lawsuit. I must accept this advice or risk  
9 losing my Sixth Amendment right to effective  
10 representation.

11 Accordingly, I assert my Federal  
12 Constitutional rights as guaranteed by the Fifth,  
13 Sixth, and Fourteenth Amendment to the constitution.

14 Q. What is e-mail address that you have been  
15 using since being sentenced in 2008?

16 MR. GOLDBERGER: Object to the form,  
17 assumes facts not in evidence.

18 THE WITNESS: I intend to respond to all  
19 relevant questions regarding this lawsuit.  
20 However, at the present time my attorneys have  
21 counseled me that I cannot provide answers to  
22 any questions relevant to this lawsuit, and I  
23 must accept this advice or risk losing my Sixth  
24 Amendment right to effective representation.

25 Accordingly, I assert my Federal

1 Constitutional rights as guaranteed by the  
2 Fifth, Sixth, and Fourteenth Amendment to the  
3 United States Constitution.

4 Q. (By Mr. Edwards) Do you intend to  
5 communicate with any minors once you are released to  
6 house arrest?

7 A. I intend to respond to all relevant  
8 questions regarding this lawsuit. However, at the  
9 present time my attorneys have counseled me that I  
10 cannot provided answers to any questions relevant to  
11 this lawsuit, and I must accept this advice or risk  
12 losing my Sixth Amendment right to effective  
13 representation.

14 Accordingly, I assert my Federal  
15 Constitutional rights as guaranteed by the Fifth,  
16 Sixth, and Fourteenth Amendment to the United States  
17 Constitution.

18 Q. Is it true that you have been diagnosed by  
19 a psychologist with a sexual disorder related to  
20 your sexual appetite for minor girls?

21 A. I intend to respond to all relevant  
22 questions regarding this lawsuit. However, at the  
23 present time my attorneys have counseled me that I  
24 cannot provide answers to any questions relevant to  
25 this lawsuit, and I must accept this advice or risk

1 losing my Sixth Amendment right to effective  
2 representation.

3 Accordingly, I assert my Federal  
4 Constitutional rights as guaranteed by the Fifth,  
5 Sixth, and Fourteenth Amendment to the constitution.

6 Q. Isn't it true that you intend to continue  
7 engaging in sex acts with minor girls once you are  
8 released?

9 MR. BURMAN: Object to the form.

10 THE WITNESS: I intend to respond to all  
11 relevant questions regarding this lawsuit.  
12 However, at the present time my attorneys have  
13 counseled me that I cannot provide answers to  
14 any questions relevant to this lawsuit, and I  
15 must accept this advice or risk losing my Sixth  
16 Amendment right to effective representation.

17 Accordingly, I assert my Federal  
18 Constitutional rights as guaranteed by the  
19 Fifth, Sixth, and Fourteenth Amendment to the  
20 United States Constitution.

21 Q. (By Mr. Edwards) Have you engaged in sex  
22 or sex acts with minor girls outside of the United  
23 States?

24 A. I intend to respond to all relevant  
25 questions regarding this lawsuit. However, at the

1 present time my attorneys have counseled me that I  
2 cannot provide answers to any questions relevant to  
3 this lawsuit, and must accept this advice or risk  
4 losing my Sixth Amendment right to effective  
5 representation.

6 Accordingly, I assert my Federal  
7 Constitutional rights as guaranteed by the Fifth,  
8 Sixth, and Fourteenth Amendment to the United States  
9 Constitution.

10 Q. Is it true that you have your own island?

11 MR. BURMAN: Object, also on the, on the  
12 grounds that the punitive damages haven't been  
13 allowed yet. Not relevant.

14 MR. EDWARDS: Answer.

15 THE WITNESS: I intend to respond to all  
16 relevant questions regarding this lawsuit.  
17 However, at the present time my attorneys have  
18 counseled me that I cannot provide answers to  
19 any questions relevant to this lawsuit, and I  
20 must accept this advice or risk losing my Sixth  
21 Amendment right to effective representation.

22 Accordingly, I assert my Federal  
23 Constitutional rights under the Fifth, Sixth,  
24 and Fourteenth Amendment to the United States  
25 Constitution.

1           Q.    (By Mr. Edwards)  Have you engaged in sex  
2 or sex acts with minors on the island of Little  
3 St. Jeff's?

4           A.    I intend to respond to all relevant  
5 questions regarding this lawsuit.  However, at the  
6 present time my attorneys have counseled me that I  
7 cannot provide answers to any questions relative to  
8 this lawsuit, and must accept this advice or risk  
9 losing my Sixth Amendment right to effective  
10 representation.

11                         Accordingly, I assert my Federal  
12 Constitutional rights as guaranteed by the Fifth,  
13 Sixth, and Fourteenth Amendment to the United States  
14 Constitution.

15           Q.    Isn't it true that you have engaged in  
16 sexual acts or sex with girls as young as 12 years  
17 old?

18           A.    I intend to respond to all relevant  
19 questions regarding this lawsuit.  However, at the  
20 present time my attorneys have counseled me that I  
21 cannot provide answers to any questions relevant to  
22 this lawsuit, and I must accept this advice or risk  
23 losing my Sixth Amendment right to effective  
24 representation.

25                         Accordingly, I assert my Federal

1 Constitutional rights as guaranteed by the Fifth,  
2 Sixth, and Fourteenth Amendment to the United States  
3 Constitution.

4 Q. What is the youngest girl that you have  
5 engaged in sex or sex acts with in the last ten  
6 years?

7 A. I intend to respond to all relevant  
8 questions regarding this lawsuit. However, at the  
9 present time my attorneys have counseled me that I  
10 cannot provide answers to any questions relevant to  
11 this lawsuit, and must accept this advice or risk  
12 losing my Sixth Amendment right to effective  
13 representation.

14 Accordingly, I assert under the Federal  
15 Constitutional rights as guaranteed by the Fifth,  
16 Sixth and Fourteenth Amendment to the United States  
17 Constitution.

18 Q. Have you discussed with any of your  
19 friends the fact that you engage in sex or sex acts  
20 with minors?

21 A. I intend to respond to all relevant  
22 questions regarding this lawsuit. However, at the  
23 present time my attorneys have counseled me that I  
24 cannot provide answers to any questions relevant to  
25 this lawsuit, and I must accept this advice or risk



1 losing my Sixth Amendment right to effective  
2 representation.

3 Accordingly, I assert my Federal  
4 Constitutional rights as guaranteed by the Fifth,  
5 Sixth, and Fourteenth Amendment to the United States  
6 Constitution.

7 Q. Did you know that the girls that were  
8 providing you massages were under the age of 18 at  
9 the time they were doing so?

10 A. I intend to respond to all relevant  
11 questions regarding this lawsuit. However, at the  
12 present time my attorneys have counseled me that I  
13 cannot provide answers to any questions relevant to  
14 this lawsuit, and I must accept their advice or risk  
15 losing my Sixth Amendment right to effective  
16 representation.

17 Accordingly, I assert my Federal  
18 Constitutional rights as guaranteed by the Fifth,  
19 Sixth, and Fourteenth Amendment to the United States  
20 Constitution.

21 Q. Isn't it true that the age group that you  
22 enjoy to engage in sex with is between 12 and 16  
23 years old?

24 MR. BURMAN: Object to form.

25 THE WITNESS: I intend to respond to all

1 relevant questions regarding this lawsuit.  
2 However, at the present time my attorneys have  
3 counseled me that I cannot provide answers to  
4 any questions relevant to this lawsuit, and I  
5 must accept this advice or risk losing my Sixth  
6 Amendment right to effective representation.

7 Accordingly, I assert my Federal  
8 Constitutional rights as guaranteed by the  
9 Fifth, Sixth, and Fourteenth Amendment to the  
10 constitution.

11 Q. (By Mr. Edwards) Do you agree with the  
12 laws that prohibit you from having sex or engaging  
13 in sex acts with minors?

14 MR. BURMAN: Object to form.

15 THE WITNESS: Can you repeat the question?

16 Q. (By Mr. Edwards) Do you agree with the  
17 laws that prohibit you from engaging in sex or sex  
18 acts with minor girls?

19 MR. BURMAN: Object to the form.

20 THE WITNESS: I intend to respond to all  
21 relevant questions regarding this lawsuit.  
22 However, at the present time my attorneys have  
23 counseled me that I cannot provide answers to  
24 any questions relevant to this lawsuit, and I  
25 must accept this advice or risk losing my Sixth

1 Amendment right to effective representation.

2 Accordingly, I assert my Federal  
3 Constitutional rights as guaranteed by the  
4 Fifth, Sixth, and Fourteenth Amendment to the  
5 United States Constitution.

6 Q. (By Mr. Edwards) Isn't it true that you  
7 devised a scheme or plan to engage in sex or sex  
8 acts with multiple minor girls?

9 A. I intend to respond to all relevant  
10 questions regarding this lawsuit. However, at the  
11 present time my attorneys have counseled me that I  
12 cannot provide answers to any questions relevant to  
13 this lawsuit, and I must accept this advice or risk  
14 losing my Sixth Amendment right to effective  
15 representation.

16 Accordingly, I must assert my Federal  
17 Constitutional rights as guaranteed by the Fifth,  
18 Sixth, and Fourteenth Amendment to the United States  
19 Constitution.

20 THE WITNESS: Can I take a pee break?

21 THE VIDEOGRAPHER: We're off the record at  
22 11:50. This will be the end of tape one.

23 (Thereupon, a brief break was taken.)

24 THE VIDEOGRAPHER: This is the beginning  
25 of tape number two, and we're back on the

1 record at 11:59.

2 Q. (By Mr. Edwards) Between 2001 and 2005  
3 did you digitally penetrate the vaginas of more than  
4 50 minor girls?

5 A. I intend to respond to all relevant  
6 questions regarding this lawsuit. However, at the  
7 present time my attorneys have counseled me that I  
8 cannot provide answers to any questions relevant to  
9 this lawsuit, and I must accept their advice or risk  
10 losing my Sixth Amendment right to effective  
11 representation.

12 Accordingly, I assert my Federal  
13 Constitutional right as guaranteed by the Fifth,  
14 Sixth and Fourteenth Amendment to the constitution.

15 Q. Between 2001 and 2005 did you masturbate  
16 in front of more than 50 minor girls?

17 A. I intend to respond to all relevant  
18 questions regarding this lawsuit. However, at the  
19 present time my attorneys have counseled me that I  
20 cannot provide answers to any questions relevant to  
21 this lawsuit, and I must accept this advice or risk  
22 losing my Sixth Amendment right to effective  
23 representation.

24 Accordingly, I assert my Federal  
25 Constitutional rights as guaranteed by the Fifth,

1 Sixth and Fourteenth Amendment to the constitution.

2 Q. Between 2001 and 2005 did you ejaculate in  
3 front of more than 50 minor girls?

4 A. I intend to respond to all relevant  
5 questions regarding this lawsuit. However, at the  
6 present time my attorneys have counseled me that I  
7 cannot provide answers to any questions relevant to  
8 this lawsuit, and I must accept this advice or risk  
9 losing my Sixth Amendment right to effective  
10 representation.

11 Accordingly, I assert my Federal  
12 Constitutional rights as guaranteed by the Fifth,  
13 Sixth, and Fourteenth Amendment to the United States  
14 Constitution.

15 Q. Does the body form of a 12 to 16 year old  
16 girl sexually appeal to you?

17 MR. BURMAN: Object to the form.

18 THE WITNESS: I intend to respond to all  
19 relevant questions regarding this lawsuit.  
20 However, at the present time my attorneys have  
21 counseled me that I cannot provide answers to  
22 any questions relevant to this lawsuit, and I  
23 must accept this advice or risk losing my Sixth  
24 Amendment right to effective representation.

25 Accordingly, I assert my Federal

1 Constitutional right as guaranteed by the  
2 Fifth, Sixth, and Fourteenth Amendment to the  
3 constitution.

4 Q. (By Mr. Edwards) Did you use your wealth,  
5 power, and connections to impress or influence minor  
6 girls into having sex with you?

7 A. I intend to respond to all relevant  
8 questions regarding this lawsuit. However, at the  
9 present time my attorneys have counseled me that I  
10 cannot provide answers to any questions relevant to  
11 this lawsuit, and I must accept their advice or risk  
12 losing my Sixth Amendment right to effective  
13 representation.

14 Accordingly, I assert my Federal  
15 Constitutional rights as guaranteed by the Fifth,  
16 Sixth, and Fourteenth Amendment to the United States  
17 Constitution.

18 Q. Did you intentionally target economically  
19 deprived children for the purposes of having sex or  
20 engaging in sex acts with?

21 A. Do you want to rephrase the question?

22 Q. Did you intentionally target economically  
23 deprived children for the purposes of sex?

24 A. I intend to respond to all relevant  
25 questions regarding this lawsuit. However, at the

1 present time my attorneys have counseled me that I  
2 cannot provide answers to any questions relevant to  
3 this lawsuit, and must accept this advice or risk  
4 losing my Sixth Amendment right to effective  
5 representation.

6 Accordingly, I assert my Federal  
7 Constitutional rights as guaranteed by the Fifth,  
8 Sixth, and Fourteenth Amendment to the United States  
9 Constitution.

10 Q. During the criminal investigation there  
11 were statements to the media that you believed the  
12 girls to be 18. Which girls were you referring to?

13 A. I intend to --

14 **THE WITNESS:** Excuse me one second.

15 (Thereupon, a discussion was had off  
16 the record.)

17 **MR. GOLDBERGER:** Umm, let me object to the  
18 form as to vague. I don't know what statements  
19 you're talking about. Are you talking about  
20 statements that Mr. Epstein made?

21 **MR. EDWARDS:** Through attorneys.

22 **MR. GOLDBERGER:** Well, is that the  
23 question? Why don't you rephrase the question,  
24 why don't you rephrase the question so we  
25 understand what it is.

1 Q. (By Mr. Edwards) Various attorneys of  
2 yours made representations to the media that you  
3 were of, under the belief that the girls that you  
4 were engaging in sex acts with were 18 years of age.  
5 Which girls were you, was that referring to?

6 MR. GOLDBERGER: Can you identify a  
7 specific statement made by a specific attorney?

8 MR. EDWARDS: We'll get there later on in  
9 the deposition.

10 Q. (By Mr. Edwards) Have you ever, at any  
11 time, made that statement, that you believed the  
12 girls that you were engaging in sex acts with were  
13 18 years of age or older?

14 MR. GOLDBERGER: To the media, are you  
15 talking about?

16 Q. (By Mr. Edwards) Yourself or through  
17 anyone else to anyone else.

18 MR. GOLDBERGER: Object to the --  
19 that's --

20 MR. BURMAN: Object to the form.

21 MR. GOLDBERGER: I have no idea what the  
22 question is. Just ask the question, I'll be  
23 happy to try and have the client answer it for  
24 you.

25 Q. (By Mr. Edwards) Okay. I'm not talking



1 about statements to your attorneys, that's  
2 privileged.

3 Have you ever made the statement to anyone  
4 else, other than your attorneys, that you believed  
5 the girls that were giving you massages at your  
6 house were over the age of 18?

7 A. I intend to respond to all relevant  
8 questions regarding this lawsuit. However, at the  
9 present time my attorneys have counseled me that I  
10 cannot provide answers to any questions relevant to  
11 this lawsuit, and I must accept this advice or risk  
12 losing my Sixth Amendment right to effective  
13 representation.

14 Accordingly, I assert my Federal  
15 Constitutional rights as guaranteed by the Fifth,  
16 Sixth, and Fourteenth Amendment to the United States  
17 Constitution.

18 Q. Between 2001 and 2005 did you pay any  
19 females for sex?

20 A. I intend to respond to all relevant  
21 questions regarding this lawsuit. However, at the  
22 present time my attorneys have counseled me that I  
23 cannot provide answers to any questions relevant to  
24 this lawsuit, and I must accept this advice or risk  
25 losing my Sixth Amendment right to effective

1 representation.

2 Accordingly, I assert Federal  
3 Constitutional rights under the Fifth, Sixth, and  
4 Fourteenth Amendment to the United States  
5 Constitution.

6 Q. Between 2001 and 2005 did you tell minor  
7 female girls at your house that you prefer to engage  
8 in sexual activities with minors?

9 A. I intend to respond to all relevant  
10 questions regarding this lawsuit. However, at the  
11 present time my attorneys have counseled me that I  
12 cannot provide answers to any questions relevant to  
13 this lawsuit, and I must accept this advice or risk  
14 losing my Sixth Amendment right to effective  
15 representation.

16 Accordingly, I assert my Federal  
17 Constitutional rights as guaranteed by the Fifth,  
18 Sixth, and Fourteenth Amendment to the United States  
19 Constitution.

20 Q. Is it true that many of the 49 minor girls  
21 previously named told you that they were under the  
22 age of 15 at the time you were engaging in sex acts  
23 with them?

24 MR. BURMAN: Object to form of the  
25 question, vague and indefinite to the extent

1 that the alleged minor girls' last names  
2 weren't provided.

3 **THE WITNESS:** I intend to respond to all  
4 relevant questions regarding this lawsuit.  
5 However, to the present time, at the present  
6 time my attorneys have counseled me that I  
7 cannot provide answers to any questions  
8 relevant to this lawsuit, and I must accept  
9 this advice or risk losing my Sixth Amendment  
10 right to effective representation.

11 Accordingly, I assert my Federal  
12 Constitutional rights as guaranteed by the  
13 Fifth, Sixth, and Fourteenth Amendment to the  
14 United States Constitution.

15 **Q. (By Mr. Edwards)** How did the minor girls  
16 previously named in this deposition arrive to your  
17 mansion between 2001 and 2005?

18 **MR. BURMAN:** Objection, vague and  
19 indefinite.

20 **MR. GOLDBERGER:** And it's, it's vague and  
21 indefinite, but to assist in answering the  
22 question, can you tell us what mansion you're  
23 talking about?

24 **MR. EDWARDS:** Palm Beach mansion.

25 **THE WITNESS:** Can you repeat the question?

1           Q.    (By Mr. Edwards) How did they arrive at  
2 your house?

3           A.    "They" arrive?

4           Q.    How did any of the minor girls whose names  
5 I named previously in this deposition arrive to your  
6 house?

7           **MR. BURMAN:** Object to the form of the  
8 question, vague and indefinite to the extent  
9 that the alleged minor girls' last names  
10 weren't provided.

11           **THE WITNESS:** I intend to respond to all  
12 relevant questions regarding this lawsuit.  
13 However, at the present time my attorneys have  
14 counseled me that I cannot provide answers to  
15 any questions relevant to this lawsuit, that I  
16 must accept this advice or risk losing my Sixth  
17 Amendment right to effective representation.

18           Accordingly, I assert my Federal  
19 Constitutional rights as guaranteed by the  
20 Fifth, Sixth, and Fourteenth Amendment to the  
21 constitution.

22           Q.    (By Mr. Edwards) Many of the minor girls  
23 named previously in this deposition did not drive a  
24 car to your house or have a driver's license, isn't  
25 that true?

1           **MR. BURMAN:** Object to form of the  
2 question, vague and indefinite to the extent  
3 that the alleged minor girls' last names  
4 weren't provided.

5           **THE WITNESS:** You have to repeat the  
6 question, again. Sorry.

7           **Q. (By Mr. Edwards)** Isn't it true that many  
8 of the minor girls previously named in this  
9 deposition did not drive a car or have driver's  
10 licenses?

11           **MR. BURMAN:** Same objection.

12           **THE WITNESS:** I intend to respond to all  
13 relevant questions regarding this lawsuit.  
14 However, at the present time my attorneys have  
15 counseled me that I cannot provide answers to  
16 any questions relevant to this lawsuit, and I  
17 must accept this advice or risk losing my Sixth  
18 Amendment right to effective representation.

19           Accordingly, I assert my Federal  
20 Constitutional rights as guaranteed by the  
21 Fifth, Sixth, and Fourteenth Amendment to the  
22 United States Constitution.

23           **Q. (By Mr. Edwards)** Is it true that you  
24 discussed with many of these girls the fact that  
25 they were in middle school or high school at the

1 time they were engaging in sex acts with you at your  
2 house?

3 MR. BURMAN: Are you referring to the  
4 previous 49?

5 MR. EDWARDS: Yes.

6 MR. BURMAN: Okay. Object to form of the  
7 question, vague and indefinite to the extent  
8 that the names, the last names of many of the  
9 alleged minor girls weren't provided.

10 THE WITNESS: I intend to respond to all  
11 relevant questions regarding this lawsuit.  
12 However, at the present time my attorneys have  
13 counseled me that I cannot provide answers to  
14 any questions relevant to this lawsuit, and I  
15 must accept this advice or risk losing my Sixth  
16 Amendment right to effective representation.

17 Accordingly, I assert my Federal  
18 Constitutional rights as guaranteed by the  
19 Fifth, Sixth, and Fourteenth Amendment to the  
20 United States Constitution.

21 Q. (By Mr. Edwards) Did any of the girls  
22 that engaged in sex acts with you at your house  
23 between 2001 and 2005 tell you that they were in  
24 middle school or high school?

25 A. Sorry, repeat the question.

1           **MR. BURMAN:** Are you talking about the 49?

2           **MR. EDWARDS:** No.

3           **MR. BURMAN:** No.

4           **Q. (By Mr. Edwards)** Did any minor girls that  
5 engaged in sex or sex acts with you between the  
6 years of 2001 and 2005 at your house tell you that  
7 they were in middle school or high school at the  
8 time?

9           **MR. BURMAN:** Object to the form.

10           **THE WITNESS:** I intend to respond to all  
11 relevant questions regarding this lawsuit.  
12 However, at the present time my attorneys have  
13 counseled me that I cannot provide answers to  
14 any questions relevant to this lawsuit, and I  
15 must accept this advice or risk losing my Sixth  
16 Amendment right to effective representation.

17           Accordingly, I assert my Federal  
18 Constitutional rights as guaranteed by the  
19 Fifth, Sixth, and Fourteenth Amendment to the  
20 constitution.

21           **MR. EDWARDS:** Okay. What time do you want  
22 to break for lunch?

23           **MR. GOLDBERGER:** 1:00.

24           **THE WITNESS:** 1:15?

25           **MR. GOLDBERGER:** Yeah, 1:15. Is that

1           okay?

2           **MR. EDWARDS:** Yeah, that's fine with me.

3           What time do we have now?

4           **THE WITNESS:** It will be another hour.

5                         (Thereupon, a discussion was had off  
6           the record.)

7           **Q. (By Mr. Edwards)** Did you ever discuss  
8           with any minor girls at your house that you would  
9           pay them to bring you other minor girls for the  
10          purposes of sex?

11          **MR. BURMAN:** Object to the form.

12          **THE WITNESS:** I intend to respond to all  
13          relevant questions regarding this lawsuit.  
14          However, at the present time my attorneys have  
15          counseled me that I cannot provide answers to  
16          any questions relevant to this lawsuit, and I  
17          must accept this advice or risk losing my Sixth  
18          Amendment right to effective representation.

19                         Accordingly, I assert my Federal  
20          Constitutional right as guaranteed by the  
21          Fifth, Sixth, and Fourteenth Amendment to the  
22          United States Constitution.

23          **Q. (By Mr. Edwards)** Did you tell any of the  
24          minor girls that were at your house for sex that you  
25          preferred pure, young girls for sex?



1           **MR. BURMAN:** Object to the form.

2           **THE WITNESS:** I intend to respond to all  
3 relevant questions regarding this lawsuit.  
4 However, at the present time my attorneys have  
5 counseled me that I cannot provide answers to  
6 any questions relevant to this lawsuit, and I  
7 must accept this advice or risk losing my Sixth  
8 Amendment right to effective representation.

9           Accordingly, I assert my Federal  
10 Constitutional rights as guaranteed by the  
11 Fifth, Sixth, and Fourteenth Amendment to the  
12 constitution.

13           **Q. (By Mr. Edwards)** Did you tell any of the  
14 minor girls at your house between 2001 and 2005 that  
15 you do not like girls that have tattoos?

16           **MR. BURMAN:** Object to the form.

17           **THE WITNESS:** I intend to respond to all  
18 relevant questions regarding this lawsuit.  
19 However, at the present time my attorneys have  
20 counseled me that I cannot provide answers to  
21 any questions relevant to this lawsuit, and  
22 must accept this advice or risk losing my Sixth  
23 Amendment right to effective representation.

24           Accordingly, I assert my Federal  
25 Constitutional right as guaranteed by the

1 Fifth, Sixth, and Fourteenth Amendment of the  
2 constitution.

3 Q. (By Mr. Edwards) Did you tell any of the  
4 minor girls that were at your house not to bring you  
5 any girls that were pregnant or had babies?

6 MR. BURMAN: Object to the form.

7 THE WITNESS: I intend to respond to all  
8 relevant questions regarding this lawsuit.  
9 However, at the present time my attorneys have  
10 counseled me that I cannot provide answers to  
11 any questions relevant to this lawsuit, and I  
12 must accept this advice or risk losing my Sixth  
13 Amendment right to effective representation.

14 Accordingly, I assert my Federal  
15 Constitutional right as guaranteed by the  
16 Fifth, Sixth, and Fourteenth Amendment to the  
17 constitution?

18 Q. (By Mr. Edwards) Did you specifically  
19 instruct any of the minor girls not to bring you any  
20 black girls?

21 MR. BURMAN: Object to the form.

22 THE WITNESS: I intend to respond to all  
23 relevant questions regarding this lawsuit.  
24 However, at the present time my attorneys have  
25 counseled me that I cannot provide answers to

1 any questions relevant to this lawsuit, and I  
2 must accept this advice or risk losing my Sixth  
3 Amendment right to effective representation.

4 Accordingly, I assert my Federal  
5 Constitutional rights as guaranteed by the  
6 Fifth, Sixth and Fourteenth Amendment of the  
7 constitution.

8 Q. (By Mr. Edwards) Isn't it true that you  
9 did not like to have sex or engage in sex acts with  
10 black girls?

11 MR. BURMAN: Object to the form.

12 THE WITNESS: I intend to respond to all  
13 relevant questions regarding this lawsuit.  
14 However, at the present time my attorneys have  
15 counseled me that I cannot provide answers to  
16 any questions relevant to this lawsuit, and I  
17 must accept this advice or risk losing my Sixth  
18 Amendment right to effective representation.

19 Accordingly, I assert my Federal  
20 Constitutional rights as guaranteed by the  
21 Fifth, Sixth, and Fourteenth Amendment.

22 Q. (By Mr. Edwards) Isn't it true that black  
23 girls were brought to your house and you turned them  
24 away at the door because you do not like black  
25 girls?

1           **MR. BURMAN:** Object to the form.

2           **THE WITNESS:** I intend to respond to all  
3 relevant questions regarding this lawsuit.  
4 However, at the present time my attorneys have  
5 counseled me that I cannot provide answers to  
6 any questions relevant to this lawsuit, and I  
7 must accept this advice or risk losing my Sixth  
8 Amendment right to effective representation.

9           Accordingly, I assert my Federal  
10 Constitutional rights as guaranteed by the  
11 Fifth, Sixth and Fourteenth Amendment to the  
12 constitution.

13          **Q. (By Mr. Edwards)** Isn't it true that you  
14 also turned away girls because they were 18 years or  
15 older and too old for you?

16           **MR. BURMAN:** Object to the form.

17           **THE WITNESS:** I intend to respond to all  
18 relevant questions regarding this lawsuit.  
19 However, at the present time my attorneys have  
20 counseled me that I cannot provide answers to  
21 any questions relevant to this lawsuit, and I  
22 must accept the advice or risk losing my Sixth  
23 Amendment right to effective representation.

24           Accordingly, I assert Federal  
25 Constitutional rights as guaranteed by the

1 Fifth, Sixth and Fourteenth Amendment to the  
2 United States Constitution.

3 Q. (By Mr. Edwards) Isn't it true that you  
4 also turned away minor girls with tattoos because  
5 you did not feel that they were pure?

6 MR. BURMAN: Object to the form.

7 THE WITNESS: I intend to respond to all  
8 relevant questions regarding this lawsuit.  
9 However, at the present time my attorneys have  
10 counseled me that I cannot provide answers to  
11 any questions relevant to this lawsuit, and I  
12 must accept this advice or risk losing my Sixth  
13 Amendment right to effective representation.

14 Accordingly, I assert my Federal  
15 Constitutional right as guaranteed by the  
16 Fifth, Sixth, and Fourteenth Amendment to the  
17 United States Constitution.

18 Q. (By Mr. Edwards) Is it true that your  
19 specific instructions were, to these minor girls, to  
20 bring you white girls between the ages of 12 and 17  
21 that were not pregnant, did not have babies, and did  
22 not have tattoos?

23 MR. BURMAN: Object to the form.

24 THE WITNESS: I intend to respond to all  
25 relevant questions regarding this lawsuit.

1           However, at the present time my attorneys have  
2           counseled me that I cannot provide answers to  
3           any questions relevant to this lawsuit, and I  
4           must accept this advice or risk losing my Sixth  
5           Amendment right to effective representation.

6           Accordingly, I assert my Federal  
7           Constitutional right as guaranteed by the  
8           Fifth, Sixth, and Fourteenth Amendment to the  
9           constitution.

10          Q.    (By Mr. Edwards) Is it true that you  
11          offered each minor girl approximately \$200 in cash  
12          for sex?

13                MR. BURMAN: Object to the form. Are you  
14          back on the 49, or is this generic?

15                MR. EDWARDS: No, generic.

16                THE WITNESS: Would you repeat the  
17          question?

18          Q.    (By Mr. Edwards) Between 2001 and 2005  
19          isn't it true that you offered each minor girl that  
20          came to your house for sex \$200 for that sex?

21                MR. BURMAN: Object to the form.

22                THE WITNESS: I intend to respond to all  
23          relevant questions regarding this lawsuit.  
24          However, at the present time my attorneys have  
25          counseled me that I cannot provide answers to

1 any questions relevant to this lawsuit, and I  
2 must accept this advice or risk losing my Sixth  
3 Amendment right to effective representation.

4 Accordingly, I assert my Federal  
5 Constitutional rights as guaranteed by the  
6 Fifth, Sixth, and Fourteenth Amendment to the  
7 United States Constitution.

8 Q. (By Mr. Edwards) Why did you laugh about  
9 that last question?

10 MR. BURMAN: Object to the form.

11 THE WITNESS: I have a stomachache at the  
12 moment. I wasn't laughing.

13 Q. (By Mr. Edwards) Isn't it true that you  
14 targeted young, economically deprived kids with  
15 little or no parental guidance?

16 MR. BURMAN: Object to the form.

17 THE WITNESS: You have to repeat the  
18 question.

19 Q. (By Mr. Edwards) Isn't it true that you  
20 were targeting young, economically deprived minor  
21 girls with little or no parental guidance?

22 MR. BURMAN: Object to the form.

23 Q. (By Mr. Edwards) For sex.

24 A. I intend to respond to all relevant  
25 questions regarding this lawsuit. However, at the

1 present time my attorneys have counseled me that I  
2 cannot provide answers to any questions relevant to  
3 this lawsuit, and I must accept their advice or risk  
4 losing my Sixth Amendment right to effective  
5 representation.

6           Accordingly, I assert my Federal  
7 Constitutional rights as guaranteed by the Fifth,  
8 Sixth, and Fourteenth Amendment to the United States  
9 Constitution.

10           Q. Have you ever told anybody that the girls  
11 were over at your house because you just like  
12 massages?

13           **MR. BURMAN:** Object to the form.

14           **THE WITNESS:** I intend to respond to all  
15 relevant questions regarding this lawsuit.  
16 However, at the present time my attorneys have  
17 counseled me that I cannot provide answers to  
18 any questions relevant to this lawsuit, and I  
19 must accept this advice or risk losing my Sixth  
20 Amendment right to effective representation.

21           Accordingly, I assert my Federal  
22 Constitutional right as guaranteed by the  
23 Fifth, Sixth, and Fourteenth Amendment to the  
24 United States Constitution.

25           Q. (By Mr. Edwards) Isn't it true that none



1 of these minor girls that you engaged in sex acts  
2 with at your house had any massage experience?

3 **MR. BURMAN:** Object to the form.

4 **THE WITNESS:** I intend to respond to all  
5 relevant questions regarding this lawsuit.  
6 However, at the present time my attorneys have  
7 counseled me that I cannot provide answers to  
8 any questions relevant to this lawsuit, and I  
9 must accept this advice or risk losing my Sixth  
10 Amendment right to effective representation.

11 Accordingly, I assert my Federal  
12 Constitutional rights as guaranteed by the  
13 Fifth, Sixth, and Fourteenth Amendment to the  
14 United States Constitution.

15 **Q. (By Mr. Edwards)** Between 2001 and 2005  
16 did you ever have a professional masseuse give you a  
17 massage at your house in Palm Beach?

18 **A.** I intend to respond to all relevant  
19 questions regarding this lawsuit. However, at the  
20 present time my attorneys have counseled me that I  
21 cannot provide answers to any questions relevant to  
22 this lawsuit, and I must accept this advice or risk  
23 losing my Sixth Amendment right to effective  
24 representation.

25 Accordingly, I assert my Federal

1 Constitutional rights as guaranteed by the Fifth,  
2 Sixth, and Fourteenth Amendment of the United States  
3 Constitution.

4 Q. In fact, when these minor girls would tell  
5 you they had no massage experience, didn't you  
6 respond by telling them that that is actually better  
7 for you?

8 MR. BURMAN: Object to the form.

9 THE WITNESS: I intend to respond to all  
10 relevant questions regarding this lawsuit.  
11 However, at the present time my attorneys have  
12 counseled me that I cannot provide answers to  
13 any questions relevant to this lawsuit, and I  
14 must accept the advice or risk losing my Sixth  
15 Amendment right to effective representation.

16 Accordingly, I assert my Federal  
17 Constitutional right as guaranteed by the  
18 Fifth, Sixth and Fourteenth Amendment to the  
19 constitution.

20 Q. (By Mr. Edwards) Did you tell these minor  
21 girls to get naked and touch you so that you could  
22 get off?

23 MR. BURMAN: Object to the form.

24 THE WITNESS: What? What's -- repeat the  
25 question.

1 Q. (By Mr. Edwards) Did you tell these minor  
2 girls between 2001 and 2005 at your Palm Beach  
3 mansion to get naked and touch you so that you could  
4 get off?

5 A. Get off?

6 MR. GOLDBERGER: Are you asking him if  
7 that's a statement that was made?

8 MR. EDWARDS: Yes, to these girls.

9 MR. BURMAN: Object to the form.

10 THE WITNESS: I intend to respond to all  
11 relevant questions regarding this lawsuit.  
12 However, at the present time my attorneys have  
13 counseled me that I cannot provide answers to  
14 any questions relevant to this lawsuit, and I  
15 must accept this advice or risk losing my Sixth  
16 Amendment right to effective representation.

17 Accordingly, I assert my Federal  
18 Constitutional right as guaranteed by the  
19 Fifth, Sixth, and Fourteenth Amendment to the  
20 United States Constitution.

21 Q. (By Mr. Edwards) Will you agree that you  
22 exchanged money for sexual gratification with at  
23 least 50 girls at your Palm Beach mansion between  
24 2001 and 2005?

25 MR. BURMAN: Object to the form.

1           **THE WITNESS:** I intend to respond to all  
2 relevant questions regarding this lawsuit.  
3 However, at the present time my attorneys have  
4 counseled me not to provide answers to any  
5 questions relevant to this lawsuit, and I must  
6 accept this advice or risk losing my Sixth  
7 Amendment right to effective representation.

8           Accordingly, I assert my Federal  
9 Constitutional rights as guaranteed by the  
10 Fifth, Sixth, and Fourteenth Amendment to the  
11 United States Constitution.

12           **Q. (By Mr. Edwards)** Between 2001 and 2005  
13 you never ordered a professional escort to come to  
14 your house for sex, did you?

15           **A.** Rephrase the question, please.

16           **Q.** Between 2001 and 2005 you never ordered  
17 from an escort service in Palm Beach County for a  
18 professional escort to come to your house for sex,  
19 did you?

20           **A.** You never ordered?

21           **THE WITNESS:** Do I answer the question?

22           **MR. GOLDBERGER:** You don't understand.

23           Rephrase it.

24           **Q. (By Mr. Edwards)** Did you ever call an  
25 escort service to have an escort sent to your house

1 in Palm Beach for sex?

2 A. I intend to respond to all relevant  
3 questions regarding this lawsuit. However, at the  
4 present time my attorneys have counseled me that I  
5 cannot provide answers to any questions relevant to  
6 this lawsuit, and I must accept this advice or risk  
7 losing my Sixth Amendment right to effective  
8 representation.

9 Accordingly, I assert my Federal  
10 Constitutional right as guaranteed by the Fifth,  
11 Sixth and Fourteenth Amendment to the United States  
12 Constitution.

13 Q. You did not call a professional escort  
14 because that would likely result in a girl over the  
15 age of 18 coming to your house for sex, right?

16 MR. BURMAN: Object to the form.

17 THE WITNESS: I intend to respond to all  
18 relevant questions regarding this lawsuit.  
19 However, at the present time my attorneys have  
20 counseled me that I cannot provide answers to  
21 any questions relevant to this lawsuit, and I  
22 must accept this advice or risk losing my Sixth  
23 Amendment right to effective representation.

24 Accordingly, I assert my Federal  
25 Constitutional rights as guaranteed by the

1 Fifth, Sixth, and Fourteenth Amendment of the  
2 constitution.

3 Q. (By Mr. Edwards) Do you enjoy coercing  
4 minors into sex acts with you?

5 MR. BURMAN: Object to the form.

6 THE WITNESS: I intend to respond to all  
7 relevant questions regarding this lawsuit.  
8 However, at the present time my attorneys have  
9 counseled me that I cannot provide answers to  
10 any questions relevant to this lawsuit, and I  
11 must accept this advice or risk losing my Sixth  
12 Amendment right to effective representation.

13 Accordingly, I assert my Federal  
14 Constitutional right as guaranteed by the  
15 Fifth, Sixth, and Fourteenth Amendment to the  
16 United States Constitution.

17 Q. (By Mr. Edwards) Do you know Sarah  
18 Kellen?

19 A. I intend to respond to all relevant  
20 questions regarding this lawsuit. However, at the  
21 present time my attorneys have counseled me that I  
22 cannot provide answers to any questions relevant to  
23 this lawsuit, and I must accept this advice or risk  
24 losing my Sixth Amendment right to effective  
25 representation.

1                   Accordingly, I assert my Federal  
2 Constitutional rights as guaranteed by the Fifth,  
3 Sixth, and Fourteenth Amendment to the constitution.

4           Q.    Did you instruct her to assist you in  
5 gaining access to minor girls for sex?

6           A.    I intend to respond to all relevant  
7 questions regarding this lawsuit.  However, at the  
8 present time my attorneys have counseled me that I  
9 cannot provide answers to any questions relevant to  
10 this lawsuit, and I must accept this advice or risk  
11 losing my Sixth Amendment right to effective  
12 representation.

13                   Accordingly, I assert my constitutional  
14 rights as guaranteed by the Fifth, Sixth, and  
15 Fourteenth Amendment to the United States  
16 Constitution.

17           Q.    Did you instruct any other employees of  
18 yours to assist you in gaining access to minors for  
19 sex?

20           A.    I intend to respond to all relevant  
21 questions regarding this lawsuit.  However, at the  
22 present time my attorneys have counseled me that I  
23 cannot provide answers to any questions relevant to  
24 this lawsuit, and I must accept this advice or risk  
25 losing my Sixth Amendment right to effective

1 representation.

2 Accordingly, I assert my Federal  
3 Constitutional rights as guaranteed by the Fifth,  
4 Sixth, and Fourteenth Amendment to the United States  
5 Constitution.

6 Q. What people were living with you in your  
7 Palm Beach mansion between 2001 and 2005?

8 MR. GOLDBERGER: Object to the form.

9 THE WITNESS: I intend to respond to all  
10 relevant questions regarding this lawsuit.  
11 However, at the present time my attorneys have  
12 counseled me that I cannot provide answers to  
13 any questions relevant to this lawsuit, and I  
14 must accept this advice or risk losing my Sixth  
15 Amendment right to effective representation.

16 Accordingly, I assert my Federal  
17 Constitutional rights as guaranteed by the  
18 Fifth, Sixth, and Fourteenth Amendment to the  
19 United States Constitution.

20 Q. (By Mr. Edwards) Did you meet with people  
21 employed by you to discuss a plan to gain access to  
22 minor girls for the purposes of sex?

23 A. I intend to respond to all relevant  
24 questions regarding this lawsuit. However, at the  
25 present time my attorneys have counseled me that I



1 cannot provide answers to any questions relevant to  
2 this lawsuit, and I must accept this advice or risk  
3 losing my Sixth Amendment right to effective  
4 representation.

5 Accordingly, I assert my Federal  
6 Constitutional rights as guaranteed by the Fifth,  
7 Sixth, and Fourteenth Amendment to the United States  
8 Constitution.

9 Q. Which employees did you discuss your plan  
10 to gain access to minor girls for the purposes of  
11 sex?

12 A. I intend to respond to all relevant  
13 questions regarding this lawsuit. However, at the  
14 present time my attorneys have counseled me that I  
15 cannot provide answers to any questions relevant to  
16 this lawsuit, and I must accept this advice or risk  
17 losing my Sixth Amendment right to effective  
18 representation.

19 Accordingly, I assert my Federal  
20 Constitutional rights as guaranteed by the Fifth,  
21 Sixth; and Fourteenth Amendment to the United States  
22 Constitution.

23 Q. Is it true that you have many people  
24 working in your house in Palm Beach County, or did,  
25 between the years 2001 and 2005?

1           A.    I intend to respond to all relevant  
2 questions regarding this lawsuit.  However, at the  
3 present time my attorneys have counseled me that I  
4 cannot provide answers to any questions relevant to  
5 this lawsuit, and I must accept this advice or risk  
6 losing my Sixth Amendment right to effective  
7 representation.

8                         Accordingly, I assert my Federal  
9 Constitutional right as guaranteed by the Fifth,  
10 Sixth, and Fourteenth Amendment to the United States  
11 Constitution.

12           Q.    How many employees work in the various  
13 houses that you own right now?

14           A.    That's -- that question is owned right  
15 now?  I don't understand the question.

16           Q.    Well, it's my understanding that you own  
17 numerous properties.  I just want to know how many  
18 people are actually paid by you or employed by you  
19 that work and/or live in those homes?

20           A.    I intend to respond to all relevant  
21 questions regarding this lawsuit.  However, at the  
22 present time my attorneys have counseled me that I  
23 cannot provide answers to any questions relevant to  
24 this lawsuit, and I must accept this advice or risk  
25 losing my Sixth Amendment right to effective

1 representation.

2 Accordingly, I assert my Federal  
3 Constitutional rights as guaranteed by the Fifth,  
4 Sixth, and Fourteenth Amendment of the United States  
5 Constitution.

6 Q. Did you ever personally procure a, or  
7 sorry, strike that.

8 Did you ever personally go out and recruit  
9 a minor girl to bring back to your house for sex?

10 THE WITNESS: Object to form, no?

11 MR. BURMAN: Object to form.

12 THE WITNESS: I intend to respond to all  
13 relevant questions regarding --

14 MR. EDWARDS: I'm sorry, is there  
15 something you don't understand about the  
16 question? If you don't, I'll rephrase it.

17 MR. GOLDBERGER: We objected to the form,  
18 now you can answer.

19 MR. EDWARDS: I thought he objected to the  
20 form, that's why I was --

21 MR. GOLDBERGER: He asked -- I'm not --  
22 Brad, he asked his lawyer a question, that's  
23 all. We objected to the form, that's fine.

24 MR. EDWARDS: Okay.

25 MR. GOLDBERGER: Go ahead and answer.

1           **THE WITNESS:** I intend to respond to all  
2 relevant questions regarding this lawsuit.  
3 However, at the present time my attorneys have  
4 counseled me that I cannot provide answers to  
5 any questions relevant to this lawsuit, and I  
6 must accept the advice or risk losing my Sixth  
7 Amendment right to effective representation.

8           Accordingly, I assert my Federal  
9 Constitutional right as guaranteed by the  
10 Fifth, Sixth, and Fourteenth Amendments to the  
11 United States Constitution.

12           **Q. (By Mr. Edwards)** Who is the first minor  
13 girl that you brought to your house for sex?

14           **MR. BURMAN:** Object to the form.

15           **THE WITNESS:** I intend to respond to all  
16 relevant questions regarding this lawsuit.  
17 However, at the present time my attorneys have  
18 counseled me that I cannot provide answers to  
19 any questions relevant to this lawsuit, and I  
20 must accept the advice or risk losing my Sixth  
21 Amendment to effective representation.

22           Accordingly, I assert my Federal  
23 Constitutional rights as guaranteed by the  
24 Fifth, Sixth, and Fourteenth Amendment to the  
25 United States Constitution.

1 Q. (By Mr. Edwards) Have you had sex with  
2 over 100 minor girls in the last ten years?

3 MR. BURMAN: Object to the form.

4 THE WITNESS: I intend to respond to all  
5 relevant questions regarding this lawsuit.  
6 However, at the present time my attorneys have  
7 counseled me that I cannot provide answers to  
8 any questions relevant to this lawsuit, and I  
9 must accept this advice or risk losing my Sixth  
10 Amendment right to effective representation.

11 Accordingly, I assert my Federal  
12 Constitutional rights as guaranteed by the  
13 Fifth, Sixth, and Fourteenth Amendment to the  
14 United States Constitution.

15 Q. (By Mr. Edwards) When did you devise your  
16 plan to gain access to minor girls for sex?

17 MR. BURMAN: Object to the form.

18 THE WITNESS: I intend to respond to all  
19 relevant questions regarding this lawsuit.  
20 However, at the present time my attorneys have  
21 counseled me that I cannot provide answers to  
22 any questions relevant to this lawsuit, and I  
23 must accept this advice or risk losing my Sixth  
24 Amendment right to effective representation.

25 Accordingly, I assert my Federal

1 Constitutional rights as guaranteed by the  
2 Fifth, Sixth, and Fourteenth Amendment to the  
3 United States Constitution.

4 Q. (By Mr. Edwards) With whom did you meet  
5 to discuss your plan to gain access to minor girls  
6 for sex?

7 MR. BURMAN: Object to the form.

8 THE WITNESS: I intend to respond to all  
9 relevant questions regarding this lawsuit.  
10 However, at the present time my attorneys have  
11 counseled me that I cannot provide answers to  
12 any questions relevant to this lawsuit, and I  
13 must accept this advice or risk losing my Sixth  
14 Amendment right to effective representation.

15 Accordingly, I assert my Federal  
16 Constitutional right as guaranteed by the  
17 Fifth, Sixth, and Fourteenth Amendment to the  
18 United States Constitution.

19 Q. (By Mr. Edwards) Do you agree that you  
20 have a criminal enterprise that is comprised of, at  
21 the very least, yourself, Sarah Kellen, and Nadia  
22 Marcinkova who have the common goal of bringing  
23 minors to you for the purposes of sex?

24 MR. BURMAN: Object to the form.

25 THE WITNESS: I intend to respond to all

1 relevant questions regarding this lawsuit.  
2 However, at the present time my attorneys have  
3 counseled me that I cannot provide answers to  
4 any questions relevant to this lawsuit, and I  
5 must accept this advice or risk losing my Sixth  
6 Amendment right to effective representation.

7 Accordingly, I assert my Federal  
8 Constitutional rights as guaranteed by the  
9 Fifth, Sixth, and Fourteenth Amendment to the  
10 United States Constitution.

11 Q. (By Mr. Edwards) Was the target age range  
12 for your criminal enterprise always minors between  
13 the ages of 12 and 16?

14 MR. BURMAN: Object to the form.

15 THE WITNESS: I intend to respond to all  
16 relevant questions regarding this lawsuit.  
17 However, at the present time my attorneys have  
18 counseled me that I cannot provide answers to  
19 any questions relevant to this lawsuit, and I  
20 must accept this advice or risk losing my Sixth  
21 Amendment right to effective representation.

22 Accordingly, I assert my Federal  
23 Constitutional rights as guaranteed by the  
24 Fifth, Sixth, and Fourteenth Amendments to the  
25 United States Constitution.

1           **Q.** (By Mr. Edwards) What are the names of  
2 all of the members of your criminal enterprise that  
3 has the common goal of procuring minors for the  
4 purposes of sex?

5           **MR. BURMAN:** Object to the form.

6           **THE WITNESS:** I intend to respond to all  
7 relevant questions regarding this lawsuit.  
8 However, at the present time my attorneys have  
9 counseled me that I cannot provide answers to  
10 any questions relevant to this lawsuit, and I  
11 must accept this advice or risk losing my Sixth  
12 Amendment to effective representation.

13           Accordingly, I assert my Federal  
14 Constitutional rights as guaranteed by the  
15 Fifth, Sixth, and Fourteenth Amendment to the  
16 United States Constitution.

17           **Q.** (By Mr. Edwards) In addition to paying  
18 each of these minor girls approximately \$200 for  
19 sex, did you also provide transportation for them to  
20 and from your house?

21           **MR. BURMAN:** Are we generic, or are we  
22 going with the 49?

23           **MR. EDWARDS:** Generic.

24           **MR. BURMAN:** Generic? Okay. Object to  
25 the form.



1           **THE WITNESS:** You have to repeat the  
2 question, I'm sorry.

3           **Q. (By Mr. Edwards)** In addition to paying  
4 minor girls approximately \$200 to engage in sex or  
5 sex acts with them, did you also provide  
6 transportation for these minor girls to and from  
7 your house?

8           **MR. BURMAN:** Same objection.

9           **THE WITNESS:** I intend to respond to all  
10 relevant questions regarding this lawsuit.  
11 However, at the present time my attorneys have  
12 counseled me that I cannot provide any answers  
13 relevant to this lawsuit, and I must accept the  
14 advice or risk losing my Sixth Amendment right  
15 to effective representation.

16           Accordingly, I assert my Federal  
17 Constitutional rights as guaranteed by the  
18 Fifth, Sixth, and Fourteenth Amendment to the  
19 United States Constitution.

20           **Q. (By Mr. Edwards)** Did you, one of your  
21 employees, or someone within your enterprise have an  
22 account with Yellow Cab for the purposes of  
23 transporting minors to and from your house?

24           **MR. BURMAN:** Object to form.

25           **MR. GOLDBERGER:** Do you understand the

1 question when he says "enterprise"? Do you  
2 have any idea what he means?

3 **THE WITNESS:** No.

4 **MR. GOLDBERGER:** Can you define  
5 enterprise, so we can determine whether we need  
6 to answer the question.

7 **MR. EDWARDS:** I'm talking about persons  
8 involved with a common goal. We have defined  
9 this earlier.

10 **MR. GOLDBERGER:** I'm sorry, I was out of  
11 the room did you define it?

12 **MR. EDWARDS:** You were out of the room.

13 **MR. GOLDBERGER:** Okay.

14 **MR. EDWARDS:** And persons, we defined it  
15 as, at the very least, Mr. Epstein, Sarah  
16 Kellen and Nadia Marcinkova having the common  
17 goal of bringing minors to and from the Palm  
18 Beach house for the purposes of sex.

19 **THE WITNESS:** I intend to respond to all  
20 relevant questions regarding this lawsuit.  
21 However, at the present time my attorneys have  
22 counseled me that I cannot provide answers to  
23 any questions relevant to this lawsuit, and I  
24 must accept this advice or risk losing my Sixth  
25 Amendment right to effective representation.

1           Accordingly, I assert my Federal  
2           Constitutional right as guaranteed by the  
3           Fifth, Sixth and Fourteenth Amendment to the  
4           United States Constitution.

5           Sorry, can we take a break again?  
6           Bathroom break.

7           **MR. EDWARDS:** Let's just break for lunch  
8           then.

9           **MR. GOLDBERGER:** I can't, because I've  
10          got -- there's a reason why, I've got a  
11          commitment at 1:15, so --

12          **THE VIDEOGRAPHER:** Off the record at  
13          12:40.

14                       (Thereupon, a discussion was had off  
15                       the record.)

16                       (Thereupon, a brief break was taken.)

17          **THE VIDEOGRAPHER:** Back on the record at  
18          12:54.

19          **Q. (By Mr. Edwards)** Between 2001 and 2005  
20          did you or any of your employees or assistants have  
21          an account with Yellow Cab?

22          **A.** I intend to respond to all relevant  
23          questions regarding this lawsuit. However, at the  
24          present time my attorneys have counseled me that I  
25          cannot provide answers to any questions relevant to

1 this lawsuit, and I must accept their advice or risk  
2 losing my Sixth Amendment right to effective  
3 representation.

4 Accordingly, I assert my Federal  
5 Constitutional right as guaranteed by the Fifth,  
6 Sixth, and Fourteenth Amendment to the United States  
7 Constitution.

8 Q. Are you currently actually a billionaire?

9 MR. BURMAN: Objection. That goes to  
10 punitive damages, and I object.

11 THE WITNESS: I intend to respond to all  
12 relevant questions regarding this lawsuit.  
13 However, at the present time my attorneys have  
14 counseled me that I cannot provide answers to  
15 any questions relevant to this lawsuit, and I  
16 must accept this advice or risk losing my Sixth  
17 Amendment right to effective representation.

18 Accordingly, I assert my Federal  
19 Constitutional right as guaranteed by the  
20 Fifth, Sixth, and Fourteenth Amendment to the  
21 United States Constitution.

22 MR. BURMAN: And I should add for the  
23 record that I would instruct him not to answer  
24 that question, even if he wasn't invoking the  
25 Fifth.

1 Q. (By Mr. Edwards) Between 2001 and 2005  
2 were you a billionaire?

3 MR. BURMAN: Objection, instruct you not  
4 to answer that question based on the fact that  
5 that's directed toward punitive damages, and  
6 that has not been allowed to file, be filed, or  
7 proceeded with in the state court action.

8 You should read that, as well.

9 THE WITNESS: I intend to respond to all  
10 relevant questions regarding this lawsuit.  
11 However, at the present time my attorneys have  
12 counseled me that I cannot provide answers to  
13 any questions relevant to this lawsuit, and I  
14 must accept their advice or risk losing my  
15 Sixth Amendment right to effective  
16 representation.

17 Accordingly, I assert my Federal  
18 Constitutional rights as guaranteed by the  
19 Fifth, Sixth and Fourteenth Amendment to the  
20 United States Constitution.

21 Q. (By Mr. Edwards) Between 2001 and 2005  
22 what types of cars did you have that you owned,  
23 parked in your driveway at your Palm Beach mansion?

24 MR. BURMAN: Object, once again on the  
25 grounds that punitive damages have not been

1 approved yet in this case. I instruct him not  
2 to answer that question.

3 **THE WITNESS:** I intend to respond to all  
4 relevant questions regarding this lawsuit.  
5 However, at the present time my attorneys have  
6 counseled me that I cannot provide answers to  
7 any questions relevant to this lawsuit, and I  
8 must accept this advice or risk losing my Sixth  
9 Amendment right to effective representation.

10 Accordingly, I assert my Federal  
11 Constitutional rights as guaranteed by the  
12 Fifth, Sixth, and Fourteenth Amendment to the  
13 United States Constitution.

14 Q. (By Mr. Edwards) Is your house in Palm  
15 Beach located on the water?

16 **THE WITNESS:** I intend to respond to all  
17 relevant questions regarding this lawsuit.  
18 However, at the present time my attorneys have  
19 counseled me that I cannot provide answers to  
20 any questions relevant to this lawsuit, and I  
21 must accept this advice or risk losing my Sixth  
22 Amendment right to effective representation.

23 Accordingly, I assert my Federal  
24 Constitutional rights under the Fifth, Sixth,  
25 and Fourteenth Amendment to the constitution.

1           **Q.** (By Mr. Edwards) What is the square  
2 footage of your house in Palm Beach?

3           **MR. BURMAN:** Object, on the grounds that  
4 that question, in part, delves into his  
5 financial situation, which has not been  
6 approved to be explored in this case yet,  
7 because punitive damages have not been approved  
8 or allowed to be proceeded with here, and I  
9 instruct him not to answer the question.

10           **THE WITNESS:** I intend to respond to all  
11 relevant questions regarding this lawsuit.  
12 However, at the present time my attorneys have  
13 counseled me that I cannot provide answers to  
14 any questions relevant to this lawsuit, and  
15 must accept his advice or risk losing my Sixth  
16 Amendment right to effective representation.

17           Accordingly, I assert my Federal  
18 Constitutional rights as guaranteed by the  
19 Fifth, Sixth and Fourteenth Amendment to the  
20 United States Constitution.

21           **Q.** (By Mr. Edwards) Did you tell the minor  
22 girls that were at your house that you were  
23 extremely wealthy between 2001 and 2005?

24           **MR. GOLDBERGER:** Object to the form.

25           **THE WITNESS:** I intend to respond to all

1 relevant questions regarding this lawsuit.  
2 However, at the present time my attorneys have  
3 counseled me that I cannot provide answers to  
4 any questions relevant to this lawsuit, and I  
5 must accept this advice or risk losing my Sixth  
6 Amendment right to effective representation.

7 Accordingly, I assert my Federal  
8 Constitutional rights as guaranteed by the  
9 Fifth, Sixth and Fourteenth Amendment to the  
10 United States Constitution.

11 Q. (By Mr. Edwards) Did you talk to the  
12 minor girls that were at your house between 2001 and  
13 2005 about all of the houses and cars that you  
14 owned?

15 MR. BURMAN: Object to the form.

16 THE WITNESS: I intend to respond to all  
17 relevant questions regarding this lawsuit.  
18 However, at the present time my attorneys have  
19 counseled me that I cannot provide answers to  
20 any questions relevant to this lawsuit, and I  
21 must accept this advice or risk losing my Sixth  
22 Amendment right to effective representation.

23 Accordingly, I assert my Federal  
24 Constitutional rights as guaranteed by the  
25 Fifth, Sixth, and Fourteenth Amendment to the



1 United States Constitution.

2 Q. (By Mr. Edwards) Did you use your wealth  
3 and the minors lack thereof to influence that minor  
4 to have sex with you?

5 MR. BURMAN: Object to the form.

6 THE WITNESS: I intend to respond to all  
7 relevant questions regarding this lawsuit.  
8 However, at the present time my attorneys have  
9 counseled me that I cannot provide answers to  
10 any questions relevant to this lawsuit, and  
11 must accept advice or risk losing my Sixth  
12 Amendment right to effective representation.

13 Accordingly, I assert my Federal  
14 Constitutional rights as guaranteed by the  
15 Fifth, Sixth, and Fourteenth Amendment to the  
16 United States Constitution.

17 Q. (By Mr. Edwards) After you ejaculated in  
18 front of minor girls, did you tell each one of them  
19 that every time she came to your house for sex, you  
20 would pay her \$200 cash?

21 MR. BURMAN: Object to the form.

22 THE WITNESS: I intend to respond to all  
23 relevant questions regarding this lawsuit.  
24 However, at the present time my attorneys have  
25 counseled me that I cannot provide answers to

1 any questions relevant to this lawsuit, and I  
2 must accept the advice or risk losing my Sixth  
3 Amendment right to effective representation.

4 Accordingly, I assert my Federal  
5 Constitutional rights as guaranteed by the  
6 Fifth, Sixth, and Fourteenth Amendment to the  
7 United States Constitution.

8 Q. (By Mr. Edwards) Was it your plan to  
9 groom each minor girl to be your personal sex slave?

10 MR. BURMAN: Object to the form.

11 THE WITNESS: I intend to respond to all  
12 relevant questions regarding this lawsuit.  
13 However, at the present time my attorneys have  
14 counseled me that I cannot provide answers to  
15 any questions relevant to this lawsuit, and I  
16 must accept this right or risk losing my Sixth  
17 Amendment right to effective representation?

18 Accordingly, I assert my Federal  
19 Constitutional rights as guaranteed by the  
20 Fifth, Sixth, and Fourteenth Amendment to the  
21 United States Constitution.

22 Q. (By Mr. Edwards) Did you impress upon  
23 each minor girl that what she was doing with you  
24 sexually was morally right?

25 MR. BURMAN: Object to the form.

1           **THE WITNESS:** I intend to respond to all  
2 relevant questions regarding this lawsuit.  
3 However, at the present time my attorneys have  
4 counseled me that I cannot provide answers to  
5 any questions relevant to this lawsuit, and I  
6 must accept the advice or risk losing my Sixth  
7 Amendment right to effective representation.

8           Accordingly, I assert my Federal  
9 Constitutional rights as guaranteed by the  
10 Fifth, Sixth, and Fourteenth Amendments to the  
11 United States Constitution.

12           **Q. (By Mr. Edwards)** Was it part of your plan  
13 to display your wealth and power in an effort to  
14 gain sexual access to minor girls?

15           **MR. BURMAN:** Object to the form.

16           **THE WITNESS:** I intend to respond to all  
17 relevant questions regarding this lawsuit.  
18 However, at the present time my attorneys have  
19 counseled me that I cannot provide answers to  
20 any questions relevant to this lawsuit, and I  
21 must accept the advice or risk losing my Sixth  
22 Amendment right to effective representation.

23           Accordingly, I assert my Federal  
24 Constitutional rights as guaranteed by the  
25 Fifth, Sixth, and Fourteenth Amendment to the

1 United States Constitution.

2 Q. (By Mr. Edwards) Did you intentionally  
3 target very poor minor girls because you knew that  
4 demographic would be the most impressed by your  
5 wealth and likely listen to you?

6 MR. BURMAN: Object to the form.

7 THE WITNESS: I intend to respond to all  
8 relevant questions regarding this lawsuit.  
9 However, at the present time my attorneys have  
10 counseled me that I cannot provide answers to  
11 any questions relevant to this lawsuit, and  
12 must accept this advice or risk losing my Sixth  
13 Amendment right to effective representation.

14 Accordingly, I assert my Federal  
15 Constitutional right as guaranteed by the  
16 Fifth, Sixth, and Fourteenth Amendment to the  
17 United States Constitution.

18 Q. (By Mr. Edwards) None of the minor girls  
19 that you engaged in sex or sex acts with had ever  
20 engaged in prostitution prior to meeting you, isn't  
21 that correct?

22 MR. BURMAN: Object to the form.

23 THE WITNESS: I intend to respond to all  
24 relevant questions regarding this lawsuit.  
25 However, at the present time my attorneys have

1 counseled me that I cannot provide answers to  
2 any questions relevant to this lawsuit, and I  
3 must accept the advice or risk losing my Sixth  
4 Amendment right to effective representation.

5 Accordingly, I assert my Federal  
6 Constitutional rights as guaranteed by the  
7 Fifth, Sixth and Fourteenth Amendment to the  
8 United States Constitution.

9 Q. (By Mr. Edwards) Isn't it true that you  
10 corrupted and injured minor girls for your own  
11 sexual gratification?

12 MR. BURMAN: Object to the form.

13 THE WITNESS: I intend to respond to all  
14 relevant questions regarding this lawsuit.  
15 However, at the present time my attorneys have  
16 counseled me that I cannot provide answers to  
17 any questions relevant to this lawsuit, and I  
18 must accept this advice or risk losing my Sixth  
19 Amendment right to effective representation.

20 Accordingly, I assert my Federal  
21 Constitutional rights as guaranteed by the  
22 Fifth, Sixth, and Fourteenth Amendment to the  
23 United States Constitution.

24 Q. (By Mr. Edwards) Isn't it true that you  
25 typically engaged in sex or sex acts with minor

1 girls three or four times each day at your Palm  
2 Beach mansion?

3 **MR. BURMAN:** Object to the form.

4 **THE WITNESS:** I intend to respond to all  
5 relevant questions regarding this lawsuit.  
6 However, at the present time my attorneys have  
7 counseled me that I cannot provide answers to  
8 any questions relevant to this lawsuit, and I  
9 must accept this advice or risk losing my Sixth  
10 Amendment right to effective representation.

11 Accordingly, I assert my Federal  
12 Constitutional rights as guaranteed by the  
13 Fifth, Sixth, and Fourteenth Amendment to the  
14 United States Constitution.

15 **Q. (By Mr. Edwards)** Isn't it true that you  
16 in, that you coerced minor girls into prostitution?

17 **MR. BURMAN:** Object to the form.

18 **THE WITNESS:** I intend to respond to all  
19 relevant questions regarding this lawsuit.  
20 However, at the present time my attorneys have  
21 counseled me that I cannot provide answers to  
22 any questions relevant to this lawsuit, and I  
23 must accept this advice or risk losing my Sixth  
24 Amendment right to effective representation.

25 Accordingly, I assert my Federal

1 Constitutional rights as guaranteed by the  
2 Fifth, Sixth, and Fourteenth Amendment in the  
3 United States Constitution.

4 Q. (By Mr. Edwards) Isn't it true that you  
5 and your employees, including Sarah Kellen, called  
6 these minor girls to encourage them to bring more  
7 minor girls to you for sex. By called I mean on the  
8 telephone?

9 MR. BURMAN: Object to the form.

10 THE WITNESS: Can you repeat the question?

11 Q. (By Mr. Edwards) Isn't it true that you  
12 and your assistants or employees, including Sarah  
13 Kellen, called minor girls on the telephone to  
14 encourage them or command that they bring you other  
15 minor girls for sex?

16 MR. BURMAN: Object to the form.

17 THE WITNESS: I intend to respond to all  
18 relevant questions regarding this lawsuit.  
19 However, at the present time my attorneys have  
20 counseled me that I cannot provide answers to  
21 any questions relevant to this lawsuit, and I  
22 must accept this advice or risk losing my Sixth  
23 Amendment right to effective representation.

24 Accordingly, I assert my Federal  
25 Constitutional rights as guaranteed by the

1 Fifth, Sixth, and Fourteenth Amendment to the  
2 United States Constitution.

3 Q. (By Mr. Edwards) What are all the  
4 telephone numbers assigned to you or your Palm Beach  
5 mansion between 2001 and 2005?

6 A. Again?

7 Q. What were all of the telephone numbers  
8 assigned to you or your Palm Beach mansion between  
9 2001 and 2005?

10 A. I intend to respond to all relevant  
11 questions regarding this lawsuit. However, at the  
12 present time my attorneys have counseled me that I  
13 cannot provide answers to any questions relevant to  
14 this lawsuit, and I must accept this advice or risk  
15 losing my Sixth Amendment right to effective  
16 representation.

17 Accordingly, I assert Federal  
18 Constitutional rights as guaranteed by the Fifth,  
19 Sixth, and Fourteenth Amendment to the United States  
20 Constitution.

21 Q. Who scheduled your massage appointments  
22 between 2001 and 2005?

23 A. I intend to respond to all relevant  
24 questions regarding this lawsuit. However, at the  
25 present time my attorneys have counseled me that I



1 cannot provide answers to any questions relevant to  
2 this lawsuit, and I must accept this advice or risk  
3 losing my Sixth Amendment right to effective  
4 representation.

5 **THE WITNESS:** Excuse me?

6 Accordingly I assert my Federal  
7 Constitutional rights as guaranteed by the  
8 Fifth, Sixth, and Fourteenth Amendment to the  
9 United States Constitution.

10 **Q. (By Mr. Edwards)** Is it true that you were  
11 ejaculating in front of three or four minor girls  
12 per day between 2002 and 2005 at your Palm Beach  
13 mansion?

14 **MR. BURMAN:** Object to the form.

15 **THE WITNESS:** I intend to respond to all  
16 relevant questions regarding this lawsuit.  
17 However, at the present time my attorneys have  
18 counseled me that I cannot provide answers to  
19 any questions relevant to this lawsuit, and I  
20 must accept the advice or risk losing my Sixth  
21 Amendment right to effective representation.

22 Accordingly, I assert my Federal  
23 Constitutional rights as guaranteed by the  
24 Fifth, Sixth, and Fourteenth Amendment to the  
25 United States Constitution.

1           **Q. (By Mr. Edwards)** Have you ever treated  
2 with any doctors or physicians and discussed sexual  
3 issues with them?

4           **THE WITNESS:** I intend to respond to all  
5 relevant questions regarding this lawsuit.  
6 However, at the present time my attorneys have  
7 counseled me that I cannot provide answers to  
8 any questions relevant to this lawsuit, and I  
9 must accept this advice or risk losing my Sixth  
10 Amendment right to effective representation.

11           Accordingly, I assert my Federal  
12 Constitutional rights as guaranteed by the  
13 Fifth, Sixth, and Fourteenth Amendment to the  
14 United States Constitution.

15           **Q. (By Mr. Edwards)** Did you and your  
16 assistants or employees use the word work, W-O-R-K,  
17 to describe you engaging in sex acts with minors at  
18 your house?

19           **A.** I intend to respond to all relevant  
20 questions regarding this lawsuit. However, at the  
21 present time my attorneys have counseled me that I  
22 cannot provide answers to any questions relevant to  
23 this lawsuit, and I must accept their advice or risk  
24 losing my Sixth Amendment right to effective  
25 representation.

1           Accordingly, I assert my Federal  
2 Constitutional rights as guaranteed by the Fifth,  
3 Sixth, and Fourteenth Amendment to the United States  
4 Constitution.

5           Q. Did you rely on Sarah Kellen and your  
6 other assistants to properly schedule these minor  
7 girls in a way so that they would not come in  
8 contact with one another?

9           MR. BURMAN: Object to form.

10          THE WITNESS: I intend to respond to all  
11 relevant questions regarding this lawsuit.  
12 However, at the present time my attorneys have  
13 counseled me that I cannot provide answers to  
14 any questions relevant to this lawsuit, and I  
15 must accept their advice or risk losing my  
16 Sixth Amendment Right to effective  
17 representation.

18          So, accordingly, I assert my  
19 Constitutional rights as guaranteed by the  
20 Fifth, Sixth and Fourteenth Amendments to the  
21 United States Constitution.

22          MR. EDWARDS: Ready to break?

23          MR. GOLDBERGER: He wants to eat.

24          THE VIDEOGRAPHER: We're off the record at

25          1:12.

1 (Thereupon, a lunch break was taken  
2 from 1:12 to 2:32 p.m.)

3 **THE VIDEOGRAPHER:** We're back on record at  
4 2:32.

5 **MR. EDWARDS:** Ready?

6 **MR. GOLDBERGER:** Sure.

7 **Q. (By Mr. Edwards)** Mr. Epstein, did you  
8 ever care about any of the feelings of the minor  
9 girls that you were engaging in sex with?

10 **MR. BURMAN:** Object to the form.

11 **THE WITNESS:** I intend to respond to all  
12 relevant questions regarding this lawsuit.  
13 However, at the present time my attorneys have  
14 counseled me that I cannot provide answers to  
15 any questions relevant to this lawsuit at this  
16 time, so I must accept their advice or I lose  
17 potential -- I risk losing my Sixth Amendment  
18 right to effective representation.

19 And accordingly, I have to assert my  
20 Federal Constitutional rights as guaranteed by  
21 the Fifth, Sixth and Fourteenth Amendment to  
22 the United States Constitution.

23 **Q. (By Mr. Edwards)** Did it ever occur to you  
24 that any of these girls were somebody's daughter --

25 **MR. BURMAN:** Object to the form.

1 Q. (By Mr. Edwards) -- when you were  
2 engaging in sex with them?

3 MR. BURMAN: Object to the form of the  
4 question.

5 THE VIDEOGRAPHER: I intend to respond to  
6 all relevant questions regarding this lawsuit.  
7 However, at the present time my attorneys have  
8 counseled me that I cannot provide answers to  
9 these questions, as I have to accept their  
10 advice or risk losing my Sixth Amendment right  
11 to effective representation, Brad.

12 THE WITNESS: Is it okay if I call you  
13 Brad?

14 MR. EDWARDS: You can continue.

15 THE WITNESS: And, accordingly, I assert  
16 my Federal Constitutional rights as guaranteed  
17 by the Fifth, Sixth and Fourteenth Amendment to  
18 the United States Constitution.

19 Q. (By Mr. Edwards) When you were digitally  
20 penetrating these minor girls, did you care about  
21 the fact that you were emotionally or  
22 psychologically hurting them?

23 MR. BURMAN: Object to the form of the  
24 question.

25 THE WITNESS: I intend to respond to all

1 relevant questions regarding this lawsuit.  
2 However, at the present time my attorneys have  
3 counseled me that I cannot provide answers to  
4 any questions relevant to this lawsuit, and I  
5 must accept this advice or risk losing my Sixth  
6 Amendment right to effective representation.

7 Accordingly, I assert my Federal  
8 Constitutional rights as guaranteed by the  
9 Fifth, Sixth, and Fourteenth Amendments to the  
10 United States Constitution.

11 Q. (By Mr. Edwards) We have heard over and  
12 over again that you intend to respond to this. When  
13 do you intend to respond to these questions?

14 MR. BURMAN: Object to the form.

15 THE WITNESS: I intend to respond to all  
16 relevant questions regarding this lawsuit.  
17 However, at the present time on advice of  
18 counsel I cannot provide answers to those  
19 questions at this time. I must accept advice  
20 of my counsel or risk losing my Sixth Amendment  
21 right to effective representation.

22 Accordingly, I'll have to assert my  
23 Federal Constitutional rights as guaranteed by  
24 the Fifth, Sixth, and Fourteenth Amendment to  
25 the United States Constitution.

1           **Q.** (By Mr. Edwards) Isn't it true that at  
2 the time that you were sexually battering these  
3 minor girls, you didn't care what happened to them  
4 and only cared about your only personal sexual  
5 gratification?

6           **MR. BURMAN:** Object to the form. We need  
7 to talk outside.

8           **THE WITNESS:** Me, too?

9           **THE VIDEOGRAPHER:** We're off the record at  
10 2:35.

11                           (Thereupon, a brief break was taken.)

12           **THE VIDEOGRAPHER:** We're back on the  
13 record at 2:36.

14           **MR. BURMAN:** For the purposes of the  
15 record, I will tell you that this line of  
16 questioning, in my view, is way beyond the  
17 bounds of permissible discovery-type questions,  
18 and nothing but pure argument, and if you  
19 continue in this vein, I will stop the  
20 deposition and we will seek instruction from  
21 Judge Hafele about what's permissible and  
22 what's not.

23           **Q.** (By Mr. Edwards) Isn't it true that at  
24 the time you were inserting your fingers into the  
25 vagina of these little kids, all you cared about was

1 your own sexual gratification?

2 MR. BURMAN: The deposition is over.

3 THE VIDEOGRAPHER: Conclude at 2:37, end  
4 of tape 2 of 2.

5 MR. BERGER: We're going to order instant  
6 copy, and we want the tape, also,  
7 Mr. Videographer.

8 MR. BURMAN: We want this as soon as they  
9 get theirs, we want ours.

10 (Thereupon, the deposition was  
11 adjourned at 2:38 p.m.)

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LINDA P. AUKAMP, RPR

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CERTIFICATE OF OATH

STATE OF FLORIDA )  
 : SS  
COUNTY OF PALM BEACH )

I, the undersigned authority, certify that  
JEFFREY EPSTEIN personally appeared before me and  
was duly sworn.

WITNESS my hand and official seal this 1st  
day of May, 2009.

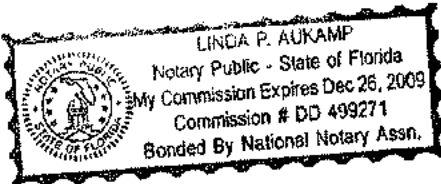
*Linda P. Aukamp*

LINDA P. AUKAMP, RPR

Commission No.: DD 499271

Notary Public - State of Florida

My Commission Expires: 12-26-09





1 TO: JEFFREY EPSTEIN  
2 c/o JOHN MICHAEL BURMAN, ESQUIRE  
3 515 North Flagler Drive, Suite 400  
4 West Palm Beach, Florida 33401

5 RE: E.W. vs. JEFFREY EPSTEIN and SARAH  
6 KELLEN

7 At the conclusion of your deposition given  
8 in the above-styled cause you indicated you wished  
9 to read and sign the transcript.

10 This letter is to advise you that your  
11 deposition is ready, and we ask that you call our  
12 office at (561) 471-2995 at your earliest  
13 convenience for an appointment to come in.

14 If you are a party in this action and your  
15 attorney has ordered a copy of this transcript, you  
16 may wish to read his copy and forward to us a  
17 photostatic copy of your signed correction sheet.

18 It is necessary that you do this as soon  
19 as possible, since the transcript cannot be held  
20 beyond two weeks from the date of this letter.

21 If you have any reason which you would  
22 like for me to place on your deposition as to your  
23 failure to sign the same, please advise.

24 Thank you for your prompt attention.

25 Very truly yours,  
PALM BEACH REPORTING SERVICE, INC.  
1665 Palm Beach Lakes Blvd.,  
Suite 1001  
West Palm Beach, Florida 33401

BY: LINDA P. AUKAMP, RPR

Date: May 1st, 2009

# ATTACHMENT 11

IN THE CIRCUIT COURT OF THE 15th JUDICIAL CIRCUIT  
IN AND FOR PALM BEACH COUNTY, FLORIDA

CASE No. 502008CA037319XXXXMB AB

B.B.,  
Plaintiff,

-vs-

JEFFREY EPSTEIN,  
Defendant.

CONTINUED DEPOSITION OF JEFFREY EPSTEIN  
VOLUME II

Thursday, October 8, 2009

10:07 - 1:03 p.m.

250 South Australian Avenue  
Suite 1400  
West Palm Beach, Florida 33401

Reported By:  
Jeana Ricciuti, RPR, FPR, CLR  
Notary Public, State of Florida  
Prose Court Reporting Agency, Inc.

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JEFFREY EPSTEIN  
BY MR. KUVIN 21

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APPEARANCES:

On behalf of the Plaintiff:  
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ADAM LANGINO, ESQUIRE  
LEOPOLD KUVIN, P.A.  
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Palm Beach Gardens, Florida 33410  
Phone: 561.935.4801

On behalf of L.M. and E.W. and Jane Doe in Case No. 80893:

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ROTHSTEIN, ROSENFELDT & ADLER  
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Suite 1650  
Fort Lauderdale, Florida 33301  
Phone: 954.522.3456

On behalf of Plaintiff Jane Doe in Case No. 80591 and 80656 via telephone:

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Phone: 305.358.2800

On behalf of the Defendant:

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STORY KOWLES, PARALEGAL  
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MICHAEL J. PIKE, ESQUIRE  
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303 Banyan Boulevard  
Suite 400  
West Palm Beach, Florida 33401  
Phone: 561.842.2820

ALSO PRESENT:  
DAN DOSKEY, VIDEOGRAPHER  
VISUAL EVIDENCE, INC.

PROCEEDINGS

Deposition taken before Jeana Ricciuti, Registered Professional Reporter and Notary Public in and for the State of Florida at Large, in the above cause.

THE VIDEOGRAPHER: We're on the video record. This is the 8th day of October, 2009, and the time it approximately 10:07 a.m.

This is the continuation of the videotaped deposition of Jeffrey Epstein in the matter of B.B. versus Epstein. This deposition is being held at 250 South Australian Avenue, No. 1400 in West Palm Beach, Florida.

My name is Dan Doskey. I'm the videographer representing Visual Evidence, Incorporated.

Would the attorneys present please announce their appearances for the record?

MR. KUVIN: Spencer Kuvin and Adam Langino on behalf of the Plaintiff, B.B.

MS. HOLMES: Cara Holmes for L.M.

MR. PIKE: Michael Pike on behalf of Jeffrey Epstein.

MR. GOLDBERGER: And Jack Goldberger on behalf of Jeffrey Epstein.

1 (Pages 16 to 19)

(561) 832-7500 PROSE COURT REPORTING AGENCY, INC. (561) 832-7506



1 Kathy, do you want to identify yourself?  
 2 Kathy, are you there?  
 3 MS. EZELL: Yes.  
 4 MR. PIKE: She puts it on mute every once in a  
 5 while.  
 6 MR. GOLDBERGER: Hey, Kathy, are you there?  
 7 MS. EZELL: Yes.  
 8 MR. GOLDBERGER: Just -- we're just  
 9 identifying everyone who's on this thing. Can you  
 10 just identify yourself?  
 11 MS. EZELL: Yes. It's Kathy Ezell. I'm  
 12 sorry, Kathy Ezell is here.  
 13  
 14 Thereupon,  
 15 (JEFFREY EPSTEIN)  
 16 having been first duly sworn or affirmed, was examined  
 17 and testified as follows:  
 18 THE WITNESS: Yes, ma'am.  
 19 MR. PIKE: Pull that back, please.  
 20 MR. KUVIN: Back?  
 21 MR. PIKE: Yeah, not on the video. I want to  
 22 make sure it's not on the video.  
 23 MR. KUVIN: We're good? Thank you.  
 24 THE VIDEOGRAPHER: It's not.  
 25 DIRECT EXAMINATION

1 A. Correct.  
 2 Q. Mr. Epstein, on January 30th of 2008, isn't it  
 3 true that you pled guilty to procuring a person under  
 4 the age of 18 for prostitution?  
 5 A. No.  
 6 Q. You did not plead guilty?  
 7 A. You asked me -- do you want to repeat it?  
 8 Q. Did you plead guilty to procuring a person  
 9 under the age of 18 for prostitution?  
 10 A. On what date?  
 11 Q. Regardless of the date, did you plead guilty  
 12 to procuring a person under the age of 18 for  
 13 prostitution?  
 14 MR. GOLDBERGER: Do you need to take a break?  
 15 MR. KUVIN: I'm sorry, what are we doing?  
 16 MR. GOLDBERGER: I'm taking a break to talk to  
 17 my client.  
 18 MR. KUVIN: For what reason?  
 19 MR. GOLDBERGER: Whether we have to invoke a  
 20 privilege or not.  
 21 MR. KUVIN: Okay.  
 22 THE VIDEOGRAPHER: Going off the record at  
 23 10:10.  
 24 (A brief recess was taken.)  
 25 THE VIDEOGRAPHER: We're back on the record at

1 BY MR. KUVIN:  
 2 Q. Could you give us your name, sir, please.  
 3 A. Jeffrey Epstein.  
 4 MR. GOLDBERGER: Kathy, you've got to put it  
 5 on mute. Kath -- Kathy?  
 6 MS. EZELL: Give me one second.  
 7 MR. GOLDBERGER: Just put it on mute, please.  
 8 MR. KUVIN: You can probably turn the volume  
 9 down; it won't effect her mic, I would imagine.  
 10 MR. GOLDBERGER: Good idea. Okay.  
 11 BY MR. KUVIN:  
 12 Q. Mr. Epstein, is your date of birth,  
 13 January 20, 1953?  
 14 A. Yes.  
 15 Q. Race is White?  
 16 A. Yes.  
 17 Q. You are male?  
 18 A. Yes.  
 19 Q. Hair is gray?  
 20 A. Yes.  
 21 Q. Eyes are blue?  
 22 A. Yes.  
 23 Q. Height is 6-foot tall?  
 24 A. Correct.  
 25 Q. Weight is 180 pounds?

1 10:12.  
 2 BY MR. KUVIN:  
 3 Q. Okay. Mr. Epstein, did you plead guilty to  
 4 procuring a person under the age of 18 for prostitution?  
 5 A. I pled guilty procuring a minor, I believe,  
 6 for prostitution.  
 7 Q. When did you plead guilty to that charge?  
 8 A. On June the 30th.  
 9 Q. And did you procure a minor for prostitution  
 10 in compliance with that charge?  
 11 A. I fully intend to respond to all relevant  
 12 questions regarding this lawsuit; however, at the  
 13 present time, my attorneys have counseled me I cannot  
 14 provide answers to any questions relevant to this  
 15 lawsuit. I must accept this advice or risk losing my  
 16 6th Amendment right to effective representation.  
 17 Accordingly, I assert my federal constitutional rights  
 18 as guaranteed by the 5th, 6th and 14th Amendment to the  
 19 US Constitution.  
 20 Q. Okay. I'd like to mark as Exhibit 1 the  
 21 Florida Department of Law Enforcement Sexual  
 22 Offender/Predator Flyer.  
 23 MR. KUVIN: For the record, let me show that  
 24 to Mr. -- well, let me show that to the camera,  
 25 first.

1 Okay. Let me know when you have it.  
 2 (Plaintiff's Exhibit No. 1 was marked for  
 3 identification.)  
 4 THE VIDEOGRAPHER: Okay.  
 5 MR. KUVIN: Okay?  
 6 BY MR. KUVIN:  
 7 Q. All right. Let me show you this sexual  
 8 offender/predator flyer. Is that you, sir?  
 9 A. It's a photograph of me, yes.  
 10 Q. Okay. Is that the predator flyer for you?  
 11 A. No, it is not.  
 12 Q. Who's it for?  
 13 A. It's a sexual offender flyer.  
 14 Q. I'm sorry, I was reading the title where it  
 15 says "Predator Flyer." Do you see that?  
 16 A. It actually said "Sexual Offender/Predator"  
 17 because it's used for both categories. And if you'll  
 18 notice, the designation says sexual offender, which is  
 19 extremely different than sexual predator.  
 20 Q. What's your understanding of the difference  
 21 between the two?  
 22 A. I'm not -- I know I'm a sex -- I've been  
 23 registered as a sexual offender.  
 24 Q. Why are you a sexual offender?  
 25 MR. GOLDBERGER: Jeff.

1 THE WITNESS: I fully intend to respond to all  
 2 relevant questions regarding this lawsuit; however,  
 3 at the present time, my attorneys have counseled me  
 4 I cannot provide answers to any questions relevant  
 5 to this lawsuit. I must accept this advice or risk  
 6 losing my 6th Amendment right to effective  
 7 representation. Accordingly, I have to assert my  
 8 federal constitutional rights as guaranteed by the  
 9 5th, 6th and 14th Amendment to the US Constitution.  
 10 MR. KUVIN: Let's go ahead and I'd like to  
 11 mark what you're reading from here today as Exhibit  
 12 2 to the deposition.  
 13 (Plaintiff's Exhibit No. 2 was marked for  
 14 identification.)  
 15 BY MR. KUVIN:  
 16 Q. Who prepared that document for you, sir?  
 17 MR. GOLDBERGER: Don't answer that question,  
 18 Jeffrey. It's attorney-client privileged and this  
 19 is my work product, and we're not marking it, so...  
 20 MR. KUVIN: I don't think you have the right  
 21 to tell me what I can and can't --  
 22 MR. GOLDBERGER: You can mark it all you  
 23 want --  
 24 MR. KUVIN: It's been marked.  
 25 MR. GOLDBERGER: You can mark it all you want,

1 but it's not --  
 2 MR. KUVIN: If you choose to --  
 3 MR. GOLDBERGER: It's not -- it's not being  
 4 admitted into evidence.  
 5 MR. KUVIN: Sir, please don't interrupt me.  
 6 Are you --  
 7 MR. GOLDBERGER: I'll interrupt you --  
 8 MR. KUVIN: Are you representing Mr. Epstein  
 9 in this deposition or is Mr. Pike? Because I want  
 10 to be clear which one of you is going to be doing  
 11 the talking during the deposition.  
 12 MR. GOLDBERGER: We both are representing  
 13 Mr. Epstein.  
 14 MR. PIKE: Let's go off the record for a  
 15 second.  
 16 MR. KUVIN: No, we're not going off the  
 17 record. We're staying on the record and only one  
 18 attorney may speak at a time.  
 19 So right now, I'd like you all to choose. I  
 20 don't mind, either one of you can inject --  
 21 MR. PIKE: Hold on a second.  
 22 MR. KUVIN: -- and represent Mr. Epstein.  
 23 MR. GOLDBERGER: Let -- let -- let him finish.  
 24 Let him finish.  
 25 MR. KUVIN: Let me finish, please.

1 Either one of you can represent Mr. Epstein,  
 2 but I don't want objections flying from both  
 3 chairs, both Mr. Epstein's criminal lawyer and his  
 4 civil lawyer.  
 5 So I'd ask you to please choose which one is  
 6 going to object, just like Judge Hafele has  
 7 required at hearings that only one attorney can  
 8 represent Mr. Epstein in an argument at a hearing.  
 9 MR. GOLDBERGER: Actually, we have two  
 10 different roles in this matter. I represent  
 11 Mr. Epstein on all criminal matters, so I'm going  
 12 to speak when I think it's relevant to any criminal  
 13 matters. And Mr. Pike represents Mr. Epstein on  
 14 any civil matters, and he will speak when it's  
 15 relevant to any civil matters.  
 16 BY MR. KUVIN:  
 17 Q. Okay. Sir, can I please have the paper back,  
 18 which has already been marked as Exhibit 2?  
 19 MR. KUVIN: Mr. Goldberger, if you choose that  
 20 this document is not to be produced in this case, I  
 21 have no objection to you sealing that document  
 22 until such time as Judge Hafele decides the issue  
 23 as to whether or not I'm allowed to mark something  
 24 that the witness is reading in a deposition. Is  
 25 that fair to you?

1 MR. GOLDBERGER: You can mark anything you  
 2 want to mark. Go ahead and mark it, and then we'll  
 3 go from there.  
 4 MR. KUVIN: Okay, sounds good. Thank you very  
 5 much.  
 6 BY MR. KUVIN:  
 7 Q. Okay, sir. What I've marked as Exhibit 2, did  
 8 you prepare that document?  
 9 MR. GOLDBERGER: Attorney-client.  
 10 THE WITNESS: Attorney-client privilege.  
 11 BY MR. KUVIN:  
 12 Q. Sir, you are reading from a document, are you  
 13 not, when I ask you certain questions?  
 14 MR. GOLDBERGER: Attorney-client.  
 15 BY MR. KUVIN:  
 16 Q. The document that you're reading from is  
 17 Exhibit 2 that's in front of you right now.  
 18 MR. GOLDBERGER: Attorney-client.  
 19 BY MR. KUVIN:  
 20 Q. Why do you feel a need to read from a document  
 21 with respect to the issues of whether or not you have a  
 22 5th Amendment right?  
 23 MR. GOLDBERGER: Attorney-client.  
 24 BY MR. KUVIN:  
 25 Q. Sir, with respect to the last questions I was

1 A. I fully intend to respond to all relevant  
 2 questions regarding this lawsuit; however, at the  
 3 present time, my attorneys have counseled me I cannot  
 4 provide answers to any questions relevant to this  
 5 lawsuit. I must accept this advice or risk losing my  
 6 6th Amendment right to effective representation.  
 7 Accordingly, I assert my federal constitutional rights  
 8 as guaranteed by the 5th, 6th and 14th Amendment to the  
 9 US Constitution.  
 10 Q. Sir, do you like having things inserted in  
 11 your anus for sexual gratification?  
 12 MR. PIKE: Objection, argumentative,  
 13 harassing.  
 14 THE WITNESS: I fully intend to respond to all  
 15 relevant questions regarding this lawsuit; however,  
 16 at the present time, my attorneys have counseled me  
 17 I cannot provide answers to any questions relevant  
 18 to this lawsuit. I must accept this advice or risk  
 19 losing my 6th Amendment right to effective  
 20 representation.  
 21 BY MR. KUVIN:  
 22 Q. Do you live at 35 --  
 23 MR. GOLDBERGER: Hold on.  
 24 THE WITNESS: Excuse me, let me finish. Is  
 25 that fair.

1 asking you about, the difference between a sexual  
 2 offender and a sexual predator, when Mr. Goldberg piped  
 3 up and said your --  
 4 MR. GOLDBERGER: Goldberger. Goldberger.  
 5 BY MR. KUVIN:  
 6 Q. -- I'm sorry, Mr. Goldberger said your name in  
 7 order to clue you in to object on 5th Amendment  
 8 grounds --  
 9 MR. GOLDBERGER: Form.  
 10 BY MR. KUVIN:  
 11 Q. -- did you feel a need to respond at that  
 12 point?  
 13 MR. PIKE: Object to the form.  
 14 MR. GOLDBERGER: The invocation of 5th  
 15 Amendment privileges is going to be decided by me,  
 16 as Mr. Epstein's criminal counsel. I will make  
 17 that decision.  
 18 MR. KUVIN: Okay. I would just like to note  
 19 for the record that that's improper. That's not  
 20 what the case law says, and we'll take that up --  
 21 MR. GOLDBERGER: Fair enough.  
 22 MR. KUVIN: -- issue with Judge Hafele?  
 23 BY MR. KUVIN:  
 24 Q. All right, sir. Do you consider yourself a  
 25 sexual offender or a sexual predator, which one?

1 BY MR. KUVIN:  
 2 Q. Absolutely. I certainly want you to finish.  
 3 A. Accordingly, I assert my federal  
 4 constitutional rights as guaranteed by the 5th, 6th and  
 5 14th Amendment to the US Constitution.  
 6 Q. Sir, do you live at 358 El Brillo Way, Paim  
 7 Beach, Florida?  
 8 A. I fully intend to respond to all relevant  
 9 questions regarding this lawsuit; however, at the  
 10 present time, my attorneys have counseled me I cannot  
 11 provide answers to any questions relevant to this  
 12 lawsuit. I must accept this advice or risk losing my  
 13 6th Amendment right to effective representation.  
 14 Accordingly, I assert my federal constitutional right as  
 15 guaranteed by the 5th, 6th and 14th Amendment to the US  
 16 Constitution.  
 17 Q. I noticed that Mr. Goldberger shook his head  
 18 when I asked you where you lived. Do you have a problem  
 19 letting us know where you live?  
 20 I'm trying to understand why that issue is  
 21 protected by the 5th Amendment, given the fact that  
 22 you're required to live at that address pursuant to the  
 23 sexual offender flyer and pursuant to the Court's order  
 24 convicting you based on your guilty plea.  
 25 MR. PIKE: Form, argumentative.

1 THE WITNESS: Do you want to repeat the  
 2 question?  
 3 BY MR. KUVIN:  
 4 Q. Sure. Did the Court require you to stay at  
 5 358 El Brillo Way on Palm Beach --  
 6 (Interruption in the proceedings.)  
 7 BY MR. KUVIN:  
 8 Q. Sir, did the Court require you to stay at 358  
 9 El Brillo Way, Palm Beach, Florida subsequent to you  
 10 being released from prison?  
 11 MR. PIKE: Form.  
 12 THE WITNESS: I fully intend to respond to all  
 13 relevant questions regarding this lawsuit; however,  
 14 at the present time, my attorneys have counseled me  
 15 I cannot provide any answers to questions relevant  
 16 to this lawsuit. I must accept this advice or risk  
 17 losing my 6th Amendment right to effective  
 18 representation. Accordingly, I assert my federal  
 19 constitutional rights as guaranteed by the 5th,  
 20 6th and 14th Amendment to the US Constitution.  
 21 BY MR. KUVIN:  
 22 Q. Let's go ahead and mark as Exhibit 3 a nice  
 23 photo of your home.  
 24 (Plaintiff's Exhibit No. 3 was marked for  
 25 identification.)

1 purple item retrieved from your trash at 358 El Brillo  
 2 Way that appeared to be a device known as a jelly anal  
 3 wand. Have you ever heard of something like that?  
 4 MR. PIKE: Form, argumentative, harassing.  
 5 Same objections, attorney-client work product.  
 6 THE WITNESS: I fully intend to respond to all  
 7 relevant questions regarding this lawsuit; however,  
 8 at the present time, my attorneys have counseled me  
 9 I cannot provide answers to any questions relevant  
 10 to this lawsuit. I must accept this advice or risk  
 11 losing my 6th Amendment right to effective  
 12 representation. Accordingly, I assert my federal  
 13 constitutional rights as guaranteed by the 5th, 6th  
 14 and 14th Amendment to the US Constitution.  
 15 BY MR. KUVIN:  
 16 Q. Outside of your home at 358 El Brillo Way was  
 17 also recovered a 3-inch purple-sized finger -- I'm  
 18 sorry, a 3-inch purple finger-sized object which had a  
 19 broken end, which is apparently a sexual toy similar --  
 20 similar to a cyclone vibrator possibly used for rectal  
 21 gratification.  
 22 Do you know what a cyclone vibrator is?  
 23 A. No.  
 24 MR. PIKE: Form, harassing.  
 25 THE WITNESS: No, but I do know that that --

1 BY MR. KUVIN:  
 2 Q. Okay. Let's get this for the camera, if I  
 3 could. Okay.  
 4 All right. I'm going to show you what I've  
 5 marked as Exhibit 3. Is that a photograph of your home,  
 6 sir, at 358 El Brillo Way?  
 7 A. I fully intend to respond to all relevant  
 8 questions regarding this lawsuit; however, at the  
 9 present time, my attorneys have counseled me I cannot  
 10 provide answers to any questions relevant to this  
 11 lawsuit. I must accept this advice or risk losing my  
 12 6th Amendment right to effective representation.  
 13 Accordingly, I assert my federal constitutional rights  
 14 as guaranteed by the 5th, 6th and 14th Amendment to the  
 15 US Constitution.  
 16 Q. I had asked you before whether or not you  
 17 liked things inserted in your anus for sexual  
 18 gratification, and I'd like to go back to that for a  
 19 moment, if I could.  
 20 Have you read the police report, incident  
 21 report, on your arrest?  
 22 MR. PIKE: Form, argumentative, harassing.  
 23 MR. GOLDBERGER: Attorney-client work product.  
 24 BY MR. KUVIN:  
 25 Q. Sir, according to the report, there was a

1 MR. PIKE: Same objections.  
 2 THE WITNESS: -- broken purple object turned  
 3 out to be, later on, described as a salad fork from  
 4 the kitchen, strictly something that had been  
 5 broken in the dishwasher and then reported it in a  
 6 report obviously inaccurately.  
 7 BY MR. KUVIN:  
 8 Q. Okay. So the broken --  
 9 A. Salad fork, nothing more than a broken salad  
 10 fork, correct.  
 11 Q. So the 3-inch purple finger-sized object was a  
 12 salad fork?  
 13 A. Was a broken handle of a salad fork. Yes, the  
 14 question has been asked and answered, I believe.  
 15 Q. Okay. When did you see that?  
 16 MR. PIKE: Form.  
 17 THE WITNESS: See what?  
 18 BY MR. KUVIN:  
 19 Q. Well, you called --  
 20 A. See that. What's the that?  
 21 Q. You called it a salad fork.  
 22 When did you see the salad fork after the  
 23 police had taken it into custody?  
 24 MR. PIKE: Form.  
 25 THE WITNESS: I did not see the salad fork,

1 nor did I represent that I did see the salad fork.  
 2 BY MR. KUVIN:  
 3 Q. Okay. So you have no idea what it was that  
 4 the police took out of the trash?  
 5 A. The police --  
 6 MR. PIKE: Form.  
 7 THE WITNESS: -- filed a later report saying  
 8 it was a salad fork, I believe.  
 9 BY MR. KUVIN:  
 10 Q. You never saw that piece, did you?  
 11 A. No.  
 12 Q. You have no idea what it was that they took  
 13 out of there?  
 14 MR. PIKE: Form.  
 15 THE WITNESS: I just said the police said it  
 16 was a salad fork, a mere salad fork misrepresented  
 17 in that police report, as many things have been, it  
 18 seems.  
 19 BY MR. KUVIN:  
 20 Q. Did they misrepresent the jelly anal wand?  
 21 A. I've --  
 22 MR. PIKE: Form.  
 23 THE WITNESS: -- never heard of that before.  
 24 BY MR. KUVIN:  
 25 Q. Have you used vibrators that you've placed in

1 your anus?  
 2 MR. PIKE: Form, objection, harassing.  
 3 THE WITNESS: No.  
 4 BY MR. KUVIN:  
 5 Q. You never placed anything like a vibrator in  
 6 your anus?  
 7 MR. PIKE: Same objections.  
 8 THE WITNESS: No.  
 9 BY MR. KUVIN:  
 10 Q. There was in a dresser of an armoire of your  
 11 home --  
 12 MR. KUVIN: This is page 44, Counsel. I'd  
 13 like to reference it.  
 14 THE WITNESS: Is that marked as an exhibit? I  
 15 don't know what he's reading.  
 16 MR. PIKE: It's not marked as an exhibit.  
 17 THE WITNESS: The police report?  
 18 BY MR. KUVIN:  
 19 Q. No, it's not. It's my work product, much like  
 20 how Mr. Goldberger felt that your 5th Amendment was your  
 21 work product.  
 22 MR. KUVIN: So let's mark this as exhibit --  
 23 what are we up to, 4?  
 24 COURT REPORTER: 4.  
 25

1 (Plaintiff's Exhibit No. 4 was marked for  
 2 identification.)  
 3 MR. KUVIN: Okay. All right. If we could,  
 4 just get a shot of that for me.  
 5 Okay, thank you.  
 6 BY MR. KUVIN:  
 7 Q. According to the incident report, in a room of  
 8 your home --  
 9 MR. PIKE: What page are you on, Counsel?  
 10 MR. KUVIN: Page 44.  
 11 MR. PIKE: What paragraph?  
 12 MR. KUVIN: Line 4.  
 13 BY MR. KUVIN:  
 14 Q. -- in a dresser armoire was located a bottle  
 15 of peach-flavored Joy Jelly, parenthetically a sexual  
 16 lubricant.  
 17 I have here something called Joy Jelly. I  
 18 even have peach. Do you know what that is?  
 19 MR. PIKE: Form objection, harassing.  
 20 MR. GOLDBERGER: Can you just clarify the  
 21 question as to where you got that? Did that come  
 22 from your home or from somewhere else, Mr. Kuvin?  
 23 MR. KUVIN: I don't think that's relevant.  
 24 MR. GOLDBERGER: Just curious as to what  
 25 you're -- you've made a big point to identify this,

1 this exhibit, and show it to the camera. So if my  
 2 client is going to answer the question, I'd like to  
 3 know whether it came from your home or from --  
 4 whether you bought it or where it came from just so  
 5 he can -- just so he can accurately answer the  
 6 question should he choose to want to answer it.  
 7 MR. KUVIN: Well, he can make the choice  
 8 whether he wants to answer it or not.  
 9 MR. GOLDBERGER: All right.  
 10 BY MR. KUVIN:  
 11 Q. Do you know what that is?  
 12 MR. PIKE: Form objection, improper  
 13 hypothetical.  
 14 THE WITNESS: I don't understand the question.  
 15 BY MR. KUVIN:  
 16 Q. Do you know what Exhibit 4 is?  
 17 A. You've just described it. I have no knowledge  
 18 but what you've just described.  
 19 Q. You don't know what that's used for?  
 20 MR. PIKE: Form objection, harassing.  
 21 THE WITNESS: I've heard what you said it's  
 22 used for. I've never seen it before.  
 23 BY MR. KUVIN:  
 24 Q. Do you know what that, right there, Exhibit 4,  
 25 this peach-flavored --

6 (Pages 36 to 39)

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1 A. You've asked me that question already.  
 2 Q. -- Joy Jelly, do you know what it's used for?  
 3 MR. PIKE: Asked and answered.  
 4 BY MR. KUVIN:  
 5 Q. Not this bottle, but Joy Jelly, do you know  
 6 what it's used for?  
 7 MR. PIKE: Same objection, harassing, asked  
 8 and answered.  
 9 BY MR. KUVIN:  
 10 Q. You can answer.  
 11 A. I've already told you.  
 12 Q. You still haven't answered the question.  
 13 MR. PIKE: Counsel, he answered the question.  
 14 It's been asked and answered twice.  
 15 MR. GOLDBERGER: Let's get a read-back on  
 16 this.  
 17 MR. KUVIN: Sure. I'd like to hear the  
 18 answer.  
 19 MR. GOLDBERGER: From the start of the line of  
 20 questioning.  
 21 COURT REPORTER: From the first time it was  
 22 asked?  
 23 MR. GOLDBERGER: Yes, please.  
 24 (A portion of the record was read by the  
 25 reporter.)

1 MR. PIKE: Form, lack of predicate.  
 2 BY MR. KUVIN:  
 3 Q. Have you used it?  
 4 MR. PIKE: Same objection, lack of predicate,  
 5 no foundation, harassing.  
 6 THE WITNESS: I fully intend to respond to all  
 7 relevant questions regarding this lawsuit; however,  
 8 at this time, I cannot provide any questions [sic]  
 9 relevant to the lawsuit. I must accept counsels'  
 10 advice or risk losing my 6th Amendment right to  
 11 effective representation. Accordingly, I assert my  
 12 federal constitutional rights as guaranteed by the  
 13 5th, 6th and 14th Amendment to the US Constitution.  
 14 BY MR. KUVIN:  
 15 Q. Would you agree with the description that you  
 16 are a pervert?  
 17 MR. PIKE: Same objection, harassing,  
 18 argumentative.  
 19 BY MR. KUVIN:  
 20 Q. You can answer. It's either a simple yes or  
 21 no.  
 22 A. I fully intend to respond to all relevant  
 23 questions regarding this lawsuit; however, at the  
 24 present time, my attorneys have counseled me that I  
 25 cannot provide answers to any questions relevant to this

1 MR. GOLDBERGER: That's all I need to hear,  
 2 thanks.  
 3 BY MR. KUVIN:  
 4 Q. Do you know what Joy Jelly is used for?  
 5 A. I've heard what you've just described. I have  
 6 no independent knowledge.  
 7 Q. You've never used Joy Jelly?  
 8 A. I fully intend to respond to all relevant  
 9 questions regarding this lawsuit; however, at the  
 10 present time, my attorneys have counseled me I cannot  
 11 provide an answer to any questions relevant to this  
 12 lawsuit. I must accept this advice or risk losing my  
 13 6th Amendment right to effective representation.  
 14 Accordingly, I assert my federal constitutional rights  
 15 as guaranteed by the 5th, 6th and 14th Amendment to the  
 16 US Constitution.  
 17 Q. You agree with me that Joy Jelly is a sexual  
 18 lubricant that's used on sexual devices like vibrators  
 19 and anal jelly wands?  
 20 MR. PIKE: Same objections.  
 21 THE WITNESS: I have no knowledge of that.  
 22 BY MR. KUVIN:  
 23 Q. Do you agree that Joy Jelly is a sexual  
 24 lubricant?  
 25 A. I have no knowledge of that.

1 lawsuit. I must accept this advice or risk losing my  
 2 6th Amendment right to effective representation.  
 3 Accordingly, I must assert my federal constitutional  
 4 rights as guaranteed by the 5th, 6th and 14th Amendment  
 5 of the US Constitution.  
 6 Q. Have any mental health counselors diagnosed  
 7 you as a sexual deviant?  
 8 MR. PIKE: Again, form --  
 9 THE WITNESS: I don't believe so.  
 10 MR. PIKE: -- work product.  
 11 BY MR. KUVIN:  
 12 Q. Do you believe you're a sexual deviant?  
 13 MR. PIKE: Form.  
 14 THE WITNESS: No, I do not.  
 15 BY MR. KUVIN:  
 16 Q. Do you have sex with minors?  
 17 MR. PIKE: Same objection, form, 5th  
 18 Amendment.  
 19 THE WITNESS: I fully intend to respond to all  
 20 relevant questions regarding this lawsuit; however,  
 21 at the present time, my attorneys have counseled me  
 22 I cannot provide answers to any questions relevant  
 23 to this lawsuit. I must accept this advice or risk  
 24 losing my 6th Amendment right to effective  
 25 representation. Accordingly, I assert my federal

1 constitutional rights as guaranteed by the 5th, 6th  
 2 and 14th Amendment to the US Constitution.  
 3 BY MR. KUVIN:  
 4 Q. Would you agree that you have a psychological  
 5 disorder with respect to your sexual preferences?  
 6 MR. PIKE: Same objection.  
 7 THE WITNESS: I fully intend to respond to all  
 8 relevant questions regarding this lawsuit; however  
 9 at the present time, my attorneys have counseled me  
 10 I cannot provide answers to any questions relevant  
 11 to this lawsuit. I must accept this advice or risk  
 12 losing my 6th Amendment right to effective  
 13 representation. Accordingly, I assert my federal  
 14 constitutional rights as guaranteed by the 5th,  
 15 6th and 14th Amendment to the US Constitution.  
 16 BY MR. KUVIN:  
 17 Q. Have you had sex with transsexuals?  
 18 MR. PIKE: Same objection.  
 19 THE WITNESS: No.  
 20 BY MR. KUVIN:  
 21 Q. Do you know a Ms. Cordero?  
 22 A. I fully intend to respond to all relevant  
 23 questions regarding this lawsuit; however, at the  
 24 present time, my attorneys have counseled me I cannot  
 25 provide answers to any questions relevant to this

1 MR. PIKE: Same objection, attorney-client,  
 2 work product.  
 3 MR. KUVIN: Are you telling him not to answer?  
 4 MR. PIKE: It's attorney-client, work product.  
 5 I'm instructing him not to answer.  
 6 BY MR. KUVIN:  
 7 Q. Okay. So despite the fact that you're reading  
 8 this canned statement over and over to my questions, you  
 9 don't want to answer any questions about the written  
 10 statement; isn't that true?  
 11 MR. PIKE: Same objection, attorney-client,  
 12 work product. I'm instructing the witness not to  
 13 answer.  
 14 BY MR. KUVIN:  
 15 Q. You don't ever fully intend to respond to  
 16 anything, do you?  
 17 MR. PIKE: Same objection.  
 18 BY MR. KUVIN:  
 19 Q. Or would you like to?  
 20 MR. PIKE: Same objection. Now we're getting  
 21 borderline harassing and argumentative.  
 22 I think you should move on to -- certainly you  
 23 didn't come here to be argumentative and harassing  
 24 all day, Mr. Kuvin, so I would hope that you would  
 25 move on to another topic.

1 lawsuit. I must accept this advice or risk losing my  
 2 6th Amendment right to effective representation.  
 3 Accordingly, I assert my federal constitutional rights  
 4 as guaranteed by the 5th, 6th and 14th Amendments to the  
 5 US Constitution.  
 6 Q. Do you know a Ms. Maximilia Cordero?  
 7 MR. PIKE: Same objection.  
 8 THE WITNESS: I fully intend to respond to all  
 9 relevant questions regarding this lawsuit; however,  
 10 at the present time, my attorneys have counseled me  
 11 I cannot provide answers to any questions relevant  
 12 to this lawsuit. I must accept this advice or risk  
 13 losing my 6th Amendment right to effective  
 14 representation. Accordingly, I assert my federal  
 15 constitutional rights as guaranteed by the 5th,  
 16 6th and 14th Amendment to the US Constitution.  
 17 BY MR. KUVIN:  
 18 Q. When do you intend to fully respond?  
 19 MR. PIKE: Same objection. In addition, work  
 20 product, attorney-client.  
 21 BY MR. KUVIN:  
 22 Q. I'm sorry, I misquoted you. You said I --  
 23 you've repeated now numerous times, "I fully intend to  
 24 respond," so let me rephrase my question.  
 25 When do you fully intend to respond?

1 THE WITNESS: Jack?  
 2 MR. KUVIN: I'm just looking.  
 3 MR. GOLDBERGER: He can look at it all he  
 4 wants.  
 5 Just ask for permission next time, if you want  
 6 to, because it is something that I gave to my  
 7 client. So when you want to look -- I've let you  
 8 mark it. If you want to look at it, just ask my  
 9 permission to do so, okay?  
 10 MR. KUVIN: Sure.  
 11 MR. GOLDBERGER: Is that all right with you?  
 12 MR. KUVIN: Perfectly fine.  
 13 MR. GOLDBERGER: Thanks.  
 14 BY MR. KUVIN:  
 15 Q. Your typed paper there says that you cannot  
 16 provide answers. Why not?  
 17 MR. PIKE: Attorney-client, work product. I'm  
 18 instructing him not to answer. It's my work  
 19 product.  
 20 MR. KUVIN: Are you stipulating that you  
 21 drafted the document we've marked as Exhibit 2?  
 22 MR. GOLDBERGER: No such stipulation.  
 23 MR. PIKE: No such stipulation.  
 24 MR. KUVIN: Well, if it's work product --  
 25 MR. PIKE: It's attorney-client, work product.

1 MR. KUVIN: -- I just wanted to clarify.  
 2 BY MR. KUVIN:  
 3 Q. Did you have a sexual relationship with  
 4 Maximilia Cordero when she still had a penis?  
 5 MR. PIKE: Same objection. 5th Amendment.  
 6 THE WITNESS: I fully intend to respond to all  
 7 relevant questions regarding this lawsuit; however,  
 8 at the present time, my attorneys have counseled me  
 9 I cannot provide answers to any questions relevant  
 10 to this lawsuit. I must -- I must accept this  
 11 advice or risk losing my 6th Amendment right to  
 12 effective representation. Accordingly, I assert my  
 13 federal constitutional rights as guaranteed by the  
 14 5th, 6th and 14th Amendment to the US Constitution.  
 15 BY MR. KUVIN:  
 16 Q. Do you know Sarah Kellen?  
 17 A. I fully intend to respond to all relevant  
 18 questions regarding this lawsuit; however, at the  
 19 present time, my attorneys have counseled me I cannot  
 20 provide answers to any questions relevant to this  
 21 lawsuit. I must accept this advice or risk losing my  
 22 6th Amendment right to effective representation.  
 23 Accordingly, I assert my federal constitutional rights  
 24 as guaranteed by the 5th, 6th and 14th Amendment to the  
 25 US Constitution.

1 Q. Okay. Go ahead. Don't wait for me.  
 2 A. -- 5th, 6th and 14th Amendment to the US  
 3 Constitution.  
 4 Q. Okay. You agree, would you not, that  
 5 Sarah Kellen is currently dating Story Kowles, the  
 6 gentleman who is sitting here in the room working for  
 7 Mr. Goldberger at your deposition?  
 8 A. I fully intend to respond to all relevant  
 9 questions regarding this lawsuit; however, at the  
 10 present time, my attorneys have counseled me I cannot  
 11 provide answers to any questions relevant to this  
 12 lawsuit. I must accept their advice or risk losing my  
 13 6th Amendment right to effective representation.  
 14 Accordingly, I assert my federal constitutional rights  
 15 as guaranteed by the 5th, 6th and 14th Amendment to the  
 16 US Constitution.  
 17 Q. Do you know how long Sarah Kellen has been  
 18 dating Mr. Story Kowles?  
 19 A. I fully intend to respond to all relevant  
 20 questions regarding this lawsuit; however, at the  
 21 present time, my attorneys have counseled me I cannot  
 22 provide answers to any questions relevant to this  
 23 lawsuit. I must accept this advice or risk losing my  
 24 6th Amendment right to effective representation.  
 25 Accordingly, I assert my federal constitutional right as

1 Q. You agree, do you not, that Sarah Kellen is,  
 2 or as least was, your personal assistant for many years?  
 3 MR. PIKE: Same objection.  
 4 THE WITNESS: I fully intend to respond to all  
 5 relevant questions regarding this lawsuit; however,  
 6 at the present time, my attorneys have counseled me  
 7 I cannot provide answers to any questions relevant  
 8 to this lawsuit. I must accept this advice or risk  
 9 losing --  
 10 MR. GOLDBERGER: Why don't you -- why don't  
 11 you wait until he's listening, so he...  
 12 MR. KUVIN: Oh, I don't need to listen. I've  
 13 heard it many times.  
 14 MR. GOLDBERGER: No, we're going to wait.  
 15 We're going to wait.  
 16 MR. KUVIN: Oh, no, you don't have to wait.  
 17 MR. GOLDBERGER: Oh, no, we will.  
 18 BY MR. KUVIN:  
 19 Q. Okay. I'm sorry, are you done?  
 20 A. No.  
 21 Q. Oh, please finish.  
 22 A. I must accept this advice or risk losing my  
 23 6th Amendment right to effective representation.  
 24 Accordingly, I assert my federal constitutional rights  
 25 as guaranteed by the 5th...

1 guaranteed by the 5th, 6th and 14th Amendment to the US  
 2 Constitution.  
 3 Q. Did you introduce Ms. Kellen to Story Kowles?  
 4 A. I fully intend to respond to all relevant  
 5 questions regarding this lawsuit; however, at the  
 6 present time, my attorneys have counseled me I cannot  
 7 provide answers to any questions relevant to this  
 8 lawsuit. I must accept this advice or risk losing my  
 9 6th Amendment right to effective representation.  
 10 Accordingly, I assert my federal constitutional rights  
 11 as guaranteed by the 5th, 6th and 14th Amendment to the  
 12 US Constitution.  
 13 Q. Are you aware that one of the State  
 14 prosecutors, Dahlia Weiss, who was working on your  
 15 criminal case, was also married to a lawyer working for  
 16 Mr. Goldberger here?  
 17 MR. GOLDBERGER: Attorney-client, work  
 18 product.  
 19 Don't answer.  
 20 MR. KUVIN: I'm sorry, work product?  
 21 Somebody's marriage?  
 22 MR. GOLDBERGER: Uh-huh. Don't answer it.  
 23 MR. KUVIN: I'd like an explanation as to how  
 24 someone's marriage is work product on the record so  
 25 I can be clear to determine whether I need to bring



1 that question up in front of Judge Hafele.  
 2 MR. PIKE: The rules do not require for  
 3 speaking objections, and we're going to limit  
 4 ourself to form and the appropriate objections  
 5 thereafter, which have been asserted. So there  
 6 does not need to be anything in the record. Should  
 7 you wish to file a motion, you can do so.  
 8 MR. KUVIN: Well, before I file such motion, I  
 9 think the rules also dictate that I can request an  
 10 explanation, which I'm doing.  
 11 MR. PIKE: We've already objected.  
 12 MR. KUVIN: Okay.  
 13 BY MR. KUVIN:  
 14 Q. Do you know Dahlia Weiss?  
 15 A. I fully intend to respond to all relevant  
 16 questions regarding this lawsuit; however, at the  
 17 present time, my attorneys have counseled me I cannot  
 18 provide answers to any questions relevant to this  
 19 lawsuit. I must accept this advice or risk losing my  
 20 6th Amendment right to effective representation.  
 21 MR. GOLDBERGER: Actually, I'll let you answer  
 22 the question as asked, as to do you know Dahlia  
 23 Weiss.  
 24 THE WITNESS: No, I do not.  
 25

1 reasonably calculated to lead to admissible  
 2 evidence in this case.  
 3 THE WITNESS: No.  
 4 BY MR. KUVIN:  
 5 Q. It's a shame.  
 6 MR. GOLDBERGER: What was that?  
 7 THE WITNESS: Shame, he said.  
 8 BY MR. KUVIN:  
 9 Q. Why not?  
 10 MR. PIKE: Objection, relevance. I'm going to  
 11 instruct him not to answer the question. It's  
 12 argumentative.  
 13 BY MR. KUVIN:  
 14 Q. Is there anyone else that you know that is  
 15 dating staff at Mr. Goldberger's office other than  
 16 Ms. Kellen and Ms. Wife -- Ms. Weiss?  
 17 MR. PIKE: Objection, form.  
 18 MR. GOLDBERGER: Whoa, whoa, whoa. First of  
 19 all, let's get the question right. Ms. Kellen and  
 20 Ms. Weiss are dating each other; is that the  
 21 question?  
 22 MR. KUVIN: No, I'll clarify.  
 23 MR. GOLDBERGER: Thank you.  
 24 BY MR. KUVIN:  
 25 Q. Is there anyone else that you know that's

1 BY MR. KUVIN:  
 2 Q. With respect to Mr. Goldberger, your criminal  
 3 attorney, did you buy him a brand new BMW?  
 4 MR. GOLDBERGER: Don't.  
 5 THE WITNESS: I fully intend to respond to all  
 6 relevant questions regarding this lawsuit; however,  
 7 at the present time, my attorneys have counseled me  
 8 I cannot provide answers to any questions relevant  
 9 to this lawsuit. I must accept this advice or risk  
 10 losing my 6th Amendment right to effective  
 11 representation.  
 12 MR. GOLDBERGER: It's also attorney-client and  
 13 work product as to my fees.  
 14 THE WITNESS: Accordingly, I assert my federal  
 15 constitutional rights as guaranteed by the 5th, 6th  
 16 and 14th Amendment to the US Constitution.  
 17 MR. GOLDBERGER: I'm sorry, it's also  
 18 attorney-client work product as to my fees.  
 19 BY MR. KUVIN:  
 20 Q. Have you bought any new cars for your civil  
 21 attorneys, like Mr. Critton?  
 22 MR. PIKE: Objection, relevance.  
 23 BY MR. KUVIN:  
 24 Q. Robert Critton.  
 25 MR. PIKE: Argumentative, harassing, not

1 dating staff at Mr. Goldberger's office other than  
 2 Ms. Kellen, or married to staff working for  
 3 Mr. Goldberger other than Ms. Weiss?  
 4 MR. GOLDBERGER: There are people --  
 5 MR. PIKE: Objection, form, multiple,  
 6 compound, vague, irrelevant, not reasonably  
 7 calculated to lead to admissible evidence.  
 8 MR. GOLDBERGER: Do you understand the  
 9 question? The question as asked: Do you know  
 10 anyone who dates anyone at my office?  
 11 THE WITNESS: This is why -- this is why we're  
 12 here?  
 13 MR. GOLDBERGER: I mean, do you know -- the  
 14 question is: Do you know if anyone in my office  
 15 dates anybody?  
 16 THE WITNESS: No, I do not.  
 17 MR. GOLDBERGER: Okay.  
 18 BY MR. KUVIN:  
 19 Q. That's a good point. I'm glad you made it.  
 20 No, you know why we're here? We're here to  
 21 ask you whether or not you had any sexual contact with  
 22 B.B. Did you?  
 23 A. Who?  
 24 Q. With a young girl that was 14 years old.  
 25 A. What was her name?

1 Q. B.B.  
 2 A. Can you refresh my recollection who she -- do  
 3 you have anything to show me, something that might --  
 4 Q. I do, and I will pursuant to the  
 5 confidentiality that we've previously discussed in this  
 6 case.  
 7 A. So tell me who it is that you're representing?  
 8 Q. I will do that.  
 9 Have you had sex with numerous girls underage?  
 10 A. You've asked me if this -- which question --  
 11 MR. GOLDBERGER: Wait, the question was --  
 12 MR. KUVIN: I'll strike the question and  
 13 rephrase.  
 14 MR. GOLDBERGER: Which question are you  
 15 striking?  
 16 MR. KUVIN: I will strike all of them and  
 17 rephrase.  
 18 BY MR. KUVIN:  
 19 Q. Did you have sex with underaged --  
 20 MR. GOLDBERGER: Sorry, wait a minute. Wait a  
 21 minute. Let me just clarify. The question that  
 22 you're striking is, did you have sex with a woman  
 23 by the name of B.B.?  
 24 MR. KUVIN: Right.  
 25 MR. GOLDBERGER: That's question one?

1 MR. KUVIN: I just wanted to make sure.  
 2 MR. GOLDBERGER: Spencer, I'm not going to get  
 3 into an argument with you. I want you to act --  
 4 MR. KUVIN: I don't want to argue. You asked  
 5 me if I was clear --  
 6 MR. GOLDBERGER: Let me -- let me finish  
 7 what --  
 8 MR. KUVIN: -- and I just wanted to be clear.  
 9 MR. GOLDBERGER: Are you -- are you going to  
 10 let me finish what I'm saying?  
 11 MR. KUVIN: I just wanted to know if I was  
 12 clear. You're trying to tell me to keep my mouth  
 13 shut.  
 14 MR. GOLDBERGER: All right.  
 15 MR. KUVIN: So I wanted to make sure that the  
 16 record was patently clear what you're asking me to  
 17 do.  
 18 MR. GOLDBERGER: Are you done?  
 19 MR. KUVIN: I'm done.  
 20 MR. GOLDBERGER: Okay. So the response to  
 21 your question is, I want you to allow my client --  
 22 let me finish -- allow my client to finish his  
 23 answers. If you want to interrupt while he's  
 24 asking -- while he's answering a question, I'm not  
 25 going to allow you to do that. If you want to

1 And the second question you're striking is?  
 2 MR. KUVIN: I'm moving on.  
 3 BY MR. KUVIN:  
 4 Q. Do you have sex with underaged girls?  
 5 A. I fully intend to respond to all relevant  
 6 questions regarding this lawsuit --  
 7 MR. GOLDBERGER: Let -- do me a favor. After  
 8 you ask the question, he's going to answer it.  
 9 Keep your mouth shut and let him answer the  
 10 question, and don't editorialize while the question  
 11 is being answered. If you want to editorialize  
 12 afterwards in the form of another question, go  
 13 ahead, but while he's answering the question, do  
 14 not say anything. Are we -- are we clear on that?  
 15 MR. KUVIN: I'm sorry, I just want to be  
 16 clear, did you just tell me to keep my mouth shut?  
 17 MR. GOLDBERGER: While my client is answering  
 18 a question.  
 19 MR. KUVIN: So you're telling me I need to  
 20 keep my mouth shut?  
 21 MR. GOLDBERGER: No, no. I'm telling  
 22 you to --  
 23 MR. KUVIN: Is that -- I'm sorry, I thought  
 24 that's what I heard.  
 25 MR. GOLDBERGER: Spencer, I'm not --

1 respond to a question that he answers by being  
 2 argumentative, you can do so, and the appropriate  
 3 objection will be entered.  
 4 My only point of my response to you was that I  
 5 do not want you interfering while he is answering a  
 6 question, that's it, okay? I just want you to act  
 7 ethically, honorably and fair.  
 8 MR. KUVIN: I would ask you to do the same --  
 9 MR. GOLDBERGER: I'm trying.  
 10 MR. KUVIN: -- and to stop your speaking  
 11 objections.  
 12 MR. GOLDBERGER: I'm trying.  
 13 MR. KUVIN: Objection to form usually works,  
 14 according to our local rules.  
 15 MR. GOLDBERGER: Okay.  
 16 MR. KUVIN: Okay? Thank you.  
 17 Maybe when you get into the civil arena, you'd  
 18 understand.  
 19 MR. PIKE: Let's move on.  
 20 MR. KUVIN: But I just want to make sure that  
 21 you're on the same page.  
 22 MR. GOLDBERGER: Spencer --  
 23 MR. PIKE: Let's move on.  
 24 MR. KUVIN: I appreciate it.  
 25 MR. GOLDBERGER: Let's move on.

1 BY MR. KUVIN:  
 2 Q. Do you have sex with underaged girls, that's  
 3 the reason we're here, is it not, Mr. Epstein, to answer  
 4 that question?  
 5 MR. PIKE: Form.  
 6 BY MR. KUVIN:  
 7 Q. Do you want to answer that question for us  
 8 today?  
 9 MR. PIKE: Multiple, compound.  
 10 THE WITNESS: What's the question?  
 11 BY MR. KUVIN:  
 12 Q. Do you have sex with underaged girls?  
 13 A. I fully intend to respond to all relevant  
 14 questions regarding this lawsuit; however, at the  
 15 present time, my attorneys have counseled me I cannot  
 16 provide answers to any questions relevant to this  
 17 lawsuit. I must accept this advice or risk losing my  
 18 6th Amendment right to effective representation.  
 19 Accordingly, I assert my federal constitutional rights  
 20 as guaranteed by the 5th, 6th and 14th Amendments to the  
 21 US Constitution.  
 22 Q. Isn't it true that you like to have sex with  
 23 little girls?  
 24 MR. PIKE: Same objection.  
 25

1 I cannot provide answers to any questions relevant  
 2 to this lawsuit. I must accept this advice or risk  
 3 losing my 6th Amendment right to effective  
 4 representation. Accordingly, I assert my federal  
 5 constitutional rights as guaranteed by the 5th, 6th  
 6 and 14th Amendment to the US Constitution.  
 7 BY MR. KUVIN:  
 8 Q. Isn't true that you've sexually molested girls  
 9 under the age of 18?  
 10 MR. PIKE: Same objection.  
 11 THE WITNESS: I fully intend to respond to all  
 12 relevant questions regarding this lawsuit; however,  
 13 at the present time, my attorneys have counseled me  
 14 I cannot provide answers to any questions relevant  
 15 to this lawsuit. I must accept this advice or risk  
 16 losing my 6th Amendment right to effective  
 17 representation. Accordingly, I assert my federal  
 18 constitutional rights as guaranteed by the 5th, 6th  
 19 and 14th Amendment to the US Constitution.  
 20 BY MR. KUVIN:  
 21 Q. Isn't it true that you've asked numerous,  
 22 possibly hundreds, of underaged girls to have sex with  
 23 you?  
 24 MR. PIKE: Same objection, argumentative,  
 25 harassing.

1 BY MR. KUVIN:  
 2 Q. Girls under the age of 18?  
 3 MR. PIKE: Argumentative, harassing.  
 4 THE WITNESS: One question or two?  
 5 BY MR. KUVIN:  
 6 Q. Isn't it true that you like to have sex with  
 7 little girls who are under the age of 18?  
 8 MR. PIKE: Argumentative, harassing.  
 9 THE WITNESS: I fully intend to respond to all  
 10 relevant questions regarding this lawsuit; however,  
 11 at the present time, my attorneys have counseled me  
 12 I cannot provide answers to any questions relevant  
 13 to this lawsuit. I must accept this advice or risk  
 14 losing my 6th Amendment right to effective  
 15 representation. Accordingly, I assert my federal  
 16 constitutional rights as guaranteed by the 5th, 6th  
 17 and 14th Amendment to the US Constitution.  
 18 BY MR. KUVIN:  
 19 Q. Isn't it true that you've asked little girls  
 20 under the age of 18 to see their vaginas?  
 21 MR. PIKE: Same objection, argumentative,  
 22 harassing.  
 23 THE WITNESS: I fully intend to respond to all  
 24 relevant questions regarding this lawsuit; however,  
 25 at the present time, my attorneys have counseled me

1 THE WITNESS: I fully intend to respond to all  
 2 relevant questions regarding this lawsuit; however,  
 3 at the present time, my attorneys have counseled me  
 4 I cannot provide answers to any questions relevant  
 5 to this lawsuit. I must accept this advice or risk  
 6 losing my 6th Amendment right to effective  
 7 representation. Accordingly, I assert my federal  
 8 constitutional rights as guaranteed by the 5th, 6th  
 9 and 14th Amendment to the US Constitution.  
 10 BY MR. KUVIN:  
 11 Q. Isn't it true that you've told Sarah Kellen to  
 12 avoid service of a witness subpoena in this case because  
 13 she has information that would incriminate you?  
 14 A. I fully intend to respond to all relevant  
 15 questions regarding this lawsuit; however, at the  
 16 present time, my attorneys have counseled me I cannot  
 17 provide answers to any questions relevant to this  
 18 lawsuit. I must accept this advice or risk losing my  
 19 6th Amendment right to effective representation.  
 20 MR. PIKE: In addition, the question is  
 21 argumentative; same objection as before.  
 22 BY MR. KUVIN:  
 23 Q. Isn't it true that you conspired with Sarah  
 24 Kellen to obtain girls under the age of 18 to come to  
 25 your home, get naked and give you massages while you

1 masturbated?  
 2 MR. PIKE: Same objections, argumentative,  
 3 harassing.  
 4 THE WITNESS: I fully intend to respond to all  
 5 relevant questions regarding this lawsuit; however,  
 6 at the present time, my attorneys have counseled me  
 7 I cannot provide answers to any questions relevant  
 8 to this lawsuit. I must accept this advice or risk  
 9 losing my 6th Amendment right to effective  
 10 representation. Accordingly, I assert my federal  
 11 constitutional rights as guaranteed by the 5th, 6th  
 12 and 14th Amendment to the US Constitution.  
 13 BY MR. KUVIN:  
 14 Q. Are you treating with a mental health  
 15 counselor currently?  
 16 A. No.  
 17 MR. PIKE: Work product.  
 18 BY MR. KUVIN:  
 19 Q. Did you go to the mental health counselor as  
 20 required by your plea of guilty?  
 21 A. I fully intend to respond to all relevant  
 22 questions regarding this lawsuit; however, at the  
 23 present time, my attorneys have counseled me I cannot  
 24 provide answers to any questions relevant to this  
 25 lawsuit. I must accept this advice or risk losing my

1 to this lawsuit. I must accept this advice or risk  
 2 losing my 6th Amendment right to effective  
 3 representation. Accordingly, I must assert my  
 4 federal constitutional rights as guaranteed by the  
 5 5th, 6th and 14th Amendment to the US Constitution.  
 6 BY MR. KUVIN:  
 7 Q. Isn't it true, sir, that you've had underaged  
 8 girls under the age of 16 come to your home, get naked  
 9 and give you massages while you masturbated?  
 10 MR. PIKE: For purposes of the record, I'm  
 11 just going to say same objection relating back to  
 12 the same objections.  
 13 THE WITNESS: I fully intend to respond to all  
 14 relevant questions regarding this lawsuit; however,  
 15 at the present time, my attorneys have counseled me  
 16 I cannot provide answers to any questions relevant  
 17 to this lawsuit. I must accept this advice or risk  
 18 losing my 6th Amendment right to effective  
 19 representation. Accordingly, I assert my federal  
 20 constitutional rights as guaranteed by the 5th, 6th  
 21 and 14th Amendment to the US Constitution.  
 22 BY MR. KUVIN:  
 23 Q. Isn't it true that you've had underaged girls  
 24 under the age of 15 come to your home, get naked and  
 25 give you massages while you masturbated?

1 6th Amendment right to effective representation.  
 2 Accordingly, I assert my federal constitutional rights  
 3 as guaranteed by the 5th, 6th and 14th Amendment to the  
 4 US Constitution.  
 5 May we take a break?  
 6 MR. GOLDBERGER: Sure.  
 7 MR. PIKE: In addition to that, it's a  
 8 psychotherapist/patient privileged information.  
 9 THE VIDEOGRAPHER: We're off the record at  
 10 10:50.  
 11 (A brief recess was taken.)  
 12 THE VIDEOGRAPHER: Back on the record at  
 13 11:00.  
 14 MR. KUVIN: Thank you.  
 15 BY MR. KUVIN:  
 16 Q. Isn't it true, sir, that you've had under  
 17 girl -- underaged girls, under the age of 17, come to  
 18 your home, get naked and give you massages while you  
 19 masturbated?  
 20 MR. PIKE: Objection, form, argumentative,  
 21 harassing.  
 22 THE WITNESS: I fully intend to respond to all  
 23 relevant questions regarding this lawsuit; however,  
 24 at the present time, my attorneys have counseled me  
 25 I cannot provide answers to any questions relevant

1 MR. PIKE: Same objections.  
 2 THE WITNESS: I fully intend to respond to all  
 3 relevant questions regarding this lawsuit; however,  
 4 at the present time, my attorneys have counseled me  
 5 I cannot provide answers to any questions relevant  
 6 to this lawsuit. I must accept this advice or risk  
 7 losing my 6th Amendment right to effective  
 8 representation. Accordingly, I assert my federal  
 9 constitutional rights as guaranteed by the 5th, 6th  
 10 and 14th Amendment to the US Constitution.  
 11 May I see -- talk to my counsel for a second  
 12 outside?  
 13 MR. KUVIN: Sure.  
 14 MR. PIKE: Are we off?  
 15 MR. KUVIN: Not yet.  
 16 MR. PIKE: We're off the record.  
 17 MR. KUVIN: We're off that record. We're not  
 18 off that record until everybody leaves.  
 19 MR. PIKE: Stop the video. The video -- off  
 20 the record.  
 21 MR. KUVIN: I can't go off the record if it  
 22 has to do with the lawsuit.  
 23 MR. PIKE: We don't have anyone here.  
 24 THE VIDEOGRAPHER: You know that you both have  
 25 to agree for us to go off the record.

1 MR. PIKE: We don't have anyone here.  
 2 MR. KUVIN: I understand that, but I am not  
 3 going off the record unless it's not pertaining to  
 4 the lawsuit. If it's not pertaining to the lawsuit  
 5 that we're here about today, I'll go off the  
 6 record, but if it pertains to the lawsuit, I cannot  
 7 go off the record.  
 8 MR. PIKE: I don't -- I don't understand. You  
 9 don't have a witness in a chair and you're rolling  
 10 tape.  
 11 MR. KUVIN: Exactly. My tape is going to  
 12 constantly roll with respect to the litigation.  
 13 MR. PIKE: And the point?  
 14 MR. KUVIN: The point is I don't want to miss  
 15 anything, and I want to make sure there's no  
 16 misrepresentations about what goes on with respect  
 17 to the litigation.  
 18 MR. PIKE: Then I'm instructing you to keep  
 19 rolling tape, and for you to keep typing to  
 20 everything that they say out loud in this room.  
 21 MR. KUVIN: Not when everybody leaves.  
 22 We're good now. He wants to go off and I want  
 23 to go off now.  
 24 THE VIDEOGRAPHER: We'll go off the record at  
 25 11:03.

1 MR. PIKE: No.  
 2 MR. GOLDBERGER: I'm sorry, you ready?  
 3 MR. PIKE: Okay.  
 4 MR. KUVIN: Are we ready now?  
 5 MR. GOLDBERGER: Yep.  
 6 MR. KUVIN: Rolling?  
 7 THE VIDEOGRAPHER: We're rolling at 11:05.  
 8 BY MR. KUVIN:  
 9 Q. Okay. Isn't it true, sir, that you've had  
 10 underaged girls under the age of 14 come to your home,  
 11 get naked and give you massages while you masturbated?  
 12 MR. PIKE: Argumentative, harassing,  
 13 irrelevant. Same objections as before.  
 14 THE WITNESS: I fully intend to respond to all  
 15 relevant questions regarding this lawsuit; however,  
 16 at the present time, my attorneys have counseled me  
 17 I cannot provide answers to any questions relevant  
 18 to this lawsuit. I must accept this advice or risk  
 19 losing my 6th Amendment right to effective  
 20 representation. Accordingly, I assert my federal  
 21 constitutional rights as guaranteed by the 5th, 6th  
 22 and 14th Amendment to the US Constitution.  
 23 BY MR. KUVIN:  
 24 Q. Isn't it true, sir, that you've had underaged  
 25 girls under the age of 13 come to your home, get naked

1 Does he, though?  
 2 MR. KUVIN: I don't know. It's a good  
 3 question.  
 4 MS. EZELL: Did you ask me if I'm on?  
 5 MR. KUVIN: Oh, no.  
 6 Hey, how are you? I keep forgetting you're  
 7 there, Katherine.  
 8 MS. EZELL: I'm there. Actually I was on the  
 9 phone, so I just missed what just happened. Are  
 10 you terminating or are you breaking or what?  
 11 MR. KUVIN: No, he wanted to step out of the  
 12 room.  
 13 MS. EZELL: Oh, okay.  
 14 MR. GOLDBERGER: Okay, thank you.  
 15 I had to discuss an issue with my client. I  
 16 appreciate the time.  
 17 MR. KUVIN: Anytime, Jack.  
 18 MR. GOLDBERGER: You know you don't like me  
 19 anymore.  
 20 MR. KUVIN: The secret is I never liked you.  
 21 THE WITNESS: That's no secret.  
 22 MR. KUVIN: There you go.  
 23 MR. PIKE: Move up the record for me so I can  
 24 see.  
 25 MR. KUVIN: Are we ready?

1 and give you massages while you masturbated?  
 2 MR. PIKE: Same objections. In addition,  
 3 asked and answered.  
 4 MR. KUVIN: No, I changed from 14 to 13.  
 5 MR. PIKE: Same objections.  
 6 BY MR. KUVIN:  
 7 Q. You can answer.  
 8 A. I fully intend to respond to all relevant  
 9 questions regarding this lawsuit; however, at the  
 10 present time, my attorneys have counseled me I cannot  
 11 provide answers to any questions relevant to this  
 12 lawsuit. I must accept this advice or risk losing my  
 13 6th Amendment right to effective representation.  
 14 MR. GOLDBERGER: Thank you, Michael.  
 15 THE WITNESS: Accordingly, I assert my federal  
 16 constitutional rights as guaranteed by the 5th, 6th  
 17 and 14th Amendment to the US Constitution.  
 18 Thank you.  
 19 BY MR. KUVIN:  
 20 Q. Isn't it true, sir, that you've had underage  
 21 girls under the age of 12 come to your home, get naked  
 22 and give you massages while you masturbated?  
 23 MR. PIKE: Same objections.  
 24 BY MR. KUVIN:  
 25 Q. I'm sorry, was there something funny about

1 that question?  
 2 A. Are we --  
 3 MR. PIKE: Same objection, argumentative.  
 4 MR. GOLDBERGER: Don't even respond to that.  
 5 THE WITNESS: I fully intend to respond to all  
 6 relevant questions regarding this lawsuit; however,  
 7 at the present time, my attorneys have counseled me  
 8 I cannot provide answers to any questions relevant  
 9 to this lawsuit. I must accept this advice or risk  
 10 losing my 6th Amendment right to effective  
 11 representation. Accordingly, I assert my federal  
 12 constitutional rights as guaranteed by the 5th, 6th  
 13 and 14th Amendment to the US Constitution.  
 14 BY MR. KUVIN:  
 15 Q. Isn't it true that you've engaged in sexual  
 16 activities with girls under the age of 17, including  
 17 touching their vaginas?  
 18 MR. PIKE: Same objections.  
 19 THE WITNESS: I fully intend to respond to all  
 20 relevant questions regarding this lawsuit; however,  
 21 at the present time, my attorneys have counseled me  
 22 I cannot provide answers to any questions relevant  
 23 to this lawsuit. I must accept this advice or risk  
 24 losing my 6th Amendment right to effective  
 25 representation. Accordingly, I assert my federal

1 losing my 6th Amendment right to effective  
 2 representation. Accordingly, I assert my federal  
 3 constitutional rights as guaranteed by the 5th, 6th  
 4 and 14th Amendment to the US Constitution.  
 5 BY MR. KUVIN:  
 6 Q. Your name is Jeffrey Epstein, correct?  
 7 A. Correct.  
 8 Q. I just wanted to see if I could get an answer.  
 9 MR. PIKE: I'm going to move to strike  
 10 counsel's last statement; it's not a question.  
 11 BY MR. KUVIN:  
 12 Q. Do you agree you maintain a home in New  
 13 Mexico?  
 14 A. I fully intend to respond to all relevant  
 15 questions regarding this lawsuit; however, at the  
 16 present time, my attorneys have counseled me I cannot  
 17 provide answers to any questions relevant to this  
 18 lawsuit. I must accept this advice or risk losing my  
 19 6th Amendment right to effective representation.  
 20 Accordingly, I assert my federal constitutional rights  
 21 as guaranteed by the 5th, 6th and 14th Amendment to the  
 22 US Constitution.  
 23 Q. Isn't it true that you've engaged in sexual  
 24 activities with girls under the age of 16, including  
 25 touching their vaginas?

1 constitutional rights as guaranteed by the 5th, 6th  
 2 and 14th Amendment to the US Constitution.  
 3 BY MR. KUVIN:  
 4 Q. Isn't it true that you've engaged in sexual  
 5 activities with girls under the age of 17, including  
 6 using vibrators on their vaginas?  
 7 MR. PIKE: Same objections.  
 8 THE WITNESS: I fully intend to respond to all  
 9 relevant questions regarding this lawsuit; however,  
 10 at the present time, my attorneys have counseled me  
 11 I cannot provide answers to any questions relevant  
 12 to this lawsuit. I must accept this advice or risk  
 13 losing my 6th Amendment right to effective  
 14 representation. Accordingly, I assert my federal  
 15 constitutional rights as guaranteed by the 5th, 6th  
 16 and 14th Amendment to the US Constitution.  
 17 BY MR. KUVIN:  
 18 Q. Do you agree that you maintain a home in New  
 19 York?  
 20 MR. PIKE: Objection, form.  
 21 THE WITNESS: I fully intend to respond to all  
 22 relevant questions regarding this lawsuit; however,  
 23 at the present time, my attorneys have counseled me  
 24 I cannot provide answers to any questions relevant  
 25 to this lawsuit. I must accept this advice or risk

1 MR. PIKE: Objection, harassing,  
 2 argumentative.  
 3 THE WITNESS: Didn't you ask the same question  
 4 before?  
 5 BY MR. KUVIN:  
 6 Q. No, it was 17 before; now I went to 16.  
 7 MR. PIKE: Same objection.  
 8 THE WITNESS: I fully intend to respond to all  
 9 relevant questions regarding this lawsuit; however,  
 10 at the present time, my attorneys have counseled me  
 11 I cannot provide answers to any questions relevant  
 12 to this lawsuit. I must accept this advice or risk  
 13 losing my 6th Amendment right to effective  
 14 representation. Accordingly, I assert my federal  
 15 constitutional rights as guaranteed by the 5th, 6th  
 16 and 14th Amendment to the US Constitution.  
 17 BY MR. KUVIN:  
 18 Q. Isn't it true that you've engaged in sexual  
 19 activities with girls under the age of 16, including  
 20 using vibrators on their vaginas?  
 21 MR. PIKE: Same objection, asked and answered.  
 22 MR. KUVIN: Nope. The question before, and we  
 23 can read it back, was whether he touched their  
 24 vaginas, and this question is very specific asking  
 25 whether he used vibrators on their vaginas.

1 MR. PIKE: Same objection, asked and answered.  
 2 BY MR. KUVIN:  
 3 Q. You can answer.  
 4 A. I fully intend to respond to all relevant  
 5 questions regarding this lawsuit; however, at the  
 6 present time, my attorneys have counseled me I cannot  
 7 provide answers to any questions relevant to this  
 8 lawsuit. I must accept this advice or risk losing my  
 9 6th Amendment right to effective representation.  
 10 Accordingly, I must assert my federal constitutional  
 11 rights as guaranteed by the 5th, 6th and 14th Amendment  
 12 to the US Constitution.  
 13 Q. Have you requested girls under the age of 16  
 14 to spread their legs in front of you so that you could  
 15 see their vaginas?  
 16 MR. PIKE: Same objection.  
 17 THE WITNESS: I fully intend to respond to all  
 18 relevant questions regarding this lawsuit; however,  
 19 at the present time, my attorneys have counseled me  
 20 I cannot provide answers to any questions relevant  
 21 to this lawsuit. I must accept this advice or risk  
 22 losing my 6th Amendment right to effective  
 23 representation. Accordingly, I assert my federal  
 24 constitutional rights as guaranteed by the 5th, 6th  
 25 and 14th Amendment to the US Constitution.

1 process, we will once again terminate this  
 2 deposition. I am giving you a fair opportunity to  
 3 continue to use the discovery process in the manner  
 4 in which it is utilized; however, your  
 5 grandstanding, laughing in the background, and  
 6 snide comments and remarks are not appropriate  
 7 during the discovery process; therefore, this is my  
 8 one warning to you, Mr. Kuvin.  
 9 MR. KUVIN: I disagree.  
 10 MR. PIKE: I'm not asking you for an  
 11 agreement. Please proceed.  
 12 MR. KUVIN: I'm just making sure that the  
 13 record is clear.  
 14 And, by the way, you should fix the door,  
 15 Jack, because there's no spring on it, so when  
 16 somebody touches it, it goes very fast. So I  
 17 apologize if it did slam, and that's the only thing  
 18 I do agree with.  
 19 MR. GOLDBERGER: Okay. I appreciate the  
 20 apology.  
 21 As long as we're going to yak here, Spencer,  
 22 you made a comment that I should learn the rules of  
 23 civil procedure and learn how to conduct  
 24 depositions and so forth. I've been practicing  
 25 primarily criminal defense for 33 years, and do you

1 BY MR. KUVIN:  
 2 Q. Do you agree that you maintain a home in the  
 3 US Virgin Islands?  
 4 A. As I've answered most of your questions today,  
 5 I'll answer this basically the same way, which is, I  
 6 fully intend to respond to all relevant questions  
 7 regarding this lawsuit; however, at the present time, my  
 8 attorneys have counseled me I cannot provide answers to  
 9 any questions relevant to this lawsuit. I must accept  
 10 this advice or risk losing my 6th Amendment right to  
 11 effective representation. Accordingly, I assert my  
 12 federal constitutional rights as guaranteed by the 5th,  
 13 6th and 14th Amendment to the US Constitution.  
 14 Q. Do you want to give answers?  
 15 MR. PIKE: Move to strike, argumentative,  
 16 harassing.  
 17 Mr. Kuvin, I have no reticence with regard to  
 18 getting in front of Judge Hafele once again, and  
 19 let me delineate for you what your comments and  
 20 some of your conduct here today is and has been:  
 21 Laughing, argumentative comments after your  
 22 questioning, interrupting the witness, snide  
 23 comments, as well as slamming doors in an office  
 24 that is not yours.  
 25 Now, if you continue to disrupt the discovery

1 know what, we don't play these games; we get to the  
 2 issues, we ask questions, we don't laugh at  
 3 witnesses when they give answers in depositions.  
 4 We're not sarcastic. We simply ask the questions  
 5 and act professionally, and that's all I'm asking  
 6 you to do in this deposition, but apparently you're  
 7 incapable of doing that.  
 8 So you're creating this environment here,  
 9 you're creating this atmosphere. I'm trying to be  
 10 polite to you, but it's becoming more and more  
 11 difficult. So I'm asking you to just kind of act  
 12 professionally and we'll get along, and we'll get  
 13 through this, that's all.  
 14 MR. KUVIN: I've been acting professionally.  
 15 Frankly, I wasn't the one that told the other  
 16 attorney to shut up. I mean, those were your  
 17 words, not mine. I just wanted to make sure that I  
 18 understood what you were saying to me.  
 19 MR. GOLDBERGER: It was a reaction to your --  
 20 MR. KUVIN: Sir --  
 21 MR. GOLDBERGER: It was a reaction to your --  
 22 MR. KUVIN: -- I would appreciate it if you  
 23 would let me finish.  
 24 MR. GOLDBERGER: It was a reaction to your  
 25 inappropriate comments and conduct.

1 MR. KUVIN: See, the problem is you keep  
 2 interrupting me.  
 3 MR. GOLDBERGER: You're the one that's  
 4 interrupting me, Spencer.  
 5 MR. KUVIN: You want me to be courteous and  
 6 let you speak, and then you continue to interrupt  
 7 me when I want to respond to the nonsensical  
 8 arguments that you're making, because I have been  
 9 perfectly courteous here. I've been asking  
 10 perfectly courteous questions, relevant questions  
 11 to the case, pertinent questions to the issues in  
 12 this case.  
 13 So if you have a problem with the questions,  
 14 then make a legal objection. You and I both know  
 15 that a speaking, lengthy objection is an improper  
 16 one; that objection to form is the only objection  
 17 you should be making. And the only comment I made  
 18 about you practicing in civil was just merely the  
 19 fact that I didn't know whether you understood that  
 20 objection to form covers everything.  
 21 MR. GOLDBERGER: I have an --  
 22 MR. KUVIN: It certainly wasn't meant as an  
 23 insult at all, and I'm sorry if you took it that  
 24 way.  
 25 MR. GOLDBERGER: I appreciate it. I accept

1 we've both been warned.  
 2 MR. PIKE: Mr. Kuvin, you bring up a fabulous  
 3 point, a fabulous point, and I'm surprised --  
 4 MR. KUVIN: It's amazing. I'm surprised that  
 5 I brought it up.  
 6 MR. PIKE: The next time you choose to laugh  
 7 at the witness, we'll call Judge Hafele and see  
 8 today what he has to say about that, okay?  
 9 MR. KUVIN: Perfectly fine.  
 10 MR. PIKE: It's a great idea.  
 11 MR. KUVIN: It sounds good to me.  
 12 MR. PIKE: So let's proceed with some relevant  
 13 questions.  
 14 And I would try to give you a hint: Keep in  
 15 mind the allegations in your complaint.  
 16 MR. KUVIN: Sounds good to me.  
 17 MR. PIKE: Let's move forward.  
 18 BY MR. KUVIN:  
 19 Q. Isn't it true, sir, that you've engaged in  
 20 sexual activities with girls under the age of 15,  
 21 including touching their vaginas?  
 22 A. I--  
 23 MR. PIKE: Argumentative, harassing, same  
 24 objections. Sorry.  
 25 THE WITNESS: I fully intend to respond to all

1 your apology.  
 2 I have -- I have a suggestion, because  
 3 apparently, for whatever reason, everyone's  
 4 grandstanding, we just can't seem -- wait a minute,  
 5 let me just finish. Let me finish.  
 6 MR. KUVIN: I'm not grandstanding. I want to  
 7 get through my questions.  
 8 MR. GOLDBERGER: We can't seem to get along.  
 9 MR. KUVIN: I just want to get through the  
 10 questions.  
 11 MR. GOLDBERGER: Do you want to have the  
 12 mediator sit in for this deposition? Is that what  
 13 you want to do?  
 14 MR. KUVIN: No, I don't think we need it. I'm  
 15 working through my questions.  
 16 MR. GOLDBERGER: Okay, then. Go ahead.  
 17 MR. PIKE: Let's proceed then.  
 18 MR. KUVIN: Okay, great.  
 19 MR. GOLDBERGER: You've been warned.  
 20 MR. KUVIN: I don't know what the warning is  
 21 supposed to mean. Nobody is a judge in this room.  
 22 I don't think I need a warning.  
 23 MR. GOLDBERGER: That's why I'm suggesting  
 24 that --  
 25 MR. KUVIN: You've been warned as well, so now

1 relevant questions regarding this lawsuit; however,  
 2 at the present time, my attorneys have counseled me  
 3 I cannot provide answers to any questions relevant  
 4 to this lawsuit. I must accept this advice or risk  
 5 losing my 6th Amendment right to effective  
 6 representation. Accordingly, I assert my federal  
 7 constitutional rights as guaranteed by the 5th, 6th  
 8 and 14th Amendment to the US Constitution.  
 9 BY MR. KUVIN:  
 10 Q. Isn't it true that you've engaged in sexual  
 11 activities with girls under the age of 15, including  
 12 using vibrators on their vaginas?  
 13 MR. PIKE: Same objection.  
 14 THE WITNESS: As I've answered your  
 15 questions -- most of your questions today, I'll  
 16 answer it the same way now, which is, I fully  
 17 intend to respond to all relevant questions  
 18 regarding this lawsuit; however, at the present  
 19 time, my attorneys have counseled me I cannot  
 20 provide answers to any questions relevant to this  
 21 lawsuit. I must accept this advice or risk losing  
 22 my 6th Amendment right to effective representation.  
 23 Accordingly, I assert my federal constitutional  
 24 rights as guaranteed by the 5th, 6th and 14th  
 25 Amendment to the US Constitution.



1 BY MR. KUVIN:

2 Q. Isn't it true that you've engaged in sexual  
3 activities with girls under the age of 14 including  
4 touching their vaginas?

5 MR. PIKE: Same objections.

6 THE WITNESS: As I've answered most of your  
7 other questions today, I fully intend to respond to  
8 all relevant questions regarding this lawsuit;  
9 however, at the present time, my attorneys have  
10 counseled me I cannot provide answers to any  
11 questions relevant to this lawsuit. I must accept  
12 this advice or risk losing my 6th Amendment right  
13 to effective representation. Accordingly, I assert  
14 my federal constitutional rights as guaranteed by  
15 the 5th, 6th and 14th Amendment to the US  
16 Constitution.

17 BY MR. KUVIN:

18 Q. Isn't it true that you've engaged in sexual  
19 activities with girls under the age of 14, including  
20 using vibrators on their vaginas?

21 MR. PIKE: Same objections.

22 THE WITNESS: I'll respond to this question in  
23 the same way I've responded to some of your other  
24 questions, which is, I fully intend to respond to  
25 all relevant questions regarding this lawsuit;

1 BY MR. KUVIN:

2 Q. What is the youngest girl that you've had sex  
3 with?

4 MR. PIKE: Form.

5 THE WITNESS: I'm going to answer that  
6 question the same way I've answered most of your  
7 other questions here today, which is, I fully  
8 intend to respond to all relevant questions  
9 regarding this lawsuit; however, at the present  
10 time, my attorneys have counseled me I cannot  
11 provide answers to any questions that may be  
12 relevant to this lawsuit. I must accept this  
13 advice or risk losing my 6th Amendment right to  
14 effective representation. Accordingly, I assert my  
15 federal constitutional rights as guaranteed by the  
16 5th, 6th and 14th Amendment to the US Constitution.

17 BY MR. KUVIN:

18 Q. What is the youngest age of a girl that has  
19 given you a naked massage?

20 MR. PIKE: Form, argumentative, harassing and  
21 as worded, irrelevant.

22 THE WITNESS: I'm going to answer that  
23 question the same way I've answered most of your  
24 other questions here today, which is, I fully  
25 intend to respond to all relevant questions

1 however, at the present time, my attorneys have  
2 counseled me I cannot provide answers to any  
3 questions relevant to this lawsuit. I must accept  
4 this advice or risk losing my 6th Amendment right  
5 to effective representation. Accordingly, I assert  
6 my federal constitutional rights as guaranteed by  
7 the 5th, 6th and 14th Amendment to the US  
8 Constitution.

9 BY MR. KUVIN:

10 Q. Isn't it true that you've engaged in sexual  
11 activities with girls under the age of 14, which  
12 includes using vibrators on their vaginas?

13 MR. PIKE: Same objections.

14 THE WITNESS: I'll answer that question the  
15 same way I've answered most of your other questions  
16 here today, Mr. Kuvin, which is, I fully intend to  
17 respond to all relevant questions regarding this  
18 lawsuit; however, at the present time, my attorneys  
19 have counseled me I cannot provide answers to any  
20 questions that may be relevant to this lawsuit. I  
21 must accept their advice or risk losing my 6th  
22 Amend -- Amendment right to effective  
23 representation. Accordingly, I assert my federal  
24 constitutional rights as guaranteed by the 5th, 6th  
25 and 14th Amendment to the US Constitution.

1 regarding this lawsuit; however, at the present  
2 time, my attorneys have counseled me I cannot  
3 provide answers to any questions that may be  
4 relevant to this lawsuit. I must accept this  
5 advice or risk losing my 6th Amendment right to  
6 effective representation. Accordingly, I assert my  
7 federal constitutional rights as guaranteed by the  
8 5th, 6th and 14th Amendment to the US Constitution.

9 BY MR. KUVIN:

10 Q. What is the youngest age of a girl you have  
11 masturbated in front of?

12 MR. PIKE: Same objections as before.

13 THE WITNESS: I'm going to answer that  
14 question in the same way I've answered most of your  
15 other questions here today, Mr. Kuvin, which is, I  
16 intend to respond to all relevant questions  
17 regarding this lawsuit; however, at the present  
18 time, my attorneys have counseled me I cannot  
19 provide answers to any questions that may be  
20 relevant to this lawsuit. I must accept this  
21 advice or risk losing my 6th Amendment right to  
22 effective representation. Accordingly, I assert my  
23 federal constitutional rights as guaranteed by the  
24 5th, 6th and 14th Amendments to the US  
25 Constitution.

1 BY MR. KUVIN:  
 2 Q. What is the youngest age of a girl that you  
 3 have ejaculated in front of?  
 4 MR. PIKE: Same objections as before to this  
 5 same line of questioning incorporated.  
 6 THE WITNESS: What was the question before  
 7 that, sir?  
 8 BY MR. KUVIN:  
 9 Q. What is the youngest age -- the one before or  
 10 this one? I'm sorry.  
 11 A. The one before, I thought it was the same  
 12 question.  
 13 Q. No, the one before was masturbated, and this  
 14 one was ejaculated. I'll rephrase it.  
 15 What is the youngest age of a girl you have  
 16 ejaculated in front of?  
 17 MR. PIKE: Same objection, argumentative,  
 18 harassing.  
 19 THE WITNESS: I'm going to respond to that  
 20 question the same way I've responded to most of  
 21 your other questions here today, which is, I fully  
 22 intend to respond to all relevant questions  
 23 regarding this lawsuit; however, at the present  
 24 time, my attorneys have counseled me I cannot  
 25 provide answers to any questions that may be

1 for girls under the age of 17?  
 2 MR. PIKE: Same objections.  
 3 THE WITNESS: I'm going to answer that  
 4 question the same way I've answered most of your  
 5 other questions here today, Mr. Kuvin, which is, I  
 6 fully intend to respond to all relevant questions  
 7 regarding this lawsuit; however, at the present  
 8 time, my attorneys have counseled me I cannot  
 9 provide answers to any questions relevant to this  
 10 lawsuit. I must accept their advice or risk losing  
 11 my 6th Amendment right to effective representation.  
 12 BY MR. KUVIN:  
 13 Q. Do you agree that you --  
 14 A. Accordingly --  
 15 Q. Oh, I apologize.  
 16 A. Accordingly, I assert my federal  
 17 constitutional rights as guaranteed by the 5th, 6th and  
 18 14th Amendment to the US Constitution.  
 19 Q. I'm sorry, are you done?  
 20 A. Yes.  
 21 Q. Okay. I apologize for interrupting you.  
 22 Do you agree that you have a sexual preference  
 23 for girls under the age of 16?  
 24 MR. PIKE: Same objections, form.  
 25 THE WITNESS: I'm going to answer that

1 relevant to this lawsuit. I must accept their  
 2 advice or risk losing my 6th Amendment right to  
 3 effective representation. Accordingly, I assert my  
 4 federal constitutional rights as guaranteed by the  
 5 5th, 6th and 14th Amendment to the US Constitution.  
 6 BY MR. KUVIN:  
 7 Q. Do you agree that you have a sexual preference  
 8 for underaged girls; in other words, girls under the age  
 9 of 18?  
 10 MR. PIKE: Same objections, in addition to  
 11 form.  
 12 THE WITNESS: I'm going to answer that  
 13 question the same way I've answered most of your  
 14 other questions here today, Mr. Kuvin, which is, I  
 15 fully intend to respond to all relevant questions  
 16 regarding this lawsuit; however, at the present  
 17 time, my attorneys have counseled me I cannot  
 18 provide answers to any questions that may be  
 19 relevant to this lawsuit. I must accept their  
 20 advice or risk losing my 6th Amendment right to  
 21 effective representation. Accordingly, I assert my  
 22 federal constitutional rights as guaranteed by the  
 23 5th, 6th and 14th Amendment to the US Constitution.  
 24 BY MR. KUVIN:  
 25 Q. Do you agree that you have a sexual preference

1 question the same way I've answered most of your  
 2 other questions here today. I fully intend to  
 3 respond to all relevant questions regarding this  
 4 lawsuit; however, at the present time, my attorneys  
 5 have counseled me I cannot provide answers to any  
 6 questions that may be relevant to this lawsuit. I  
 7 must accept their advice or risk losing my 6th  
 8 Amendment right to effective representation.  
 9 Accordingly, I assert my federal constitutional  
 10 rights as guaranteed by the 5th, 6th and 14th  
 11 Amendment of the US Constitution.  
 12 BY MR. KUVIN:  
 13 Q. Do you agree that you have a sexual preference  
 14 for girls under the age of 15?  
 15 MR. PIKE: Same objections.  
 16 THE WITNESS: I'm going to answer that  
 17 question the same way I've answered most of your  
 18 other questions here today, Mr. Kuvin, which is, I  
 19 fully intend to respond to all relevant questions  
 20 regarding this lawsuit; however, at the present  
 21 time, my attorneys have counseled me I cannot  
 22 provide answers to any questions relevant to this  
 23 lawsuit. I must accept their advice or risk losing  
 24 my 6th Amendment right to effective representation.  
 25 Accordingly, I assert my federal constitutional

1 rights as guaranteed by the 5th, 6th and 14th  
 2 Amendment to the US Constitution.  
 3 BY MR. KUVIN:  
 4 Q. Do you agree that you have a sexual preference  
 5 for girls under the age of 14?  
 6 MR. PIKE: Same objections.  
 7 THE WITNESS: I'm going to answer that  
 8 question the same way I've answered most of your  
 9 other questions here today, Mr. Kuvin, which is, I  
 10 fully intend to respond to all relevant questions  
 11 regarding this lawsuit; however, at the present  
 12 time, my attorneys have counseled me I cannot  
 13 provide answers to any questions relevant to this  
 14 lawsuit. I must accept their advice or risk losing  
 15 my 6th Amendment right to effective representation.  
 16 Accordingly, I assert my federal constitutional  
 17 rights as guaranteed by the 5th, 6th and 14th  
 18 Amendment to the US Constitution.  
 19 BY MR. KUVIN:  
 20 Q. Do you agree that you have a sexual preference  
 21 for girls under the age of 13?  
 22 MR. PIKE: Same objection.  
 23 THE WITNESS: I'm going to answer that  
 24 question the same way I've answered most of your  
 25 other questions today, which is, I fully intend to

1 Constitution.  
 2 BY MR. KUVIN:  
 3 Q. Do you agree that you've been treating with a  
 4 psychologist for your sexual perversions?  
 5 MR. PIKE: Objection, vague, harassing, also  
 6 psychotherapist/patient privilege; in addition,  
 7 could call for their information resulting from  
 8 non-testifying consulting expert information.  
 9 I'm going to instruct the witness not to  
 10 answer.  
 11 BY MR. KUVIN:  
 12 Q. Do you agree that you've been treating with a  
 13 psychiatrist for your sexual perversions?  
 14 MR. PIKE: Same objection.  
 15 BY MR. KUVIN:  
 16 Q. Do you agree that according to your State  
 17 Court sentence, you are mandated to obtain mental health  
 18 counseling or therapy?  
 19 MR. PIKE: Same objection.  
 20 BY MR. KUVIN:  
 21 Q. Who is that therapy with?  
 22 MR. PIKE: Let's take a break for one second.  
 23 We don't have to leave.  
 24 I'm going to maintain the same objections and  
 25 instructions.

1 respond to all relevant questions regarding this  
 2 lawsuit; however, at the present time, my attorneys  
 3 have counseled me I cannot provide answers to any  
 4 questions that may be relevant to this lawsuit. I  
 5 must accept this advice or risk losing my 6th  
 6 Amendment right to effective representation.  
 7 Accordingly, I assert my federal constitutional  
 8 rights as guaranteed by the 5th, 6th and 14th  
 9 Amendment to the US Constitution.  
 10 BY MR. KUVIN:  
 11 Q. Do you agree that you have a sexual preference  
 12 for girls under the age of 12?  
 13 MR. PIKE: Objection, harassing. In addition,  
 14 vague and indefinite, form.  
 15 THE WITNESS: I'm going to answer that  
 16 question the same way I've answered your other  
 17 questions here today, which is, I intend to respond  
 18 to all relevant questions regarding this lawsuit;  
 19 however, at the present time, my attorneys have  
 20 counseled me I cannot provide answers to any  
 21 questions relevant to this lawsuit. I must accept  
 22 this advice or risk losing my 6th Amendment right  
 23 to effective representation. Accordingly, I assert  
 24 my federal constitutional rights as guaranteed by  
 25 the 5th, 6th and 14th Amendment to the US

1 BY MR. KUVIN:  
 2 Q. How often are you going to that mental health  
 3 counselor?  
 4 MR. PIKE: Same objection and instruction.  
 5 BY MR. KUVIN:  
 6 Q. What do you discuss with the therapist?  
 7 MR. PIKE: Definitely same objection and  
 8 instruction.  
 9 BY MR. KUVIN:  
 10 Q. Have you violated your probation by not going  
 11 to a mental health counselor or therapist?  
 12 MR. PIKE: Same objection and instruction.  
 13 BY MR. KUVIN:  
 14 Q. Do you agree that while in Palm Beach you've  
 15 preyed on girls who are generally troubled, under the  
 16 age of 17 and economically disadvantaged because you can  
 17 control them better?  
 18 MR. PIKE: Objection, harassing,  
 19 argumentative, vague and indefinite.  
 20 THE WITNESS: I'm going to answer that  
 21 question the same way I've answered most of your  
 22 other questions here today, which is, I fully  
 23 intend to respond to all relevant questions  
 24 regarding this lawsuit; however, at the present  
 25 time, my attorneys have counseled me I cannot

1 provide answers to any questions relevant to this  
2 lawsuit. I must accept this advice or risk losing  
3 my 6th Amendment right to effective representation.  
4 Accordingly, I assert my federal constitutional  
5 rights as guaranteed by the 5th, 6th and 14th  
6 Amendment to the US Constitution.

7 BY MR. KUVIN:

8 Q. Do you agree that -- let me ask you this: Do  
9 you see patterns in things?

10 MR. PIKE: Form, compound, confusing, vague.

11 THE WITNESS: I don't --

12 BY MR. KUVIN:

13 Q. Do you understand the question?

14 A. No, I don't.

15 Q. Do you see patterns in numbers?

16 MR. PIKE: Same objection, lack of predicate,  
17 foundation.

18 What are you talking about?

19 THE WITNESS: I don't understand the question.

20 BY MR. KUVIN:

21 Q. Do you recognize patterns in large numbers?

22 MR. PIKE: Same --

23 MR. GOLDBERGER: You just asked the question  
24 the same way. Just ask it a different way and  
25 he'll try and answer it for you.

1 Union from 1969 to 1971, correct?

2 A. Correct.

3 Q. Okay. You were raised in Coney Island?

4 A. Correct.

5 Q. You attended Lafayette High School in  
6 Brooklyn, New York?

7 A. Is that a question?

8 Q. Yes. Did you attend -- I'm sorry, did you  
9 attend Lafayette High School in Brooklyn, New York?

10 A. Yes.

11 Q. And you took classes at -- oh, I asked that,  
12 I'm sorry.

13 You went to Courant Institute of Mathematical  
14 Sciences where you left without a degree, correct?

15 A. Correct.

16 Q. From '73 to '75, you taught calculus and  
17 physics at The Dalton School?

18 A. I'm not sure those years are correct.

19 Q. What years were you at Dalton?

20 A. I believe it was '74 to '76.

21 Q. Okay.

22 A. I'm not certain.

23 Q. Okay. Now, Dalton School is a high school,  
24 correct?

25 A. Correct.

1 MR. KUVIN: I did. I tried to clarify it.

2 MR. GOLDBERGER: You made it -- you said large  
3 numbers versus numbers.

4 THE WITNESS: I don't understand the question.

5 BY MR. KUVIN:

6 Q. Do you see patterns in any sequences of  
7 numbers?

8 MR. PIKE: Same objection.

9 THE WITNESS: Do I see patterns? I don't  
10 understand the question.

11 BY MR. KUVIN:

12 Q. Well, you developed a software to help make  
13 money in the stock market, correct?

14 MR. PIKE: Objection as to relevance.

15 THE WITNESS: No, that's -- no, absolutely  
16 not.

17 BY MR. KUVIN:

18 Q. It wasn't a software, a computer software,  
19 that you helped to develop many years ago after leaving  
20 your teaching job?

21 MR. PIKE: Same objection.

22 THE WITNESS: I don't know what you're talking  
23 about.

24 BY MR. KUVIN:

25 Q. Let's go back. You took classes at Cooper

1 Q. What were the ages of the children you were  
2 teaching at that high school?

3 A. Mostly old -- mostly 17 and 18.

4 Q. Okay. So you were teaching seniors?

5 A. Yes.

6 Q. What were you teaching?

7 A. You just asked that question, mathematics and  
8 physics.

9 Q. You're right, I apologize.

10 Were you teaching any girls that were under  
11 the age of 17 at the time?

12 A. I don't know.

13 Q. Did you have any sexual contact with any of  
14 the girls that you were teaching at Dalton?

15 A. Again?

16 Q. Did you have any sexual contact with the girls  
17 that you were teaching at Dalton?

18 A. While I was a teacher?

19 Q. Well, let's start with that question, yes.

20 A. No.

21 Q. How about after?

22 A. Not that I remember.

23 Q. Did you date any girls that were previously  
24 your student at Dalton?

25 A. I'm going to answer that question like every

1 other question I've answered today, which is, I intend  
2 to respond to all relevant questions regarding this  
3 lawsuit; however, at the present time, my attorneys have  
4 counseled me I cannot provide answers to any questions  
5 that may be relevant to this lawsuit. I must accept  
6 this advice or risk losing my 6th Amendment right to  
7 effective representation. Accordingly, I assert my  
8 federal constitutional rights as guaranteed by the 5th,  
9 6th and 14th Amendment to the US Constitution.

10 Q. You do not have a college degree, correct?

11 A. Correct.

12 Q. Regardless of that, you became a trader at  
13 Bear Stearns at some point, correct?

14 MR. PIKE: Form.

15 BY MR. KUVIN:

16 Q. Let me ask it a different way if you're  
17 confused. You look confused.

18 A. Yes.

19 Q. You became a trader at Bear Stearns without a  
20 college degree; is that correct?

21 A. No.

22 Q. You had --

23 A. I was never a trader.

24 Q. I'm sorry. What job did you hold at  
25 Bear Stearns?

1 I've tried, can you believe that?

2 THE VIDEOGRAPHER: I do believe that. I do.

3 MR. KUVIN: Right. Oh, yeah, yeah, yeah. I  
4 remember you mentioned that before, right, yeah.

5 THE WITNESS: Are we off the record?

6 MR. KUVIN: Unfortunately, Mr. Pike wanted us  
7 on permanently, so we're on permanently.

8 MR. PIKE: Actually, no. The -- I wanted to  
9 go off the record in order to, you know, conserve  
10 on Jeana's time, as well as the videographer, but  
11 Mr. Kuvin, you stated you wanted to be on the  
12 record because you wanted to ensure that everything  
13 was on the record that had to deal with this case.  
14 So now we're seeing people coming in and out of  
15 doors after they use the restroom, which I really  
16 see as a complete waste of resources.

17 Nonetheless --

18 MR. GOLDBERGER: Let's all be friends here and  
19 let's just do this depo.

20 MR. KUVIN: I just wanted to stay on the  
21 record while --

22 MR. GOLDBERGER: That's fine.

23 MR. KUVIN: -- the attorneys were still in the  
24 room, that's all.

25 MR. GOLDBERGER: That's fine.

1 MR. PIKE: I'd like to take a break and speak  
2 to my client.

3 MR. KUVIN: Okay.

4 THE VIDEOGRAPHER: Your mic is still on,  
5 Mr. Pike.

6 MR. PIKE: Thank you. I appreciate that  
7 reminder.

8 MR. GOLDBERGER: Okay.

9 MR. PIKE: Go ahead.

10 MR. KUVIN: Yes. As far as I'm concerned, you  
11 can cut it.

12 THE VIDEOGRAPHER: Okay. We'll go off the  
13 record at 11:33.

14 MR. KUVIN: As far as she is concerned, she's  
15 got to keep going, so...

16 THE VIDEOGRAPHER: Well, I'm going to start  
17 the recording again because I -- I'm in an awkward  
18 position. I'm just going to keep it going.

19 MR. KUVIN: That's not a problem.

20 THE VIDEOGRAPHER: Okay.

21 MR. KUVIN: Can I make shadow animals in front  
22 of you?

23 THE VIDEOGRAPHER: If you'd like.

24 MR. KUVIN: Jeana is the best court reporter I  
25 have ever had in all of the hundreds of cases that

1 MR. KUVIN: When the attorneys leave the room,  
2 I don't mind going off the record. That's no  
3 problem with me.

4 MR. GOLDBERGER: Let's just get along and get  
5 this stuff done and move on.

6 MR. KUVIN: I'm more than happy to do that.

7 MR. GOLDBERGER: Are we cool with that?

8 MR. KUVIN: Sure.

9 MR. GOLDBERGER: Sure.

10 THE VIDEOGRAPHER: Spencer, you have about  
11 five minutes.

12 MR. KUVIN: Why don't you change tape so we  
13 don't have to stop.

14 MR. GOLDBERGER: What time do you want to  
15 stop, because I've just got some stuff that I need  
16 to do at some point today. Do you want to take a  
17 break or do you not --

18 THE VIDEOGRAPHER: Let me go off the record.  
19 We'll go off the record at 11:36. This will be the  
20 end of videotape No. 1.

21 COURT REPORTER: Are we going off the paper  
22 record, too?

23 MR. KUVIN: Sure.

24 MR. PIKE: Yeah.

25 (A brief recess was taken.)

1 THE VIDEOGRAPHER: We're back on the record at  
 2 11:39. This will be the beginning of tape No. 2.  
 3 BY MR. KUVIN:  
 4 Q. What job -- what job did you have at  
 5 Bear Stearns?  
 6 A. I fully intend to respond to all relevant  
 7 questions regarding this lawsuit; however, at the  
 8 present time, my attorneys have counseled me I cannot  
 9 provide answers to any questions that may be relevant to  
 10 this lawsuit. I must accept this advice or risk losing  
 11 my 6th Amendment right to effective representation.  
 12 Accordingly, I assert my federal constitutional rights  
 13 as guaranteed by the 5th, 6th and 14th Amendment to the  
 14 US Constitution.  
 15 MR. KUVIN: Obviously, I'm going to have to  
 16 take this up with Judge Hafele, but I'm trying to  
 17 understand, counsel, and, you know, I'm not going  
 18 to ask the witness obviously but how his job at  
 19 Bear Stearns is a potential 5th Amendment issue in  
 20 this case.  
 21 MR. PIKE: It's asked and answered.  
 22 MR. KUVIN: So there is no explanation?  
 23 MR. PIKE: You said you wanted to take it up  
 24 with the judge; you can take it up with the judge.  
 25 Number one, the relevancy of it is it's not

1 as guaranteed by the 5th, 6th and 14th Amendment to the  
 2 US Constitution.  
 3 Q. In 1982, you founded your own financial  
 4 management firm called J. Epstein & Company; isn't that  
 5 true?  
 6 A. As I've answered most of your other questions  
 7 today, Mr. Kuvin, I intend to fully respond to all  
 8 relevant questions regarding this lawsuit; however, at  
 9 the present time, my attorneys have counseled me I  
 10 cannot provide answers to any questions relevant to this  
 11 lawsuit. I must accept their advice or risk losing my  
 12 6th Amendment right to effective representation.  
 13 Accordingly, I assert my federal constitutional rights  
 14 as guaranteed by the 5th, 6th and 14th Amendment to the  
 15 US Constitution.  
 16 Q. The company that you founded called J. Epstein  
 17 & Company later changed its name to Financial Trust Co,  
 18 and its headquarters are in the private islands of the  
 19 US Virgin Islands; isn't that true?  
 20 A. I fully intend to respond to all relevant  
 21 questions regarding this lawsuit; however, at the  
 22 present time, my attorneys have counseled me I cannot  
 23 provide answers to any questions relevant to this  
 24 lawsuit. I must accept their advice or risk losing my  
 25 6th Amendment right to effective representation.

1 applicable to your lawsuit, that -- I mean, that's  
 2 the large part.  
 3 MR. KUVIN: Relevance we can argue about.  
 4 MR. PIKE: Anyway, but again, I don't need to  
 5 make your case for you. You can make your case to  
 6 Judge Hafele. The privilege has been asserted.  
 7 BY MR. KUVIN:  
 8 Q. Sir, isn't it true that you do not have a  
 9 college degree?  
 10 A. Yes, that's true.  
 11 Q. All right. Now, you have no post-secondary  
 12 degrees?  
 13 A. No, sir.  
 14 Q. How did you get the job at Bear Stearns  
 15 without a college degree or any post-secondary degrees?  
 16 A. You don't need a college degree to get a job  
 17 with Bear Stearns.  
 18 Q. Who gave you the job?  
 19 A. I fully intend to respond to all relevant  
 20 questions regarding this lawsuit; however, at the  
 21 present time, my attorneys have counseled me I cannot  
 22 provide answers to any questions relevant to this  
 23 lawsuit. I must accept their advice or risk losing my  
 24 6th Amendment right to effective representation.  
 25 Accordingly, I assert my federal constitutional rights

1 Accordingly, I assert my federal constitutional rights  
 2 as guaranteed by the 5th, 6th and 14th Amendments to the  
 3 United States Constitution.  
 4 Q. Do you socialize with Leonard Sustein  
 5 (phonetic)?  
 6 A. I'm going to answer that question the way I've  
 7 answered most of your other questions here today,  
 8 Mr. Kuvin, which is, I intend to respond to all relevant  
 9 questions regarding this lawsuit; however, at the  
 10 present time, my attorneys have counseled me I cannot  
 11 provide answers to any questions relevant to this  
 12 lawsuit. I must accept their advice or risk losing my  
 13 6th Amendment right to effective representation.  
 14 Accordingly, I assert my federal constitutional rights  
 15 as guaranteed by the 5th, 6th and 14th Amendment to the  
 16 US Constitution.  
 17 Q. Have you socialized with Richard Axle  
 18 (phonetic)?  
 19 A. I'm going to answer that question the same way  
 20 I've answered most of your other questions here today,  
 21 which is, I fully intend to respond to all relevant  
 22 questions regarding this lawsuit; however, at the  
 23 present time, my attorneys have counseled me I cannot  
 24 provide answers to any questions relevant to this  
 25 lawsuit. I must accept their advice or risk losing my

1 6th Amendment right to effective representation.  
2 Accordingly, I assert my federal constitutional rights  
3 as guaranteed by the 5th, 6th and 14th Amendment to the  
4 US Constitution.

5 MR. PIKE: And in addition, the question lacks  
6 predicate and it's vague and ambiguous. It's  
7 overly broad.

8 BY MR. KUVIN:

9 Q. Do you know Gerald Edelman?

10 A. I'm going to answer that question the same way  
11 I've answered most of your other questions here today,  
12 Mr. Kuvin, which is, I fully intend to respond to all  
13 relevant questions regarding this lawsuit; however, at  
14 the present time, my attorneys have counseled me that I  
15 cannot provide answers to any questions that may be  
16 relevant to this lawsuit. I must accept this advice or  
17 risk losing my 6th Amendment right to effective  
18 representation. Accordingly, I assert my federal  
19 constitutional rights as guaranteed by the 5th, 6th and  
20 14th Amendment to the US Constitution.

21 Q. Do you know Murray Gelman?

22 A. I'm going to answer that question the same way  
23 I've answered most of your other questions here today,  
24 which is, I fully intend to respond to all relevant  
25 questions regarding this lawsuit; however, at the

1 I fully intend to respond to all relevant questions  
2 regarding this lawsuit; however, at the present time, my  
3 attorneys have counseled me I cannot provide answers to  
4 any questions relevant to this lawsuit. I must accept  
5 this advice or risk losing my 6th Amendment right to  
6 effective representation. Accordingly, I assert my  
7 federal constitutional rights as guaranteed by the 5th,  
8 6th and 14th Amendment to the US Constitution.

9 Q. Do you know a politician, George Mitchell?

10 A. I'm going to answer that question the same way  
11 I've answered most of your other questions here today,  
12 which is, I fully intend to respond to all relevant  
13 questions regarding this lawsuit; however, at the  
14 present time, my attorneys have counseled me I cannot  
15 provide answers to any questions relevant to this  
16 lawsuit. I must accept their advice or risk losing my  
17 6th Amendment right -- another yawn?

18 Q. I'm sorry, I can't help yawning. It seems to  
19 be a function of the day.

20 MR. PIKE: Move to strike.

21 BY MR. KUVIN:

22 Q. I apologize. I tried to keep my mouth shut  
23 for that one, so -- but I can't help it. I apologize.

24 MR. PIKE: Move to strike.

25 THE WITNESS: Accordingly, I assert my federal

1 present time, my attorneys have counseled me I cannot  
2 provide answers to any questions that may be relevant to  
3 this lawsuit. I must accept this advice or risk losing  
4 my 6th Amendment right to effective representation.  
5 Accordingly, I assert my federal constitutional rights  
6 as guaranteed by the 5th, 6th and 14th Amendment to the  
7 US Constitution.

8 Q. Do you know Ben Goertzel, spelled  
9 G-O-E-R-T-Z-E-L?

10 A. I'm going to answer that question the same way  
11 I've answered most of your other questions here today,  
12 which is, I fully intend to respond to all relevant  
13 questions regarding this lawsuit; however, at the  
14 present time, my attorneys have counseled me I cannot  
15 provide answers to any questions relevant -- was that  
16 just a yawn?

17 Q. I'm sorry, yes, that was just a yawn.

18 A. I must accept this advice or risk losing my  
19 6th Amendment right to effective representation.  
20 Accordingly, I assert my federal constitutional rights  
21 as guaranteed by the 5th, 6th and 14th Amendment to the  
22 US Constitution.

23 Q. Do you know Marvin Minsky, M-I-N-S-K-Y?

24 A. I'm going to answer that question the same way  
25 I've answered most of your other questions here today.

1 constitutional rights as guaranteed by the 5th, 6th  
2 and 14th Amendment to the US Constitution.

3 BY MR. KUVIN:

4 Q. Do you know President Bill Clinton?

5 A. I'm going to respond to that question the same  
6 way I've responded to most of your other questions here  
7 today, which is, I intend to respond to all relevant  
8 questions regarding this lawsuit; however, at the  
9 present time, my attorneys have counseled me that I  
10 cannot provide any answers to questions that may be  
11 relevant to this lawsuit. I must accept this advice or  
12 risk losing my 6th Amendment right to effective  
13 representation. Accordingly, I assert my federal  
14 constitutional rights as guaranteed by the 5th, 6th and  
15 14th Amendment to the US Constitution.

16 Q. Do you know Actor Kevin Spacey?

17 A. I'm going to answer that question the same way  
18 I've answered most of your other questions here today --

19 MR. PIKE: Excuse me for a minute,  
20 Mr. Epstein.

21 Obviously, your line of questioning is  
22 personal not does -- does Mr. Epstein -- does  
23 Mr. Epstein know who President Clinton is by virtue  
24 of him being the President of the United States.  
25 You mean, does he personally know him, correct?

1 MR. KUVIN: Absolutely. Thank you for the  
 2 clarification, and I'll clarify. Next time I can  
 3 rephrase, do you know them personally. I don't  
 4 want to have go back to every question. Do we have  
 5 the understanding that my questions before --  
 6 MR. PIKE: Yes.  
 7 MR. KUVIN: -- dealt with whether or not  
 8 Mr. Epstein knew these gentleman, I was asking,  
 9 personally?  
 10 MR. PIKE: Yes. I want the record to be  
 11 clear. I don't want you to later say that how  
 12 could Mr. Epstein not know who President Clinton is  
 13 by virtue of him being the President of the United  
 14 States at some point in time, and vice versa with  
 15 Kevin Spacey and whoever else you -- so, yes, we  
 16 have that agreement on a personal basis.  
 17 MR. KUVIN: Okay, perfectly fine.  
 18 BY MR. KUVIN:  
 19 Q. Do you know Actor Kevin Spacey personally?  
 20 A. I'm going to answer that question the same way  
 21 I've answered most of your other questions here today,  
 22 which is, I intend to respond to all relevant questions  
 23 regarding this lawsuit; however, at the present time, I  
 24 cannot provide questions to any questions relevant to  
 25 this lawsuit. I must accept this advice or risk losing

1 THE WITNESS: I'm going to --  
 2 MR. KUVIN: Hang on.  
 3 THE WITNESS: Excuse me.  
 4 MR. KUVIN: I'm sorry, what's the form  
 5 objection?  
 6 MR. PIKE: It's a form objection and relevance  
 7 followed thereafter.  
 8 MR. KUVIN: I just wanted to correct the form  
 9 if there was something wrong with the form. Is  
 10 there anything particular with the form I need to  
 11 correct?  
 12 MR. PIKE: Form, relevance.  
 13 BY MR. KUVIN:  
 14 Q. Do you own a Boeing 727?  
 15 A. I'm going to answer that --  
 16 (Interruption in the proceedings.)  
 17 UNIDENTIFIED WOMAN: Carl, is here for,  
 18 Mr. Kuvin.  
 19 MR. KUVIN: Who?  
 20 UNIDENTIFIED WOMAN: He said he was expecting  
 21 him.  
 22 MR. KUVIN: Please let him know we're going to  
 23 be taking a break at 12:00, and if he could wait.  
 24 Thank you.  
 25 BY MR. KUVIN:

1 my 6th Amendment right to effective representation.  
 2 Accordingly, I assert my federal constitutional rights  
 3 as guaranteed by the 5th, 6th and 14th Amendment to the  
 4 US Constitution.  
 5 Another yawn? That's pretty good. Try to --  
 6 Q. That was just a breath, actually, a deep  
 7 breath, that's all. Thank you for paying attention.  
 8 Do you know Actor Chris Tucker personally?  
 9 A. I'm going to answer that question the same way  
 10 I've answered most of your other questions here today,  
 11 which is, I intend to respond to all relevant questions  
 12 regarding this lawsuit; however, at the present time, my  
 13 attorneys have counseled me I cannot provide answers to  
 14 any questions that may be relevant to this lawsuit. I  
 15 must accept their advice or risk losing my 6th Amendment  
 16 right to effective representation. Accordingly, I  
 17 assert my federal constitutional rights as guaranteed by  
 18 the 5th, 6th and 14th Amendment to the US Constitution.  
 19 Q. Do you own -- do you own a Boeing 727?  
 20 MR. PIKE: I'm sorry, Spencer, I didn't hear  
 21 you. Can you repeat the question?  
 22 MR. KUVIN: Sure.  
 23 BY MR. KUVIN:  
 24 Q. Do you own a Boeing 727?  
 25 MR. PIKE: Form objection, relevance.

1 Q. I apologize for the interruption.  
 2 A. No problem.  
 3 I'm going to answer that question the same way  
 4 I've answered most of your other questions here today,  
 5 which is, I fully intend to respond to all relevant  
 6 questions regarding this lawsuit; however, at the  
 7 present time, my attorneys have counseled me I cannot  
 8 provide answers to any questions relevant to this  
 9 lawsuit. I must accept their advice or risk losing my  
 10 6th Amendment right to effective representation.  
 11 Accordingly, I assert my federal constitutional rights  
 12 as guaranteed by the 5th, 6th and 14th Amendment to the  
 13 US Constitution.  
 14 Q. Have you ever referred to your Boeing 727  
 15 plane as "Air Fuck One"?  
 16 MR. PIKE: Form, argumentative, harassing.  
 17 THE WITNESS: I'll have to answer that the  
 18 same way I've answered most of your other questions  
 19 here today, which is, I intend to respond to all  
 20 relevant questions regarding this lawsuit; however,  
 21 at the present time, my attorneys have counseled me  
 22 I cannot provide answers to any questions that may  
 23 be relevant to this lawsuit. I must accept their  
 24 advice or risk losing my 6th Amendment right to  
 25 effective representation. Accordingly, I assert my



1 federal constitutional rights as guaranteed by the  
 2 5th, 6th and 14th Amendment to the US Constitution.  
 3 BY MR. KUVIN:  
 4 Q. Have you ever taken any underaged girls, girls  
 5 under the age of 18, on your Boeing 727?  
 6 A. I'm going to answer that question the same way  
 7 I've answered most of your other questions here today,  
 8 Mr. Kuvin, which is, I intend to fully respond to all  
 9 relevant questions regarding this lawsuit; however, at  
 10 this time, I cannot provide any answers to questions  
 11 relevant to this lawsuit as my attorneys have counseled  
 12 me. I must accept their advice or risk losing my 6th  
 13 Amendment right to effective representation.  
 14 Accordingly, I assert my federal constitutional rights  
 15 as guaranteed by the 5th, 6th and 14th Amendment to the  
 16 US Constitution.  
 17 Q. Are you a confidential informant for the  
 18 prosecution of Bear Stearns?  
 19 MR. PIKE: Form, relevance.  
 20 THE WITNESS: I'm going to answer that  
 21 question the same way I've answered most of your  
 22 questions here today, which is, I fully intend to  
 23 respond to all relevant questions regarding this  
 24 lawsuit; however, at the present time, my attorneys  
 25 have counseled me I cannot provide answers to any

1 which is, I fully intend to respond to all relevant  
 2 questions regarding this lawsuit; however, at the  
 3 present time, my attorneys have counseled me I cannot  
 4 provide answers to any questions that may be relevant to  
 5 this lawsuit. I must accept their advice or risk losing  
 6 my 6th Amendment right to effective representation.  
 7 Accordingly, I assert my federal constitutional rights  
 8 as guaranteed by the 5th, 6th and 14th Amendment to the  
 9 US Constitution.  
 10 Q. Isn't it true that you funded Mr. Nowak's  
 11 research at the Institute For Advanced Study in  
 12 Princeton?  
 13 A. I'm going to answer that question the same way  
 14 I've answered most of your other questions here today,  
 15 Mr. Kuvin, which is, I fully intend to respond to all  
 16 relevant questions regarding this lawsuit; however, at  
 17 the present time, my attorneys have counseled me I  
 18 cannot provide answers to any questions relevant to this  
 19 lawsuit. I must accept their advice or risk losing my  
 20 6th Amendment right to effective representation.  
 21 Accordingly, I assert my federal constitutional rights  
 22 as guaranteed by the 5th, 6th and 14th Amendment of the  
 23 US Constitution.  
 24 MR. PIKE: Can we go off the record for a  
 25 second?

1 questions that may be relevant to the lawsuit. I  
 2 must accept their advice or risk losing my 6th  
 3 Amendment right to effective representation.  
 4 Accordingly, I assert my federal constitutional  
 5 rights as guaranteed by the 5th, 6th and 14th  
 6 Amendment to the US Constitution.  
 7 BY MR. KUVIN:  
 8 Q. Did you trade information with the Federal  
 9 authorities in order to get a lighter sentence with  
 10 respect to the charges brought against you in Palm Beach  
 11 County by the US Attorney's Office?  
 12 A. I'm going to answer that question the same way  
 13 I've answered most of your other questions here today,  
 14 which is, I fully intend to respond to all relevant  
 15 questions regarding this lawsuit; however, at the  
 16 present time, my attorneys have counseled me I cannot  
 17 provide answers to any questions relevant to this  
 18 lawsuit. I must accept their advice or risk losing my  
 19 6th Amendment right to effective representation.  
 20 Accordingly, I assert my federal constitutional rights  
 21 as guaranteed by the 5th, 6th and 14th Amendment to the  
 22 US Constitution.  
 23 Q. Do you know, personally, Martin Nowak?  
 24 A. I'm going to answer that question the same way  
 25 I've answered most of your other questions here today,

1 MR. KUVIN: Sure.  
 2 THE VIDEOGRAPHER: Off the record at  
 3 11:55 a.m.  
 4 MR. GOLDBERGER: Here's my issue. Actually,  
 5 we probably should be on the record on this one.  
 6 MR. KUVIN: Are we going on?  
 7 MR. GOLDBERGER: Yeah, let's go on.  
 8 MR. KUVIN: Sure.  
 9 THE VIDEOGRAPHER: Back on the record at  
 10 11:55.  
 11 MR. GOLDBERGER: We were just off the record  
 12 and talked about taking a break, and I hate to  
 13 inject personal problems into a scheduling, but I  
 14 am suffering from some -- actually some nerve  
 15 neurological problem. I'm on a fairly heavy  
 16 steroid right now and it's causing me some issues.  
 17 I didn't want to try and reset this deposition  
 18 because I know, Mr. Kuvin, you wanted to take the  
 19 deposition, but given the medications I'm on, I'd  
 20 just assume keep going unless that's a huge problem  
 21 for you.  
 22 MR. KUVIN: Not a problem for me at all. Do  
 23 you want to go straight through lunch?  
 24 MR. GOLDBERGER: I think so. I mean, if  
 25 you've ever taken steroids before, they can -- they

1 can mess with you pretty good, so I'd prefer to  
 2 keep going.  
 3 MR. KUVIN: Fine with me.  
 4 MR. PIKE: May we go off the record?  
 5 MR. KUVIN: Sure.  
 6 THE VIDEOGRAPHER: We'll go off the record at  
 7 11:56.  
 8 (A brief recess was taken.)  
 9 THE VIDEOGRAPHER: We're back on the record at  
 10 12:12.  
 11 BY MR. KUVIN:  
 12 Q. Sir, isn't it true that you pledged  
 13 \$30 million to Harvard University in 2003?  
 14 A. I'm going to answer that question the same way  
 15 I've answered most of your other questions here today,  
 16 which is, I intend to respond to all relevant questions  
 17 regarding this lawsuit; however, at the present time, my  
 18 attorneys have counseled me I cannot provide answers to  
 19 any questions relevant to this lawsuit. I must accept  
 20 their advice or risk losing my 6th Amendment right to  
 21 effective representation. Accordingly, I assert my  
 22 federal constitutional rights as guaranteed by the 5th,  
 23 6th and 14th Amendment to the US Constitution.  
 24 Q. Isn't it true that that \$30 million pledge to  
 25 Harvard was shortly before you were arrested with

1 respect to the charges brought against you in Palm Beach  
 2 for having sex with underaged girls and soliciting  
 3 underaged girls for prostitution?  
 4 (Interruption in the proceedings.)  
 5 MR. GOLDBERGER: Thank you.  
 6 Hey Kathy, it's Jack Goldberger. You're back  
 7 on.  
 8 MS. EZELL: Okay, good. Thanks, Jack.  
 9 MR. GOLDBERGER: Okay.  
 10 MS. EZELL: I'm putting the mute on.  
 11 MR. GOLDBERGER: Okay.  
 12 THE WITNESS: Can you read me the question?  
 13 MR. KUVIN: Sure. Could you read it back,  
 14 please?  
 15 (A portion of the record was read by the  
 16 reporter.)  
 17 THE WITNESS: No.  
 18 BY MR. KUVIN:  
 19 Q. Isn't it true that you pledged \$30 million to  
 20 Harvard University in 2003, which is shortly before  
 21 charges were brought against you in Palm Beach?  
 22 A. I'll answer that question the same way I've  
 23 answered most of your other questions here today, which  
 24 is, I fully intend to respond to all relevant questions  
 25 regarding this lawsuit; however, at the present time, my

1 attorneys have counseled me I cannot provide answers to  
 2 any questions relevant to this lawsuit. I must accept  
 3 this advice or risk losing my 6th Amendment right to  
 4 effective representation. Accordingly, I assert my  
 5 federal constitutional rights as guaranteed by the 5th,  
 6 6th and 14th Amendment to the US Constitution.  
 7 Q. And isn't it true also that you have retained  
 8 Alan Dershowitz to defend you in the criminal charges  
 9 that were brought against you in Palm Beach?  
 10 MR. GOLDBERGER: Attorney-client.  
 11 MR. PIKE: Attorney-client, work product.  
 12 BY MR. KUVIN:  
 13 Q. Isn't it also true that Alan Dershowitz works  
 14 on staff at Harvard University as a professor? I mean,  
 15 if you know.  
 16 A. I'm going to answer that question like I've  
 17 answered most of your other questions here today, which  
 18 is, I fully intend to respond to all relevant questions  
 19 regarding this lawsuit; however, at the present time, my  
 20 attorneys have counseled me I cannot provide answers to  
 21 any questions that may be relevant to this lawsuit. I  
 22 must accept this advice or risk losing my 6th Amendment  
 23 right to effective representation. Accordingly, I  
 24 assert my federal constitutional rights as guaranteed by  
 25 the 5th, 6th and 14th Amendment to the US Constitution.

1 Q. Isn't it true that you own a 50,000 square  
 2 foot home in Manhattan that was formerly owned by Lex  
 3 Wexner?  
 4 A. I'm going to answer that question as I've  
 5 answered most of your other questions here today,  
 6 Mr. Kuvin, which is, I fully intend to respond to all  
 7 relevant questions regarding this lawsuit; however, at  
 8 the present time, my attorneys have counseled me I  
 9 cannot provide answers to any questions that may be  
 10 relevant to this lawsuit. I must accept this advice or  
 11 risk losing my 6th Amendment right to effective  
 12 representation. Accordingly, I assert my federal  
 13 constitutional rights as guaranteed by the 5th, 6th and  
 14 14th Amendment to the US Constitution.  
 15 Q. Isn't it true that one of your only clients is  
 16 a financial advisor with Lex Wexner?  
 17 A. I'm going to respond to that question the same  
 18 way I've responded to most of your other questions here  
 19 today, which is, I fully intend to respond to all  
 20 relevant questions regarding this lawsuit; however, at  
 21 the present time, my attorneys have counseled me I  
 22 cannot provide answers to any questions relevant to this  
 23 lawsuit. I must accept their advice or risk losing my  
 24 6th Amendment right to effective representation.  
 25 Accordingly, I assert my federal constitutional rights

1 as guaranteed by the 5th, 6th and 14th Amendment to the  
2 US Constitution.

3 Q. Isn't it true that Lex Wexner has since fired  
4 you after charges were brought against you in Palm Beach  
5 County for soliciting underaged girls for sex?

6 A. I'm going to respond to that question the same  
7 way I've responded to most of your other questions here  
8 today, which is, I intend to respond to all relevant  
9 questions regarding this lawsuit; however, at the  
10 present time, my attorneys have counseled me I cannot  
11 provide answers to any questions relevant to this  
12 lawsuit. I must accept their advice or risk losing my  
13 6th Amendment right to effective representation.

14 Accordingly, I assert my federal constitutional rights  
15 as guaranteed by the 5th, 6th and 14th Amendment to the  
16 United States Constitution.

17 Q. Are you a homosexual?

18 A. No.

19 Q. Have you had homosexual relationships with  
20 Mr. Wexner?

21 A. I'm going to answer that question the way I've  
22 answered all your other questions here today, basically,  
23 which is, I intend to respond to all relevant questions  
24 regarding this lawsuit; however, at the present time, my  
25 attorneys have counseled me I cannot provide answers to

1 Q. Did Mr. Wexner replace you with Dennis Hersch?

2 A. I'm going to answer that question like I've  
3 answered most of your other questions here today, which  
4 is, I fully intend to respond to all relevant questions  
5 regarding this lawsuit; however, at the present time, my  
6 attorneys have counseled me I cannot provide answers to  
7 any questions relevant to this lawsuit. I must accept  
8 their advice or risk losing my 6th Amendment right to  
9 effective representation. Accordingly, I assert my  
10 federal constitutional rights as guaranteed by the 5th,  
11 6th and 14th Amendment to the US Constitution.

12 Q. Would you agree that Mr. Wexner was your only  
13 client when you were a financial advisor?

14 A. I'm going to answer that question like I've  
15 answered most of your other questions here today,  
16 Spencer -- Mr. Kuvin --

17 Q. Thank you.

18 A. -- which is, I fully intend to respond to all  
19 relevant questions regarding this lawsuit; however, at  
20 the present time, my attorneys have counseled me I  
21 cannot provide answers to any questions relative to this  
22 lawsuit. I must accept their advice or risk losing my  
23 6th Amendment right to effective representation.  
24 Accordingly, I assert my federal constitutional rights  
25 as guaranteed by the 5th, 6th and 14th Amendment to the

1 any questions relevant to this lawsuit. I must accept  
2 this advice or risk losing my 6th Amendment right to  
3 effective representation. Accordingly, I assert my  
4 federal constitutional rights as guaranteed by the 5th,  
5 6th and 14th Amendment to the US Constitution.

6 Q. Have you ever touched Mr. Wexner's penis?

7 MR. PIKE: Objection, harassing, irrelevant,  
8 argumentative.

9 MR. GOLDBERGER: Object.

10 THE WITNESS: No.

11 BY MR. KUVIN:

12 Q. Have you ever had anal sex with Mr. Wexner?

13 A. No.

14 Q. Have you ever threatened Mr. Wexner that you  
15 would disclose private information about him if he  
16 testified against you in the civil proceedings which  
17 have been brought against you here in Palm Beach County?

18 MR. GOLDBERGER: Can you -- I'm sorry, can you  
19 repeat the question?

20 MR. KUVIN: Sure. Go ahead and repeat it  
21 back, please.

22 (A portion of the record was read by the  
23 reporter.)

24 THE WITNESS: No.

25 BY MR. KUVIN:

1 US Constitution.

2 MR. KUVIN: All right. With the understanding  
3 that -- see, now he's yawning. You don't pick on  
4 him when he yawns.

5 With the --

6 MR. PIKE: Move to strike.

7 MR. KUVIN: With the understanding that I  
8 understand you all object and you've moved to  
9 disclose the identity of B.B., who's been  
10 identified in this case, obviously the same  
11 proceedings would go with respect to this  
12 deposition that have gone with every other  
13 deposition regarding the identity of the unknown  
14 B.B. So I'm going to ask questions, obviously,  
15 utilizing full names and using the same procedure  
16 we've used in all other depositions in this case.

17 MR. PIKE: I don't think that there's been an  
18 agreement in that regard. I think that there's  
19 been a motion to seal that had been subsequently  
20 filed by, I believe it was, Brad Edwards' office  
21 after a particular depo occurred. So if you want  
22 to address it by -- by that, then that would be  
23 fine.

24 If there was an order entered that that  
25 deposition shall not be disclosed to the media

1 earlier this morning, in that regard, I'm not quite  
 2 sure what -- what you're asking, Mr. Kuvin.  
 3 MR. KUVIN: Well, I just want to make sure  
 4 that when Jeana types up the transcript, that it's  
 5 done the same exact way that they've all been done,  
 6 which is, that the girls would be utilized by  
 7 initial that will have the same --  
 8 MR. PIKE: Pseudonym.  
 9 MR. KUVIN: -- pseudonym -- that will have the  
 10 same attachment to the deposition as we always  
 11 have, which is confidential.  
 12 MR. PIKE: That's fine.  
 13 MR. KUVIN: If you chose to obviously  
 14 challenge the confidentiality and want to disclose  
 15 my client's name for some reason, then we'll  
 16 address that with the Court at some later time.  
 17 MR. PIKE: That's fine.  
 18 MR. KUVIN: Okay. Good enough. All right.  
 19 MR. PIKE: Pending the Court's ruling on that.  
 20 MR. KUVIN: Obviously pending the Court's  
 21 ruling.  
 22 All right. You got your camera? Good to go?  
 23 BY MR. KUVIN:  
 24 Q. I'm going to show you what we'll mark as  
 25 Exhibit 5.

1 which is, I fully intend to respond to all relevant  
 2 questions regarding this lawsuit; however, at the  
 3 present time, my attorneys have counseled me I cannot  
 4 provide answers to any questions that may be relevant to  
 5 this lawsuit. I must accept this advice or risk losing  
 6 my 6th Amendment right to effective representation.  
 7 Accordingly, I assert my federal constitutional rights  
 8 as guaranteed by the 5th, 6th and 14th Amendment to the  
 9 US Constitution.  
 10 Q. I'm going to show you what I've marked as  
 11 Exhibit 7, and I've blacked out the name -- or the face  
 12 of a girl that is shown in this photograph before I mark  
 13 it to the deposition. I'm going to draw an arrow with a  
 14 star to the girl that I'd like you to identify.  
 15 MR. PIKE: First, I'm going to object to the  
 16 use of this exhibit. It's -- it's not an original  
 17 any longer, and it was not provided to me prior to  
 18 your marking out the face of the other individual  
 19 in this photograph; therefore, I don't -- I object  
 20 to it and would like to know the basis for which  
 21 you've marked out this individual's face.  
 22 MR. KUVIN: To protect her privacy.  
 23 MR. PIKE: Third party privacy right?  
 24 MR. KUVIN: She has a right to privacy. I  
 25 certainly don't want to breach any potential right

1 (Plaintiff's Exhibit No. 5 was marked for  
 2 identification.)  
 3 MR. KUVIN: Okay?  
 4 BY MR. KUVIN:  
 5 Q. Do you recognize this young girl?  
 6 A. I'm going to answer that question the same way  
 7 I've answered most of your other questions, which is, I  
 8 intend to respond to all relevant questions regarding  
 9 this lawsuit; however, at the present time, my attorneys  
 10 have questioned -- excuse me, my attorneys have  
 11 counseled me I cannot provide answers to any questions  
 12 relevant to this lawsuit. I must accept this advice or  
 13 risk losing my 6th Amendment right to effective  
 14 representation. Accordingly, I assert my federal  
 15 constitutional rights as guaranteed by the 5th, 6th and  
 16 14th Amendment to the United States Constitution.  
 17 Q. I'll show you what we're marking as Exhibit 6.  
 18 Okay?  
 19 (Plaintiff's Exhibit No. 6 was marked for  
 20 identification.)  
 21 BY MR. KUVIN:  
 22 Q. Do you recognize this young girl that I've  
 23 marked as Exhibit 6?  
 24 A. I'm going to respond to that the same way I've  
 25 responded to most of your other questions here today,

1 to privacy she may have because I haven't asked her  
 2 whether or not it's okay to show her photograph,  
 3 which is why I blacked her out.  
 4 MR. PIKE: Okay. But having said that,  
 5 that -- that theory and objection is duly noted.  
 6 I'll go ahead and allow the witness to be  
 7 questioned on Exhibit 7.  
 8 (Plaintiff's Exhibit No. 7 was marked for  
 9 identification.)  
 10 BY MR. KUVIN:  
 11 Q. I'd like you to take a look --  
 12 MR. KUVIN: I'm sorry, let me show this to the  
 13 camera, first.  
 14 THE VIDEOGRAPHER: Okay.  
 15 BY MR. KUVIN:  
 16 Q. Okay. Do you recognize the girl on the left  
 17 in Photograph Exhibit 7?  
 18 A. I'm going to respond to that question the same  
 19 way I've responded to most of your other questions here  
 20 today, Mr. Kuvin, which is, I intend to respond to all  
 21 relevant questions regarding this lawsuit; however, at  
 22 the present time, my attorneys have counseled me I  
 23 cannot provide answers to any questions relevant to this  
 24 lawsuit. I must accept this advice or risk losing my  
 25 6th Amendment right to effective representation.

1 Q. Excuse me.  
 2 A. Accordingly, I assert my federal  
 3 constitutional rights as guaranteed by the 5th, 6th and  
 4 14th Amendment to the US Constitution.  
 5 (Photograph shown to the camera.)  
 6 (Plaintiff's Exhibit No. 8 was marked for  
 7 identification.)  
 8 BY MR. KUVIN:  
 9 Q. Okay. Do you recognize the girl shown in  
 10 Exhibit 8?  
 11 A. I'm going to answer that question the same way  
 12 I've answered most of the other questions here today,  
 13 which is, I fully intend to respond to all relevant  
 14 questions regarding this lawsuit; however, at the  
 15 present time, my attorneys have counseled me I cannot  
 16 provide answers to any questions relevant to this  
 17 lawsuit. I must accept this advice or risk losing my  
 18 6th Amendment right to effective representation.  
 19 Accordingly, I assert my federal constitutional rights  
 20 as guaranteed by the 5th, 6th and 14th Amendment of the  
 21 United States Constitution.  
 22 Can we take a break for a second?  
 23 Q. Sure.  
 24 MR. PIKE: Sure.  
 25 THE VIDEOGRAPHER: Going off the record at

1 this massage, you were masturbating?  
 2 A. "She" being B.B.? I'm sorry. She -- what was  
 3 the question?  
 4 Q. Yes, all these questions refer to the same  
 5 child, B.B. You can make that assumption for all my  
 6 questions.  
 7 A. Okay.  
 8 MR. PIKE: Objection to form, argumentative,  
 9 move to strike.  
 10 BY MR. KUVIN:  
 11 Q. Do you agree that while she was giving you  
 12 this massage, you were masturbating?  
 13 MR. PIKE: Form, argumentative, harassing.  
 14 THE WITNESS: I'm going to respond to that  
 15 question the same way I've responded to most of  
 16 your other questions here today, which is, I intend  
 17 to respond to all relevant questions regarding this  
 18 lawsuit; however, at the present time, my attorneys  
 19 have counseled me I cannot provide answers to any  
 20 questions relevant to this lawsuit. I must accept  
 21 their advice or risk losing my 6th Amendment right  
 22 to effective representation. Accordingly, I assert  
 23 my federal constitutional rights as guaranteed by  
 24 the 5th, 6th and 14th Amendment to the US  
 25 Constitution.

1 12:27.  
 2 (A brief recess was taken.)  
 3 THE VIDEOGRAPHER: Back on the record at  
 4 12:29.  
 5 BY MR. KUVIN:  
 6 Q. Sir, do you agree that in 2005, you had B.B.  
 7 come to your house, get naked and give you a massage  
 8 while you had nothing on but a washcloth over your  
 9 genitals?  
 10 MR. PIKE: Objection form, argumentative.  
 11 THE WITNESS: Is that B.B.; is that who you  
 12 said? Can you spell that for me?  
 13 BY MR. KUVIN:  
 14 Q. It's in the record.  
 15 A. I'm going to answer that question the same way  
 16 I've answered most of your other questions here today,  
 17 which is, I intend to respond to all relevant questions  
 18 regarding this lawsuit; however, at the present time, my  
 19 attorneys have counseled me I cannot provide answers to  
 20 any questions relevant to this lawsuit. I must accept  
 21 this advice or risk losing my 6th Amendment right to  
 22 effective representation. Accordingly, I assert my  
 23 federal constitutional rights as guaranteed by the 5th,  
 24 6th and 14th Amendment to the US Constitution.  
 25 Q. Do you agree that while she was giving you

1 BY MR. KUVIN:  
 2 Q. Do you agree that while she was giving you  
 3 this naked massage, she told you she was 16?  
 4 MR. PIKE: Form, argumentative, harassing,  
 5 assumes facts not in evidence.  
 6 THE WITNESS: I'm going to have to respond to  
 7 that question the same way I've responded to most  
 8 of your other questions here today, which is, I  
 9 intend to respond to all relevant questions  
 10 regarding this lawsuit; however, at the present  
 11 time, my attorneys have counseled me I cannot  
 12 provide answers to any questions that may be  
 13 relevant to this lawsuit. I must accept their  
 14 advice or risk losing my 6th Amendment right to  
 15 effective representation. Accordingly, I assert my  
 16 federal constitutional rights as guaranteed by the  
 17 5th, 6th and 14th Amendment to the US Constitution.  
 18 BY MR. KUVIN:  
 19 Q. Do you agree that while she was giving you  
 20 this naked massage, she told you that she was 15?  
 21 MR. PIKE: Same objections as before.  
 22 THE WITNESS: I'm going to answer that  
 23 question the same way I've answered most of your  
 24 other questions here today, which is, I intend to  
 25 respond to all relevant questions regarding this

1 lawsuit; however, at the present time, my attorneys  
2 have counseled me I cannot provide answers to any  
3 questions that may be relevant to this lawsuit. I  
4 must accept this advice or risk losing my 6th  
5 Amendment right to effective representation.  
6 Accordingly, I assert my federal constitutional  
7 rights as guaranteed by the 5th, 6th and 14th  
8 Amendment to the US Constitution.

9 MR. PIKE: Mr. Kuvin, I've been incorporating  
10 and asserting the same objections, by saying same  
11 objection as before, are you okay with that?

12 MR. KUVIN: Perfectly fine.

13 MR. PIKE: Okay.

14 BY MR. KUVIN:

15 Q. Do you agree that while B.B. was in your home,  
16 you asked her to get completely naked?

17 MR. PIKE: Same objection.

18 THE WITNESS: I'm going to respond to that  
19 question the way I've responded to most of your  
20 other questions here today, which is, I intend to  
21 respond to all relevant questions regarding this  
22 lawsuit; however, at the present time, my attorneys  
23 have counseled me I cannot provide answers to any  
24 questions relevant to this lawsuit. I must accept  
25 their advice or risk losing my 6th Amendment right

1 you a naked massage while you were naked, that you also  
2 touched her vagina?

3 MR. PIKE: Same objections as before.

4 THE WITNESS: I'm going to respond to that  
5 question the same way I've responded to most of  
6 your other questions here today, Mr. Kuvin, which  
7 is, I fully intend to respond to all relevant  
8 questions regarding this lawsuit; however, at the  
9 present time, my attorneys have counseled me I  
10 cannot provide answers to any questions that may be  
11 relevant to this lawsuit. I must accept this  
12 advice or risk losing my 6th Amendment right to  
13 effective representation. Accordingly, I must  
14 assert my federal constitutional rights as  
15 guaranteed by the 5th, 6th and 14th Amendment to  
16 the United States Constitution.

17 BY MR. KUVIN:

18 Q. Do you agree that during this naked massage  
19 with B.B., that you asked her whether she wanted you to  
20 stop touching her vagina, and she said yes.

21 MR. PIKE: Same objections.

22 THE WITNESS: I'm going to respond to that  
23 question the same way I've responded to most of  
24 your other questions here today, Mr. Kuvin, which  
25 is, I intend to respond to all relevant questions

1 to effective representation. Accordingly, I assert  
2 my federal constitutional rights as guaranteed by  
3 the 5th, 6th and 14th Amendment to the United  
4 States Constitution.

5 BY MR. KUVIN:

6 Q. Do you agree that after B.B. got naked in your  
7 home, that you asked her to massage you while you were  
8 naked?

9 MR. PIKE: Form, lacks predicate,  
10 argumentative, harassing, assumes facts not in  
11 evidence.

12 THE WITNESS: I'm going to respond to that  
13 question the same way I've responded to most of  
14 your other questions here today, Mr. Kuvin, which  
15 is, I intend to respond to all relevant questions  
16 regarding this lawsuit; however, at the present  
17 time, my attorneys have counseled me that I cannot  
18 provide answers to any questions that may be  
19 relevant to this lawsuit. I must accept their  
20 advice or risk losing my 6th Amendment right to  
21 effective representation. Accordingly, I assert my  
22 federal constitutional rights as guaranteed by the  
23 5th, 6th and 14th Amendment to the US Constitution.

24 BY MR. KUVIN:

25 Q. Do you agree that while B.B. was 15 and giving

1 regarding this lawsuit; however, at the present  
2 time my attorneys have counseled me I cannot  
3 provide answers to any questions relevant to this  
4 lawsuit. I must accept their advice or risk losing  
5 my 6th Amendment right to effective representation.  
6 Accordingly, I assert my federal constitutional  
7 rights as guaranteed by the 5th, 6th and 14th  
8 Amendment of the United States Constitution.

9 BY MR. KUVIN:

10 Q. Do you agree that regardless of B.B. telling  
11 you to stop touching her vagina, you nonetheless  
12 disregarded her and touched her there again?

13 MR. PIKE: Same objections as before.

14 THE WITNESS: I'm going to respond that  
15 question the same way I've responded to most of  
16 your other questions here today, which is, I intend  
17 to respond to all relevant questions regarding this  
18 lawsuit; however, at the present time. My  
19 attorneys have counseled me that I cannot provide  
20 answers to any questions relevant to this lawsuit.  
21 I must accept their advice or risk losing my 6th  
22 Amendment right to effective representation.  
23 Accordingly, I must assert my federal  
24 constitutional rights as guaranteed by the 5th, 6th  
25 and 14th Amendment to the United States

1 Constitution.  
 2 BY MR. KUVIN:  
 3 Q. You penetrated B.B.'s vagina with your finger  
 4 and a vibrator, did you not?  
 5 MR. PIKE: Same objections.  
 6 THE WITNESS: I'm going to respond to that  
 7 question the same way I've responded to most of  
 8 your other questions here today, which is, I fully  
 9 intend to respond to all relevant questions  
 10 regarding this lawsuit; however, at the present  
 11 time, my attorneys have counseled me I cannot  
 12 provide answers to any questions relevant to this  
 13 lawsuit. I must accept their advice or risk losing  
 14 my 6th Amendment right to effective representation.  
 15 Accordingly, I must assert my federal  
 16 constitutional rights as guaranteed by the 5th, 6th  
 17 and 14th Amendment to the United States  
 18 Constitution.  
 19 BY MR. KUVIN:  
 20 Q. And it is also true that you've paid hundreds  
 21 of girls under the age of 17 for similar encounters  
 22 where you've asked them to get naked, you've laid on a  
 23 table naked, masturbated and then touched them in their  
 24 vagina at your Palm Beach home; isn't that true?  
 25 MR. PIKE: Form, argumentative, harassing,

1 Sarah Kellen, you had another underage girl, Haley  
 2 Robson, working to obtain other underage girls to come  
 3 to your house with sexual encounters -- for sexual  
 4 encounters with you?  
 5 MR. PIKE: Same objections.  
 6 THE WITNESS: Could you repeat the question?  
 7 BY MR. KUVIN:  
 8 Q. Sure. Isn't it true that in addition to Sarah  
 9 Kellen, you had another girl who, at the time was  
 10 underage, Haley Robson, working to obtain underage  
 11 girls to come to your house for sexual encounters with  
 12 you?  
 13 MR. PIKE: Same objections.  
 14 THE WITNESS: I'm going to have to respond to  
 15 that question the same way I've responded to your  
 16 other questions here today, Mr. Kuvin, which is, I  
 17 intend to respond to all relevant questions  
 18 regarding this lawsuit; however, at the present  
 19 time, my attorneys have counseled me that I cannot  
 20 provide answers to any questions that may be  
 21 relevant to this lawsuit. I must accept this  
 22 advice or risk losing my 6th Amendment right to  
 23 effective representation. Accordingly, I must  
 24 assert my federal constitutional rights as  
 25 guaranteed by the 5th, 6th and 14th Amendment to

1 multiple, compound, it's confusing, vague, it lacks  
 2 proper predicate and foundation.  
 3 MR. KUVIN: Let me back up.  
 4 BY MR. KUVIN:  
 5 Q. Because of the compound, I'm going to have to  
 6 break it down a little.  
 7 Isn't it true, sir, that you've paid hundreds  
 8 of girls under the age of 17 to come to your home and  
 9 give you naked massages?  
 10 MR. PIKE: Same objection, plural.  
 11 THE WITNESS: I'm going to have to respond to  
 12 that question the same way I've responded to most  
 13 of your other questions here today, Mr. Kuvin,  
 14 which is, I intend to respond to all relevant  
 15 questions regarding this lawsuit; however, at the  
 16 present time, my attorneys have counseled me I  
 17 cannot provide answers to any questions relevant to  
 18 this lawsuit. I must accept their advice or risk  
 19 losing my 6th Amendment right to effective  
 20 representation. Accordingly, I assert my federal  
 21 constitutional rights as guaranteed by the 5th, 6th  
 22 and 14th Amendment to the United States  
 23 Constitution.  
 24 BY MR. KUVIN:  
 25 Q. Isn't it true, sir, that in addition to

1 the United States Constitution.  
 2 BY MR. KUVIN:  
 3 Q. And when these young girls were recruited to  
 4 come to your home, you told Kellen and Robson to tell  
 5 them that it would be a platonic massage with no sexual  
 6 contact; isn't that true?  
 7 MR. PIKE: Same objections.  
 8 THE WITNESS: I'm going to respond to that  
 9 question the way I've responded to most of your  
 10 other questions here today, Mr. Kuvin, which is, I  
 11 intend to respond to all relevant questions  
 12 regarding this lawsuit; however, at the present  
 13 time, my attorneys have counseled me I cannot  
 14 provide answers to any questions that may be  
 15 relevant to this lawsuit. I must accept their  
 16 advice or risk losing my 6th Amendment right to  
 17 effective representation. Accordingly, I assert my  
 18 federal constitutional rights as guaranteed by the  
 19 5th, 6th and 14th Amendment to the United States  
 20 Constitution.  
 21 BY MR. KUVIN:  
 22 Q. It was only after the girls arrived at your  
 23 home that they learned that they would have to get naked  
 24 and you would be fondling them sexually; isn't that  
 25 true?

1 MR. PIKE: Form, argumentative, lacks  
2 predicate, improper foundation, argumentative and  
3 harassing.

4 THE WITNESS: I'm going to respond to that  
5 question the same way I responded to most of your  
6 other questions here today, which is, I intend to  
7 respond to all relevant questions regarding this  
8 lawsuit; however, at the present time, my attorneys  
9 have counseled me I cannot provide any answers to  
10 question that may be relevant to this lawsuit. I  
11 must accept their advice or risk losing my 6th  
12 Amendment right to effective representation.  
13 Accordingly, I must assert my federal  
14 constitutional rights as guaranteed by the 5th, 6th  
15 and 14th Amendment to the United States  
16 Constitution.

17 BY MR. KUVIN:

18 Q. Isn't it true that you had numerous girls  
19 under the age of 17 brought to your home by taxi?

20 MR. PIKE: Form, argumentative, overbroad,  
21 lacks appropriate foundation.

22 BY MR. KUVIN:

23 Q. And let me clarify. From the years 2004  
24 through 2006.

25 MR. PIKE: Same objections, minus overbroad.

1 statement.

2 MR. KUVIN: He was asking me a question,  
3 that's the only reason why I responded. I  
4 apologize.

5 MR. PIKE: Once again, move to strike.

6 THE WITNESS: I intend to respond to all  
7 relevant questions regarding this lawsuit; however,  
8 at the present time, my attorneys have counseled me  
9 I cannot provide answers to any questions relevant  
10 to this lawsuit. I must accept this advice or risk  
11 losing my 6th Amendment right to effective  
12 representation. Accordingly, I assert my federal  
13 constitutional rights as guaranteed by the 5th, 6th  
14 and 14th Amendment to the United States  
15 Constitution.

16 BY MR. KUVIN:

17 Q. Do you have a massage table in your Palm Beach  
18 home?

19 A. I'm going to answer that question, Mr. Kuvin,  
20 the same way I've answered most of your other questions  
21 here today, which is, I intend to respond to all  
22 relevant questions regarding this lawsuit; however, at  
23 the present time, my attorneys have counseled me that I  
24 cannot provide answers to any questions relevant to this  
25 lawsuit. I must accept their advice or risk losing my

1 THE WITNESS: I'm going to have to answer that  
2 question the same way I've answered most of your  
3 other questions here today, which is, I intend to  
4 respond to all relevant questions regarding this  
5 lawsuit; however, at the present time, my attorneys  
6 have counseled me I cannot provide answers to any  
7 questions that may be relevant to this lawsuit. I  
8 must accept their advice or risk losing my 6th  
9 Amendment right to effective representation.  
10 Accordingly, I assert my federal constitutional  
11 rights as guaranteed by the 5th, 6th and 14th  
12 Amendment to the United States Constitution.

13 BY MR. KUVIN:

14 Q. Isn't it true that you paid a taxi to have  
15 girls, underaged girls like B.B., brought to your home  
16 from the years 2004 to 2006?

17 A. I'm going to respond to that question the way  
18 I've responded to most of your other questions here  
19 today, which is, I intend to respond to all relevant  
20 questions regarding this lawsuit; however, at the  
21 present time, my attorneys have counseled me that I  
22 cannot -- I'm sorry, should I start again? Do you  
23 want --

24 Q. No, please, don't start again.

25 MR. PIKE: Move to strike counsel's last

1 6th Amendment right to effective representation.  
2 Accordingly, I must assert my federal constitutional  
3 rights as guaranteed by the 5th, 6th and 14th Amendment  
4 to the United States Constitution.

5 Q. Did you have a massage table at your home in  
6 2005?

7 MR. PIKE: Lacks appropriate foundation.

8 MR. KUVIN: I'm sorry, what's the objection to  
9 that one?

10 MR. PIKE: Lacks appropriate foundation.

11 MR. KUVIN: Foundation?

12 MR. PIKE: Yes, it does.

13 BY MR. KUVIN:

14 Q. Did you have a home in 2005?

15 I'm sorry, I'm just trying to lay the  
16 foundation, and I apologize for laughing, I just don't  
17 understand the objection. I'm trying to understand the  
18 foundation question of did you have a massage table at  
19 your home in 2005. I want to fix my question, if -- if  
20 I can.

21 MR. PIKE: If you can.

22 MR. KUVIN: All right.

23 BY MR. KUVIN:

24 Q. Did you have a home in 2005?

25 A. I'm going to respond to that question the same



1 way I've responded to most of your other questions here  
2 today, which is, I fully intend to respond to all  
3 relevant questions regarding this lawsuit; however, at  
4 the present time, my attorneys have counseled me that I  
5 cannot provide answers to any of your questions that may  
6 be relevant to this lawsuit. I must accept their advice  
7 or risk losing my 6th Amendment right to effective  
8 representation. Accordingly, I assert my federal  
9 constitutional rights as guaranteed by the 5th, 6th and  
10 14th Amendment to the United States Constitution.

11 Q. Do you know what a massage table is?

12 A. I'm going to have to answer that question the  
13 same way I've answered most of your other questions here  
14 today, Mr. Kuvin, which is, I intend to respond to all  
15 relevant questions regarding this lawsuit; however, at  
16 the present time, my attorneys have counseled me I  
17 cannot provide answers to any questions that may be  
18 relevant to this lawsuit. I must accept this advice or  
19 risk losing my 6th Amendment right to effective  
20 representation. Accordingly, I assert my federal  
21 constitutional rights as guaranteed by the 5th, 6th and  
22 14th Amendment to the United States Constitution.

23 Q. Do you know what a table is?

24 MR. PIKE: Objection, harassing --

25 MR. KUVIN: I'm just trying --

1 BY MR. KUVIN:

2 Q. Do you know what the word "massage" is? Do  
3 you know what that word means?

4 A. I'm going to respond to that question the same  
5 way I've responded to most of your other questions here  
6 today, which is, I intend to respond to all relevant  
7 questions regarding this lawsuit; however, at the  
8 present time, my attorneys have counseled me I cannot  
9 provide any answers to questions that may be relevant to  
10 this lawsuit. I must accept their advice or risk losing  
11 my 6th Amendment right to effective representation.  
12 Accordingly, I assert my federal constitutional rights  
13 as guaranteed by the 5th, 6th and 14th Amendment to the  
14 United States Constitution.

15 Q. Do you understand what I mean when I ask you  
16 about the year 2005?

17 MR. PIKE: Form, vague and confusing.

18 BY MR. KUVIN:

19 Q. You can answer.

20 A. I don't understand the question.

21 Q. Do you understand what I mean by the year  
22 2005?

23 MR. GOLDBERGER: You just asked the same  
24 question. He said he didn't understand it. Just  
25 rephrase the question.

1 MR. PIKE: -- argumentative.

2 MR. KUVIN: I apologize. I'm just trying to  
3 lay the foundation. I want to make sure that  
4 there's no problem with the foundation for the  
5 question of, did you have a massage table in your  
6 home in 2005. So I've asked him whether he had a  
7 home, I'm asking him whether he knows what a  
8 massage table is --

9 MR. GOLDBERGER: I have no problem with him  
10 answering what a table is. Just ask him the  
11 question.

12 BY MR. KUVIN:

13 Q. Do you know what a table is?

14 A. Yes.

15 Q. Okay. Did you have a massage table in your  
16 home back in 2005?

17 MR. PIKE: Same objection.

18 THE WITNESS: I've already answered --

19 MR. KUVIN: Wait. Wait. Same objection --

20 MR. PIKE: Asked and answered.

21 MR. KUVIN: -- means what?

22 MR. PIKE: It's asked and answered.

23 MR. KUVIN: Is that the only objection?

24 MR. PIKE: And it still lacks the appropriate  
25 foundation.

1 BY MR. KUVIN:

2 Q. Do you understand dates?

3 A. Like going on a date?

4 Q. No. Like years, dates. 2001, 2000, do you  
5 know what that means?

6 A. Yes.

7 MR. KUVIN: Okay. So I just want to make  
8 sure. We've objected to the word "massage," 5th  
9 Amendment, he knows what a table is, he knows what  
10 dates and years are and he's objected to his house.

11 MR. GOLDBERGER: The question, Spencer, okay?  
12 Don't do that, please.

13 MR. KUVIN: I'm trying to make sure that I  
14 have it all right here.

15 MR. GOLDBERGER: All right, but don't  
16 verbalize your thoughts. Just ask a question.

17 MR. KUVIN: Okay.

18 MR. PIKE: I'm also going to move to strike  
19 counsel's last statement from the record.

20 BY MR. KUVIN:

21 Q. Did you have a massage table at your home in  
22 2005?

23 MR. PIKE: Same objection, lacks foundation,  
24 improper predicate.

25 THE WITNESS: I'm going to respond to that

1 question the same way I've responded to most of  
 2 your other questions here today, which is, I intend  
 3 to respond to all relevant questions regarding this  
 4 lawsuit; however, at the present time, my attorneys  
 5 have counseled me I cannot provide answers to any  
 6 questions that may be relevant to the lawsuit. I  
 7 must accept their advice or risk losing my 6th  
 8 Amendment right to effective representation.

Excuse me?

BY MR. KUVIN:

Q. I'm sorry, I just had a nasal problem.

A. Let me start from the beginning again.

Q. Whatever you'd like to do.

A. I intend to respond to all relevant questions regarding this lawsuit. I should start again.

Q. Okay. Whatever you're comfortable doing. I have all day.

A. I intend to respond to all relevant questions regarding this lawsuit; however, at the present time, my attorneys have counseled me I cannot provide answers to any questions relevant to this lawsuit. I must accept their advice or risk losing my 6th Amendment right to effective representation. Accordingly, I must assert my federal constitutional rights as guaranteed by the 5th, 6th and 14th Amendment to the United States

1 MR. PIKE: There was not a compound.

2 MR. KUVIN: Okay.

3 MR. PIKE: The objection was foundation and  
4 predicate.

5 BY MR. KUVIN:

6 Q. Okay. You can answer.

7 A. I'm going to answer that question the way I've  
8 answered most of your other questions here today. I  
9 intend to respond to all relevant questions regarding  
10 this lawsuit; however, at the present time, my attorneys  
11 have counseled me I cannot provide answers to any  
12 questions that may be relevant to the lawsuit. I must  
13 accept their advice or risk losing my 6th Amendment  
14 right to effective representation. Accordingly, I  
15 assert my federal constitutional rights as guaranteed by  
16 the 5th, 6th and 14th Amendment to the United States  
17 Constitution.

18 Q. I'm going to show you a clip of a deposition  
19 that was taken in this case and, first of all, ask  
20 you -- this is the deposition of L.M. that had been  
21 previously taken in this case.

22 MR. PIKE: Wait a minute.

23 MR. KUVIN: You're welcome to watch.

24 MR. PIKE: I might -- I want it played to the  
25 video first.

1 Constitution.

2 Q. Did you have a massage table in your upstairs  
3 bathroom in 2005?

4 MR. PIKE: Foundation, lacks appropriate  
5 predicate.

6 THE WITNESS: I'm going to respond to that  
7 question the same way I've responded to most of  
8 your other questions here today, Mr. Kuvin, which  
9 is, I intend to respond to all relevant questions  
10 regarding this lawsuit; however, at the present  
11 time, my attorneys have counseled me I cannot  
12 provide answers to any questions that may be  
13 relevant to the lawsuit. I must accept their  
14 advice or risk losing my 6th Amendment right to  
15 effective representation. Accordingly, I assert my  
16 federal constitutional rights as guaranteed by the  
17 5th, 6th and 14th Amendment to the United States  
18 Constitution.

19 BY MR. KUVIN:

20 Q. Did you keep various massage oils, lotions,  
21 sexual devices and sexual toys in your upstairs bathroom  
22 in 2005?

23 MR. PIKE: Same objection.

24 MR. KUVIN: Wait a minute, is there a compound  
25 in there? Because if so, I'll separate them out.

1 MR. KUVIN: Okay, I can do that.

2 MR. PIKE: Okay. So let's play it to the  
3 video first and then we'll determine what's next.

4 MR. KUVIN: Well, I'm going to ask him a  
5 couple of questions first before I hit play.

6 MR. PIKE: I need to see it first.

7 MR. KUVIN: Come around and look. I want him  
8 to see it at the same time.

9 MR. PIKE: That's fine. I want it played to  
10 the camera first.

11 MR. KUVIN: Oh, no. I'm not going to do your  
12 order. I'm going to just ask him first --

13 MR. PIKE: You need to -- you're asking the  
14 witness about an exhibit technically that is going  
15 to be utilized in this deposition that you have not  
16 provided me first. So just like you would  
17 professionally provide me a document first, I'm  
18 asking that you provide me the video first, play it  
19 to the camera, or you and I can step outside and  
20 you can play it to me and then you can ask the  
21 witness. The witness will remain in here. You and  
22 I can go into a different room. Then he's not  
23 going to answer any questions with regard to the  
24 video, then I ask that it not -- you're not giving  
25 me a document that you're questioning the witness

1 on. It doesn't work that way.  
 2 MR. KUVIN: Let me speak. You were provided  
 3 the deposition of L.M. Someone from your office  
 4 was present and actually asking the questions.  
 5 This is not an exhibit that you do not have or did  
 6 not have previous. You've had this ever since the  
 7 deposition was taken. So I'm not surprising you  
 8 with any new document or testimony or anything of  
 9 the like. This is the exact same testimony of a  
 10 witness who had been previously taken in this case  
 11 and I'm not going to play it, I just want to see a  
 12 couple of questions first. I will agree with your  
 13 procedure to play it to the camera first, and then  
 14 I will ask him questions after I've played it to  
 15 the camera about what I just played.  
 16 MR. PIKE: As long as --  
 17 MR. KUVIN: But I want some identification  
 18 issues first, and that's all.  
 19 MR. PIKE: Let me clear something up. I was  
 20 not at the deposition of L.M. Bob Critton and Mark  
 21 Luttier --  
 22 MR. KUVIN: Correct.  
 23 MR. PIKE: -- were at that deposition.  
 24 MR. KUVIN: Both attorneys at your office.  
 25 MR. PIKE: I have not seen this video.

1 lawsuit. I must accept this advice or risk losing my  
 2 6th Amendment right to effective representation.  
 3 Accordingly, I assert my federal constitutional rights  
 4 as guaranteed by the 5th, 6th and 14th Amendment of the  
 5 United States Constitution.  
 6 Q. Did you watch her deposition as she was giving  
 7 it?  
 8 MR. GOLDBERGER: Attorney-client.  
 9 BY MR. KUVIN:  
 10 Q. Were you present and watching L.M.'s testimony  
 11 by closed-circuit camera as she gave her testimony in  
 12 this case?  
 13 MR. PIKE: Attorney-client, work product.  
 14 MR. GOLDBERGER: Attorney-client, work  
 15 product.  
 16 MR. PIKE: I'm going to instruct the witness  
 17 not to answer both of those questions.  
 18 MR. KUVIN: I'm going to play one of the  
 19 clips. Tell me if you can get a clear shot of  
 20 this.  
 21 THE VIDEOGRAPHER: Is this going to be played  
 22 with audio?  
 23 MR. KUVIN: Yes, and I'll put my mic so you  
 24 can pick it up.  
 25 MR. PIKE: And for purposes of the record, I

1 MR. KUVIN: Both attorneys at your office.  
 2 MR. PIKE: It doesn't matter. It doesn't  
 3 matter.  
 4 So as long as you agree to play the video  
 5 first to the camera --  
 6 MR. KUVIN: Sure.  
 7 MR. PIKE: -- then you can proceed with your  
 8 questioning.  
 9 MR. KUVIN: Sure.  
 10 MR. PIKE: And then you can play it to the  
 11 witness, but I want to see it first.  
 12 MR. KUVIN: That's fine. That's fine.  
 13 BY MR. KUVIN:  
 14 Q. All right. I have a photograph here or a  
 15 video clip showing a young lady who's been identified in  
 16 this case as L.M. Her deposition was given in this  
 17 case.  
 18 And just to lay some foundation, first, do you  
 19 recognize this girl?  
 20 A. I'm going to respond to that question the way  
 21 I've responded to most of your other questions here  
 22 today, which is, I intend to respond to all relevant  
 23 questions regarding this lawsuit; however, at the  
 24 present time, my attorneys have counseled me I cannot  
 25 provide answers to any questions relevant to this

1 want it to -- this camera to zero out from the  
 2 current deponent onto that. I do not want my  
 3 client in the background of this videotape. Is  
 4 that understood?  
 5 THE VIDEOGRAPHER: I've asked to get a shot of  
 6 the computer screen and that's what I have.  
 7 MR. PIKE: Let me see what your shot is.  
 8 THE VIDEOGRAPHER: You're welcome to do so.  
 9 MR. KUVIN: You got a clean shot?  
 10 THE VIDEOGRAPHER: If he sticks his face in  
 11 front of the computer, I can't do anything about  
 12 it, but I've been asked to give a shot of the  
 13 computer. That's what I have.  
 14 MR. PIKE: Let's go.  
 15 MR. KUVIN: Okay, are we good? Clean shot?  
 16 (Video being played.)  
 17 VIDEO WITNESS: "And his little fetish with  
 18 me, pinching his nipples. He's probably getting  
 19 hard right now."  
 20 (Video stopped.)  
 21 BY MR. KUVIN:  
 22 Q. Okay. That's all. All right? Okay.  
 23 Let me make sure that I have that. I'm going  
 24 to play a clip for you that I just played for your  
 25 attorneys, and then I'd like to ask you a question about

1 it.  
 2 (Video being played.)  
 3 VIDEO WITNESS: "And his little fetish with  
 4 me, pinching his nipples. He's probably getting  
 5 hard right now."  
 6 (Video stopped.)  
 7 BY MR. KUVIN:  
 8 Q. Do you have a fetish where you like young  
 9 women to pinch your nipples?  
 10 A. I'm going to respond to that the same way I've  
 11 responded to most of your other questions here today,  
 12 which is, I intend to respond to all relevant questions  
 13 regarding this lawsuit; however, at the present time, my  
 14 attorneys have counseled me I cannot provide answers to  
 15 any questions relevant to this lawsuit. I must accept  
 16 their advice or risk losing my 6th Amendment right to  
 17 effective representation. Accordingly, I assert my  
 18 federal constitutional rights as guaranteed by the 5th,  
 19 6th and 14th Amendment to the United States  
 20 Constitution.  
 21 MR. PIKE: And I assume, Mr. Kuvin, you will  
 22 provide me with the number on the roll that  
 23 you're -- that you pretty much marked as an exhibit  
 24 here, where it starts numerically and where it ends  
 25 numerically so I can pull it and we can have an

1 United States Constitution.  
 2 Q. Have you had underaged girls, which include  
 3 B.B., in 2004, 2005 and 2006, massage your chest while  
 4 they were naked?  
 5 A. I intend to respond to all relevant questions  
 6 to this lawsuit; however, at the present time, my  
 7 attorneys have counseled me I cannot provide answers to  
 8 any questions that may be relevant to this lawsuit. As  
 9 I've done with most of your questions here today, I must  
 10 accept their advice or risk losing my 6th Amendment  
 11 right to effective representation. Accordingly, I  
 12 assert my federal constitutional rights as guaranteed by  
 13 the 5th, 6th and 14th Amendment to the United States  
 14 Constitution.  
 15 Q. Does Mr. Wexner know of your sexual preference  
 16 for underaged girls, girls under the age of 17?  
 17 MR. PIKE: Form, argumentative, harassing,  
 18 assumes facts not in evidence.  
 19 THE WITNESS: I'm going to have to answer that  
 20 the same way I've answered most of your questions  
 21 here today, which is, I intend to respond to all  
 22 relevant questions regarding this lawsuit; however,  
 23 at the present time, my attorneys have counseled me  
 24 I cannot provide answers to any questions that may  
 25 be relevant to the lawsuit. I must accept their

1 exhibit made for purposes of this deposition.  
 2 MR. KUVIN: Oh, I don't intend to attach it as  
 3 an exhibit to this deposition.  
 4 MR. PIKE: Well, what were the -- where did it  
 5 start and where did it begin on the roll?  
 6 MR. KUVIN: I don't know. It's a clip that I  
 7 pulled from the master video. I can get it for you  
 8 though. I can certainly identify it in the  
 9 transcript.  
 10 MR. PIKE: So you'll provide that to me?  
 11 MR. KUVIN: Yeah, I'll find a place in the  
 12 transcript for you, that's not a problem.  
 13 BY MR. KUVIN:  
 14 Q. Do you like to have underaged girls massage  
 15 your legs, underaged being under the age of 18?  
 16 A. I'm going to respond to that question the same  
 17 way I've responded to most of your other questions here  
 18 today, which is, I intend to respond to all relevant  
 19 questions regarding this lawsuit; however, at the  
 20 present time, my attorneys have counseled me I cannot  
 21 provide answers to any questions relevant to this  
 22 lawsuit. I must accept their advice or risk losing my  
 23 6th Amendment right to effective representation.  
 24 Accordingly, I assert my federal constitutional rights  
 25 as guaranteed by the 5th, 6th and 14th Amendment to the

1 advice or risk losing my 6th Amendment right to  
 2 effective representation. Accordingly, I assert my  
 3 federal constitutional rights as guaranteed by the  
 4 5th, 6th and 14th Amendment to the United States  
 5 Constitution.  
 6 BY MR. KUVIN:  
 7 Q. Did you pay B.B. \$200 to come to your home in  
 8 2005?  
 9 MR. PIKE: Form.  
 10 MR. KUVIN: I'm sorry, what's the form  
 11 problem?  
 12 MR. PIKE: I don't need to provide you with a  
 13 speaking objection. The rules are the rules.  
 14 You've clearly stated to me today that you don't  
 15 want speaking objections, and I've abided by that;  
 16 therefore, the objection is form.  
 17 MR. KUVIN: I'm just asking for a  
 18 clarification so I can correct the question if I  
 19 need to.  
 20 MR. PIKE: Ask your question again, Mr. Kuvin.  
 21 MR. KUVIN: Can you read it back for me?  
 22 Thank you.  
 23 (A portion of the record was read by the  
 24 reporter.)  
 25 THE WITNESS: I'm going to respond to that

1 question in the same way I've responded to most of  
 2 your other questions here today, which is, I intend  
 3 to respond to all relevant questions regarding this  
 4 lawsuit; however, at the present time, my attorneys  
 5 have counseled me I cannot provide answers to any  
 6 questions that may be relevant to this lawsuit. I  
 7 must accept their advice or risk losing my 6th  
 8 Amendment right to effective representation.  
 9 Accordingly, I must assert my federal  
 10 constitutional rights as guaranteed by the 5th, 6th  
 11 and 14th Amendment to the United States  
 12 Constitution.

13 MR. PIKE: Same objection.

14 BY MR. KUVIN:

15 Q. You knew B.B. was 15 years old when she came  
 16 to your home, didn't you?

17 MR. PIKE: Form.

18 THE WITNESS: I'm going to respond to that  
 19 question the same way I've responded to most of  
 20 your other questions here today, which is, I intend  
 21 to respond to all relevant questions regarding this  
 22 lawsuit; however, at the present time, my attorneys  
 23 have counseled me I cannot provide answers to any  
 24 questions relevant to this lawsuit. I must accept  
 25 their advice or risk losing my 6th Amendment right

1 and 14th Amendment to the United States  
 2 Constitution.

3 THE VIDEOGRAPHER: Spencer, can we take a  
 4 quick break?

5 MR. KUVIN: Change tape?

6 THE VIDEOGRAPHER: No, a problem with your  
 7 mic. I just want to go off for a second and see if  
 8 we can fix it.

9 MR. KUVIN: Sure.

10 THE VIDEOGRAPHER: We're off the record at  
 11 1:03 p.m.

12 (A brief recess was taken.)  
 13  
 14  
 15  
 16  
 17  
 18  
 19  
 20  
 21  
 22  
 23  
 24  
 25

1 to effective representation. Accordingly, I assert  
 2 my federal constitutional rights as guaranteed by  
 3 the 5th, 6th and 14th Amendment to the United  
 4 States Constitution.

5 BY MR. KUVIN:

6 Q. What is the Wexner Children's Trust, the  
 7 second?

8 MR. PIKE: Can you restate your question  
 9 again?

10 BY MR. KUVIN:

11 Q. Yes. What is the Wexner's Children's -- I'm  
 12 sorry, Wexner, singular, Children's Trust II, or the  
 13 second?

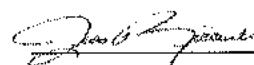

14 MR. GOLDBERGER: Okay.

15 THE WITNESS: I'm going to have to respond to  
 16 that question the same way I've responded to most  
 17 of your other questions here today, Mr. Kuvin,  
 18 which is, I intend to respond to all relevant  
 19 questions regarding this lawsuit; however, at the  
 20 present time, my attorneys have counseled me I  
 21 cannot provide answers to any questions relevant to  
 22 this lawsuit. I must accept this advice or risk  
 23 losing my 6th Amendment right to effective  
 24 representation. Accordingly, I assert my federal  
 25 constitutional rights as guaranteed by the 5th, 6th

1 CERTIFICATE OF OATH  
 2 THE STATE OF FLORIDA  
 3 COUNTY OF PALM BEACH  
 4  
 5

6 I, the undersigned authority, certify that  
 7 JEFFREY EPSTEIN personally appeared before me and was  
 8 duly sworn on the 8th day of October, 2009.  
 9

10 Dated this 8th day of October, 2009.  
 11  
 12  
 13  
 14

15  

16 Jeana Ricciuti, RPR, FPR, CLR  
 17 Notary Public - State of Florida  
 18 My Commission Expires: 2/17/2013  
 19 My Commission No.: DD 854778  
 20  
 21  
 22  
 23  
 24  
 25

CERTIFICATE  
THE STATE OF FLORIDA  
COUNTY OF PALM BEACH

I, Jeana Ricciuti, Registered Professional 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 8th day of October, 2009.

  
Jeana Ricciuti, RPR, FPR, CLR

CERTIFICATE

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.

JEFFREY EPSTEIN

DATE: October 23, 2009  
TO: JEFFREY EPSTEIN  
c/o Michael J. Pike  
BURMAN, CRYSTON, LUTTER & COLEMAN, P.A.  
303 Banyan Boulevard  
Suite 400  
West Palm Beach, Florida 33401

IN RE: B.B. v. EPSTEIN

Please take notice that on Thursday, the 8th of October, 2009, you gave your deposition in the above-referred matter. At that time, you did not waive signature. It is now necessary that you sign your deposition.

As previously agreed to, the transcript will be furnished to you through your counsel. Please read the following instructions carefully:

At the end of the transcript you will find an errata sheet. As you read your deposition, any changes or corrections that you wish to make should be noted on the errata sheet, citing page and line number of said change. DO NOT write on the transcript itself. Once you have read the transcript and noted any changes, be sure to sign and date the errata sheet and return these pages to me.

If you do not read and sign the deposition within a reasonable time (i.e., 30 days unless otherwise directed) the original, which has already been forwarded to the ordering attorney, may be filed with the Clerk of the Court. If you wish to waive your signature, sign your name in the blank at the bottom of this letter and return it to us.

Very truly yours,

Jeana Ricciuti, RPR, FPR, CLR  
Prose Court Reporting Agency, INC.  
250 S. Australian Avenue, Ste 1500  
West Palm Beach, Florida 33401

I do hereby waive my signature.

JEFFREY EPSTEIN

ERRATA SHEET

IN RE: B.B. v. EPSTEIN CR: JEANA RICCIUTI  
DEPOSITION OF: JEFFREY EPSTEIN  
TAKEN: October 8, 2009

DO NOT WRITE ON TRANSCRIPT - ENTER CHANGES HERE  
PAGE # LINE # CHANGE REASON

Table with 4 columns: PAGE #, LINE #, CHANGE, REASON. The table contains several empty rows for recording changes.

Please forward the original signed errata sheet to this office so that copies may be distributed to all parties.

Under penalty of perjury, I declare that I have read my deposition and that it is true and correct subject to any changes in form or substance entered here.

DATE: \_\_\_\_\_

SIGNATURE OF DEPONENT: \_\_\_\_\_

IN THE CIRCUIT COURT OF THE 15th JUDICIAL CIRCUIT  
IN AND FOR PALM BEACH COUNTY, FLORIDA

CASE No. 502008CA037319XXXXMB AB

B.B.,  
Plaintiff,

-vs-

JEFFREY EPSTEIN,  
Defendant.

CONTINUED DEPOSITION OF JEFFREY EPSTEIN  
VOLUME III

Thursday, October 8, 2009

1:46 - 3:48 p.m.

250 South Australian Avenue  
Suite 1400  
West Palm Beach, Florida 33401

Reported By:  
Jeana Ricciuti, RPR, FPR, CLR  
Notary Public, State of Florida  
Prose Court Reporting Agency, Inc.

EXHIBITS

WITNESS: CONT'D DIRECT  
JEFFREY EPSTEIN  
BY MR. KUVIN 175

EXHIBITS

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ALSO PRESENT:  
DAN DOSKEY, VIDEOGRAPHER  
VISUAL EVIDENCE, INC.

PROCEEDINGS

THE VIDEOGRAPHER: We're back on the record at 1:46.

CONTINUED DIRECT EXAMINATION  
BY MR. KUVIN:

Q. Do you personally know John Mack, former CEO at Morgan Stanley?

A. I'll have to answer that the same way I've answered most of your questions here today, Mr. Kuvin, which is, I intend to respond to all relevant questions regarding this lawsuit; however, at the present time, my attorneys have counseled me I cannot provide answers to any questions relevant to this lawsuit. I must accept this advice or risk losing my 6th Amendment right to effective representation. Accordingly, I assert my federal constitutional rights as guaranteed by the 5th, 6th and 14th Amendment to the United States Constitution.

MR. KUVIN: Okay. Same deposition as shown before, different clip. I'm going to play it for counsel first.

MR. PIKE: Thank you.

MR. KUVIN: Mr. Videographer, just let me know when you're ready.

1 THE VIDEOGRAPHER: Whenever you are.  
 2 MR. KUVIN: Okay.  
 3 (Video played.)  
 4 VIDEO WITNESS: "What did I do to Jeffrey and  
 5 what did Jeffrey do to me? I went up there  
 6 multiple times; I can't count. And I would be on a  
 7 massage table, massaging his legs, he would turn  
 8 over, his penis would be hanging out. He would put  
 9 a vagina -- or a vibrator to my vagina. He would  
 10 touch my vagina with his fingers. He would touch  
 11 my breasts. He would try to kiss my mouth. He  
 12 would bring my hands toward his penis."  
 13 (Video stopped.)  
 14 MR. KUVIN: Okay.  
 15 MR. PIKE: I'm just going to object to the use  
 16 of the video as to relevance, predicate and  
 17 foundation.  
 18 BY MR. KUVIN:  
 19 Q. All right. Let me get it back to the same  
 20 location.  
 21 Sir, first of all, once again, just so I can  
 22 lay the foundation for this, do you recognize this girl?  
 23 A. I'm going to have to respond to that question  
 24 the same way I've responded to most of your other  
 25 questions here today, which is, I intend to respond to

1 MR. KUVIN: Exactly.  
 2 MR. PIKE: Same objection.  
 3 (Video played.)  
 4 VIDEO WITNESS: "What did I do to Jeffrey and  
 5 what did Jeffrey do to me? I went out there  
 6 multiple times; I can't count. And I would be on a  
 7 massage table, massaging his legs. He would turn  
 8 over, his penis would be hanging out. He would put  
 9 a vagina -- or vibrator to my vagina. He would  
 10 touch my vagina with his fingers. He would touch  
 11 my breasts. He would try to kiss my mouth. He  
 12 would bring my hands toward his penis."  
 13 (Video stopped.)  
 14 BY MR. KUVIN:  
 15 Q. Did you do that with that girl?  
 16 MR. PIKE: Form.  
 17 THE WITNESS: I intend to respond to all  
 18 relevant questions regarding this lawsuit; however,  
 19 at the present time, my attorneys have counseled me  
 20 I cannot provide answers to any questions that may  
 21 be relevant to this lawsuit. I must accept this  
 22 advice or risk losing my 6th Amendment right to  
 23 effective representation. Accordingly, I must  
 24 assert my federal constitutional rights as  
 25 guaranteed by the 5th, 6th and 14th Amendment to

1 all relevant cannot provide answers to any questions  
 2 relevant to this lawsuit; however, at the present time,  
 3 my attorneys have counseled me I cannot provide answers  
 4 to any questions relevant to the lawsuit. I must accept  
 5 this advice or risk losing my 6th Amendment right to  
 6 effective representation. Accordingly, I assert my  
 7 federal constitutional rights as guaranteed by the 5th,  
 8 6th and 14th Amendment to the United States  
 9 Constitution.  
 10 Q. Did this girl bring B.B. to your home for a  
 11 naked massage?  
 12 A. I'm going to have to respond to that the same  
 13 way I've responded to most of your other questions here  
 14 today, which is, I intend to respond to all relevant  
 15 questions regarding this lawsuit; however, at the  
 16 present time, my attorneys have counseled me I cannot  
 17 provide answers to any questions that may be relevant to  
 18 the lawsuit. I must accept this advice or risk losing  
 19 my 6th Amendment right to effective representation.  
 20 Accordingly, I assert my federal constitutional rights  
 21 as guaranteed by the 5th, 6th and 14th Amendment to the  
 22 United States Constitution.  
 23 Q. I'd like to play this clip for you and then  
 24 I'm going to ask you a question.  
 25 MR. PIKE: The same clip you just played?

1 the United States Constitution.  
 2 BY MR. KUVIN:  
 3 Q. Did you do what that young lady described just  
 4 now to hundreds of women, including B.B.?  
 5 MR. PIKE: Form, argumentative, harassing,  
 6 lacks appropriate predicate, foundation, lacks  
 7 identity.  
 8 THE WITNESS: Excuse me. I'm going to respond  
 9 to that the same way I've responded to most of your  
 10 other questions here today, which is, I intend to  
 11 respond to all relevant questions regarding this  
 12 lawsuit; however, at the present time, my attorneys  
 13 have counseled me that I cannot provide answers to  
 14 any questions relevant to the lawsuit. I must  
 15 accept their advice or risk losing my 6th Amendment  
 16 right to effective representation. Accordingly, I  
 17 must assert my federal constitutional rights as  
 18 guaranteed by the 5th, 6th and 14th Amendment to  
 19 the United States Constitution.  
 20 BY MR. KUVIN:  
 21 Q. While B.B. was standing naked in your home,  
 22 specifically in your bathroom, did you tell her that you  
 23 could get her an interview as a model because of your  
 24 connections?  
 25 A. I'm going respond to that the same way I've



1 responded to most of your questions today, Spencer. I  
2 intend to respond to all relevant questions regarding  
3 this lawsuit; however, at the present time, my attorneys  
4 have counseled me I cannot provide answers to any  
5 questions that may be relevant to the lawsuit. I must  
6 accept this advice or risk losing my 6th Amendment right  
7 to effective representation. Accordingly, I must assert  
8 my federal constitutional right as guaranteed by the  
9 5th, 6th and 14th Amendment to the United States  
10 Constitution.

11 MR. PIKE: Same objection to that line of  
12 questioning.

13 BY MR. KUVIN:

14 Q. As B.B. was standing naked in your bathroom  
15 before you when she was 15, did you ask her to turn  
16 around so you could see her ass better?

17 MR. PIKE: Form, argumentative, harassing,  
18 lacks appropriate predicate, foundation.

19 THE WITNESS: I'll respond to that as I  
20 responded to your last question, which is, I intend  
21 to respond to all relevant questions regarding this  
22 lawsuit; however, at the present time, my attorneys  
23 have counseled me I cannot provide answers to any  
24 questions that may be relevant to this lawsuit. I  
25 must accept their advice or risk losing my 6th

1 Constitution.

2 BY MR. KUVIN:

3 Q. Who is Ghislaine Maxwell?

4 A. I intend to respond to all relevant questions  
5 regarding this lawsuit; however, at the present time, my  
6 attorneys have counseled me that I cannot provide  
7 answers to any questions relevant to this lawsuit. As I  
8 have done to most of your other questions here today, I  
9 must accept their advice or risk losing my 6th Amendment  
10 right to effective representation. Accordingly, I  
11 assert my federal constitutional rights as guaranteed by  
12 the 5th, 6th and 14th Amendment to the United States  
13 Constitution.

14 MR. KUVIN: Let me show the camera what we'll  
15 mark as Exhibit 9 to this deposition.

16 THE VIDEOGRAPHER: Okay.

17 (Plaintiff's Exhibit No. 9 was marked for  
18 identification.)

19 BY MR. KUVIN:

20 Q. Let me show you what we've marked as Exhibit 9  
21 to your deposition. Do you recognize Ghislaine Maxwell  
22 in this photograph?

23 A. Yes.

24 Q. And who is she standing with?

25 A. Her father.

1 Amendment right to effective representation;  
2 therefore, I must assert my federal constitutional  
3 rights as guaranteed by the 5th, 6th and 14th  
4 Amendment to the United States Constitution.

5 BY MR. KUVIN:

6 Q. When B.B. was 15 years old and standing naked  
7 in front of you in your bathroom, did you tell her that  
8 you could help her become a model?

9 MR. PIKE: Same objections, including  
10 foundation.

11 THE WITNESS: Is it different than the last  
12 question?

13 MR. KUVIN: Uh-huh.

14 MR. GOLDBERGER: Just go ahead.

15 THE WITNESS: Okay. I intend to respond to  
16 all relevant questions pertaining to this lawsuit;  
17 however, at the present time, my attorneys have  
18 counseled me I cannot provide answers to any  
19 questions that may be relevant to this lawsuit, so  
20 I've answered most questions here today the same  
21 way. I must expect that -- accept their advice or  
22 risk losing my 6th Amendment right to effective  
23 representation. Accordingly, I assert my federal  
24 constitutional rights as guaranteed by the 5th, 6th  
25 and 14th Amendment to the United States

1 Q. And her father is Robert Maxwell?

2 A. Was Robert Maxwell.

3 Q. I'm sorry, he's passed, correct?

4 A. Correct.

5 Q. She is a close friend of yours, is she not?

6 A. I'm going to respond to that question the same  
7 way I've responded to most of your other questions here  
8 today, Mr. Kuvin, which is, I intend to respond to all  
9 relevant questions regarding to this lawsuit; however,  
10 at the present time, my attorneys have counseled me I  
11 cannot provide answers to any questions that may be  
12 relevant to this lawsuit. I must expect -- accept their  
13 advice or risk losing my 6th Amendment right to  
14 effective representation. Accordingly, I must assert my  
15 federal constitutional rights as guaranteed by the 5th,  
16 6th and 14th Amendment to the United States  
17 Constitution.

18 Q. Ghislaine Maxwell has accompanied you to  
19 numerous social events in the last few years; isn't that  
20 true?

21 MR. PIKE: Form.

22 THE WITNESS: I'm going to respond to that  
23 question the same way I've responded to most of  
24 your questions here today, which is, I intend to  
25 respond to all relevant questions regarding your

1 lawsuit; however, at the present time, my attorneys  
2 have counseled me I cannot provide answers to any  
3 questions that may be relevant to that lawsuit. I  
4 must accept their advice or risk losing my 6th  
5 Amendment right to effective representation.  
6 Accordingly, I must assert my federal  
7 constitutional right as guaranteed by the 5th, 6th  
8 and 14th Amendment of the United States  
9 Constitution.

10 BY MR. KUVIN:

11 Q. One of your houseboys that has been deposed in  
12 this case testified that you were a rather nice  
13 gentleman that used to talk to the staff, and that when  
14 Ms. Maxwell came into the picture, that you stopped  
15 talking to the staff and the staff had to communicate  
16 through Ms. Maxwell. Do you agree or disagree with  
17 that?

18 MR. PIKE: Form, foundation, predicate,  
19 argumentative, assumes facts not in evidence.

20 THE WITNESS: I'm going to answer that the  
21 same way I've answered most of your questions here  
22 today, which is, I intend to respond to all  
23 relevant questions regarding this lawsuit; however,  
24 at the present time, my attorneys have counseled me  
25 that I cannot provide answers to any questions that

1 Constitution.

2 BY MR. KUVIN:

3 Q. Did Ms. Maxwell procure underaged girls for  
4 you to have sexual relationships with?

5 A. I'm going to answer that question the same way  
6 I've answered most of your other questions today,  
7 Mr. Kuvin, which is, I intend to respond to all relevant  
8 questions regarding this lawsuit; however, at the  
9 present time, my attorneys have counseled me I cannot  
10 provide answers to any questions relevant to that  
11 lawsuit. Excuse me. I must accept their advice or risk  
12 losing my 6th Amendment right to effective  
13 representation. Accordingly, I must assert my federal  
14 constitutional rights as guaranteed -- guaranteed by the  
15 5th, 6th and 14th Amendments to the United States  
16 Constitution.

17 Q. Ms. Maxwell procured a particular underaged  
18 girl who worked at Donald Trump's Maralago, for you to  
19 have a sexual relationship with; isn't that true?

20 MR. PIKE: Form, argumentative, lacks  
21 appropriate predicate, foundation, assumes facts  
22 not in evidence.

23 THE WITNESS: I'm going to respond to that the  
24 same way I've responded to most of your other  
25 questions here today, Mr. Kuvin, which is, I intend

1 may be relevant to your lawsuit. I must accept  
2 their advice or risk losing my 6th Amendment right  
3 to effective representation. Accordingly, I assert  
4 my federal constitutional rights as guaranteed by  
5 the 5th, 6th and 14th Amendment of the United  
6 States Constitution.

7 BY MR. KUVIN:

8 Q. He also testified that he felt you were a  
9 rather normal guy until Ms. Maxwell came into the  
10 picture, and that she led you into this life of  
11 perversion, sexual perversion. Do you agree with that?

12 MR. PIKE: Same objections.

13 THE WITNESS: I'm going to respond to that the  
14 same way I've responded to most of your questions  
15 here today, Mr. Kuvin, which is, I intend to  
16 respond to all relevant questions regarding this  
17 lawsuit; however, at the present time, my attorneys  
18 have counseled me I cannot provide answers to any  
19 questions relevant to this lawsuit. I must accept  
20 their advice or risk losing my 6th Amendment --  
21 excuse me -- I must accept their advice or risk  
22 losing my 6th Amendment right to effective  
23 representation. Accordingly, I must assert my  
24 federal constitutional rights as guaranteed by the  
25 5th, 6th and 14th Amendment to the United States

1 to respond to all relevant questions regarding this  
2 lawsuit; however, at the present time, my attorneys  
3 have counseled me I cannot provide answers to any  
4 questions relevant to that lawsuit. I must accept  
5 their advice or risk losing my 6th Amendment right  
6 to effective representation. Therefore, I assert  
7 my federal constitutional rights as guaranteed by  
8 the 5th, 6th and 14th Amendments to the United  
9 States Constitution.

10 BY MR. KUVIN:

11 Q. Do you know where Donald Trump's Maralago  
12 estate is?

13 A. Yes.

14 Q. Have you been there?

15 A. Yes.

16 Q. Who with?

17 A. I'm going to have to answer that question the  
18 same way I've answered most of your other questions here  
19 today. I intend to respond to all relevant questions  
20 regarding this lawsuit; however, at the present time, my  
21 attorneys have counseled me I cannot provide answers to  
22 any questions that may be relevant to the same lawsuit.  
23 I must accept their advice or risk losing my 6th  
24 Amendment right to effective representation.  
25 Accordingly, I must assert my federal constitutional

1 rights as guaranteed by the 5th, 6th and 14th Amendment  
2 to the United States Constitution.

3 Q. Have you seen the high school transcripts  
4 grades of girls that you have had sexual relationships  
5 with dating back to 2005?

6 MR. PIKE: Form, relevance, improper  
7 hypothetical, lacks facts -- assumes facts not in  
8 evidence, lacks appropriate predicate, foundation.

9 THE WITNESS: I'm going to answer that  
10 question the same as I've answered most of your  
11 other questions here today, Mr. Kuvin, which is, I  
12 intend to respond to all relevant questions  
13 regarding this lawsuit; however, at the present  
14 time, my attorneys have counseled me that I cannot  
15 provide answers to any questions that may be  
16 relevant to this lawsuit. I must accept their  
17 advice or risk losing my 6th Amendment right to  
18 effective representation. Accordingly, I assert my  
19 federal constitutional rights as guaranteed by the  
20 5th, 6th and 14th Amendment to the United States  
21 Constitution.

22 BY MR. KUVIN:

23 Q. Do you deny that the high school transcripts  
24 which were found in your trash on Palm Beach that showed  
25 the ages of some of the girls you were engaged with

1 same lawsuit. I must accept their advice or risk losing  
2 my 6th Amendment right to effective representation.  
3 Accordingly, I must assert my federal constitutional  
4 rights as guaranteed by the 5th, 6th and 14th Amendment.

5 Q. Did you have photographs of girls under the  
6 age of ten who were nude, either partially or fully  
7 nude, in your home on Palm Beach in 2005 and 2006?

8 MR. PIKE: Form.

9 THE WITNESS: I'm going to respond to that  
10 question the same way I've responded to most of  
11 your other questions, which is, I intend to respond  
12 to all relevant questions regarding this lawsuit;  
13 however, at the present time, my attorneys have  
14 counseled me I cannot provide answers to any  
15 questions relevant to this lawsuit. I must accept  
16 this advice or risk losing my 6th Amendment right  
17 to effective representation. Accordingly, I assert  
18 my federal constitutional rights as guaranteed by  
19 the 5th, 6th and 14th Amendments of the United  
20 States Constitution.

21 THE VIDEOGRAPHER: Mr. Kuvin, I'm sorry I have  
22 to change.

23 MR. KUVIN: Go ahead.

24 THE VIDEOGRAPHER: We'll go off the record at  
25 2:03. This will be the end of tape No. 2.

1 sexual acts with at your home came from your house?

2 MR. PIKE: Same objection in addition to  
3 argumentative and harassing.

4 THE WITNESS: I intend to respond to all  
5 relevant questions regarding this lawsuit; however,  
6 as I've done with most of your other questions  
7 today, at the present time my attorneys have  
8 counseled me that I cannot provide answers to any  
9 of those questions relevant to this lawsuit. I  
10 must accept their advice or risk losing my 6th  
11 Amendment right to effective representation.  
12 Accordingly, I must assert my federal  
13 constitutional rights as guaranteed by the 5th, 6th  
14 and 14th Amendments to the United States  
15 Constitution.

16 BY MR. KUVIN:

17 Q. Did you have numerous photos of nude young  
18 women, girls under the age of 18, back in your home  
19 in -- on Palm Beach Island in 2005 and 2006?

20 A. I'm going to have to respond to that question  
21 the same way I've responded to most of your questions  
22 here today, which is, I intend to respond to all  
23 relevant questions regarding this lawsuit; however, at  
24 the present time, my attorneys have counseled me I  
25 cannot provide answers to any questions relevant to the

1 MR. GOLDBERGER: Break time?

2 MR. KUVIN: No, not again. Please not.  
3 Just let us know when you're good to go.

4 THE VIDEOGRAPHER: We're back on the record at  
5 2:04. This will be the beginning of tape No. 3.

6 BY MR. KUVIN:

7 Q. Do you have security cameras throughout your  
8 home on Palm Beach Island?

9 A. I'm going to answer that question the same way  
10 I've answered most of your questions here today,  
11 Mr. Kuvin. I intend to respond to all relevant  
12 questions regarding this lawsuit; however, at the  
13 present time, my attorneys have counseled me I cannot  
14 provide answers to any questions relevant to the  
15 lawsuit. I must accept their advice or risk losing my  
16 6th Amendment right to effective representation.  
17 Accordingly, I assert my federal constitutional rights  
18 as guaranteed by the 5th, 6th and 14th Amendment to the  
19 United States Constitution.

20 (Plaintiff's Exhibit No. 10 was marked for  
21 identification.)

22 MR. KUVIN: I'll show the camera a photograph  
23 here. Okay?

24 THE VIDEOGRAPHER: Lift it up. Yeah, there  
25 you go. Okay.

1 MR. KUVIN: Okay?  
 2 BY MR. KUVIN:  
 3 Q. Let me show you what we marked as Plaintiff's  
 4 Exhibit 10. Do you recognize this young lady?  
 5 A. Yes.  
 6 Q. Who is she?  
 7 A. Her name is Joanna Shogert (phonetic).  
 8 Q. And who is she?  
 9 A. I just -- her name is Joanna Shogert.  
 10 Q. How do you recognize her?  
 11 A. I don't understand the question.  
 12 Q. Well, is she a friend of yours? Did she work  
 13 for you? How do you recognize her?  
 14 A. How do I recognize her?  
 15 Well, I'd like to respond to that question  
 16 but, however, my attorneys have told me that I can't  
 17 respond to any questions today that may -- excuse me. I  
 18 intend to respond to all relevant questions regarding  
 19 this lawsuit; however, at the present time, my attorneys  
 20 have counseled me that I cannot provide answers to any  
 21 questions relevant to this lawsuit. I must accept their  
 22 advice or risk losing my 6th Amendment right to  
 23 effective representation. Accordingly, I assert my  
 24 federal constitutional rights as guaranteed by the 5th,  
 25 6th and 14th Amendment to the United States

1 effective representation. Accordingly, I must assert my  
 2 federal constitutional rights as guaranteed by the 5th,  
 3 6th and 14th Amendment to the United States  
 4 Constitution.  
 5 MR. PIKE: In addition, relevance.  
 6 BY MR. KUVIN:  
 7 Q. Do you pay Ms. Maxwell a salary?  
 8 MR. PIKE: Form.  
 9 BY MR. KUVIN:  
 10 Q. Ghislaine Maxwell, so we're clear. Do you pay  
 11 her a salary?  
 12 A. I'd like -- excuse me. I'm going to answer  
 13 that question the same way I've answered most of your  
 14 questions here today, which is, I intend to answer all  
 15 questions relevant to this lawsuit; however, at the  
 16 present time, my attorneys have counseled me I cannot  
 17 provide answers to any questions relevant to this  
 18 lawsuit. I must accept their advice or risk losing my  
 19 6th Amendment right to effective representation.  
 20 Accordingly, I assert my federal constitutional rights  
 21 as guaranteed by the 5th, 6th and 14th Amendment to the  
 22 United States Constitution.  
 23 Q. Did you provide any underaged girls for sex to  
 24 Prince Andrew?  
 25 MR. PIKE: Form.

1 Constitution.  
 2 Q. Did you have sex with Joanna Shogert?  
 3 A. I'm going to answer that question like I've  
 4 answered most of your questions here today, which is, I  
 5 intend to respond to all relevant questions regarding  
 6 this lawsuit; however, at the present time, my attorneys  
 7 have counseled me I cannot provide answers to any  
 8 questions relevant to this lawsuit. I must accept their  
 9 advice or risk losing my 6th Amendment right to  
 10 effective representation. Accordingly, I assert my  
 11 federal constitutional rights as guaranteed by the 5th,  
 12 6th and 14th Amendment to the United States  
 13 Constitution.  
 14 Q. When did you first meet Prince Andrew?  
 15 And let me make it a compound question so I  
 16 don't have to repeat it over and over. When did you  
 17 first meet Prince Andrew, under what conditions did you  
 18 meet him, and who was present at that first meeting?  
 19 A. I'm going to answer that question as I've done  
 20 most of your questions here today, Mr. Kuvin, which is,  
 21 I intend to respond to all relevant questions regarding  
 22 this lawsuit; however, at the present time, my attorneys  
 23 have counseled me I cannot provide answers to any  
 24 questions relevant to that lawsuit. I must accept their  
 25 advice or risk losing my 6th Amendment right to

1 THE WITNESS: I'm going to respond to that  
 2 question the same way I've responded to most of  
 3 your questions here today, Mr. Kuvin, which is, I  
 4 intend to respond to all relevant questions  
 5 regarding this lawsuit -- excuse me, however, at  
 6 the present time, my attorneys have counseled me I  
 7 cannot provide answers to any questions relevant to  
 8 the lawsuit, or might be relevant to the lawsuit.  
 9 I must accept their advice or risk losing my 6th  
 10 Amendment right to effective representation.  
 11 Accordingly, I assert my federal constitutional  
 12 rights as guaranteed by the 5th, 6th and 14th  
 13 Amendment of the United States Constitution.  
 14 BY MR. KUVIN:  
 15 Q. Did you fly with Prince Andrew on your plane,  
 16 or planes, with any underaged girls, girls under the age  
 17 of 18?  
 18 A. I'm going to answer that question the same way  
 19 I've answered all the other questions here today,  
 20 virtually, which is, I intend to respond to all relevant  
 21 questions regarding this lawsuit; however, at the  
 22 present time, my attorneys have counseled me I cannot  
 23 provide answers to any questions relevant to the  
 24 lawsuit. I must accept their advice or risk losing my  
 25 6th Amendment right to effective representation.

1 Accordingly, I must assert my federal constitutional  
2 rights as guaranteed by the 5th, 6th and 14th Amendments  
3 to the United States Constitution.

4 Q. Do you know Christine Drangsholt?

5 MR. KUVIN: For the court reporter, it's  
6 D-R-A-N-G-S-H-O-L-T.

7 THE WITNESS: I intend to respond to all  
8 relevant questions regarding this lawsuit; however,  
9 at the present time, my attorneys have counseled me  
10 I cannot provide answers to any questions relevant  
11 to the lawsuit. I must accept this advice or risk  
12 losing my 6th Amendment right to effective  
13 representation. Accordingly, I assert my federal  
14 constitutional rights as guaranteed by the 5th, 6th  
15 and 14th Amendments to the United States  
16 Constitution.

17 MR. KUVIN: Let me show the camera what we'll  
18 mark as Exhibit 11.

19 (Plaintiff's Exhibit No. 11 was marked for  
20 identification.)

21 THE VIDEOGRAPHER: Okay.

22 MR. KUVIN: Okay?

23 BY MR. KUVIN:

24 Q. In Exhibit 11, sir, you're standing with a  
25 woman. Who is that woman in that photograph?

1 guarantee -- guaranteed by the 5th, 6th and 14th  
2 Amendment to the United States Constitution.  
3 (Plaintiff's Exhibit No. 12 was marked for  
4 identification.)

5 MR. KUVIN: Let me show to the camera what  
6 we've marked as Exhibit 12.

7 BY MR. KUVIN:

8 Q. Let me show you what I've marked as Exhibit  
9 12. Do you recognize any of the girls in that  
10 photograph?

11 A. I'm going to answer that question the same way  
12 I've answered most of your other questions here today,  
13 Mr. Kuvin, which is, I intend to respond to all relevant  
14 questions regarding this lawsuit; however, at the  
15 present time, my attorneys have counseled me that I  
16 cannot provide answers to any questions that may be  
17 relevant to the lawsuit. I must accept their advice or  
18 risk losing my 6th Amendment right to effective  
19 representation. Accordingly, I assert my federal  
20 constitutional rights as guaranteed by the 5th, 6th and  
21 14th Amendment to the United States Constitution.

22 Q. Sir, isn't it true that in what we've marked  
23 as Plaintiff's Exhibit 12, the blond standing on the  
24 left is Nadia Marcinkova, and the blonde, dirty blonde  
25 standing on the right is Sarah Kellen?

1 A. Eula Maxwell (phonetic).

2 Q. Where were you?

3 A. I intend to respond to all relevant questions  
4 regarding this lawsuit; however, at the present time, my  
5 attorneys have counseled me I cannot provide answers to  
6 any questions that may be relevant to this lawsuit. I  
7 must accept this advice or risk losing my 6th Amendment  
8 right to effective representation. Accordingly, I must  
9 assert my federal constitutional rights as guaranteed by  
10 the 5th, 6th and 14th Amendments to the United States  
11 Constitution.

12 MR. KUVIN: And just so the court reporter  
13 knows, Ghislaine is spelled G-H-I-S-L-A-I-N-E.

14 BY MR. KUVIN:

15 Q. Who is Nadia Marinkova -- Marcinkova, excuse  
16 me?

17 A. I'm going to answer that question the same way  
18 I've answered most of your questions here today, which  
19 is, I intend to respond to all relevant questions  
20 regarding this lawsuit; however, at the present time, my  
21 attorneys have counseled me I cannot provide answers to  
22 any questions relevant to the lawsuit. I must accept  
23 their advice or risk losing my 6th Amendment right to  
24 effective representation. Excuse me. Accordingly, I  
25 must assert my federal constitutional rights as

1 A. I intend to respond to all relevant questions  
2 regarding this lawsuit; however, as I've done to most of  
3 the questions at the present time, my attorneys have  
4 counseled me that I cannot provide answers to any of  
5 those questions that may be relevant to the lawsuit. I  
6 must accept this advice or risk losing my 6th Amendment  
7 right to effective representation. Accordingly, I  
8 assert my federal constitutional rights as guaranteed by  
9 the 5th, 6th and 14th Amendments of the United States  
10 Constitution.

11 BY MR. KUVIN:

12 Q. I'm going to show you what we'll mark as  
13 Exhibit 13. Let me show it to the camera, first.

14 (Plaintiff's Exhibit No. 13 was marked for  
15 identification.)

16 BY MR. KUVIN:

17 Q. Sir, is it true that Exhibit 13 shows your  
18 personal assistant, Sarah Kellen?

19 A. I intend to respond to all relevant questions  
20 regarding this lawsuit; however, at the present time, my  
21 attorneys have counseled me that I cannot provide  
22 answers to any questions that may be relevant to this  
23 lawsuit. I must accept their advice or risk losing my  
24 6th Amendment right to effective representation.  
25 Accordingly, I assert my federal constitutional rights

1 as guaranteed by the 5th, 6th and 14th Amendment to the  
2 United States Constitution.

3 Q. Let me show you what we'll mark as Exhibit 14.  
4 (Plaintiff's Exhibit No. 14 was marked for  
5 identification.)

6 BY MR. KUVIN:

7 Q. Sir, does Exhibit 14 show Nadia Marcinkova, a  
8 girl that you have had a sexual relationship with since  
9 before she was 18 years old?

10 MR. PIKE: Form, argumentative, harassing,  
11 assumes facts not in evidence, lacks appropriate  
12 predicate and foundation.

13 THE WITNESS: I intend to respond to all  
14 relevant questions regarding this lawsuit; however,  
15 at the present time, my attorneys have counseled me  
16 I cannot provide answers to any questions relevant  
17 to this lawsuit. I must accept their advice or  
18 risk losing my 6th Amendment right to effective  
19 representation. Accordingly, I assert my federal  
20 constitutional rights as guaranteed by the 5th, 6th  
21 and 14th Amendment to the United States  
22 Constitution.

23 BY MR. KUVIN:

24 Q. I'm going to show the camera what we'll mark  
25 as Exhibit 15.

1 marked as Exhibit 16.

2 BY MR. KUVIN:

3 Q. Do you recognize the gentleman in that  
4 photograph, sir?

5 MR. PIKE: Hold on for a second.

6 MR. GOLDBERGER: Do you want to discuss it  
7 with me?

8 MR. PIKE: Let's take a break for one minute.

9 MR. KUVIN: All right.

10 THE VIDEOGRAPHER: Off the record at 2:16.  
11 (A brief recess was taken.)

12 THE VIDEOGRAPHER: We're back on the record at  
13 2:45.

14 BY MR. KUVIN:

15 Q. Okay. Do you recognize the person that's  
16 shown in Exhibit 16?

17 A. Yes.

18 Q. Who is that?

19 A. Prince Andrew.

20 Q. And how do you know Prince Andrew?

21 A. I'm going to have to respond to that question  
22 the same way I've responded to most of your questions  
23 here today, Mr. Kuvin, which is, I intend to respond to  
24 all relevant questions regarding this lawsuit; however,  
25 at the present time, my attorneys have counseled me I

1 (Plaintiff's Exhibit No. 15 was marked for  
2 identification.)

3 BY MR. KUVIN:

4 Q. Sir, does Exhibit 15 show Haley Robson, an  
5 underaged girl that you were utilizing back in 2005 and  
6 2006 to procure other underaged girls for sex and sexual  
7 contact at your home?

8 MR. PIKE: Same objections to Exhibit 15 as  
9 were made to Exhibit 14.

10 THE WITNESS: I'm going to answer that the  
11 same way I've answered most of your questions here  
12 today, Mr. Kuvin, which is, I intend to respond to  
13 all relevant questions regarding this lawsuit;  
14 however, at the present time, my attorneys have  
15 counseled me that I cannot provide answers to any  
16 questions that may be relevant to the lawsuit. I  
17 must accept their advice or risk losing my 6th  
18 Amendment right to effective representation.  
19 Accordingly, I am going to assert my federal  
20 constitutional rights as guaranteed by the 5th, 6th  
21 and 14th Amendments to the United States  
22 Constitution.

23 (Plaintiff's Exhibit No. 16 was marked for  
24 identification.)

25 MR. KUVIN: Let me show the camera what we've

1 cannot provide answers to any questions relevant to this  
2 lawsuit. I must accept their advice or risk losing my  
3 6th Amendment right to effective representation.  
4 Accordingly, I assert my federal constitutional rights  
5 as guaranteed by the 5th, 6th and 14th Amendment to the  
6 United States Constitution.

7 Q. I'm going to show you a document that we'll  
8 mark as Exhibit 17.

9 MR. PIKE: Thank you.

10 (Plaintiff's Exhibit No. 17 was marked for  
11 identification.)

12 BY MR. KUVIN:

13 Q. I'm going to give you a minute to take a look  
14 at that document and just tell me when you're ready to  
15 answer any questions about it.

16 A. Okay.

17 Q. Okay. First of all, have you seen this letter  
18 before?

19 MR. GOLDBERGER: Attorney-client privilege,  
20 work product.

21 BY MR. KUVIN:

22 Q. Have you seen this letter before outside of  
23 the relationship with your attorneys?

24 MR. GOLDBERGER: You can answer that question.

25 THE WITNESS: No.

1 BY MR. KUVIN:  
 2 Q. Do you know Chief of Police Michael Reiter?  
 3 Do you know who he is?  
 4 A. I know who he is.  
 5 Q. Do you know State Attorney Barry Krischer?  
 6 A. I know who he is.  
 7 Q. Did you ever speak with Chief of Police  
 8 Michael Reiter in the past?  
 9 A. I don't remember.  
 10 Q. Did you ever talk to anyone, either at the  
 11 State Attorney's office, yourself, or Michael Reiter  
 12 about the prosecution of your claim without the presence  
 13 of your attorneys?  
 14 A. No.  
 15 Q. Did you ever talk to any of the police that  
 16 worked for the Town of Palm Beach without the presence  
 17 of your attorneys?  
 18 A. Explain --  
 19 MR. PIKE: Wait one second.  
 20 THE WITNESS: I'm sorry.  
 21 MR. PIKE: Can you state the question again?  
 22 MR. KUVIN: Sure.  
 23 BY MR. KUVIN:  
 24 Q. Did you ever speak to any of the police  
 25 officers that worked for the Town of Palm Beach without

1 BY MR. KUVIN:  
 2 Q. How long were you there?  
 3 A. 13 months, approximately.  
 4 Q. All right. And of those 13 months, how many  
 5 months were you there where you had to stay there 24  
 6 hours a day?  
 7 A. I don't recall specifically.  
 8 Q. More than a month?  
 9 A. Yes.  
 10 Q. More than two months?  
 11 A. Yes.  
 12 Q. More than three months?  
 13 A. Yes.  
 14 Q. More than four?  
 15 A. I think so, I don't remember.  
 16 Q. Do you recall when you were provided work  
 17 release, when you were able to leave during the daylight  
 18 hours?  
 19 A. Not with specificity.  
 20 Q. While you were there at the jail in Palm  
 21 Beach -- I'm going to show you what we'll mark as  
 22 Exhibit 18.  
 23 (Plaintiff's Exhibit No. 18 was marked for  
 24 identification.)  
 25

1 the presence of your attorneys?  
 2 MR. GOLDBERGER: Is the question, have you  
 3 ever spoken to a Town of Palm Beach police officer?  
 4 Is that the -- can we rephrase it like that?  
 5 MR. KUVIN: Sure.  
 6 MR. GOLDBERGER: Okay.  
 7 THE WITNESS: I've been stopped by the police  
 8 for traffic violations, if that's what you mean.  
 9 BY MR. KUVIN:  
 10 Q. Any other times that you had conversations  
 11 with any of the Town of Palm Beach --  
 12 A. No.  
 13 Q. -- police officers?  
 14 A. Not that I recall specifically.  
 15 Q. Okay. Now, you were housed at the jail after  
 16 your plea of guilty that we had spoke about at the  
 17 beginning of your deposition; is that correct?  
 18 MR. PIKE: Form.  
 19 THE WITNESS: Say it again.  
 20 BY MR. KUVIN:  
 21 Q. Yes. You were housed at the local jail here  
 22 in Palm Beach County after your plea of guilty that we  
 23 spoke about at the beginning of your deposition?  
 24 MR. PIKE: Form.  
 25 THE WITNESS: Yes.

1 BY MR. KUVIN:  
 2 Q. Did you purchase items from the jail?  
 3 MR. GOLDBERGER: Hang on a second.  
 4 MR. PIKE: Hold on one second.  
 5 THE WITNESS: It looks that way, yes, sir.  
 6 BY MR. KUVIN:  
 7 Q. Okay.  
 8 MR. PIKE: And the document speaks for itself,  
 9 the composite document speaks for itself.  
 10 BY MR. KUVIN:  
 11 Q. I'd like you to take a look at Exhibit 18. It  
 12 shows purchases -- well, does it show purchases by you?  
 13 MR. PIKE: Asked and answered.  
 14 THE WITNESS: Yes.  
 15 BY MR. KUVIN:  
 16 Q. Okay. And it appears those purchases took  
 17 place from 7/8/08 through 9/30/08 is the last one that I  
 18 have; is that correct?  
 19 MR. PIKE: The document speaks for itself.  
 20 BY MR. KUVIN:  
 21 Q. You can answer.  
 22 A. The document speaks for itself.  
 23 Q. Is that correct, the last date is 9/30/08?  
 24 A. The last date here is 9/30, yes.  
 25 MR. PIKE: With regard to what you provided to

1 the witness.  
 2 MR. KUVIN: Sure, absolutely.  
 3 THE WITNESS: Okay.  
 4 BY MR. KUVIN:  
 5 Q. And just so we're clear, this composite  
 6 exhibit that we've marked as Exhibit 18 contains  
 7 purchases from 7/8/08, 7/15, 7/22, 7/29, 8/5, 8/12,  
 8 8/21, 8/26, 9/2, 9/9, 9/23 and 9/30, just so the record  
 9 is clear; there is no question.  
 10 A. Okay.  
 11 Q. Okay?  
 12 A. Uh-huh.  
 13 Q. All right. These items that you purchased,  
 14 did you utilize all of these items yourself?  
 15 MR. PIKE: Form, relevance.  
 16 THE WITNESS: I don't understand the question.  
 17 BY MR. KUVIN:  
 18 Q. Well, you purchased a number of items that are  
 19 shown in this receipt.  
 20 A. Yes.  
 21 Q. The question is: Did you use them yourself?  
 22 MR. PIKE: Same objection.  
 23 THE WITNESS: I don't know if I used all of  
 24 them, so...  
 25

1 MR. PIKE: Asked and answered.  
 2 THE WITNESS: So should I answer?  
 3 MR. PIKE: You can answer again.  
 4 THE WITNESS: Ask the question again.  
 5 BY MR. KUVIN:  
 6 Q. So can we assume that all of the items that  
 7 are shown in these receipts were either used by you or  
 8 thrown away?  
 9 A. I don't even know if I received some of those  
 10 items, so I would assume I used most of them.  
 11 Q. Okay.  
 12 A. Okay?  
 13 Q. Sure. Take a look, I just want to make sure,  
 14 did you receive all these items?  
 15 A. I don't know.  
 16 MR. PIKE: Asked and answered.  
 17 BY MR. KUVIN:  
 18 Q. How did you purchase them?  
 19 A. I filled out a form.  
 20 Q. And how were they provided to you?  
 21 MR. PIKE: Form.  
 22 THE WITNESS: Sometimes they would come in a  
 23 bag.  
 24 BY MR. KUVIN:  
 25 Q. Okay. And did you determine whether or not

1 BY MR. KUVIN:  
 2 Q. Well, what did you do with the items that you  
 3 purchased?  
 4 MR. PIKE: Form, overbroad.  
 5 BY MR. KUVIN:  
 6 Q. You can answer.  
 7 A. I used some, I threw away some.  
 8 Q. Did you give any away?  
 9 A. Not that I remember.  
 10 MR. PIKE: Same objection.  
 11 BY MR. KUVIN:  
 12 Q. Did you provide any items that you purchased  
 13 to other inmates while you were there in jail?  
 14 MR. PIKE: Form.  
 15 THE WITNESS: Not to the best of my  
 16 recollection.  
 17 BY MR. KUVIN:  
 18 Q. Okay. With respect to all of the items that  
 19 are listed in these receipts, is it a safe assumption  
 20 that you either used them yourself or threw them away?  
 21 MR. PIKE: Asked and answered. If you don't  
 22 know -- if you know.  
 23 THE WITNESS: I don't know.  
 24 BY MR. KUVIN:  
 25 Q. I'm sorry? I didn't hear you.

1 the form you filled out, the information or the product  
 2 that you put on that form actually was provided?  
 3 A. No, never.  
 4 Q. If we look at the items that are contained  
 5 within these receipts, I'd like you to go, if you would,  
 6 to the second invoice here dated 7/15/08. The third  
 7 item down is a Lubriderm lotion.  
 8 A. Yes.  
 9 Q. Do you see that?  
 10 A. Yes.  
 11 Q. Did you purchase that?  
 12 A. It appears so.  
 13 Q. Did you receive it?  
 14 A. I don't remember.  
 15 Q. Did you use the Lubriderm lotion that you  
 16 received or that you may have received in jail?  
 17 MR. PIKE: Form.  
 18 BY MR. KUVIN:  
 19 Q. Let me strike that and re-ask it.  
 20 A. Okay.  
 21 Q. Did you use the Lubriderm lotion which you had  
 22 purchased from the jail while you were there?  
 23 A. I might have.  
 24 Q. What for?  
 25 A. To moisturize my hands and face.



1 Q. Okay. Did you use Lubriderm lotion while you  
 2 were in jail to masturbate at all?  
 3 A. No.  
 4 MR. PIKE: Form objection, harassing.  
 5 THE WITNESS: Absolutely not.  
 6 BY MR. KUVIN:  
 7 Q. It appears, if you would turn to 7/29/08,  
 8 which is approximately two weeks later, and the second  
 9 thing down is another bottle of Lubriderm lotion. Do  
 10 you see that?  
 11 A. Yes.  
 12 Q. What did you use that for?  
 13 MR. PIKE: Asked and answered.  
 14 MR. KUVIN: It's a second bottle.  
 15 MR. PIKE: It's the same question, Spencer.  
 16 Can we get to something relevant?  
 17 THE WITNESS: No problem.  
 18 MR. PIKE: He can answer.  
 19 THE WITNESS: My hands and my face.  
 20 BY MR. KUVIN:  
 21 Q. Okay.  
 22 A. I believe the first bottle went missing.  
 23 Q. If we turn to approximately one month later on  
 24 8/21/08, do you have that one?  
 25 A. Yes.

1 Q. How do you know you definitely did not use it?  
 2 A. Because it was not -- anything that said hand  
 3 lotion I did not use, I threw in the garbage.  
 4 Q. Why is that?  
 5 A. Because it wasn't something that I had  
 6 ordered.  
 7 MR. PIKE: Can I -- can I just have an  
 8 agreement that the objections to this line of  
 9 questioning is irrelevant, so I don't have to --  
 10 MR. KUVIN: Sure.  
 11 MR. PIKE: -- interrupt.  
 12 MR. KUVIN: Sure.  
 13 MR. PIKE: Agreed?  
 14 MR. KUVIN: Agreed.  
 15 BY MR. KUVIN:  
 16 Q. Let's turn again to 9/30/08, the last invoice  
 17 in there.  
 18 A. Yes.  
 19 Q. Do you see there is an entry for two more  
 20 bottles of hand lotion. Do you see that?  
 21 A. Correct.  
 22 Q. What did you do with those?  
 23 A. To the best of my knowledge, I threw them  
 24 right away.  
 25 Q. You didn't use them for anything?

1 Q. All right. On that occasion, you bought two  
 2 bottles of hand lotion again.  
 3 A. Yes.  
 4 Q. What did you use those for?  
 5 A. Nothing.  
 6 Q. What did you do with them?  
 7 A. They were bought by accident.  
 8 Q. How did you buy them by accident?  
 9 A. Because you fill out a check form and  
 10 sometimes the forms don't make any sense, they just  
 11 deliver in other things.  
 12 Q. Sir, did you get those two bottles?  
 13 A. Yes. Yes.  
 14 Q. And you never used them?  
 15 A. No. I threw them away.  
 16 Q. Okay. If we turn to 9/9/08, do you see that  
 17 entry?  
 18 A. Yes.  
 19 Q. All right. And another invoice here, on that  
 20 date a bottle of hand lotion, do you see that?  
 21 A. Yes, I do.  
 22 Q. Did you get it?  
 23 A. I don't know.  
 24 Q. Do you know if you used it?  
 25 A. Definitely not.

1 A. No.  
 2 Q. Is it your testimony here today that you did  
 3 not use any of the bottles of hand lotion or Lubriderm  
 4 lotion that we had previously just gone through to  
 5 masturbate while you were in jail?  
 6 A. That's correct.  
 7 Q. Did Ghislaine Maxwell visit you in jail?  
 8 A. No.  
 9 Q. Did Nadia Marcinkova visit you while you were  
 10 in jail?  
 11 A. I intend to respond to all relevant questions  
 12 regarding this lawsuit; however, at the present time, my  
 13 attorneys have counseled me I cannot provide answers to  
 14 any questions relevant to this lawsuit. I must accept  
 15 this advice or risk losing my 6th Amendment right to  
 16 effective representation. Accordingly, I assert my  
 17 federal constitutional rights as guaranteed by the 5th,  
 18 6th and 14th Amendment to the United States  
 19 Constitution.  
 20 Q. Did you have sex with Nadia Marcinkova while  
 21 you were housed at the Palm Beach jail facility?  
 22 MR. PIKE: Form.  
 23 THE WITNESS: I intend to respond to all  
 24 relevant questions regarding this lawsuit; however,  
 25 at the present time, my attorneys have counseled me

1 I cannot provide answers to any questions relevant  
2 to this lawsuit. As I've answered most of your  
3 question today, Mr. Kuvin, I must accept this  
4 advice or risk losing my 6th Amendment right to  
5 effective representation. Accordingly, I assert my  
6 federal constitutional rights as guaranteed by the  
7 5th, 6th and 14th Amendments to the United States  
8 Constitution.

9 BY MR. KUVIN:

10 Q. Did you pay girls so that they would not  
11 testify against you in the civil proceedings that have  
12 been filed in both Federal and State Court?

13 MR. PIKE: Form.

14 THE WITNESS: Okay. Like most of your other  
15 questions here today, Mr. Kuvin, I'm going to  
16 respond by saying I intend to respond to all  
17 relevant questions regarding this lawsuit; however,  
18 at the present time, my attorneys have counseled me  
19 I cannot provide answers to any questions relevant  
20 to this lawsuit. I must accept this advice or risk  
21 losing my 6th Amendment right to effective  
22 representation. Accordingly, I must assert my  
23 federal constitutional rights as guaranteed by the  
24 5th, 6th and 14th Amendments to the United States  
25 Constitution.

1 5th, 6th and 14th Amendment to the United States  
2 Constitution. Excuse me.

3 MR. KUVIN: This is 19.

4 (Plaintiff's Exhibit No. 19 was marked for  
5 identification.)

6 BY MR. KUVIN:

7 Q. I have an FAA registry for a Boeing 727,  
8 manufacture year 1969, with -- I'm just looking for the  
9 tail number here. I'm sorry, I'm just trying to find  
10 the tail number.

11 A. Not a problem.

12 Q. Let's do this, it's a Mode S Code 53106661.  
13 I'll show this to your counsel first.

14 Here it is, I'm sorry, Tail No. N908JE.

15 There's no question pending just yet.

16 MR. PIKE: Thank you.

17 Okay.

18 BY MR. KUVIN:

19 Q. Let me show you what we marked as Exhibit 19.  
20 I'll give you a minute to take a look at that.

21 A. Okay.

22 Q. What is JA -- EGE, Inc.?

23 A. I intend to respond to all relevant questions  
24 regarding this lawsuit; however, at the present time, my  
25 attorneys have counseled me I cannot provide answers to

1 BY MR. KUVIN:

2 Q. Did you have sex with Nadia Marcinkova when  
3 she was under the age of 14?

4 MR. PIKE: Form.

5 THE WITNESS: I intend to respond to all  
6 relevant questions regarding this lawsuit; however,  
7 at the present time, my attorneys have counseled me  
8 I cannot provide answers to any questions relevant  
9 to this lawsuit. I must accept this advice or risk  
10 losing my 6th Amendment right to effective  
11 representation. Accordingly, I must assert my  
12 federal constitutional rights as guaranteed by the  
13 5th, 6th and 14th Amendment to the Constitution.

14 BY MR. KUVIN:

15 Q. Did you tell people that Nadia Marcinkova was  
16 your sex slave?

17 MR. PIKE: Same objection.

18 THE WITNESS: I intend to respond to all  
19 relevant questions regarding this lawsuit; however,  
20 at the present time, my attorneys have counseled me  
21 I cannot provide answers to any questions relevant  
22 to this lawsuit. I must accept this advice or risk  
23 losing my 6th Amendment right to effective  
24 representation. Accordingly, I must assert my  
25 federal constitutional rights as guaranteed by the

1 any questions relevant to this lawsuit. I must accept  
2 this advice or risk losing my 6th Amendment right to  
3 effective representation. Accordingly, as I've done  
4 with most of your questions, I must assert my federal  
5 constitutional rights as guaranteed by the 5th, 6th and  
6 14th Amendment to the United States Constitution.

7 Q. Mr. Epstein, are you aware that after  
8 September 11, 2001 that the Federal Government started  
9 tracking all flights of all public and private aircraft?

10 MR. PIKE: Form, relevance.

11 BY MR. KUVIN:

12 Q. Are you aware of that?

13 A. No.

14 Q. Okay. Are you aware that the FAA keeps track  
15 of all flights that are made both within the continental  
16 US and from the continental US abroad?

17 MR. PIKE: Same objection.

18 THE WITNESS: No.

19 BY MR. KUVIN:

20 Q. Do you know whether or not -- let me ask it  
21 this way: Have you ever seen the flight tracking  
22 information for any planes that you may own?

23 A. I don't believe so.

24 Q. Is JEJE, Inc. a company that is owned by you?

25 A. I'll have to answer that question the way I've

1 answered most of your other questions here today, which  
2 is, I intend to respond to all relevant questions  
3 regarding this lawsuit; however, at the present time, my  
4 attorneys have counseled me I cannot provide answers to  
5 any questions relevant to this lawsuit. I must accept  
6 this advice or risk losing my 6th Amendment right to  
7 effective representation. Accordingly, I assert my  
8 federal constitutional rights as guaranteed by the 5th,  
9 6th and 14th Amendment to the United States  
10 Constitution.

11 Q. The plane that is identified in the FAA  
12 registry in the document marked Exhibit 19, just so  
13 we're clear, because I don't think I asked it exactly,  
14 but is this your plane?

15 A. I'm going to answer that question the same way  
16 I've answered most of your questions today, Mr. Kuvin,  
17 which is, I intend to respond to all relevant questions  
18 regarding this lawsuit; however, at the present time, my  
19 attorneys have counseled me I cannot provide answers to  
20 any questions relevant to this lawsuit. I must accept  
21 this advice or risk losing my 6th Amendment right to  
22 effective representation. Accordingly, I assert my  
23 federal constitutional rights as guaranteed by the 5th,  
24 6th and 14th Amendment to the United States  
25 Constitution.

1 federal constitutional rights as guaranteed by the  
2 5th, 6th and 14th Amendment to the United States  
3 Constitution.

4 BY MR. KUVIN:

5 Q. Isn't it true that you went to Thailand in  
6 2001 so that you could engage in sexual relations with  
7 girls under the age of 16 with Prince Andrew without any  
8 fear of any legal recourse?

9 MR. PIKE: Same objection. In addition,  
10 improper hypothetical, lack of predicate,  
11 foundation, argumentative, harassing.

12 THE WITNESS: I intend to respond to all  
13 relevant questions regarding this lawsuit; however,  
14 at the present time, my attorneys have counseled me  
15 I cannot provide answers to any questions relevant  
16 to this lawsuit. I must accept this advice or risk  
17 losing my 6th Amendment right to effective  
18 representation. Accordingly, I must assert my  
19 federal constitutional rights as guaranteed by the  
20 5th, 6th and 14th Amendment to the United States  
21 Constitution.

22 BY MR. KUVIN:

23 Q. Have you seen the photographs of you and  
24 Prince Andrew while you were in Thailand with half naked  
25 women, some of which were under the age of 16?

1 Q. Isn't it true, sir, that you flew to Thailand  
2 in 2001?

3 MR. PIKE: Form.

4 THE WITNESS: I intend to respond to all  
5 relevant questions regarding this lawsuit; however,  
6 at the present time, my attorneys have counseled me  
7 I cannot provide answers to any questions relevant  
8 to this lawsuit. I must accept this advice or risk  
9 losing my 6th Amendment right to effective  
10 representation. Accordingly, I assert my federal  
11 constitutional rights as guaranteed by the 5th, 6th  
12 and 14th Amendment to the United States  
13 Constitution.

14 BY MR. KUVIN:

15 Q. Is it true that you went to Thailand in 2001  
16 with Prince Andrew?

17 MR. PIKE: Form.

18 THE WITNESS: I intend to respond to all  
19 relevant questions regarding this lawsuit; however,  
20 at the present time, my attorneys have counseled me  
21 I cannot provide answers to any questions relevant  
22 to this lawsuit, and as I've done for most of all  
23 your questions today, Mr. Kuvin, I must accept this  
24 advice or risk losing my 6th Amendment right to  
25 effective representation. Accordingly, I assert my

1 MR. PIKE: Same objections.

2 THE WITNESS: I intend --

3 MR. PIKE: Relevance as well, excuse me. I'm  
4 sorry.

5 THE WITNESS: I intend to respond to all  
6 relevant questions regarding this lawsuit; however,  
7 at the present time, my attorneys have counseled me  
8 I cannot provide answers to any questions relevant  
9 to this lawsuit. I must accept this advice or risk  
10 losing my 6th Amendment right to effective  
11 representation. Accordingly, I assert my federal  
12 constitutional rights as guaranteed by the 5th, 6th  
13 and 14th Amendments to the United States  
14 Constitution.

15 BY MR. KUVIN:

16 Q. Did you bring any young women on the plane  
17 with you when you went to Thailand in 2001?

18 MR. PIKE: Same objection.

19 THE WITNESS: I intend to respond to all  
20 relevant questions regarding this lawsuit; however,  
21 at the present time, my attorneys have counseled me  
22 I cannot provide answers to any questions relevant  
23 to this lawsuit. I must accept this advice or risk  
24 losing my 6th Amendment right to effective  
25 representation. Accordingly, I assert my federal

1 constitutional rights as guaranteed by the 5th, 6th  
2 and 14th Amendments to the United States  
3 Constitution.

4 BY MR. KUVIN:

5 Q. Have you bragged to people before that you  
6 bought -- brought Nadia Marcinkova to the United States  
7 to be your Yugoslavian sex slave?

8 A. I intend to respond to all relevant questions  
9 regarding this lawsuit; however, at the present time, my  
10 attorneys have counseled me I cannot provide answers to  
11 any questions relevant to this lawsuit. I must accept  
12 their advice or risk losing my 6th Amendment right to  
13 effective representation. Accordingly, I must assert my  
14 federal constitutional rights as guaranteed by the 5th,  
15 6th and 14th Amendments to the United States  
16 Constitution.

17 Q. Have you had --

18 MR. GOLDBERGER: You raised the same objection  
19 to that question, right?

20 MR. PIKE: Yeah, I did.

21 BY MR. KUVIN:

22 Q. Have you had sex with numerous girls under the  
23 age of 18 in the presence of Nadia Marcinkova?

24 MR. PIKE: Same objections.

25 THE WITNESS: I'm going to answer that the

1 Q. Yeah. Capital M, capital C, number 2; sound  
2 familiar at all?

3 A. No.

4 Q. Okay. Are you part owner in a teen modeling  
5 agency?

6 A. No.

7 Q. Do you own any interest in any modeling  
8 agencies currently?

9 A. I intend to respond to all relevant questions  
10 regarding this lawsuit; however, at the present time, my  
11 attorneys have counseled me I cannot provide answers to  
12 any questions relevant to this lawsuit. I must accept  
13 this advice or risk losing my 6th Amendment right to  
14 effective representation. Accordingly, I assert my  
15 federal constitutional rights as guaranteed by the 5th,  
16 6th and 14th Amendments to the United States  
17 Constitution.

18 Q. Do you know what a sexual device called a Twin  
19 Torpedo is?

20 MR. PIKE: Same objections, irrelevant as  
21 worded.

22 THE WITNESS: Would you like to ask me a bunch  
23 of questions or are we going to -- do you want to  
24 individual answers to these? Do you want a  
25 compound question?

1 same way I've answered most of your questions here  
2 today, Mr. Kuvin, which is, I intend to respond to  
3 all relevant questions regarding this lawsuit;  
4 however, at the present time, my attorneys have  
5 counseled me I cannot provide answers to any  
6 questions relevant to the lawsuit. I must accept  
7 their advice or risk losing my 6th Amendment right  
8 to effective representation. Accordingly, I assert  
9 my federal constitutional rights as guaranteed by  
10 the 5th, 6th and 14th Amendments to the United  
11 States Constitution.

12 BY MR. KUVIN:

13 Q. What is MC2?

14 MR. PIKE: Same objection.

15 THE WITNESS: I don't understand the question.

16 BY MR. KUVIN:

17 Q. MC and then a number 2, what is that?

18 MR. PIKE: Lack of predicate, foundation.

19 THE WITNESS: What is that?

20 MR. PIKE: Irrelevant.

21 BY MR. KUVIN:

22 Q. Do you know what it is?

23 A. No.

24 Q. You've never heard of that before?

25 A. MC2?

1 BY MR. KUVIN:

2 Q. I can do it that way, it doesn't matter to me.

3 THE WITNESS: It's up to you.

4 MR. KUVIN: It's up to you guys.

5 MR. PIKE: As I've said, Mr. Kuvin, if you  
6 want to limit the time that we spend here today and  
7 ask a compound question if you're going to list  
8 various items or list individuals by name and ask  
9 questions, I won't have a compound objection to  
10 that type of inquiry if it's in light of attempting  
11 to save time.

12 MR. KUVIN: Sure.

13 BY MR. KUVIN:

14 Q. All righty.

15 MR. PIKE: But that's limited to the compound  
16 objection.

17 MR. KUVIN: Oh, no, that's fine.

18 BY MR. KUVIN:

19 Q. All right. Did you purchase something called  
20 a Twin Torpedo, a soap made in the shape of a penis, and  
21 a soap in the shape of a vagina?

22 A. I'm going to answer that question like I've  
23 answered most of your questions here today, which is, I  
24 intend to respond to all relevant questions regarding  
25 this lawsuit; however, at the present time, my attorneys

1 have counseled me that I cannot provide answers to any  
2 questions relevant to this lawsuit. I must accept this  
3 advice or risk losing my 6th Amendment right to  
4 effective representation. Accordingly, I assert my  
5 federal constitutional rights as guaranteed by the 5th,  
6 6th and 14th Amendment to the United States  
7 Constitution.

8 MR. PIKE: Additionally, just for the Court's  
9 record, you're questioning the witness on Exhibit  
10 No. what?

11 MR. KUVIN: It's not an exhibit. It's the  
12 Town of Palm Beach Incident Report with respect to  
13 Jeffrey Epstein, of which I gave you a copy before.  
14 And that was referencing, just so the record is  
15 clear, page 46.

16 MR. PIKE: Then I would add additional  
17 privileges and objections in addition to what  
18 Mr. Epstein has already raised underneath Florida  
19 Rule of Criminal Procedure 3.220 and work product.  
20 Not necessarily the document in front of you, but  
21 the questions and the answer you're attempting to  
22 elicit.

23 BY MR. KUVIN:

24 Q. Whose mobile wireless number is (561)317-2143?

25 A. I intend to respond to all relevant questions

1 A. I intend to respond to all relevant questions  
2 regarding this lawsuit; however, at the present time, my  
3 attorneys have counseled me I cannot provide answers to  
4 any questions relevant to the lawsuit. I must accept  
5 this advice or risk losing my 6th Amendment right to  
6 effective representation. Accordingly, I must assert my  
7 federal constitutional rights as guaranteed by the 5th,  
8 6th and 14th Amendments to the Constitution.

9 Q. Do you have an egg-shaped penis?

10 A. I intend to respond to all relevant questions  
11 regarding this lawsuit; however, at the present time, my  
12 attorneys have counseled me I cannot provide answers to  
13 any questions that may be relevant to this lawsuit. I  
14 must accept this advice or risk losing my 6th Amendment  
15 right to effective representation. Accordingly, I must  
16 assert my federal constitutional rights as guaranteed by  
17 the 5th, 6th and 14th Amendment to the United States  
18 Constitution.

19 Q. Do you have any identifying marks on your  
20 penis?

21 A. I intend to respond to all relevant questions  
22 regarding this lawsuit; however, at the present time, my  
23 attorneys have counseled me I cannot provide answers to  
24 any questions relevant to the lawsuit. I must accept  
25 their advice or risk losing my 6th Amendment right to

1 regarding this lawsuit; however, at the present time, my  
2 attorneys have counseled me I cannot provide answers to  
3 any questions relevant to this lawsuit. I must accept  
4 this advice or risk losing my 6th Amendment right to  
5 effective representation. Accordingly, I hereby assert  
6 my federal constitutional rights as guaranteed by the  
7 5th, 6th and 14th Amendments to the United States  
8 Constitution.

9 Q. I'm going to read you, for speed's sake, three  
10 separate phone numbers, and it's the same question for  
11 each. Do you recognize the following phone numbers?  
12 They all have Area Code 561. The first one is 832-4117,  
13 the second is 317-2143, and the third is 383-7542.

14 A. I intend to respond to all relevant questions  
15 regarding this lawsuit; however, at the present time, my  
16 attorneys have counseled me I cannot provide answers to  
17 any questions relevant to this lawsuit. I must accept  
18 this advice or risk losing my 6th Amendment right to  
19 effective representation. Accordingly, I must assert my  
20 federal constitutional rights as guaranteed by the 5th,  
21 6th and 14th Amendments to the United States  
22 Constitution.

23 Q. Did Sarah Kellen have the phone number  
24 655-0995 or 881-8116 or 655 -- I'm sorry, same number  
25 again. So two numbers: Either 655-0995 or 881-8116?

1 effective representation. Accordingly, I hereby assert  
2 my federal constitutional rights as guaranteed by the  
3 5th, 6th and 14th Amendments to the United States  
4 Constitution.

5 MR. PIKE: In addition, same objection and  
6 privilege which regard to the Florida Rule of  
7 Procedure 3.220 and work product. Not necessarily  
8 the document you're talking or speaking from, but  
9 the testimony.

10 MR. KUVIN: I was just reading this. I wasn't  
11 asking questions from this at the moment.

12 BY MR. KUVIN:

13 Q. Does your penis have any deformities?

14 MR. PIKE: Form.

15 THE WITNESS: I intend to respond to all  
16 relevant questions regarding this lawsuit; however,  
17 at the present time, my attorneys have counseled me  
18 I cannot provide answers the any questions relevant  
19 to the lawsuit. I must accept this advice or risk  
20 losing my 6th Amendment right to effective  
21 representation. Accordingly, I assert my federal  
22 constitutional rights as guaranteed by the 5th, 6th  
23 and 14th Amendment to the Constitution, as I've  
24 done with most of your questions here today.  
25

1 BY MR. KUVIN:  
 2 Q. Did you ever utilize Dollar-Rent-a-Car to rent  
 3 cars while you were here in Palm Beach at any time?  
 4 A. I intend to respond to all relevant questions,  
 5 Mr. Kuvin, regarding this lawsuit; however, at the  
 6 present time, my attorneys have counseled me I cannot  
 7 provide answers to any questions that may prove relevant  
 8 to this lawsuit. I must accept this advice or risk  
 9 losing my 6th Amendment right to effective  
 10 representation. Accordingly, I must assert my federal  
 11 constitutional rights as guaranteed by the 5th, 6th and  
 12 14th Amendment to the United States Constitution.  
 13 Q. What was your personal cell phone carrier back  
 14 in 2004?  
 15 A. I intend to respond to all relevant questions  
 16 regarding this lawsuit.  
 17 Q. Let me make this quicker. I'm sorry for  
 18 interrupting you, I apologize. Let's say, what was your  
 19 cell phone carrier back from 2004 through 2006.  
 20 MR. PIKE: And I'm not objecting to compound;  
 21 however, there are various allegations in your  
 22 complaint regarding a time frame. So therefore,  
 23 with regard to the allegations in your complaint,  
 24 relative to your question, I'm not objecting to the  
 25 compound, I'm saying it's overbroad.

1 Marcinkova, Sarah Kellen or Ghislaine Maxwell from the  
 2 years 2005 to 2006?  
 3 MR. PIKE: Relevance.  
 4 THE WITNESS: I intend to respond to all  
 5 relevant questions regarding this lawsuit. As I've  
 6 answered most of your questions the same way today,  
 7 Mr. Kuvin, at the present time, my attorneys have  
 8 counseled me I cannot provide answers to any of  
 9 your questions that may be relevant to this  
 10 lawsuit. I must accept this advice or risk losing  
 11 my 6th Amendment right to effective representation.  
 12 Therefore, accordingly, I assert my federal  
 13 constitutional rights as guaranteed by the 5th, 6th  
 14 and 14th Amendment to the United States  
 15 Constitution.  
 16 May we take a break, please?  
 17 MR. KUVIN: Sure.  
 18 MR. PIKE: Yes.  
 19 MR. GOLDBERGER: Yes.  
 20 THE VIDEOGRAPHER: Going off the record at  
 21 3:21.  
 22 (A brief recess was taken.)  
 23 THE VIDEOGRAPHER: We're back on the record at  
 24 3:30.  
 25

1 MR. KUVIN: 2004 to 2006?  
 2 MR. PIKE: Overbroad and irrelevant based upon  
 3 the allegations that you've alleged.  
 4 MR. KUVIN: All right. Well, let me clarify  
 5 the question then.  
 6 BY MR. KUVIN:  
 7 Q. What was your cell phone carrier from 2004 to  
 8 2005?  
 9 MR. PIKE: Same objections.  
 10 BY MR. KUVIN:  
 11 Q. Well, let me try and fix it again. What was  
 12 your cell phone carrier from 2005 to 2006?  
 13 MR. PIKE: Relevance.  
 14 THE WITNESS: I intend to respond to all  
 15 relevant questions regarding this lawsuit; however,  
 16 at the present time, my attorneys have counseled me  
 17 I cannot provide answers to any questions relevant  
 18 to this lawsuit. I must accept their advice or  
 19 risk losing my 6th Amendment right to effective  
 20 representation; therefore, I must assert my federal  
 21 constitutional rights as guaranteed by the 5th, 6th  
 22 and 14th Amendments to the United States  
 23 Constitution.  
 24 BY MR. KUVIN:  
 25 Q. What were the cell phone carriers of Nadia

1 BY MR. KUVIN:  
 2 Q. Here, let me move this out of the way.  
 3 A. You can take your Joy Jelly home now.  
 4 Q. It's actually an exhibit to your deposition.  
 5 A. Sorry.  
 6 Q. Have you read the police department's, the  
 7 Palm Beach Police Department's, probable cause  
 8 affidavit? Have you ever read it?  
 9 MR. PIKE: Attorney-client, work privilege.  
 10 BY MR. KUVIN:  
 11 Q. Have you ever read the police department, Palm  
 12 Beach Police Department's incident report regarding you?  
 13 MR. PIKE: Same objection.  
 14 MR. GOLDBERGER: Same objection.  
 15 MR. PIKE: And instruction, I'm sorry.  
 16 BY MR. KUVIN:  
 17 Q. Are you circumcised?  
 18 MR. PIKE: Objection, relevance.  
 19 THE WITNESS: I intend to respond to all  
 20 relevant questions regarding this lawsuit; however,  
 21 at the present time, my attorneys have counseled me  
 22 I cannot provide answers to any questions relevant  
 23 to this lawsuit. I must accept this advice or risk  
 24 losing my 6th Amendment right to effective  
 25 representation. Accordingly, I assert my federal

1 constitutional rights as guaranteed by the 5th, 6th  
 2 and 14th Amendments to the United States  
 3 Constitution.  
 4 BY MR. KUVIN:  
 5 Q. Was a search warrant performed and executed at  
 6 your home on Palm Beach Island?  
 7 MR. GOLDBERGER: Attorney-client, work  
 8 privilege.  
 9 I'll instruct you not to answer.  
 10 BY MR. KUVIN:  
 11 Q. Do you know Zara Bailey, spelled Z-A-R-A,  
 12 B-A-I-L-E-Y; Daniel Estes, spelled E-S-T-E-S; or Douglas  
 13 Schoettle, S-C-H-O-E-T-T-L-E?  
 14 A. I intend to respond to all relevant questions  
 15 regarding this lawsuit; however, at the present time, my  
 16 attorneys have counseled me I cannot provide answers to  
 17 any questions relevant to this lawsuit. And as I've  
 18 answered most of your questions today, Mr. Kuvin, I must  
 19 accept this advice and risk losing -- or risk losing my  
 20 6th Amendment right to effective representation.  
 21 Accordingly, I assert my federal constitutional rights  
 22 as guaranteed by the 5th, 6th and 14th Amendments to the  
 23 United States Constitution.  
 24 Q. Did you have a chef working for you at your  
 25 Palm Beach home back in 2005?

1 correct?  
 2 A. You asked that before.  
 3 Yes, correct.  
 4 Q. Okay, I'm sorry.  
 5 Do you own a -- or did you own -- let me  
 6 clarify.  
 7 A. Do you want to do compound again?  
 8 Q. Yeah. Did you or do you currently own a 2005  
 9 black Cadillac Escalade ESV, bearing Florida license tag  
 10 Q29-9GT?  
 11 A. I intend to respond to all relevant questions  
 12 regarding this lawsuit; however, at the present time, my  
 13 attorneys have counseled me I cannot provide answers to  
 14 any questions that may be relevant to the lawsuit. I  
 15 must accept their advice or risk losing my 6th Amendment  
 16 right to effective representation. Accordingly, I  
 17 assert my federal constitutional rights as guaranteed by  
 18 the 5th, 6th and 14th Amendment to the United States  
 19 Constitution.  
 20 Q. Have you hired attorneys for either  
 21 Sarah Kellen, Ghislaine Maxwell, Nadia Marcinkova or any  
 22 other --  
 23 MR. GOLDBERGER: Attorney-client, work  
 24 product.  
 25 Are you done? I'm sorry.

1 A. I intend to respond to all relevant questions  
 2 regarding this lawsuit; however, at the present time, my  
 3 attorneys have counseled me I cannot provide answers to  
 4 any questions relevant to this lawsuit at this time. I  
 5 must accept their advice or risk losing my 6th Amendment  
 6 right to effective representation. Accordingly, I must  
 7 assert my federal constitutional rights as guaranteed by  
 8 the 5th, 6th and 14th Amendment to the United States  
 9 Constitution.  
 10 MR. PIKE: Additionally, predicate and  
 11 foundation.  
 12 BY MR. KUVIN:  
 13 Q. Did you own or do you currently own a 2004  
 14 black Chevy Suburban, bearing Florida tag X99-EGL?  
 15 A. I intend to respond to all relevant questions  
 16 regarding this lawsuit; however, at the present time, my  
 17 attorneys have counseled me I cannot provide answers to  
 18 any questions that may be relevant to the lawsuit. I  
 19 must accept their advice or risk losing my 6th Amendment  
 20 right to effective representation; therefore, I assert  
 21 my federal constitutional rights as guaranteed by the  
 22 5th, 6th and 14th Amendment to the United States  
 23 Constitution.  
 24 Q. I think I asked this before, and I apologize  
 25 if I did, but your date of birth is January 20, 1953,

1 BY MR. KUVIN:  
 2 Q. -- or any other women in this case?  
 3 MR. GOLDBERGER: Okay. Now attorney-client,  
 4 work product.  
 5 I direct you not to answer.  
 6 BY MR. KUVIN:  
 7 Q. Do you know the name of the girl that was with  
 8 B.B. when she was brought to your home?  
 9 MR. PIKE: Form, lack of predicate,  
 10 foundation.  
 11 THE WITNESS: Like I've done to many of your  
 12 other questions and responded to many of your other  
 13 questions today, Mr. Kuvin, that question -- I must  
 14 answer that, I intend to answer all relevant  
 15 questions regarding this lawsuit; however, at the  
 16 present time, my attorneys have counseled me I  
 17 cannot provide answers to any questions that may be  
 18 relevant. I must accept this advice or risk losing  
 19 my 6th Amendment right to effective representation;  
 20 therefore, I assert my federal constitutional  
 21 rights as guaranteed by the 5th, 6th and 14th  
 22 Amendment to the Constitution.  
 23 BY MR. KUVIN:  
 24 Q. Did you, in fact, give B.B. \$200 for a -- for  
 25 her to get naked and give you a massage while you were

1 naked and, in addition, touch her in her vagina without  
2 her permission in 2005?

3 MR. PIKE: Predicate, foundation --

4 THE WITNESS: I believe that's been asked and  
5 answered.

6 MR. PIKE: Harassing. And I believe as  
7 worded, that question has been asked and answered  
8 in sub parts. I believe you've asked those  
9 questions initially at the beginning of this  
10 deposition. The same objections would, therefore,  
11 apply and be incorporated.

12 MR. KUVIN: I disagree, but...

13 THE WITNESS: Like most of your other  
14 questions here today, I intend to respond to all  
15 relevant questions regarding this lawsuit; however,  
16 at the present time, my attorneys have counseled me  
17 I cannot provide answers to any questions that may  
18 be relevant. I must accept this advice or risk  
19 losing my 6th Amendment privilege. Accordingly, I  
20 assert my federal constitutional rights as  
21 guaranteed by the 5th, 6th and 14th Amendment to  
22 the US Constitution.

23 BY MR. KUVIN:

24 Q. Do you agree, sir, that your conduct, with  
25 respect to B.B., caused her severe emotional distress?

1 Q. Have you told young ladies -- girls under the  
2 age of 18, when they came to your house and got naked to  
3 give you a massage, quote, the more you do, the more you  
4 get paid?

5 MR. PIKE: Objection, form, predicate,  
6 foundation, improper hypothetical and assumes facts  
7 not in evidence, relevance.

8 THE WITNESS: Like most of your questions,  
9 Mr. Kuvin, today, I intend to respond to all  
10 relevant questions regarding this lawsuit; however,  
11 at the present time, my attorneys have counseled me  
12 I cannot provide answers to any questions relevant  
13 to this lawsuit. I must accept this advice or risk  
14 losing my 6th Amendment right to effective  
15 representation. Accordingly, I assert my federal  
16 constitutional rights as guaranteed by the 5th, 6th  
17 and 14th Amendment to the United States  
18 Constitution.

19 BY MR. KUVIN:

20 Q. Do you have any tattoos?

21 A. I intend to respond to all relevant questions  
22 regarding this lawsuit; however, at the present time, my  
23 attorneys have counseled me I cannot provide answers to  
24 any questions relevant to this lawsuit. I must accept  
25 this advice or risk losing my 6th Amendment right to

1 MR. PIKE: Same objection. In addition, it's  
2 argumentative, harassing and calls for a  
3 conclusion.

4 THE WITNESS: I'm going to have to answer that  
5 the same way I've answered most of your questions  
6 today, Mr. Kuvin, which is, I intend to respond to  
7 all relevant questions regarding this lawsuit;  
8 however, at the present time, my attorneys have  
9 counseled me I cannot provide answers to any  
10 questions relevant to the lawsuit. I must accept  
11 this advice or risk losing my 6th Amendment right  
12 to effective representation. Accordingly, I must  
13 assert my federal constitutional rights as  
14 guaranteed by the 5th, 6th and 14th Amendment.

15 BY MR. KUVIN:

16 Q. Do you have gray chest hair?

17 A. I intend to respond to all relevant questions  
18 regarding this lawsuit; however, at the present time, my  
19 attorneys have counseled me I cannot provide answers to  
20 any of those questions that may be relevant. I must  
21 accept this advice or risk losing my 6th Amendment right  
22 to effective representation. Accordingly, I assert my  
23 federal constitutional rights as guaranteed by the 5th,  
24 6th and 14th Amendments to the United States  
25 Constitution.

1 effective representation. Accordingly, I must assert my  
2 federal constitutional rights as guaranteed by the 5th,  
3 6th and 14th Amendments to the United States  
4 Constitution.

5 Q. Do you have a steam room in your home on Palm  
6 Beach Island?

7 MR. PIKE: Same objections.

8 THE WITNESS: I'm going to answer that  
9 question the same way I've answered most of your  
10 questions here today, which is, I intend to respond  
11 to all relevant questions regarding this lawsuit;  
12 however, at the present time, my attorneys have  
13 counseled me that I cannot provide answers to any  
14 questions relevant to the lawsuit. I must accept  
15 this advice or risk losing my 6th Amendment right  
16 to effective representation. Accordingly, I must  
17 assert my constitutional rights as guaranteed by  
18 the 5th -- 5th, 6th and 14th Amendments to the  
19 United States Constitution.

20 BY MR. KUVIN:

21 Q. Did you provide payments to underaged girls by  
22 utilizing cash and wire transfers through Western Union  
23 in 2004 or 2005?

24 MR. PIKE: Same objections as raised to the  
25 previous last three questions incorporated here.



1 THE WITNESS: I intend to respond to all  
 2 relevant questions regarding this lawsuit; however,  
 3 at the present time, my attorneys have counseled me  
 4 I cannot provide answers to any questions relevant  
 5 to the lawsuit. I must accept this advice or risk  
 6 losing my 6th Amendment right to effective  
 7 representation. Accordingly, I assert my federal  
 8 constitutional rights as guaranteed by the 5th, 6th  
 9 and 14th Amendment to the United States  
 10 Constitution.

11 BY MR. KUVIN:

12 Q. Did you -- excuse me. Did you take any  
 13 videotapes of girls that were under the age of 18 in  
 14 your home on Palm Beach Island?

15 MR. PIKE: Same objections incorporated.

16 THE WITNESS: As I have with most of your  
 17 questions today, I'm going to have to answer that,  
 18 I intend to respond to all relevant questions  
 19 regarding this lawsuit; however, at the present  
 20 time, my attorneys have counseled me I cannot  
 21 provide answers to any questions that may be  
 22 relevant to this lawsuit. I must accept this  
 23 advice or risk losing my 6th Amendment right to  
 24 effective representation. Accordingly, I assert my  
 25 federal constitutional rights as guaranteed by the

1 at the present time, my attorneys have counseled me  
 2 that I cannot provide answers to any questions  
 3 relevant to the lawsuit. I must accept their  
 4 advice or risk losing my 6th Amendment right to  
 5 effective representation. Accordingly, I assert my  
 6 federal constitutional rights as guaranteed by the  
 7 5th, 6th and 14th Amendment to the United States  
 8 Constitution.

9 BY MR. KUVIN:

10 Q. Hold on a second. I may be done.

11 Do you know a Dr. Kaku, K-A-K-U?

12 A. I intend to respond to all relevant questions  
 13 regarding this lawsuit; however, at the present time, my  
 14 attorneys have counseled me I cannot provide answers to  
 15 any questions that may be relevant. I must accept this  
 16 advice or risk losing my 6th right to effective  
 17 representation. Accordingly, I assert my federal  
 18 constitutional rights as guaranteed by the 5th, 6th and  
 19 14th Amendment to the United States Constitution.

20 MR. PIKE: Can you hold on one second?

21 MR. KUVIN: I'm almost done.

22 MR. PIKE: No, no. We're not going anywhere.

23 MR. KUVIN: Okay.

24 MR. PIKE: Okay.  
25

1 5th, 6th and 14th Amendment to the United States  
 2 Constitution.

3 BY MR. KUVIN:

4 Q. Have you ever provided a dozen roses to a  
 5 young girl under the age of 18 who came to your house to  
 6 give you a massage?

7 MR. PIKE: Form, vague, ambiguous, assumes  
8 facts not in evidence.

9 THE WITNESS: I intend to respond to all  
 10 relevant questions regarding this lawsuit; however,  
 11 at the present time, my attorneys have counseled me  
 12 that I cannot provide answers to any questions that  
 13 may be relevant. I must accept their advice or  
 14 risk losing my 6th Amendment right to effective  
 15 representation. Accordingly, I must assert my  
 16 federal constitutional rights as guaranteed by the  
 17 5th, 6th and 14th Amendment.

18 BY MR. KUVIN:

19 Q. Did you ever instruct anyone to deliver a  
 20 bucket of roses after a high school drama performance to  
 21 an underage girl?

22 MR. PIKE: Same objection. In addition, lacks  
23 predicate and foundation. It's overbroad as well.

24 THE WITNESS: I fully intend to respond to all  
 25 relevant questions regarding this lawsuit; however,

1 MR. KUVIN: Okay. All right, I appreciate  
 2 your patience. That's all the questions that I  
 3 have right now. I know that Mr. Goldberger needs  
 4 to deal with an issue right now with Ms. Ezell  
 5 regarding any further questions.

6 MR. GOLDBERGER: I think we clarified that.

7 Ms. Ezell, are you there?

8 MS. EZELL: I'm here.

9 MR. GOLDBERGER: Yeah. You had a discussion  
 10 with Bob Critton already concerning the question  
 11 you raised with me earlier, right?

12 MS. EZELL: Yes, I did, and I don't have any  
13 questions.

14 MR. PIKE: Ms. Ezell, this is Michael Pike. I  
 15 don't know what your conversation was with Bob, but  
 16 did you cross notice this deposition?

17 MS. EZELL: No, I did not.

18 MR. PIKE: So what is your purpose of being  
 19 here?

20 My position is that these are closed  
 21 proceedings and your client, your client did not  
 22 cross notice this deposition and/or your clients.  
 23 So what is your purpose of sitting in on this  
 24 deposition?

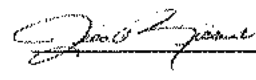

25 MS. EZELL: Well, I received a notice of it,

1 and I just thought I would listen to it while I was  
 2 doing some other work. And I don't know why it  
 3 would be a closed proceeding.  
 4 MR. PIKE: Discovery proceedings are closed if  
 5 it's a pre-trial discovery, ma'am, it's not a court  
 6 proceeding.  
 7 Nonetheless, do you have any questions for the  
 8 witness?  
 9 MS. EZELL: No, I don't.  
 10 MR. PIKE: And Ms. Holmes, who are you here on  
 11 behalf of? Which clients?  
 12 MS. HOLMES: L.M. and E.W.  
 13 MR. PIKE: Are you also here on behalf of Jane  
 14 Doe in the case 80893?  
 15 MS. HOLMES: I believe so, yes.  
 16 MR. PIKE: Do you have any questions for the  
 17 witness?  
 18 MS. HOLMES: No, I do not.  
 19 MR. GOLDBERGER: Katherine, we're going to  
 20 end. Do you want me to disconnect you now?  
 21 MS. EZELL: Yes, thanks.  
 22 MR. GOLDBERGER: Okay.  
 23 THE VIDEOGRAPHER: Conclude the deposition and  
 24 go off the record at 3:00 --  
 25 MR. PIKE: Wait one second.

1 CERTIFICATE OF OATH  
 2 THE STATE OF FLORIDA  
 3 COUNTY OF PALM BEACH

4  
 5  
 6 I, the undersigned authority, certify that  
 7 JEFFREY EPSTEIN personally appeared before me and was  
 8 duly sworn on the 8th day of October, 2009.  
 9

10 Dated this 8th day of October, 2009.  
 11

12  
 13  
 14  
 15  

16 Jeana Ricciuti, RPR, FPR, CLR  
 17 Notary Public - State of Florida  
 18 My Commission Expires: 2/17/2013  
 19 My Commission No.: DD 854778  
 20  
 21  
 22  
 23  
 24  
 25

1 MR. KUVIN: Oh, wait.  
 2 MR. GOLDBERGER: He's just going to read.  
 3 MR. PIKE: You didn't give the witness a  
 4 chance to read or waive and he'll read.  
 5 THE VIDEOGRAPHER: Conclude the deposition and  
 6 go off the record at 3:48. This will be the end of  
 7 tape No. 3.  
 8  
 9 (Witness excused.)  
 10 (Deposition was concluded.)  
 11  
 12  
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1 CERTIFICATE  
 2 THE STATE OF FLORIDA  
 3 COUNTY OF PALM BEACH

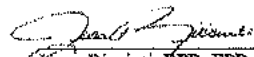
4  
 5 I, Jeana Ricciuti, Registered Professional  
 6 Reporter and Notary Public in and for the State of  
 7 Florida at large, do hereby certify that I was  
 8 authorized to and did report said deposition in  
 9 stenotype; and that the foregoing pages are a true and  
 10 correct transcription of my shorthand notes of said  
 11 deposition.

12 I further certify that said deposition was  
 13 taken at the time and place hereinabove set forth and  
 14 that the taking of said deposition was commenced and  
 15 completed as hereinabove set out.

16 I further certify that I am not attorney or  
 17 counsel of any of the parties, nor am I a relative or  
 18 employee of any attorney or counsel of party connected  
 19 with the action, nor am I financially interested in the  
 20 action.

21 The foregoing certification of this transcript  
 22 does not apply to any reproduction of the same by any  
 23 means unless under the direct control and/or direction  
 24 of the certifying reporter.

25 Dated this 8th day of October, 2009.

  
 Jeana Ricciuti, RPR, FPR, CLR

1 DATE: October 22, 2009  
 2 TO: JEFFREY EPSTEIN  
 3 c/o Michael J. Pike  
 4 BURMAN, CRITTON, LUTTIER & COLEMAN, P.A.  
 5 303 Banyan Boulevard  
 6 Suite 400  
 7 West Palm Beach, Florida 33401

8 IN RE: B.B. v. EPSTEIN

9 Please take notice that on Thursday, the 8th  
 10 of October, 2009, you gave your deposition in the  
 11 above-referred matter. At that time, you did not waive  
 12 signature. It is now necessary that you sign your  
 13 deposition.

14 As previously agreed to, the transcript will  
 15 be furnished to you through your counsel. Please read  
 16 the following instructions carefully:

17 At the end of the transcript you will find an  
 18 errata sheet. As you read your deposition, any changes  
 19 or corrections that you wish to make should be noted on  
 20 the errata sheet, citing page and line number of said  
 21 change. DO NOT write on the transcript itself. Once  
 22 you have read the transcript and noted any changes, be  
 23 sure to sign and date the errata sheet and return these  
 24 pages to me.

25 If you do not read and sign the deposition  
 within a reasonable time (i.e., 30 days unless otherwise  
 directed) the original, which has already been forwarded  
 to the ordering attorney, may be filed with the Clerk of  
 the Court. If you wish to waive your signature, sign  
 your name in the blank at the bottom of this letter and  
 return it to us.

Very truly yours,

\_\_\_\_\_  
 Jeana Ricciuti, RPR, FPR, CLR  
 Prose Court Reporting Agency, INC.  
 250 S. Australian Avenue, Ste 1500  
 West Palm Beach, Florida 33401

I do hereby waive my signature.

JEFFREY EPSTEIN

ERRATA SHEET  
 IN RE: B.B. v. EPSTEIN CR: JEANA RICCIUTI  
 DEPOSITION OF: JEFFREY EPSTEIN  
 TAKEN: October 8, 2009  
 DO NOT WRITE ON TRANSCRIPT - ENTER CHANGES HERE  
 PAGE # LINE # CHANGE REASON

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13	_____	_____	_____
14	_____	_____	_____
15	_____	_____	_____

Please forward the original signed errata sheet to this office so that copies may be distributed to all parties.

Under penalty of perjury, I declare that I have read my deposition and that it is true and correct subject to any changes in form or substance entered here.

DATE: \_\_\_\_\_

SIGNATURE OF DEPONENT: \_\_\_\_\_

CERTIFICATE

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.

\_\_\_\_\_  
 JEFFREY EPSTEIN

# ATTACHMENT 10

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

CASE NO: 08-CV-80119-MARRA/JOHNSON

JANE DOE NO. 2,  
Plaintiff,

vs.  
JEFFREY EPSTEIN,  
Defendant.

Related Cases:  
08-80232, 08-80380,08-80381,08-80994,  
08-80993, 08-80811,08-80893,09-80469,  
09-80591,09-80656,09-80802,09-81092.

VIDEOTAPED DEPOSITION OF JEFFREY EDWARD EPSTEIN  
VOLUME I  
(Pages 1 - 189)

Monday, March 8, 2010  
301 Clematis Street  
Suite 3000  
West Palm Beach, Florida 33401  
10:05 a.m. - 6:17 p.m.

Reported By:  
Vicki L. Lima, Court Reporter  
Notary Public, State of Florida  
Universal Legal Reporting  
Phone - (954) 712-2600  
Job #92076-A

VOLUME I  
(Pages 1 - 189)

EXAMINATION INDEX

JEFFREY EDWARD EPSTEIN  
DIRECT BY MR. HOROWITZ ..... 5

---  
NO EXHIBITS MARKED  
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1 APPEARANCES:

2 On behalf of the Plaintiffs, Jane Doe 2 through 8:  
3 ADAM HOROWITZ, ESQUIRE  
4 JESSICA D. ARBOUR, ESQUIRE  
5 MERMELSTEIN & HOROWITZ, P.A.  
6 18205 Biscayne Boulevard  
7 Suite 2218  
8 Miami, Florida 33160

9 On behalf of the Plaintiffs, Jane Doe, L.M. and E.W.:  
10 BRAD EDWARDS, ESQUIRE  
11 FARMER, JAFFE, WEISSING,  
12 EDWARDS, PISTOS & LEHRMAN, P.L.  
13 425 North Andrews Avenue  
14 Suite 2  
15 Fort Lauderdale, Florida 33301

16 On behalf of the Plaintiff, Jane Doe 103:  
17 KATHERINE W. EZELL, ESQUIRE  
18 PODHURST ORSECK  
19 City National Bank Building  
20 25 West Flagler Street  
21 Suite 800  
22 Miami, Florida 33130

23 On behalf of the Defendant and Witness:  
24 MICHAEL J. PIKE, ESQUIRE  
25 BURMAN, CRITTON, LUTTIER & COLEMAN  
303 Banyan Boulevard  
Suite 400  
West Palm Beach, Florida 33401

JACK A. GOLDBERGER, ESQUIRE  
ATTERBURY, GOLDBERGER & WEISS, P.A.  
One Clearlake Centre  
250 Australian Avenue South  
Suite 1400  
West Palm Beach, Florida 33401

ALSO PRESENT:  
Alex Ayala, Videographer

PROCEEDINGS

---  
Videotaped deposition taken before Vicki L. Lima, Court  
Reporter, and Notary Public in and for the State of  
Florida at Large, in the above cause.

---  
THE VIDEOGRAPHER: We are now on the record.  
This is the videotaped deposition of Jeffrey  
Epstein, taken in the matter of Jane Doe Number 2  
vs. Jeffrey Epstein, Case Number 08-CV-80119.  
We are here at 301 Clematis Street, Suite 3000,  
West Palm Beach, Florida 33401. It is Monday,  
March 8th, 2010. The time is 10:05. The court  
reporter is Vicki Lima. The videographer is Alex  
Ayala.

Will counsel please introduce themselves?  
MR. HOROWITZ: Sure. My name is Adam Horowitz  
from Mermelstein & Horowitz, counsel for Plaintiffs  
Jane Doe 2 through 8. And just for record  
purposes, the deposition is taken -- being taken in  
those cases as well.

MR. PIKE: Please introduce yourself.  
MS. ARBOUR: Jessica Arbour, Mermelstein &  
Horowitz.

MR. EDWARDS: Brad Edwards. I represent Jane

1 Doe. It's also been cross-noticed in that case as  
2 well, but I think it's styled in the Jane Doe 2  
3 case.

4 MS. EZELL: Katherine Ezell. I represent Jane  
5 Doe 103.

6 MR. PIKE: Michael Pike on behalf of Jeffrey  
7 Epstein.

8 THE VIDEOGRAPHER: Will the court reporter  
9 please swear in the witness?

10 THE REPORTER: Raise your right hand, please.

11 ---

12 THEREUPON:

13 JEFFREY EDWARD EPSTEIN  
14 having been first duly sworn or affirmed, was examined  
15 and testified as follows:

16 THE WITNESS: Yes, ma'am.

17 DIRECT EXAMINATION

18 BY MR. HOROWITZ:

19 Q Please tell us your full name?

20 A Jeffrey Edward Epstein.

21 Q And is your date of birth January 20, 1953?

22 A Yes.

23 Q Okay. And I guess that makes you 57 years old  
24 at the present time?

25 A Correct.

1 A What's that? Yes.

2 Q Okay. No back or neck pain at the present  
3 time?

4 A No.

5 Q Do you have a girlfriend at the present time?

6 MR. PIKE: Form.

7 THE WITNESS: On advice of counsel, I'm going  
8 to assert my Fifth Amendment Right.

9 BY MR. HOROWITZ:

10 Q Do you have a driver's license in any state?

11 A Yes.

12 Q In what state?

13 A The United States Virgin Islands.

14 Q Okay. How long have you had a driver's license  
15 in the Virgin Islands?

16 A I believe twelve years.

17 Q Okay. Have you ever had a driver's license in  
18 the State of Florida?

19 A Yes, sir.

20 Q Okay. And during what years did you have a  
21 driver's license in the State of Florida?

22 A I don't remember.

23 Q Okay. What address appears on your driver's  
24 license in the Virgin Islands?

25 MR. PIKE: Form.

1 Q And you are, sir, a registered sex offender in  
2 the State of Florida?

3 A Correct.

4 Q Okay. How long have you been a sex offender in  
5 the State of Florida?

6 MR. PIKE: Form.

7 THE WITNESS: I registered on -- in, I believe,  
8 '08, July of '08.

9 BY MR. HOROWITZ:

10 Q Okay. Are you married?

11 A No.

12 Q Have you ever been married?

13 A No.

14 Q Are you engaged?

15 A No.

16 Q Have you ever been engaged?

17 MR. PIKE: Form.

18 THE WITNESS: On advice of counsel, I'm going  
19 to assert my Fifth Amendment Right as to that.

20 BY MR. HOROWITZ:

21 Q Are you suffering from any physical illness or  
22 injury today that would prevent you from sitting for a  
23 full day of deposition?

24 A No.

25 Q Your hearing is okay?

1 THE WITNESS: I don't remember.

2 BY MR. HOROWITZ:

3 Q Is it the address that you reside in?

4 MR. PIKE: Form.

5 THE WITNESS: On advice of counsel, I am going  
6 to assert my Fifth Amendment Right.

7 BY MR. HOROWITZ:

8 Q Okay. Did you review any documents in  
9 preparation for today's deposition?

10 A No.

11 Q Okay. Did you meet with your attorneys  
12 concerning this deposition at any time before it  
13 started?

14 A At any time I've -- over the past couple of  
15 months, but not specifically with this deposition.

16 Q Okay. I'm asking about -- concerning this  
17 deposition?

18 A No.

19 Q Okay. In June of 2008, you pled guilty to two  
20 felonies; is that correct?

21 A Correct.

22 Q Okay. One of those felonies involved procuring  
23 a person under the age of 18 for prostitution, correct?

24 A Yes.

25 Q You pled guilty to that charge, correct?

1 A That's correct.  
 2 Q Okay. And you were represented by legal  
 3 counsel at the time of your plea?  
 4 A That's correct.  
 5 Q Okay. In that particular charge the person  
 6 under the age of 18 who you allegedly procured for  
 7 prostitution, was a female, correct?  
 8 A On advice of counsel, I am going to have to  
 9 assert my Fifth Amendment, Sixth Amendment and  
 10 Fourteenth Amendment Right.  
 11 Q In June of 2008, you also pled guilty to a  
 12 felony charge of solicitation of a prostitute, correct?  
 13 A No, solicitation of prostitution, correct.  
 14 Q Okay. And to make sure we're on the same page,  
 15 in June of 2008, you pled guilty to a felony of  
 16 solicitation of prostitution, correct?  
 17 A Yes.  
 18 Q Okay. And you were represented by counsel at  
 19 the time of that guilty plea as well?  
 20 A Yes, sir.  
 21 Q Okay. And you were sentenced in Palm Beach  
 22 County for both of those felonies, correct?  
 23 A That's correct.  
 24 Q Okay. You actually served your time in Palm  
 25 Beach County?

1 Q Okay. Do you register your home address as  
 2 part of your sex offender designation?  
 3 MR. PIKE: Form.  
 4 THE WITNESS: I believe so.  
 5 BY MR. HOROWITZ:  
 6 Q Okay. What address do you provide as your home  
 7 address as part of your sex offender registration?  
 8 MR. PIKE: Form.  
 9 THE WITNESS: On advice of counsel, I will have  
 10 to assert my Fifth Amendment, Sixth Amendment and  
 11 Fourteenth Amendment Right.  
 12 BY MR. HOROWITZ:  
 13 Q Okay. Do you tell the State of Florida where  
 14 you live as part of your sex offender registration?  
 15 A Do I tell the State of Florida?  
 16 Q Any department within the State of Florida  
 17 where you live as part of your sex offender  
 18 registration?  
 19 A I believe so.  
 20 Q What address do you tell them that you live in?  
 21 MR. PIKE: Form, same objection.  
 22 THE WITNESS: And I am going to assert my Fifth  
 23 Amendment, Sixth Amendment and Fourteenth Amendmen  
 24 Rights.  
 25 BY MR. HOROWITZ:

1 A That's correct.  
 2 Q Okay. And at the time of your sentence, did  
 3 the Judge advise you as to what your sentence would be?  
 4 A I believe so.  
 5 Q You were there when the Judge entered the  
 6 sentence?  
 7 MR. PIKE: Form.  
 8 THE WITNESS: Yes.  
 9 BY MR. HOROWITZ:  
 10 Q Okay. Your sentence included jail time; is  
 11 that right?  
 12 A That's correct.  
 13 Q Okay. And the sentence you received was twelve  
 14 months, followed by six months; is that correct?  
 15 A I believe so.  
 16 Q Uh-huh. And was it at -- as part of that  
 17 sentence, that you were designated as a sex offender?  
 18 MR. PIKE: Form.  
 19 THE WITNESS: As a result of that sentence.  
 20 BY MR. HOROWITZ:  
 21 Q You were designated as a sex offender?  
 22 A That's correct.  
 23 Q Okay. So that would have been that June/July  
 24 2008 time frame?  
 25 A I believe so.

1 Q Do you tell any departments of the State of  
 2 Florida what vessels or vehicles you own as part of your  
 3 sex offender registration?  
 4 A My sex offender registration will speak for  
 5 itself, but I believe so. I don't remember.  
 6 Q Okay. What vehicles or vessels do you inform  
 7 the State of Florida that you own or have an interest in  
 8 as part of your sex offender registry?  
 9 MR. PIKE: Form, same objection.  
 10 THE WITNESS: I don't recall.  
 11 THE REPORTER: What did you say?  
 12 THE WITNESS: I don't recall.  
 13 BY MR. HOROWITZ:  
 14 Q If you know, are there locations that you  
 15 cannot live in because of your status as a sex  
 16 offender?  
 17 A I believe I --  
 18 MR. PIKE: Form.  
 19 THE WITNESS: -- I believe I can live in any  
 20 location.  
 21 BY MR. HOROWITZ:  
 22 Q Any location?  
 23 A Yes, sir.  
 24 Q If you know, are there places you cannot work  
 25 because of your status as a sex offender?

1 MR. PIKE: Form.  
 2 THE WITNESS: I don't believe so.  
 3 BY MR. HOROWITZ:  
 4 Q If you know, are there people that you cannot  
 5 come into contact with because of your status as a sex  
 6 offender?  
 7 MR. PIKE: Form.  
 8 THE WITNESS: I do not know.  
 9 BY MR. HOROWITZ:  
 10 Q Okay. Since being sentenced -- strike that.  
 11 As part of your sentence, are you forbidden  
 12 from having sexual contact with minors?  
 13 MR. PIKE: Form, argumentative.  
 14 THE WITNESS: I'm sorry?  
 15 BY MR. HOROWITZ:  
 16 Q As part of your sentence, are you forbidden  
 17 from having sexual contact with minors?  
 18 MR. PIKE: Same objection.  
 19 THE WITNESS: I don't know -- I believe that  
 20 sexual contact with minors is against the law, so I  
 21 would assume so.  
 22 BY MR. HOROWITZ:  
 23 Q Okay. As part of registering as a sex  
 24 offender, do you have to provide the State of Florida  
 25 with your business address?

1 information?  
 2 A It's done at the Stockade in Palm Beach County.  
 3 Q Okay. So since being released, you travel to  
 4 the Stockade to provide that information?  
 5 A On advice of counsel, I am going to assert my  
 6 Fifth Amendment, Fourteen Amendment and Sixth Amendment  
 7 Right.  
 8 THE VIDEOGRAPHER: Sorry to interrupt. I need  
 9 to go off the record for a second because of  
 10 sound.  
 11 MR. HOROWITZ: All right.  
 12 THE VIDEOGRAPHER: Time off the record 10:14.  
 13 (Thereupon, a short break was taken.)  
 14 THE VIDEOGRAPHER: Time on the record 10:15.  
 15 BY MR. HOROWITZ:  
 16 Q Sir, as part of your sentence in 2008, you also  
 17 had to provide a DNA sample to the court; is that  
 18 correct?  
 19 MR. PIKE: Form.  
 20 THE WITNESS: That's correct.  
 21 BY MR. HOROWITZ:  
 22 Q And per the sentence in the summer of 2008, you  
 23 were to be under community control after your time in  
 24 jail; is that correct?  
 25 MR. PIKE: Form.

1 A Yes, I believe so.  
 2 Q Okay. And what business address do you provide  
 3 the State of Florida --  
 4 MR. PIKE: Form.  
 5 BY MR. HOROWITZ:  
 6 Q -- as part of your registry with the -- as a  
 7 sex offender?  
 8 THE WITNESS: On advice of counsel, I am going  
 9 to assert my Fifth Amendment, Fourteen Amendment  
 10 and Sixth Amendment Right.  
 11 BY MR. HOROWITZ:  
 12 Q How many vehicles do you tell the State of  
 13 Florida that you own as part of your registration as a  
 14 sex offender?  
 15 A I don't know. I -- I don't know. I don't  
 16 recall.  
 17 Q With respect to those matters that you -- you  
 18 do know that you provide to the State of Florida --  
 19 A Yes.  
 20 Q -- who provides that information, meaning you  
 21 or someone on your behalf?  
 22 MR. PIKE: Form.  
 23 THE WITNESS: I do.  
 24 BY MR. HOROWITZ:  
 25 Q Okay. And where do you send in that

1 THE WITNESS: That's correct.  
 2 BY MR. HOROWITZ:  
 3 Q Are you still under community control?  
 4 A Yes, sir.  
 5 Q Okay. When does that end?  
 6 A July 21st --  
 7 Q 2010?  
 8 A -- July 10 -- yes, 2010.  
 9 Q July 21st, 2010, your community control  
 10 ceases?  
 11 A That's correct.  
 12 Q Okay. Do you have a community control  
 13 officer?  
 14 A Yes, sir.  
 15 Q What is his or her name?  
 16 A Miss Elkins, Officer Elkins.  
 17 Q How often do you see Miss Elkins in person?  
 18 A At least twice a week.  
 19 Q Okay. How much time do you spend with Miss  
 20 Elkins when you see her?  
 21 A It varies --  
 22 Q And --  
 23 A -- up to an hour each time.  
 24 Q Okay. And the typical occasion which you come  
 25 face-to-face with Miss Elkins, what -- what -- what do



1 you do?  
 2 MR. PIKE: Form.  
 3 THE WITNESS: I talk to Miss Elkins.  
 4 BY MR. HOROWITZ:  
 5 Q What do you talk about?  
 6 A If there's -- my schedule. I -- I prepare a  
 7 schedule for Miss Elkins.  
 8 Q Okay. A written schedule?  
 9 A Yes, sir.  
 10 Q Okay. And you do that every week, or twice a  
 11 week?  
 12 A Every week.  
 13 Q Okay. When was the last time you provided Miss  
 14 Elkins with a copy of your schedule?  
 15 A Last Monday.  
 16 Q Okay. What is Miss Elkins' first name?  
 17 A I don't know.  
 18 Q Okay. And so do you drive or get driven to the  
 19 Stockade to see Miss Elkins?  
 20 A Yes.  
 21 Q Okay. And has that been true since you were  
 22 released from jail?  
 23 MR. PIKE: Form.  
 24 THE WITNESS: No.  
 25 BY MR. HOROWITZ:

1 A Basically, yes.  
 2 Q And that takes up to an hour?  
 3 A Yes.  
 4 Q Okay. Anything else that you talk about other  
 5 than your schedule with either Miss Sloan or your --  
 6 your current -- Miss Elkins?  
 7 A Not that I can recall.  
 8 Q And it takes an hour approximately to talk  
 9 about your schedule?  
 10 MR. PIKE: Asked and answered.  
 11 THE WITNESS: Up to an hour.  
 12 BY MR. HOROWITZ:  
 13 Q Up to an hour?  
 14 A Yes.  
 15 Q Up to an hour?  
 16 A Yes.  
 17 Q Okay. Is anyone else with you when you meet --  
 18 when you met with Miss Elkins or Miss Sloan?  
 19 MR. PIKE: Form.  
 20 THE WITNESS: Which time?  
 21 BY MR. HOROWITZ:  
 22 Q Typically. It -- do you go alone?  
 23 A It's -- it's -- it's in the office.  
 24 MR. PIKE: Same objection.  
 25 THE WITNESS: It's at the probation office.

1 Q Okay. For how long have you been seeing Miss  
 2 Elkins one to two times per week?  
 3 A Miss Elkins was -- had replaced my former  
 4 probation officer, which is Carmine Sloan (phonetic),  
 5 about a month ago.  
 6 Q Okay. Did you have a -- another probation  
 7 officer before Carmine Sloan?  
 8 A No, sir.  
 9 Q Okay. And when Carmine Sloan was your  
 10 probation officer, were you also seeing -- were you  
 11 seeing him one to two times a week?  
 12 A It's her, but yes.  
 13 Q Okay. And were you providing Miss Sloan with a  
 14 -- a written schedule?  
 15 A Yes.  
 16 Q Okay. Other than providing Miss Sloan with a  
 17 written schedule, what else -- what else do you talk  
 18 about?  
 19 A Just my daily activities.  
 20 Q Well, what do you tell her about your daily  
 21 activities?  
 22 A Where I will be. Just my schedule. Where I  
 23 will be.  
 24 Q Okay. Is that the subject matter each time  
 25 that you go see her?

1 BY MR. HOROWITZ:  
 2 Q Okay. Is anyone within earshot such that they  
 3 can hear your conversation?  
 4 A I don't know.  
 5 Q Okay. Do you travel to go see Miss Elkins or  
 6 Miss Sloan with anybody else?  
 7 MR. PIKE: Form.  
 8 THE WITNESS: On advice of counsel, I am going  
 9 to assert my Fifth Amendment, Sixth Amendment and  
 10 Fourteenth Amendment Right.  
 11 BY MR. HOROWITZ:  
 12 Q Other than the probation officer, whether it be  
 13 Miss Sloan or Miss Elkins, is there anyone else from  
 14 their office that is present when you meet with them?  
 15 MR. GOLDBERGER: From their office, did you  
 16 say?  
 17 MR. HOROWITZ: Yes.  
 18 THE WITNESS: Maybe a couple of times, maybe  
 19 another probation officer.  
 20 BY MR. HOROWITZ:  
 21 Q Okay. And who is that?  
 22 A I don't know.  
 23 Q Is there anything else, other than your written  
 24 schedule, that you provide to Miss Elkins or Miss Sloan  
 25 during the course of your community control?

1 A Not that I can recall.  
 2 Q Okay. What sort of things would we find on  
 3 that schedule?  
 4 MR. PIKE: Form.  
 5 THE WITNESS: Where I intend to be.  
 6 BY MR. HOROWITZ:  
 7 Q Okay. So it would have a physical location --  
 8 MR. PIKE: Form.  
 9 BY MR. HOROWITZ:  
 10 Q -- such as "office," or would it say an  
 11 address?  
 12 A It just might say "office." It might say an  
 13 address.  
 14 Q Okay. What addresses do you provide Miss Sloan  
 15 or Miss Elkins as your address when you are providing  
 16 your written schedule?  
 17 MR. PIKE: Form.  
 18 MR. GOLDBERGER: Form.  
 19 THE WITNESS: On advice of counsel, I am going  
 20 to have to assert my Fifth Amendment, Sixth  
 21 Amendment and Fourteenth Amendment Right.  
 22 BY MR. HOROWITZ:  
 23 Q Other than telling Miss Elkins and Miss Sloan  
 24 that you're at the office, where else do you tell them  
 25 that you will be?

1 A Yes.  
 2 Q Well, where do they travel to to see you?  
 3 MR. PIKE: Form.  
 4 THE WITNESS: On advice of counsel, I am going  
 5 to assert my Fifth Amendment, Sixth Amendment and  
 6 Fourteenth Amendment Right.  
 7 BY MR. HOROWITZ:  
 8 Q Okay. Other than your own office, are there  
 9 any other locations where you have met Miss Sloan or  
 10 Miss Elkins to discuss your schedule?  
 11 A My probation office.  
 12 Q Other than the probation office, are there any  
 13 other locations where you've met them?  
 14 A On advice of counsel, I am going to assert my  
 15 Sixth Amendment, Fourteenth Amendment and Fifth  
 16 Amendment Right.  
 17 BY MR. HOROWITZ:  
 18 Q Okay. Do you anticipate that you'll be seeing  
 19 Miss Elkins one to two times per week until your  
 20 community control expires?  
 21 A Yes.  
 22 Q You were also ordered at the time of your  
 23 sentence to have no contact, direct or indirect, with  
 24 various girls; is that correct?  
 25 MR. PIKE: Form, confusing.

1 MR. PIKE: Same objection.  
 2 THE WITNESS: I am going to have to assert my  
 3 Fifth Amendment, Fourteenth Amendment and Sixth  
 4 Amendment Right.  
 5 BY MR. HOROWITZ:  
 6 Q Does the schedule -- written schedule that you  
 7 provide to Miss Elkins and Miss Sloan simply say a  
 8 location, or do you also describe your activities?  
 9 A Just the location.  
 10 Q Okay. Other than "office," what other  
 11 locations do you from time to time provide to Miss  
 12 Elkins or Miss Sloan?  
 13 MR. PIKE: Form.  
 14 THE WITNESS: I'm going -- I am going to, on  
 15 advice of counsel, assert my Fifth Amendment, Sixth  
 16 Amendment and Fourteenth Amendment Right.  
 17 BY MR. HOROWITZ:  
 18 Q Okay. Does your community control officer --  
 19 is that -- is that the correct term, "community control  
 20 officer"?  
 21 MR. PIKE: Form.  
 22 THE WITNESS: I believe so.  
 23 BY MR. HOROWITZ:  
 24 Q Okay. Does your community control officer ever  
 25 make unannounced visits to your home?

1 THE WITNESS: I'm sorry, I don't understand the  
 2 question.  
 3 BY MR. HOROWITZ:  
 4 Q Sure. At the time of your sentence -- we  
 5 talked about that a few times already, that was in  
 6 June/July of 2008?  
 7 A Uh-huh.  
 8 Q My question is: Isn't it true you were ordered  
 9 at that time to have no contact, direct or indirect,  
 10 with various girls?  
 11 MR. PIKE: Objection.  
 12 THE WITNESS: I don't recall.  
 13 BY MR. HOROWITZ:  
 14 Q Do you know --  
 15 A I don't recall.  
 16 Q Do you know whether the Judge announced that in  
 17 Court to you on the date of your sentence?  
 18 A I don't recall.  
 19 Q Do you recall a document saying that you were  
 20 directed to have no contact, direct or indirect, with  
 21 various girls as part of your criminal sentence?  
 22 MR. PIKE: Form.  
 23 THE WITNESS: I believe that was much later.  
 24 BY MR. HOROWITZ:  
 25 Q Okay. At some point -- that happened later?

1 A That's correct.  
 2 Q Okay. What do you understand to be the terms  
 3 of this no-contact order that you believe you were  
 4 provided at a later date?  
 5 MR. PIKE: Form.  
 6 MR. GOLDBERGER: If you know.  
 7 THE WITNESS: Just to have no affirmative  
 8 contact --  
 9 MR. GOLDBERGER: Be specific.  
 10 THE WITNESS: -- with -- with -- with three  
 11 specific girls.  
 12 MR. HOROWITZ: Let me just nip this in the  
 13 bud. A witness --  
 14 MR. GOLDBERGER: I -- I am just trying to help  
 15 you along here.  
 16 MR. HOROWITZ: Okay.  
 17 MR. GOLDBERGER: No problem. You can -- you  
 18 can ask the questions, and it will take an hour  
 19 later. I'm trying to get you an answer that you  
 20 want.  
 21 MR. HOROWITZ: I appreciate that. If I -- and  
 22 if I'm having a hard time, that's my problem. Not  
 23 yours.  
 24 MR. GOLDBERGER: Okay.  
 25 MR. HOROWITZ: But what I was addressing was

1 now, I'm just trying to help you along.  
 2 MR. HOROWITZ: I appreciate that.  
 3 MR. GOLDBERGER: That's the only reason I did  
 4 it.  
 5 MR. HOROWITZ: All right. I'm going to put  
 6 this on the record again. The local rules provide  
 7 that in a deposition in a civil case one witness,  
 8 one attorney who can object, period. It doesn't  
 9 say if there is also a criminal case, two attorneys  
 10 can speak. So if Mr. Epstein wanted to hire an  
 11 attorney familiar with his criminal case for his  
 12 civil case, he could have done so. If he didn't,  
 13 that was at his own peril. So I'm just going to  
 14 ask you to refrain, and I'm just going to put you  
 15 on notice that if you -- if you interject an  
 16 objection --  
 17 MR. GOLDBERGER: Uh-huh.  
 18 MR. HOROWITZ: -- I'll seek the relief from the  
 19 Court, and that's -- that's it, but --  
 20 MR. GOLDBERGER: That's fine. And I'm going to  
 21 continue to do so, and if you want to adjourn at  
 22 this point, we can do that. But if I think it's an  
 23 issue relevant to my representation of him on a  
 24 pending criminal case, I'm going to do so, okay?  
 25 MR. HOROWITZ: Okay.

1 not your assistance, but the fact that you're  
 2 speaking up, and you're familiar with the local  
 3 rules.  
 4 MR. PIKE: Yeah, let me --  
 5 MR. HOROWITZ: No, no, no.  
 6 MR. PIKE: I know. I understand.  
 7 MR. HOROWITZ: No, no --  
 8 MR. PIKE: Listen, we have got a -- we've got a  
 9 long day ahead of us, so let's move along.  
 10 MR. HOROWITZ: This is -- this is in the  
 11 interest of efficiency.  
 12 MR. PIKE: Okay. Let's go.  
 13 MR. HOROWITZ: Per witness, one attorney, okay?  
 14 I don't care who it is, but it can only be one of  
 15 you.  
 16 MR. GOLDBERGER: Okay. So here's the deal: I  
 17 represent Mr. Epstein on his criminal cases. If I  
 18 feel it is important for me to interject on issues  
 19 relevant to his criminal case, I'll do so.  
 20 Mr. Pike has taken the -- the lead role in  
 21 representing Mr. Epstein civilly.  
 22 MR. HOROWITZ: Well --  
 23 MR. GOLDBERGER: If there are issues relevant  
 24 to the criminal case, I'm going interject.  
 25 As far as your concern about what just occurred

1 MR. GOLDBERGER: And you'll -- you're free to  
 2 seek whatever relief you want.  
 3 MR. PIKE: And -- and let me -- let me put  
 4 something on the record, since you chose to do so.  
 5 One, this is -- this proceeding has a quasi-  
 6 criminal component to it, and your questions today,  
 7 Mr. Horowitz, are interjected in a manner in an  
 8 attempt to cause Mr. Epstein to waive his Fifth  
 9 Amendment Right, along with his Sixth and his  
 10 Fourteenth which are incorporated therein. So the  
 11 fact that Mr. Goldberger is here making sure that  
 12 his client and my mutual client maintain and  
 13 preserve those privileges that are afforded under  
 14 the United States Constitution, he will continue to  
 15 do that today, okay?  
 16 Now, we're here to answer your questions.  
 17 We're here to move forward with the depo. We'd  
 18 like to do that. If you'd like to adjourn to take  
 19 this up with the Court today, we could do that as  
 20 well, but it was -- it's your choice.  
 21 MR. HOROWITZ: Okay.  
 22 MR. PIKE: Okay?  
 23 BY MR. HOROWITZ:  
 24 Q One girl that you were ordered to have no  
 25 contact with is Jane Doe 2, correct?

1 MR. PIKE: Form.  
 2 THE WITNESS: I don't know.  
 3 BY MR. HOROWITZ:  
 4 Q Another girl that you were ordered to have no  
 5 contact with is Jane Doe 4, correct?  
 6 MR. PIKE: Form.  
 7 THE WITNESS: No, I don't -- you -- you've  
 8 asked me a question regarding a criminal case?  
 9 MR. HOROWITZ: Correct.  
 10 THE WITNESS: So regarding my criminal case, I  
 11 believe the answers to the both of those questions  
 12 are no.  
 13 BY MR. HOROWITZ:  
 14 Q Okay. I have some more questions about your  
 15 criminal case.  
 16 A Okay.  
 17 Q Another girl that you were ordered to have no  
 18 contact with as a result of your -- following your  
 19 sentence is Jane Doe 6; is that correct?  
 20 MR. PIKE: Form.  
 21 THE WITNESS: I don't believe so.  
 22 BY MR. HOROWITZ:  
 23 Q Okay. And another girl that you were ordered  
 24 to have no contact with as a result of your criminal  
 25 case is Jane Doe 7, correct?

1 A I don't believe so.  
 2 Q Okay. Another girl that you were ordered to  
 3 have no contact with is Jane Doe 5?  
 4 MR. PIKE: Form.  
 5 THE WITNESS: As far as my criminal case, I  
 6 don't believe so.  
 7 BY MR. HOROWITZ:  
 8 Q Okay. Another girl you were ordered to have no  
 9 contact with is Jane Doe 8, correct?  
 10 MR. PIKE: Form.  
 11 THE WITNESS: I'm sorry, who?  
 12 MR. HOROWITZ: Jane Doe 8.  
 13 THE WITNESS: I don't believe so.  
 14 BY MR. HOROWITZ:  
 15 Q Okay. Another girl you were ordered to have no  
 16 contact with is Jane Doe 3, correct?  
 17 MR. PIKE: Same objection.  
 18 THE WITNESS: I don't believe so.  
 19 BY MR. HOROWITZ:  
 20 Q Okay. Are you aware of the names of any girls  
 21 who you were ordered to have no contact with as part of  
 22 your criminal case?  
 23 MR. PIKE: Form.  
 24 THE WITNESS: On the advice of counsel, I am  
 25 going to assert my Fifth Amendment, Sixth Amendment

1 and Fourteenth Amendment Right.  
 2 MR. HOROWITZ: Okay. I mentioned seven girls'  
 3 names. I'll just put them on the record so you  
 4 know what seven girls I'm talking about.  
 5 THE WITNESS: Okay.  
 6 MR. HOROWITZ: Jane Doe 5, Jane Doe 8, Jane Doe  
 7 6, Jane Doe 2, Jane Doe 3, Jane Doe 7.  
 8 BY MR. HOROWITZ:  
 9 Q Is it your testimony today that you were not  
 10 ordered as a result of a criminal case to have no  
 11 contact with them?  
 12 MR. PIKE: Form.  
 13 THE WITNESS: That's my best recollection.  
 14 BY MR. HOROWITZ:  
 15 Q Okay. And, therefore, since you have no  
 16 recollection of being ordered, you've made no  
 17 affirmative attempt to have no contact with them; is  
 18 that correct?  
 19 MR. PIKE: Form, asked and answered. I am  
 20 going to instruct him not to answer that question.  
 21 If you want to rephrase it, go ahead.  
 22 MR. HOROWITZ: Are you going to accept --  
 23 accept his advice?  
 24 MR. PIKE: Yeah.  
 25 THE WITNESS: Yes.

1 BY MR. HOROWITZ:  
 2 Q Okay. Have you made any affirmative attempt to  
 3 have no contact with Jane Doe 5, Jane Doe 8, Jane Doe 6,  
 4 Jane Doe 2, Jane Doe 3, Jane Doe 4 or Jane Doe 7?  
 5 MR. PIKE: Form, lack of predicate and  
 6 foundation.  
 7 THE WITNESS: And on the advice of counsel, I  
 8 am going to assert my Fifth Amendment, Sixth  
 9 Amendment and Fourteenth Amendment Right.  
 10 BY MR. HOROWITZ:  
 11 Q Have you at any time known the names of the  
 12 girls that you were directed to have no contact with --  
 13 MR. PIKE: Same objection.  
 14 BY MR. HOROWITZ:  
 15 Q -- in the criminal case?  
 16 A Known the names?  
 17 Q Known, known.  
 18 A I was told that in fact some of your -- the  
 19 cases that were filed against me by your firm, a firm  
 20 whose partner was disbarred for his conduct, and in fact  
 21 Mr. Edwards sitting there with his firm who is called by  
 22 the U.S. Attorney to be the largest fraud in South  
 23 Florida's history -- I believe these girls have always  
 24 been -- and I believe the ladies and gentlemen of the  
 25 jury will eventually be aware that these girls have

1 filed the claim many years after they alleged and even  
2 associated with firms whose partners have been disbarred  
3 and is part -- one of his partners is currently in jail,  
4 yes.

5 Q Okay. Are you suggesting that a partner of  
6 mine was disbarred? Is that your testimony?

7 MR. PIKE: Form.

8 THE WITNESS: Yes, that's -- I believe that's  
9 my understanding.

10 BY MR. HOROWITZ:

11 Q Okay. Are you suggesting that my clients  
12 fabricated their claims against you after coming into  
13 contact with an attorney who you believe was  
14 disciplined?

15 MR. PIKE: Form.

16 THE WITNESS: You know, I'd really like to  
17 answer that question, and hopefully some day I  
18 will. I think the answer is pretty obvious to you  
19 and the other people in this room, but, however,  
20 today, Mr. Horowitz, I am going to, on the advice  
21 of counsel, have to assert my Fifth Amendment,  
22 Sixth Amendment and Fourteenth Amendment Right,  
23 though I would like to -- and I'm sure you and the  
24 ladies and gentlemen understand, I'd like to answer  
25 that question.

1 BY MR. HOROWITZ:

2 Q Well, you mentioned an attorney who you believe  
3 was disciplined, and you mentioned an attorney who you  
4 believe --

5 A I don't believe I said "disciplined." I think  
6 you -- I said "disbarred."

7 Q Disbarred, okay.

8 A Is that correct?

9 Q No, it's wrong, but that was your words.

10 A He was not disbarred?

11 Q I'm not allowed to testify to those --

12 A Oh, I'm sorry.

13 Q I didn't create these rules.

14 A I thought he was disbarred. I think the paper  
15 said he was disbarred.

16 Q Okay. You mentioned that an attorney was  
17 disbarred, and another attorney --

18 A Your partner was disbarred. Not an attorney,  
19 correct?

20 Q You mentioned that my partner was disbarred,  
21 and that's your testimony?

22 A Yes.

23 Q And you mentioned that another attorney  
24 committed fraud?

25 A Yes.

1 Q Are you suggesting that somehow the Plaintiffs  
2 fabricated their allegations because of their  
3 association with these lawyers?

4 MR. PIKE: Form.

5 THE WITNESS: In fact, according to the  
6 newspapers, the attorney who's -- who is currently  
7 sitting in jail, Mr. Edwards' partner, was accused  
8 of fabricating many cases not only against people  
9 like me, but others, of the sexual nature, very  
10 similar to the ones you've filed.

11 BY MR. HOROWITZ:

12 Q Okay. As to my clients -- I'm not asking about  
13 anybody else's clients. As to my client, are you  
14 suggesting that they fabricated any aspect of their  
15 dealings with you as a result of their dealings with  
16 their attorney, or some remote dealings with  
17 Mr. Rothstein? Is that -- is that your testimony?

18 A I think that answer --

19 MR. PIKE: Form, predicate, foundations, sorry.

20 THE WITNESS: I think that answer is pretty  
21 obvious. But, however, on advice of counsel, I  
22 cannot answer any questions today that are relevant  
23 to this law -- to these lawsuits. I would like  
24 to. I'm sure everybody knows that I would like  
25 to. You know I would like to. But today, on the

1 advice of counsel, I am going to have to assert my  
2 Fifth Amendment, Sixteenth -- sorry -- Sixth  
3 Amendment and Fourteenth Amendment Rights as  
4 guaranteed by the Constitution.

5 And if I don't follow their advice and I prefer  
6 -- I would actually prefer to answer the question,  
7 but if I don't follow their advice, I am going to  
8 risk losing my counsel, which is a violation. So I  
9 am going to have to assert those rights today.

10 MR. PIKE: Okay. And just for the record --

11 MR. HOROWITZ: Move to strike the  
12 non-responsive portion.

13 MR. PIKE: Just for the record, let's try to go  
14 -- take turns for the court reporter's benefit.  
15 Finish your answer --

16 THE WITNESS: Okay.

17 MR. PIKE: -- finish your question, before both  
18 of you continue to talk to -- over each other,  
19 thanks.

20 BY MR. HOROWITZ:

21 Q Mr. Epstein, if I heard you right, you said  
22 that your attorneys have advised you that your -- you  
23 could not answer these questions without waiving the  
24 Fifth, Sixth and Fourteenth Amendment; is that right?

25 MR. PIKE: Form. I am going to instruct him

1 not to answer that question because the way it's  
2 phrased attempts to elicit attorney-client  
3 communications.

4 BY MR. HOROWITZ:

5 Q Did I paraphrase you correctly?

6 A No, you did not.

7 Q Okay. Well, sir, are you -- are you testifying  
8 that Jane Doe 2 falsified a lawsuit because of her  
9 association with a lawyer?

10 MR. PIKE: Form, predicate, foundation.

11 THE WITNESS: I would really like to answer  
12 that question, but today, and just today at least  
13 on the advice of counsel, I cannot, because they  
14 have advised me that if I do, I risk losing their  
15 counsel, but as I think it is going to be pretty  
16 obvious, I would like to answer that question, but  
17 on the advice of counsel, I am going to assert my  
18 Fifth, Sixth and Fourteenth Amendment Right as  
19 provided by the U.S. Constitution.

20 BY MR. HOROWITZ:

21 Q Well, Mr. Epstein, if you continue to laugh at  
22 any of my questions, shake your head, nod, it's my  
23 intention to inform the Court and file a motion that  
24 you've waived your Fifth Amendment Right.

25 MR. PIKE: All right. First of all, that's --

1 just said about his Constitutional Rights. He said  
2 he would be losing his Sixth Amendment Right to  
3 effective representation. Do you understand -- is  
4 that what you said, sir?

5 MR. PIKE: Form.

6 THE WITNESS: Correct.

7 BY MR. HOROWITZ:

8 Q Okay. Okay. When you say your Sixth Amendmen  
9 Right to effective representation, who -- representation  
10 by who? Who -- who are you talking about?

11 MR. PIKE: Form. I'm going to instruct him not  
12 to answer that question.

13 BY MR. HOROWITZ:

14 Q Are you suggesting that your attorneys would  
15 not represent you if -- if you didn't assert your Sixth  
16 Amendment Right?

17 MR. PIKE: Same objection. I'm going to  
18 instruct him not to answer that question, attorney-  
19 client.

20 BY MR. HOROWITZ:

21 Q How do you ensure that you have no contact with  
22 the various girls you've been ordered to have no contact  
23 with?

24 MR. PIKE: Form, predicate, foundation.

25 THE WITNESS: On advice of counsel, I am going

1 that's argumentative and it's harassing, and you  
2 don't have a question on the table, so let's --  
3 let's --

4 MR. HOROWITZ: Why are you interrupting me?

5 MR. PIKE: Because -- because this deposition  
6 is not going to be utilized as a -- as a means to  
7 harass my client. Ask your questions, you'll get  
8 your answers, and let's move forward.

9 BY MR. HOROWITZ:

10 Q I'm going to ask that you not shake your head,  
11 nod or laugh at my questions. Because if you do, it  
12 will be at your own peril, because I'm -- I will file a  
13 motion to have your Fifth Amendment Rights waived.

14 MR. PIKE: I'm going to move to strike --

15 MR. HOROWITZ: Okay.

16 MR. PIKE: -- your two last statements,

17 Mr. Horowitz. Let's get on with the deposition.

18 BY MR. HOROWITZ:

19 Q When you said that you must accept the advice  
20 of your attorney or risk waiving your Constitutional  
21 Rights, what advice were you talking about?

22 MR. PIKE: Form. I'm going to instruct him not  
23 to answer that question. He's asserting his  
24 Constitutional Rights.

25 MR. HOROWITZ: And I want to explore what he

1 to have to assert my Fifth Amendment, Sixth  
2 Amendment and Fourteenth Amendment Rights as  
3 guaranteed by the U.S. Constitution, though I would  
4 like to answer that question.

5 BY MR. HOROWITZ:

6 Q With respect to those girls whom you've been  
7 ordered to have no contact with, have you had any  
8 contact, direct or indirect, with them since receiving  
9 that order?

10 MR. PIKE: Same objection; form, predicate and  
11 foundation.

12 THE WITNESS: I would like to answer that  
13 question, however, today my -- I have been informed  
14 that I cannot answer any questions that may be  
15 relevant to your lawsuit. So I'm going to assert  
16 my Fifth Amendment, Sixth Amendment and Fourteenth  
17 Amendment Right. Excuse me, could I use the  
18 restroom?

19 MR. HOROWITZ: Yes.

20 THE VIDEOGRAPHER: Time off the record 10:35  
21 (Thereupon, a short break was taken.)

22 THE VIDEOGRAPHER: Time on the record 10:42.

23 BY MR. HOROWITZ:

24 Q As a result of your criminal sentence, how many  
25 girls were you ordered to have no contact with?

1 MR. PIKE: Form.  
 2 THE WITNESS: Three.  
 3 BY MR. HOROWITZ:  
 4 Q Okay. And what are their names?  
 5 MR. PIKE: Form.  
 6 THE WITNESS: I believe it was Jane Doe 103,  
 7 A.D. and S.G.  
 8 MR. HOROWITZ: Can you read that back?  
 9 THE REPORTER: A.H. --  
 10 MR. HOROWITZ: No, I don't think that's right.  
 11 That's not what he said.  
 12 (The pending answer was read back by the court  
 13 reporter.)  
 14 MR. HOROWITZ: Thank you.  
 15 BY MR. HOROWITZ:  
 16 Q Is it your testimony, sir, that those are the  
 17 only three girls who, as a result of a criminal case  
 18 against you, you've been ordered to have no contact  
 19 with?  
 20 MR. PIKE: Form.  
 21 THE WITNESS: That's correct.  
 22 BY MR. HOROWITZ:  
 23 Q Okay. With respect to S.G., do you acknowledge  
 24 that she has been to your home?  
 25 MR. PIKE: Form.

1 THE WITNESS: Sorry?  
 2 BY MR. HOROWITZ:  
 3 Q With respect to S.G., do you acknowledge she  
 4 has been to your home?  
 5 MR. PIKE: Same objection.  
 6 THE WITNESS: On advice of counsel -- I would  
 7 like to answer all your questions today,  
 8 Mr. Horowitz. I'm sorry your partner that was  
 9 disbarred is not here, because I would like to  
 10 answer his questions because I believe he was the  
 11 one who represented S.G. So I would like to see  
 12 Mr. Herman at some point when he gets --  
 13 potentially gets his license back. But, though I  
 14 would like to answer your questions in more detail,  
 15 on advice of counsel, I am going to have to assert  
 16 my Fifth, Sixth and Fourteenth Amendment Rights  
 17 under the U.S. Constitution. I would like to  
 18 answer the question, but my counsel has told me  
 19 that I risk losing their representation if I do,  
 20 so, therefore, I'm going to have to assert those  
 21 rights.  
 22 BY MR. HOROWITZ:  
 23 Q With respect to S.G., do you acknowledge that  
 24 she has -- she went to your home when she was a child?  
 25 MR. PIKE: Form.

1 THE WITNESS: Again, I would like to answer  
 2 that question, and I'm sure you know I would like  
 3 to answer that question. I'm sure your partner,  
 4 that was disbarred while he represented S.G., I  
 5 believe, or her parents, or he claimed he  
 6 represented one parent, and the other parent sued  
 7 him or tried to bring a lawsuit against your  
 8 partner -- I would like to answer any questions  
 9 with respect to S.G., but today on advice of  
 10 counsel, I'm not going to be able to do that  
 11 because they've advised me I must assert my Fifth,  
 12 Sixth and Fourteenth Amendment Right --  
 13 MR. HOROWITZ: Okay.  
 14 THE WITNESS: -- so therefore -- excuse me, I  
 15 am going -- should I finish?  
 16 MR. PIKE: Yes.  
 17 THE WITNESS: So, therefore -- though I would  
 18 like to answer that question and -- I am going to  
 19 have to assert those rights.  
 20 MR. HOROWITZ: Okay. Move to strike the  
 21 non-responsive -- the non-responsive portion of the  
 22 answer.  
 23 BY MR. HOROWITZ:  
 24 Q Do you acknowledge, sir, that with respect to  
 25 S.G. during her childhood, you paid her for sexual

1 contact?  
 2 MR. PIKE: Form.  
 3 THE WITNESS: Again, I would like to answer  
 4 that question, but as most of your other questions  
 5 here today, and I -- I understand that your partner  
 6 who represented this S.G. was disbarred, but at  
 7 some point in future I would like to answer that.  
 8 Today, unfortunately, I am going to have to assert  
 9 my Fifth, Sixth and Fourteenth Amendment Rights  
 10 under the U.S. Constitution because my counsel has  
 11 advise me that, though I would like to answer that  
 12 question, I cannot today.  
 13 BY MR. HOROWITZ:  
 14 Q Are you suggesting, sir, that S.G. fabricated  
 15 or embellished her allegations because of her  
 16 association with a disbarred attorney?  
 17 MR. PIKE: Form, move to strike,  
 18 mischaracterizes the witness' testimony.  
 19 THE WITNESS: Can you repeat the question?  
 20 BY MR. HOROWITZ:  
 21 Q Are you suggesting that S.G. either fabricated  
 22 or embellished her -- her allegations because of any  
 23 association she had with an attorney who's been  
 24 disbarred?  
 25 MR. PIKE: Same objection.

1 THE WITNESS: It's not an attorney who's been  
2 disbarred. I believe I said it's your partner that  
3 was disbarred when -- after representing S.G., and  
4 I would like -- though I would like to answer those  
5 questions in detail, today I have been advised by  
6 counsel that I cannot answer any questions that may  
7 be relevant to your lawsuits --

8 MR. HOROWITZ: All right.

9 THE WITNESS: -- and -- excuse me.

10 MR. HOROWITZ: Go ahead, finish.

11 THE WITNESS: Thank you. And, though I would  
12 like to answer the questions, and I know you keep  
13 trying to strike my answer with respect to S.G.'s  
14 representation by your former partner, Jeffrey  
15 Herman, who was disbarred, who held press  
16 conferences to try to make a big -- so he tried to  
17 embarrass me as best as he could, I'm -- I would  
18 like to answer those questions, but I cannot on  
19 advice of counsel.

20 BY MR. HOROWITZ:

21 Q Okay. And do you feel that because my partner,  
22 Jeffrey Herman, was an attorney involved in S.G.'s case,  
23 that somehow the allegations she's made against you are  
24 fabricated or embellished?

25 A I'd let -- the ladies and gentlemen of the jury

1 because Jeffrey Herman was involved in the  
2 representation of S.G., that her allegations of abuse by  
3 you are fabricated or embellished?

4 MR. PIKE: Form, predicate, foundation.

5 THE WITNESS: I would very much like to answer  
6 the question regarding S.G. -- which  
7 embellishments, as you've described them, or  
8 fabrications -- at the same time she met your  
9 partner that was later disbarred. However, as of  
10 today, though I would like to answer those  
11 questions -- and I think those answers are pretty  
12 obvious -- I am going to have to assert my Fifth  
13 Amendment, Sixth Amendment and Fourteenth Amendmen  
14 Rights under the U.S. Constitution.

15 And, though I think again those -- that answer  
16 is obvious, and will be obvious to most people here  
17 on the jury, my attorneys have advised me I cannot  
18 answer that question today.

19 BY MR. HOROWITZ:

20 Q Okay. You told us that in addition to S.G.,  
21 you were also ordered to have no contact with Jane Doe  
22 103 and A.D.; is that correct?

23 A Excuse me, yes.

24 Q And when did you receive such an order?

25 MR. PIKE: Form.

1 will make that decision, I'm sure. I can't -- I would  
2 like to answer those questions. I would really like to  
3 answer -- I think those answers are obvious, frankly.  
4 But today, on advice of counsel, I'm not going to be  
5 able to answer those questions. I am going --

6 Q Well --

7 A Mr. Horowitz, I would like to finish my answer,  
8 please. Is that okay?

9 Q Well, you keep repeating yourself.

10 THE WITNESS: Mr. Pike?

11 MR. PIKE: Go ahead and finish.

12 Please allow -- allow the witness to finish his  
13 answer.

14 THE WITNESS: So let's start -- should -- could  
15 you repeat the question, please?

16 MR. HOROWITZ: Yes.

17 (The pending question was read back by the  
18 court reporter.)

19 MR. HOROWITZ: That wasn't exactly the  
20 question, but I'll -- let me ask it again. Maybe  
21 it will be smoother, and just try and follow what  
22 it is I'm asking.

23 THE WITNESS: I'm trying my best.

24 BY MR. HOROWITZ:

25 Q Do you believe, as we sit here today, that

1 THE WITNESS: I don't recall.

2 BY MR. HOROWITZ:

3 Q Okay. Was it -- if I heard you correctly, it  
4 was in association with your criminal case?

5 A That's correct.

6 Q Okay. And with respect to Jane Doe 103, do you  
7 acknowledge that she has been to your home?

8 MR. PIKE: Form.

9 THE WITNESS: Again, I would like to answer  
10 most of your questions. However, today, as I've  
11 answered most -- almost all of your questions and  
12 will continue to answer, on advice of counsel, I  
13 believe, this question, I have to assert my Fifth  
14 Amendment, Fourteenth Amendment and Sixth Amendmen  
15 Rights under the U.S. Constitution.

16 BY MR. HOROWITZ:

17 Q Okay. And -- are you done?

18 A (No verbal response).

19 Q Do you acknowledge that Jane Doe 103 came to  
20 your home for sexual contact during her childhood, and  
21 that you paid her for those services?

22 MR. PIKE: Form, predicate, foundation,  
23 argumentative.

24 THE WITNESS: I'd -- I would like to answer  
25 that question. I think those questions will all



1 have obvious answers and not -- however, today, I  
2 am going to have to assert my Fifth Amendment,  
3 Sixth Amendment and Fourteenth Amendment Rights  
4 under the U.S. Constitution, because, though I  
5 would like to answer that question, my attorneys  
6 have advised me that I cannot -- today cannot  
7 answer any questions that may be relevant to this  
8 lawsuit.

9 BY MR. HOROWITZ:

10 Q Okay. You also told us -- provided this name  
11 of A.D. Do you acknowledge that A.D. was paid by you  
12 for sexual contact during her childhood?

13 MR. PIKE: Form, predicate, foundation,  
14 argument.

15 THE WITNESS: I would like to answer that  
16 question, as I would like to answer most of your  
17 other questions here today, but I, unfortunately,  
18 am going to have to answer that one, as I've  
19 answered most of your other questions, which is  
20 unfortunately today, I cannot answer any question  
21 that may be relevant to this lawsuit on advice of  
22 counsel. I must assert my Fifth Amendment, Sixth  
23 Amendment and Fourteenth Amendment Right under the  
24 U.S. Constitution.

25 BY MR. HOROWITZ:

1 his doctors and as well as his prescriptions,  
2 correct? You're aware of that?

3 MR. PIKE: I recall that order, but I don't  
4 recall -- I don't recall -- if you have the -- if  
5 you have the answers, then you can provide them to  
6 me, and maybe I would be better situated to allow  
7 the client to answer or not answer the questions.  
8 I saw your associate reaching for something. So  
9 maybe -- maybe you do have them, you can refresh my  
10 recollection.

11 MR. HOROWITZ: Well, I'm just going to ask the  
12 witness -- I'm not here to refresh his  
13 recollection. I want his --

14 MR. PIKE: Or mine.

15 MR. HOROWITZ: Or yours.

16 MR. PIKE: Right.

17 MR. HOROWITZ: I want his testimony on today's  
18 date as to the truth.

19 MR. PIKE: Okay. Well, I'm going to instruct  
20 him not to answer that question right now. Let's  
21 --

22 MR. HOROWITZ: You guys want to talk among  
23 yourselves?

24 MR. PIKE: Sure. I'm still going to maintain  
25 the objection it's also attorney-client and work

1 Q When in the future do you presently intend to  
2 stop asserting your Fifth, Sixth and Fourteenth  
3 Amendment Rights, if any, and intend to start answering  
4 these questions?

5 MR. PIKE: Form. I am going to instruct him  
6 not to answer that question, attorney-client.

7 BY MR. HOROWITZ:

8 Q Do you intend at trial to start answering these  
9 questions?

10 MR. PIKE: Same objection. I am going to  
11 instruct him not to answer, attorney-client.

12 BY MR. HOROWITZ:

13 Q At the time of your sentence you told us --  
14 which was in the summer of 2008, did you have a private  
15 psychologist --

16 MR. PIKE: Form.

17 BY MR. HOROWITZ:

18 Q -- named Dr. Alexander?

19 MR. PIKE: Form. I am going to instruct him  
20 not to answer that question as well because the  
21 Judge has already ruled that Mr. Epstein's medical  
22 history is not an element in any of these cases.

23 MR. HOROWITZ: Well, despite -- you -- you --  
24 you're aware we have a court order in which  
25 Mr. Epstein was required to provide us the names of

1 product.

2 BY MR. HOROWITZ:

3 Q What -- are -- are you under the care of any  
4 physicians at the present time other than Dr. Alexander?

5 MR. PIKE: Form, predicate, foundation and  
6 mischaracterizes, I believe, my objection.

7 THE WITNESS: I would like to answer that  
8 question, as I would like to answer most of your  
9 other questions here today, but today I am going to  
10 have to assert my Fifth Amendment, Sixth Amendment  
11 and Fourteenth Amendment Rights under the advice --  
12 on advice of counsel.

13 BY MR. HOROWITZ:

14 Q All right. What doctors have you been under  
15 the care of in the past five years?

16 MR. PIKE: Form.

17 THE WITNESS: I am going to have to assert my  
18 Fifth Amendment, Sixth Amendment and Fourteenth  
19 Amendment Rights on advice of counsel, though I  
20 would like to answer these questions.

21 MR. HOROWITZ: Okay. I mean, you -- you could  
22 -- you can tell your client to do what you want,  
23 but, I mean, we have a specific court order.

24 MR. PIKE: Do you have a copy of it with you?

25 MR. HOROWITZ: During the break I'll get you a

1 copy.  
 2 MR. PIKE: I mean, if you have a copy of an  
 3 order, and you want to refresh my recollection --  
 4 since the Fifth Amendment and the Sixth Amendment  
 5 and the Fourteenth Amendment are highly technical  
 6 Constitutional Amendments, if you wish to ask my  
 7 client questions based upon an order, I would ask  
 8 that you simply provide me with the order  
 9 beforehand, and then we can make this a much easier  
 10 process. We're here for you, Adam.

11 MR. HOROWITZ: Thanks. I'm pretty sure the  
 12 Court gave you a copy of the order, but -- but it's  
 13 okay. We can move on. During the break we'll  
 14 address it.

15 MR. PIKE: No -- well, wait a second --

16 MR. HOROWITZ: During the break we'll address  
 17 it.

18 MR. PIKE: -- I am not going to banter with  
 19 you, and nor am I going to accept this type of  
 20 laughing from the corner show over there  
 21 (indicating). Listen, the fact remains is this:  
 22 There have been several orders. That of which I  
 23 was the initial author of the -- of the motions  
 24 that resulted in the positive orders, reflective of  
 25 the Fifth, Sixth and Fourteenth Amendment. So it

1 medications that you have been prescribed or have taken  
 2 in the past five years?

3 A On advice of counsel, I am going to have to  
 4 assert my Fifth Amendment, Sixth Amendment and  
 5 Fourteenth Amendment Rights, though I would like to  
 6 answer that question.

7 Q Okay. Is it true, sir, that a -- a girl named  
 8 Jane Doe 2 came to your Palm Beach home in late 2004?

9 A Is she someone you represent?

10 Q Do you -- do you -- do you not know the answer?

11 A I do not know the name.

12 Q Okay. Do you know we're here on a case called  
 13 Jane Doe 2 vs. Jeffrey Epstein?

14 MR. PIKE: Form.

15 THE WITNESS: Yes.

16 BY MR. HOROWITZ:

17 Q And you've seen that on the deposition notice?

18 A Yes.

19 Q Are you suggesting that you -- you do not know  
 20 who Jane Doe 2 is?

21 MR. PIKE: Form.

22 THE WITNESS: I've seen it on the allegation --  
 23 on your complaint today.

24 BY MR. HOROWITZ:

25 Q Okay. So we have the answer to that question?

1 is: If you have some of those orders, which are  
 2 probably ten plus, bring them to me, and I will  
 3 read them, and we will make this deposition go  
 4 forward a lot easier.

5 BY MR. HOROWITZ:

6 Q All right. Are you -- have you been prescribed  
 7 any medications in the past five years?

8 MR. PIKE: Form.

9 THE WITNESS: It's the same answer. I would  
 10 like to answer that question, as I would like to  
 11 answer most of your other questions here today.  
 12 However, I've been advised by counsel that at least  
 13 today I cannot answer those questions, and I must  
 14 assert my Fifth Amendment, Sixth Amendment and  
 15 Fourteenth Amendment Right.

16 BY MR. HOROWITZ:

17 Q So you -- you told us in a sworn interrogatory  
 18 answer that you were prescribed Lipitor, and that you  
 19 take -- you take Lipitor. Are there other medications  
 20 that you receive, for instance, to treat you for a  
 21 sexual disorder?

22 MR. PIKE: Form. I am going to instruct him  
 23 not to answer that question as phrased.

24 BY MR. HOROWITZ:

25 Q Other than Lipitor, are there any other

1 MR. PIKE: Form.

2 THE WITNESS: I see it's on the complaint.

3 BY MR. HOROWITZ:

4 Q You've been a Defendant in that lawsuit for the  
 5 past two years?

6 A I don't know the time.

7 Q Do you know who the Plaintiff is, Jane Doe 2?

8 MR. PIKE: Form.

9 THE WITNESS: I read the complaint.

10 BY MR. HOROWITZ:

11 Q Okay. All right. My -- my earlier question to  
 12 you was: Isn't it true that a girl named Jane Doe 2 --

13 A Uh-huh.

14 Q -- came to your Palm Beach home in -- in late  
 15 2004?

16 A I -- again, I understand that Jane Doe 2 was  
 17 represented by your partner, Jeffrey Herman, who was  
 18 disbarred by The Florida Bar Association. I believe she  
 19 was represented by Mr. Herman prior to his disbarment.  
 20 I believe he represented her in a -- in some type of  
 21 press conference in association with other firms later  
 22 where other partners have gone to jail for representing  
 23 claims of a sexual nature against people like me and  
 24 others, and the U.S. Attorney called one of the other  
 25 firms involved in this the largest fraud in Florida --

1 in South Florida's history. But separate from that,  
2 unfortunately today, I am going to have to assert my  
3 Fifth Amendment, Fourteen Amendment and Sixth Amendment  
4 Rights on the advice of counsel.

5 MR. HOROWITZ: Okay. Move to strike that.  
6 BY MR. HOROWITZ:

7 Q Do you believe that Jane Doe 2's lawsuit  
8 against you was either fabricated, falsified or  
9 embellished due to any association she had with an  
10 attorney who was suspended or disbarred, as you say?

11 MR. PIKE: Form.

12 THE WITNESS: Again?

13 BY MR. HOROWITZ:

14 Q Do you believe that Jane Doe 2's lawsuit was  
15 either fabricated or embellished because of her  
16 association with any attorney?

17 MR. PIKE: Form.

18 THE WITNESS: I would like to tell you my  
19 beliefs. I would like to give you an answer to  
20 that question. I would like to -- I'm sure the  
21 jury is going to want to explain -- understand that  
22 she was represented by an attorney that was  
23 disbarred at the time when this lawsuit, I believe,  
24 got filed. Later he was disbarred. Today I would  
25 like to answer that question, but however, today on

1 home?

2 MR. PIKE: Form.

3 THE WITNESS: Can you tell me who those people  
4 are? Are those two of your clients?

5 MR. HOROWITZ: Yes, two of the three people I  
6 mentioned are my clients.

7 BY MR. HOROWITZ:

8 Q Are -- are -- are -- are -- are you denying  
9 that those girls were in your home?

10 A I'm asking you for clarification.

11 Q Okay. Do you want me to repeat the question?

12 A Do I understand the question that two of your  
13 clients have suggested one of your clients brought the  
14 other client?

15 Q Okay. Let me back up.

16 A Sorry. Is that -- is that --

17 Q My questions aren't suggesting anything.  
18 They're asking a question. Do you understand that?

19 A I understand that.

20 Q Okay. My question is: Is it true that in late  
21 2004 --

22 A Yes.

23 Q -- S.K. received a telephone call wherein she  
24 was told that Jane Doe 3 was bringing Jane Doe 2 to your  
25 home?

1 advice of counsel I cannot, and I am going to have  
2 to assert on their advice my Fifth Amendment, Sixth  
3 Amendment and Fourteenth Amendment Rights under the  
4 U.S. Constitution or risk losing their counsel.

5 MR. PIKE: Let me take a break really quick. I  
6 need a 60-second break.

7 THE VIDEOGRAPHER: Time off the record 10:59.  
8 (Thereupon, a short break was taken.)

9 THE VIDEOGRAPHER: Time on the record 11:06.

10 BY MR. HOROWITZ:

11 Q Sir, between 2001 and 2006 did you instruct  
12 S.K. to place telephone calls to arrange for girls under  
13 the age of 18 to come to your home for your sexual  
14 gratification?

15 MR. PIKE: Form.

16 THE WITNESS: Though I would like to answer  
17 that question, today, on advice of counsel, I am  
18 going to have to assert my Fifth Amendment, Sixth  
19 Amendment and Fourteenth Amendment Rights under the  
20 U.S. Constitution. And, though I'd really much  
21 like to answer that question, today, I cannot.

22 BY MR. HOROWITZ:

23 Q Is it true, sir, that in late 2004 S.K received  
24 a telephone call wherein she was told that a girl named  
25 Jane Doe 3 was bringing a girl named Jane Doe 2 to your

1 MR. PIKE: Form.

2 THE WITNESS: I'd like to answer that question,  
3 but unfortunately, today, at least, I am going to  
4 have to answer that like I've answered many of your  
5 other questions. Unfortunately, I have to answer  
6 -- on advice of counsel, I am going to have to  
7 assert my Fifth Amendment, Sixth Amendment and  
8 Fourteenth Amendment Rights under the U.S.  
9 Constitution because I've been told that I cannot  
10 answer any questions that may be relevant to any of  
11 your lawsuits, or -- and if I do, I risk losing my  
12 representation.

13 BY MR. HOROWITZ:

14 Q Okay. Did you instruct S.K. to communicate by  
15 telephone to arrange for Jane Doe 2 to come to your home  
16 for your own sexual gratification?

17 MR. PIKE: Form.

18 THE WITNESS: Who? I'm sorry, what was the  
19 name again?

20 BY MR. HOROWITZ:

21 Q This is about the fifth time I mentioned her  
22 name. Her name is Jane Doe 2.

23 A Uh-huh.

24 MR. PIKE: Same objection.

25 THE WITNESS: I'd like to answer that question,

1 as I would like to answer most of your other  
2 questions here today, Mr. Horowitz. However, on  
3 advice of counsel, they have instructed me that I  
4 cannot answer any questions that may be relevant to  
5 any of your multiple lawsuits. So, though I would  
6 like to answer it today, I am going to have to  
7 assert my Fifth Amendment, Sixth Amendment and  
8 Fourteenth Amendment Rights as provided by the U.S.  
9 Constitution.

10 BY MR. HOROWITZ:

11 Q I am going to stick with the line of questions  
12 involving Jane Doe 2, so I'm just going to ask that you  
13 keep that name in your head, okay? Jane Doe 2; you got  
14 that?

15 A I'll try.

16 Q Okay. Thank you. Did you inform S.K. that  
17 Jane Doe 2 would be giving you a massage that was sexual  
18 in nature?

19 MR. PIKE: Form.

20 THE WITNESS: I have -- I'm going to have to  
21 answer that question -- though I would like to  
22 answer that question today, I am going to have to  
23 assert my Fifth Amendment, Sixth Amendment and  
24 Fourteenth Amendment Rights, because on advice of  
25 counsel I cannot answer that question no matter how

1 have to respond the same way I've responded to most  
2 of your other questions here today, which is on  
3 advice of my counsel, I am going to have to assert  
4 my Fifth Amendment, Sixth Amendment and Fourteenth  
5 Amendment Rights as provided by the U.S.  
6 Constitution. And, though I would like to answer  
7 that question, if I do so, I risk losing my  
8 counsel's representation.

9 BY MR. HOROWITZ:

10 Q Was it your intent during the course of Jane  
11 Doe 2's visit to your home, that you would persuade,  
12 induce or entice her to engage in sexual activity?

13 MR. PIKE: Form.

14 THE WITNESS: Again, I would like to answer  
15 that question, as I would like to answer most of  
16 your other questions here today. However, on  
17 advice of my counsel, I cannot answer those  
18 questions today, so I am going to have to assert my  
19 Fifth Amendment, Sixth Amendment and Fourteenth  
20 Amendment Rights as provided by the U.S.  
21 Constitution. And, though I would like to answer  
22 it, and I think -- I am going to have to assert  
23 those rights.

24 BY MR. HOROWITZ:

25 Q Okay. During the course of Jane Doe 2's visit

1 much I actually want to today. So, unfortunately,  
2 I'll have to assert those rights.

3 BY MR. HOROWITZ:

4 Q Did you observe S.K. speaking by telephone to  
5 arrange for Jane Doe 2 to come to your home to give you  
6 a sexual massage?

7 MR. PIKE: Form.

8 THE WITNESS: Again, I'm going to have to  
9 answer that the way I've answered your other  
10 questions, Mr. Horowitz, which is, though I would  
11 like to answer that question today, on advice of  
12 counsel, I cannot answer any questions that may be  
13 relevant to any of your lawsuits. Therefore, I  
14 must assert my Fifth Amendment, Sixth Amendment and  
15 Fourteenth Amendment Rights as provided by the U.S.  
16 Constitution. And if I don't answer that way, I  
17 risk losing my counsel's representation.

18 BY MR. HOROWITZ:

19 Q Did S.K. tell you that she confirmed by  
20 telephone that Jane Doe 2 would be coming to your home  
21 at a specific time to give you a massage?

22 MR. PIKE: Form.

23 THE WITNESS: Though I would like to answer all  
24 of your questions here today, and I would like to  
25 answer that question specifically, I am going to

1 to your home, did you, in fact, persuade, induce or  
2 entice her to engage in sexual activity with you?

3 MR. PIKE: Form.

4 THE WITNESS: Though I would like to answer  
5 that question, as I would like to answer most of  
6 your other questions here today, on advice of  
7 counsel, I am not going to be able to answer those  
8 questions here today. They've advised me I must  
9 assert my Fourth -- excuse me -- Fifth -- excuse me  
10 -- Sixth and Fourteenth Amendment Rights as  
11 provided by the U.S. Constitution. And if I don't  
12 do so, I potentially risk losing their  
13 representation, so though I'd like to answer it, I  
14 must not.

15 BY MR. HOROWITZ:

16 Q Okay. At no point did Jane Doe 2 tell you that  
17 she was 18 or older, correct?

18 MR. PIKE: Form.

19 THE WITNESS: Again, I would like to answer --  
20 I'd really like to answer that question. However,  
21 I cannot, because on advice of counsel, I've been  
22 advised that I must assert my Fifth Amendment,  
23 Fourteenth Amendment and Sixth Amendment Rights as  
24 provided by the U.S. constitution. And if I don't  
25 do so, I potentially risk losing their

1 representation, though I would like to answer that  
2 question.

3 BY MR. HOROWITZ:

4 Q In your own mind, you didn't believe that when  
5 Jane Doe 2 came to your home that she was 18 or older,  
6 correct?

7 MR. PIKE: Form.

8 THE WITNESS: I'd really like to answer that  
9 question. I'd really like to answer most of your  
10 other questions here today. But however, on the  
11 advice of counsel, they've advised me I must assert  
12 my Fifth Amendment, Sixth Amendment and Fourteenth  
13 Amendment Rights as provided by the Constitution,  
14 and have asked me or instructed me, not to answer  
15 any questions that may be relevant to this  
16 lawsuit. So, though I would like to answer it, I  
17 cannot.

18 BY MR. HOROWITZ:

19 Q Okay. Jane Doe 2 told you that she attended  
20 Royal Palm Beach High School when she came to your home,  
21 correct?

22 MR. PIKE: Form.

23 THE WITNESS: I would like to answer that  
24 question, as I would like to answer every one of  
25 your questions here today. However, on advice of

1 MR. PIKE: Form.

2 THE WITNESS: I'd like to answer that  
3 question. I would like to answer that question, as  
4 I've had -- I would like to answer most of your  
5 other questions here today. However, upon advice  
6 of counsel, I have been instructed that I must  
7 assert my Fifth Amendment, Sixth Amendment and  
8 Fourteenth Amendment Rights as provided by the U.S.  
9 constitution. And though I would like to answer  
10 that question, I cannot.

11 BY MR. HOROWITZ:

12 Q During Jane Doe 2's visit to your home in 2004,  
13 did you instruct Jane Doe 2 to pinch your nipples and  
14 rub your chest?

15 MR. PIKE: Form.

16 THE WITNESS: I'd like to answer that question  
17 here today, like I'd like to answer most of your  
18 other questions here today, but, unfortunately, I  
19 am going to respond, as I've responded to virtually  
20 all of your questions, which is on advice of  
21 Counsel today, at least today, I cannot answer  
22 those questions, but must assert my Fifth  
23 Amendment, Sixth Amendment and Fourteenth Amendmen  
24 Right as provided by the U.S. Constitution. And  
25 therefore, though I would like to answer it, I am

1 counsel, I cannot. And, though I would like to, I  
2 must assert my Fifth Amendment, the Sixth Amendmen  
3 and Fourteenth Amendment Rights as provided by the  
4 U.S. Constitution. And if I don't do so, I risk  
5 losing their representation. Though I would like  
6 to answer, but today I cannot.

7 BY MR. HOROWITZ:

8 Q During Jane Doe 2's visit to your home in 2004,  
9 you were nude in front of her, isn't that right, sir?

10 MR. PIKE: Form.

11 THE WITNESS: I would like to answer that  
12 question, as I would like to answer most of your  
13 other questions here today. But my answer is going  
14 to be virtually the same as I've had to answer most  
15 of your other questions, which is on advice of  
16 counsel, I cannot answer those questions. I must  
17 assert my Fifth Amendment, Sixth Amendment and  
18 Fourteenth Amendment Rights as provided by the U.S.  
19 Constitution. And if I don't do so, I've been told  
20 I lose risking -- excuse me -- I risk losing their  
21 representation, and so therefore, I cannot answer  
22 that question.

23 BY MR. HOROWITZ:

24 Q During Jane Doe 2's visit to your home in 2004,  
25 did you instruct her to remove all of her clothing?

1 going to be required by my counsel not to.

2 BY MR. HOROWITZ:

3 Q During Jane Doe 2's visit to your home in 2004,  
4 did you ask her questions about her sexual experiences  
5 and preferences?

6 MR. PIKE: Form.

7 THE WITNESS: Though I would like to answer  
8 your question here today, Mr. Horowitz, as I would  
9 like to answer most of your other questions here  
10 today, my counsel has advised me I must assert my  
11 Sixth Amendment, Fourteenth Amendment and Fifth  
12 Amendment Rights. And if I don't follow their  
13 advice, I risk losing their representation, so  
14 therefore, I'd going to have to assert those  
15 rights, though I prefer to answer the question.

16 BY MR. HOROWITZ:

17 Q During Jane Doe 2's visit to your home in 2004,  
18 did you unfasten her bra and rub her breasts?

19 MR. PIKE: Form.

20 THE WITNESS: Though I'd like to answer that  
21 question -- I would like to answer all your  
22 questions here today, I'm going to have to respond  
23 as I've done to mostly all your other questions  
24 here today, Mr. Horowitz, which is on advice of my  
25 counsel, they've advised me I must assert my Sixth

1 Amendment Rights, my Fifth Amendment Rights and my  
 2 Fourteenth Amendment Rights under the U.S.  
 3 Constitution. And if I don't do so, and I answer  
 4 your question, which I would like to do, I risk  
 5 losing their representation, so, therefore, I must  
 6 just simply assert those rights.  
 7 THE VIDEOGRAPHER: Three minutes of tape  
 8 remaining.  
 9 MR. HOROWITZ: Okay. Thanks.  
 10 BY MR. HOROWITZ:  
 11 Q During Jane Doe 2's visit to your home in 2004,  
 12 did you rub Jane Doe 2's vagina?  
 13 MR. PIKE? Form.  
 14 THE WITNESS: I'd like to answer that question,  
 15 however, today, at least today, my counsel has  
 16 advised me that I cannot answer any questions that  
 17 may be relevant to your lawsuits --  
 18 BY MR. HOROWITZ:  
 19 Q During --  
 20 A -- and --  
 21 Q Sorry.  
 22 A Excuse me.  
 23 Q Go ahead.  
 24 A And, though I would like to answer each and  
 25 every one of your questions, I am going to have to

1 THE VIDEOGRAPHER: Time on the record 11:29  
 2 This is Tape 2.  
 3 BY MR. HOROWITZ:  
 4 Q Sir, during Jane Doe 2's visit to your home in  
 5 2004, did you masturbate in front of her?  
 6 MR. PIKE: Form.  
 7 THE WITNESS: Mr. Horowitz, I would like to  
 8 answer every one of your questions here today. I  
 9 specifically would like to answer that question.  
 10 However, on advice counsel, they've advised me I am  
 11 going to have to assert my Fifth Amendment, Sixth  
 12 Amendment and Fourteenth Rights as provided by the  
 13 U.S. Constitution. And if I don't follow their  
 14 advice, I risk losing their representation, so  
 15 therefore, I am going to have to assert those  
 16 rights.  
 17 BY MR. HOROWITZ:  
 18 Q During Jane Doe 2's visit to your home in 2004,  
 19 did you ejaculate in front of her?  
 20 MR. PIKE: Form.  
 21 THE WITNESS: I'd like to answer that  
 22 question. I'd like to answer most of your other  
 23 questions here today, but I am going to have to  
 24 respond, as I've responded to most of your other  
 25 questions here today, which is my counsel has

1 respond as I've responded to most of your other  
 2 questions here today, Mr. Horowitz, which is I am going  
 3 to have to assert my Sixth Amendment, Fourteenth  
 4 Amendment and Fifth Amendment Rights as provided by the  
 5 U.S. Constitution. I've been advised by counsel that if  
 6 I don't do so, I risk losing their representation.  
 7 Though I would like to answer, I cannot.  
 8 Q During Jane Doe 2's visit to your home in 2004,  
 9 did you insert your fingers into Jane Doe 2's vagina?  
 10 MR. PIKE: Form.  
 11 THE WITNESS: I would like to answer that  
 12 question. I would like to answer all your  
 13 questions here today. However, on advice of  
 14 counsel, they've advised me I must assert my Fifth  
 15 Amendment, Sixth Amendment and Fourteenth Amendment  
 16 Rights as provided by the U.S. Constitution. And,  
 17 though I would like to answer that question, I  
 18 cannot here today --  
 19 THE VIDEOGRAPHER: I need to --  
 20 THE WITNESS: -- sorry -- but  
 21 MR. PIKE: If you need to finish, go ahead.  
 22 THE WITNESS: -- based on my counsel's advice.  
 23 THE VIDEOGRAPHER: Time off the record 11:59 --  
 24 11:19.  
 25 (Thereupon, a short break was taken.)

1 advised me at least today -- excuse me -- I cannot  
 2 answer any questions that may be relevant to this  
 3 lawsuit. And I -- if I do not follow their advice,  
 4 I risk losing their representation. Therefore, I  
 5 am going to have to assert those rights and not  
 6 respond today.  
 7 BY MR. HOROWITZ:  
 8 Q During Jane Doe 2's visit to your home in 2004,  
 9 did you tell her that she had a very hard clit as you  
 10 were rubbing it?  
 11 A What?  
 12 MR. PIKE: Form.  
 13 BY MR. HOROWITZ:  
 14 Q A hard clit.  
 15 MR. PIKE: Same objection.  
 16 THE WITNESS: I would like to respond to that  
 17 question. I would like to answer that question.  
 18 However, I am going to have to respond, as I've  
 19 responded to most of your other questions here  
 20 today, because my -- on advice of my counsel,  
 21 they've advised me I must assert my Sixth Amendment  
 22 Rights, my Fifth Amendment Rights and my Fourteenth  
 23 Amendment rights as provided by the Constitution.  
 24 And if I don't do so, and I answer that question, I  
 25 risk losing their representation. So therefore,

1 unfortunately, Mr. Horowitz, though I would like to  
2 answer it, I cannot today.

3 BY MR. HOROWITZ:

4 Q Did you have sexual contact with Jane Doe 2 at  
5 your Palm Beach home in late 2004?

6 MR. PIKE: Form, predicate, foundation.

7 THE WITNESS: I'd very much like to answer that  
8 question, as I would like to answer most of your  
9 other questions here today. However, just like  
10 I've answered for most of your other questions, on  
11 advice of my counsel today, they've advised me that  
12 I must assert my Sixth Amendment, Fifth Amendment  
13 and Fourteenth Amendment Rights as provided by the  
14 U.S Constitution. And, though I would like to  
15 answer it, if I do so, I risk losing their  
16 representation; therefore, I must not respond.

17 Thank you.

18 BY MR. HOROWITZ:

19 Q During Jane Doe 2's visit to your home in 2004,  
20 did you pay her \$200 after you had sexual contact with  
21 her?

22 MR. PIKE: Form.

23 THE WITNESS: Could you repeat the question for  
24 me?

25 BY MR. HOROWITZ:

1 Q During Jane Doe 2's visit to your home in 2004,  
2 did you pay her \$200 after you had sexual contact with  
3 her?

4 MR. PIKE: Form.

5 THE WITNESS: I would like to answer that  
6 question -- is she saying I paid her \$200? Is that  
7 in the allegation?

8 MR. HOROWITZ: I'm just asking the questions.

9 THE WITNESS: I know. I'm asking you to  
10 clarify. Is that -- is it -- is it in the -- in  
11 the complaint?

12 MR. HOROWITZ: I'm not allowed to answer your  
13 questions today.

14 THE WITNESS: I'm sorry.

15 MR. HOROWITZ: I wish I could.

16 THE WITNESS: I'm sorry. I wish you could  
17 too. I'm sure the jury would like you to answer  
18 some of my questions, but today, I'll answer that  
19 question -- unfortunately, I would like to respond  
20 to every one of your questions, every single one,  
21 however, today, on advice of counsel, I cannot.  
22 And, though I would like to answer each one of your  
23 questions, on the advice of my counsel, I am going  
24 to have to assert my Sixth Amendment, Fifth  
25 Amendment and Fourteenth Amendment Rights not to

1 answer, and because -- if I answer, they've advised  
2 me I risk losing their representation.

3 BY MR. HOROWITZ:

4 Q You never asked Jane Doe 2 for permission to  
5 touch her breasts and genitals, correct?

6 MR. PIKE: Form.

7 THE WITNESS: I would like to answer each one  
8 of your questions today, each one. However, on my  
9 advice of my counsel, they've advised me I cannot  
10 answer any questions that may be relevant to your  
11 lawsuit, or her lawsuit, or the lawsuit -- I guess  
12 it's the lawsuit brought by the same -- one of your  
13 partners originally whose become disbarred. I  
14 would like to answer it; however, I cannot. On the  
15 advice of counsel, I must assert my Sixth  
16 Amendment, Fourteenth Amendment and Fifth Amendmen  
17 Rights as provided by the Constitution, because  
18 they've advised me that if I answer those  
19 questions, I risk losing their representation.

20 MR. HOROWITZ: Okay. Move to strike.

21 BY MR. HOROWITZ:

22 Q And isn't it true that Jane Doe 2 indicated to  
23 you that she did not want you to touch her?

24 A I would like to answer --

25 MR. PIKE: Form.

1 THE WITNESS: Excuse me?

2 MR. PIKE: Go ahead.

3 THE WITNESS: I'm sorry. I would like to  
4 answer every one of your questions today, every  
5 one. However, on advice of my counsel, I cannot  
6 answer any questions that may be relevant to any of  
7 your lawsuits. And so today, on advice of counsel,  
8 I must assert my Sixth Amendment, Fifth Amendment  
9 and Fourteenth Amendment Rights as provided by the  
10 Constitution, because if I answer these questions,  
11 I risk -- they tell me, I risk losing their  
12 representation.

13 BY MR. HOROWITZ:

14 Q All right. Isn't it true that you touched Jane  
15 Doe 2's breasts and genitals after she indicated she did  
16 not want you to touch her?

17 MR. PIKE: Form.

18 THE WITNESS: I would like to answer that  
19 question, as well as each and every question you've  
20 asked me here today regarding each and one of your  
21 lawsuits. However, today, on the advice of  
22 counsel, I am going to have to assert my Sixth  
23 Amendment, Fifth Amendment and Fourteenth Amendmen  
24 Rights as provided by the Constitution. And,  
25 though I would like to answer that question, as all

1 the other questions today, I am going to have to  
 2 assert those rights because I've been advised that  
 3 not doing so, I might risk losing their counsel.  
 4 BY MR. HOROWITZ:  
 5 Q Did you try to persuade Jane Doe 2 that it was  
 6 okay for to you touch her breasts and genitals?  
 7 MR. PIKE: Form.  
 8 THE WITNESS: I'd like to answer every one of  
 9 your questions here today, every one. However, on  
 10 advice of counsel, they've advised me that I cannot  
 11 answer any questions that may be relevant to any of  
 12 your lawsuits. Therefore, I am going to have to  
 13 assert my Sixth Amendment, Fourteenth Amendment and  
 14 Fifth Amendment Rights as provided by the  
 15 Constitution because, though I would like to answer  
 16 those questions -- that question, as well as all  
 17 the other questions you've asked me here today, I  
 18 cannot do so on advice of counsel.  
 19 BY MR. HOROWITZ:  
 20 Q Sir, you don't deny that you sexually abused  
 21 Jane Doe 2, do you?  
 22 MR. PIKE: Form.  
 23 THE WITNESS: I would like to answer that  
 24 question. I'd really like to answer that  
 25 question. However, I cannot on advice of counsel,

1 Q Put out of your mind anything else you may  
 2 register. Focus on my question to you.  
 3 A I am going to try.  
 4 Q Did you pay Jane Doe 3 for bringing Jane Doe 2  
 5 to your home in late 2004?  
 6 MR. PIKE: Form.  
 7 THE WITNESS: Did I pay Jane Doe 3, Jane Doe  
 8 2's friend? Is that -- I'm sorry. Is that --  
 9 BY MR. HOROWITZ:  
 10 Q Do you know them to be friends?  
 11 A I'm asking you, sorry.  
 12 Q I'm not allowed --  
 13 A You're not allowed to testify. You can't  
 14 testify that they're friends, okay. I'm sorry. I would  
 15 like to answer those questions, Mr. Horowitz. I'm sure  
 16 the ladies and gentlemen of the jury -- these questions  
 17 -- these answers are pretty obvious. However, on advice  
 18 of counsel, I'm not going to be able to answer those  
 19 questions today. And, though I would like to, I'm going  
 20 to have to assert my Fifth Amendment, Sixth Amendment  
 21 and Fourteenth Amendment Rights as provided by the  
 22 Constitutions because my counsel has told me that if I  
 23 don't do so, I risk losing their -- potentially risk  
 24 losing their representation. So, though I would like to  
 25 answer that question, as I understand it, I cannot.

1 because they told me that I cannot answer any  
 2 questions that may be relevant to any of your  
 3 lawsuits here today. And if I do so, I risk losing  
 4 their representation, so, unfortunately, Mr.  
 5 Horowitz, I am going to have to assert those  
 6 rights.  
 7 BY MR. HOROWITZ:  
 8 Q Did you pay Jane Doe 3 for bringing Jane Doe 2  
 9 to your home in late 2004?  
 10 MR. PIKE: Form.  
 11 THE WITNESS: Who?  
 12 MR. HOROWITZ: Jane Doe 3. I may ask you a few  
 13 more questions about her name, so just kind of hold  
 14 that name in your head.  
 15 THE WITNESS: So it's now not Jane Doe 2?  
 16 MR. HOROWITZ: Well --  
 17 THE WITNESS: Are these two friends? I mean,  
 18 these are two friends here supposedly?  
 19 MR. HOROWITZ: I'm not allowed to answer.  
 20 THE WITNESS: Oh, you can't, sorry. I guess  
 21 one friend supposedly brought the other  
 22 acquaintance --  
 23 BY MR. HOROWITZ:  
 24 Q My question -- my question --  
 25 A Sorry. Okay. Sorry. What's your question?

1 BY MR. HOROWITZ:  
 2 Q Okay. Did you instruct S.K. to take Jane Doe  
 3 2's name and number for the purpose of calling her to  
 4 come to your house for more sexual activity?  
 5 MR. PIKE: Form.  
 6 THE WITNESS: I'd like to answer that question,  
 7 as I'd like to answer most of your other questions  
 8 that you've asked me here today. However, based on  
 9 advice of counsel, they've advised me I cannot  
 10 answer any questions that may become relevant to  
 11 any of your lawsuits. So, though I would like to  
 12 answer the question, Mr. Horowitz, I cannot because  
 13 my counsel has advised me that if I do, I risk  
 14 losing their representation. So, unfortunately,  
 15 today I cannot answer that question.  
 16 BY MR. HOROWITZ:  
 17 Q Okay. So you've asserted the Fifth Amendment  
 18 as to -- privilege as to my questions about Jane Doe 2.  
 19 Is there any reason a jury should not infer from your  
 20 response that you sexually abused Jane Doe 2?  
 21 MR. PIKE: Object to the form of that question,  
 22 and I'm going to instruct him not to answer simply  
 23 because the way the question is worded, it could  
 24 get into attorney-client communications and  
 25 potentially work product. I'm not quite sure I



1 understand the question. So if you'd rephrase it,  
2 possibly, if you can.

3 BY MR. HOROWITZ:

4 Q You've asserted a Fifth Amendment privilege to  
5 various questions I've asked you about Jane Doe 2. My  
6 question is: Is there any reason in your mind, absent  
7 anything you've spoken to with your attorney about, why  
8 the jury should not infer from your assertion of the  
9 Fifth Amendment privilege, that you in fact sexually  
10 abused Jane Doe 2?

11 MR. PIKE: Form.

12 THE WITNESS: Well, I believe, Mr. Horowitz,  
13 the Fifth Amendment is by the Supreme Court's  
14 ruling. It's, in fact, used to protect the  
15 innocent, as well as certain people that might be  
16 not guilty. So in response to that question, with  
17 the fact that Jane Doe 2 -- the jury will  
18 understand that Jane Doe 2's lawsuit brought by a  
19 partner of yours who's been disbarred, constant --  
20 after, in fact, he brought the lawsuit, well -- the  
21 jury, I have a strange feeling will -- sorry -- the  
22 jury, I believe, will understand that my taking the  
23 Fifth Amendment is only as a result of my counsel  
24 advising me today that I must do so, because if I  
25 don't do so, I risk losing their representation,

1 representation.

2 BY MR. HOROWITZ:

3 Q Okay. I am going to be asking you some  
4 questions about Jane Doe 3. She's the Plaintiff in --  
5 identified as Jane Doe Number 3. I just want you to  
6 keep her name in your head so -- for this series of  
7 questions, okay?

8 A Yes.

9 Q Sir, isn't it true that a girl named Jane Doe 3  
10 came to your Palm Beach home on multiple occasions in  
11 2004?

12 MR. PIKE: Form.

13 THE WITNESS: I understand that Jane Doe 3 was  
14 the girl you mentioned before who was friendly with  
15 Jane Doe 2. So the two friends, I believe, you're  
16 just suggesting -- now, there was a question -- oh,  
17 I'm asking you to testify. I'd like to answer the  
18 questions about Jane Doe 3. I'd like to answer the  
19 questions about your former other client you talked  
20 about, Jane Doe 2, the two friends, but I cannot  
21 based on my advice of counsel just today at least.  
22 Though I would like to respond in detail, I am  
23 going to have to assert on their opinion -- their  
24 advice, the Sixth Amendment, Fifth Amendment and  
25 Fourteenth Amendment Rights as provided by the U.S.

1 though I'd like to answer each and every one of  
2 your questions.

3 BY MR. HOROWITZ:

4 Q In this case are you asserting the Fifth  
5 Amendment privilege because you are in fact innocent?

6 MR. PIKE: Form.

7 THE WITNESS: Do you want me to answer that  
8 question?

9 MR. PIKE: Form. It's -- it's the same  
10 objection.

11 THE WITNESS: I would like to answer that  
12 question. As I said before, your partner who's  
13 been disbarred after filing this lawsuit,  
14 Mr. Edwards who's sitting there whose partner, in  
15 fact, is sitting in jail for filing lawsuits of a  
16 sexual nature against people like me and others.  
17 Though I would like to answer every one of your  
18 questions, every single one, my counsel has advised  
19 me at least today that any question that may be  
20 relevant to this lawsuit, I must assert my Sixth  
21 Amendment, Fourteenth Amendment and Fifth Amendment  
22 Rights, and, though I would like to answer that  
23 question, as well as every other question you've  
24 asked here today, I am going to have to assert  
25 those rights, or lose -- risk losing their

1 Constitution. And, though I would like to answer  
2 each and every one of your questions, I cannot do  
3 so here today.

4 BY MR. HOROWITZ:

5 Q Did you ever instruct a girl named H.R. to  
6 bring underage girls to your home for your sexual  
7 pleasure?

8 MR. PIKE: Form.

9 THE WITNESS: I'd like to answer each and every  
10 one of your questions here today, Mr. Horowitz,  
11 regarding these lawsuits that you and your  
12 disbarred partner -- your partner who's been  
13 disbarred after bringing these lawsuits has  
14 brought. However, though I'd like to answer that  
15 question, as you probably understand, my counsel  
16 who has advised me at least today, that I cannot  
17 answer any questions that may become relevant or  
18 may be relevant to this lawsuit, and they've  
19 advised me I must assert my Sixth Amendment, Fifth  
20 Amendment and Fourteenth Amendment Rights as  
21 provided by the U.S. Constitution, or risk losing  
22 their representation, so unfortunately, I must  
23 respond that way.

24 BY MR. HOROWITZ:

25 Q Did you ever pay H.R. to bring you other

1 underage girls for your sexual pleasure?

2 MR. PIKE: Form.

3 THE WITNESS: Can you give me the question  
4 again? I'm sorry.

5 BY MR. HOROWITZ:

6 Q H.R., the -- in your mind, do you know who that  
7 is?

8 A I'm listening.

9 Q Well, that's my question -- it was a question.

10 A I'm sorry, what was the question?

11 Q Do you know who H.R. -- I mean, in your mind,  
12 you can picture who that is, right?

13 MR. PIKE: Form, move to strike.

14 THE WITNESS: I'm going up --

15 MR. HOROWITZ: It's a question.

16 MR. PIKE: What is the question?

17 BY MR. HOROWITZ:

18 Q Do you -- in your mind, can you picture -- when  
19 I say "H.R.", do you know who I'm talking about?

20 MR. PIKE: Form.

21 THE WITNESS: I would like to answer each and  
22 every one of your questions brought here today  
23 under these lawsuits filed by you and your partner  
24 that was disbarred, but on advice of counsel here  
25 today, Mr. Horowitz, I'm going to have to assert my

1 as before, who's the friend of all of the girls you  
2 keep talking about; is that what you're saying?

3 BY MR. HOROWITZ:

4 Q Is that your testimony?

5 A This is your testimony -- I'm sorry -- this is  
6 your -- I'm trying to understand the question.

7 Unfortunately, I would like to answer that  
8 question. However, on advice of counsel here today,  
9 they've informed me that I must assert my Sixth  
10 Amendment, Fourteenth Amendment and Fifth Amendmen  
11 Rights.

12 Though I would like to answer each and every  
13 one of your questions, I am going to have to respond to  
14 that question the same way I've responded to mostly each  
15 one of your other questions here today and refuse to  
16 testify.

17 BY MR. HOROWITZ:

18 Q In 2004 did you receive a phone call from H.R.  
19 In which she informed you that she was bringing Jane Doe  
20 3 to your home for you to engage in sexual activity?

21 MR. PIKE: Form.

22 THE WITNESS: Did I receive a call?

23 MR. HOROWITZ: That's my question.

24 THE WITNESS: I would like to answer that  
25 question, however, on advice of counsel, I cannot

1 Sixth Amendment, Fourteenth Amendment and Fifth  
2 Amendment Rights. Though I would like to answer  
3 each and every one of your questions, I cannot do  
4 so today.

5 BY MR. HOROWITZ:

6 Q Did you ever pay H.R. to bring you underage  
7 girls for your sexual pleasure?

8 MR. PIKE: Form.

9 THE WITNESS: I would like to answer each one  
10 of your questions that you've been posing to me  
11 today. Unfortunately, my counsel has advised me  
12 that today I must assert any of my rights under the  
13 Sixth Amendment, Fifth Amendment and Fourteenth  
14 Amendment to any questions that may become relevant  
15 to this lawsuit brought by you and your firm and  
16 your partner who's been disbarred. But I would  
17 like to answer that question. However, today I  
18 cannot.

19 BY MR. HOROWITZ:

20 Q Between 2000 -- strike that.

21 In 2004 and 2005, did you pay Jane Doe 3 to  
22 bring other minor girls to your home for your own sexual  
23 gratification?

24 MR. PIKE: Form.

25 THE WITNESS: This is Jane Doe 3, the same girl

1 because they've told me I must assert my Sixth  
2 Amendment, Fourteenth Amendment and Fifth Amendmen  
3 Rights to any question that may become relevant to  
4 one of your lawsuits. So, though I would like to  
5 answer that question, as the other questions you've  
6 asked, I must assert those rights here today.

7 BY MR. HOROWITZ:

8 Q Sir, if you shake your head after I ask a  
9 question, should we infer that you're saying "no" to my  
10 question?

11 MR. PIKE: Form. I am going to instruct him  
12 not to answer that question. It -- I'm -- I'm not  
13 quite sure that you -- what you're trying to do  
14 here is you're asking a -- a question. His -- his  
15 answer is his answer, and it's a verbal answer, and  
16 you know the rules of deposition where nods of the  
17 head, shakes of the head, um-hum and un-huns are  
18 not understood by the court reporter. So his  
19 answer is his verbal response, and no such gesture  
20 should be interpreted in a manner that would  
21 benefit your case, Mr. Horowitz.

22 MR. HOROWITZ: Okay. Well, the video will --  
23 will -- will be played, and persons who view the  
24 video will -- will determine from themselves -- for  
25 themselves --

1 MR. PIKE: Absolutely.  
 2 MR. HOROWITZ: -- what to infer from nodding --  
 3 MR. PIKE: But he's not --  
 4 THE REPORTER: Wait --  
 5 MR. HOROWITZ: -- or shaking of the head.  
 6 MR. PIKE: I'm sorry. Correct, but he's not  
 7 going to answer that question.  
 8 MR. HOROWITZ: Okay.  
 9 BY MR. HOROWITZ:

10 Q Did you instruct S.K. to communicate by  
 11 telephone with H.R. for the purpose of arranging for  
 12 underage girls to come to your home to engage in sexual  
 13 activity?

14 MR. PIKE: Form.  
 15 THE WITNESS: I would like to answer each and  
 16 every one of your questions posed today about the  
 17 various lawsuits brought by you and your disbarred  
 18 partner -- your partner who was disbarred after  
 19 they filed these lawsuits. However, on advice of  
 20 counsel, they've told me I must assert my Sixth  
 21 Amendment, Fifth Amendment and Fourteenth Amendmen  
 22 Rights as provided by the U.S. Constitution, or if  
 23 I testify I risk losing their representation. So,  
 24 though I would like to answer each one of your  
 25 questions, Mr. Horowitz, I cannot do so today.

1 they've advised that I must assert my Sixth  
 2 Amendment Rights, my Fourteenth Amendment Rights  
 3 and my Fifth Amendment rights as provided by the  
 4 U.S. Constitution. And, though I would like to  
 5 answer these questions brought by you -- you, your  
 6 disbarred partner, or Mr. Edwards' firm whose  
 7 partner sits in jail for -- for what the U.S.  
 8 Attorney calls a criminal enterprise, I would like  
 9 nothing more than to answer that question, but  
 10 today I am going to have to assert those rights.

11 BY MR. HOROWITZ:  
 12 Q Did you observe S.K. speaking with H.R. by  
 13 telephone and arranging for Jane Doe 3 to come to your  
 14 home for a massage?  
 15 MR. PIKE: Form, predicate, foundation.  
 16 THE WITNESS: I will much -- I'd very much like  
 17 to answer that question, like most of your other  
 18 questions here today; however, upon advice of  
 19 counsel, they've advised me I must assert my Sixth  
 20 Amendment, Fifth Amendment and Fourteenth Amendmen  
 21 Rights as provided by the U.S. Constitution. And,  
 22 though I would like to answer each and every one of  
 23 your questions brought by you, your firm, your  
 24 partner that was disbarred after bringing these  
 25 claims, Mr. Edwards' firm that's been accused of

1 BY MR. HOROWITZ:  
 2 Q Did you call -- did you instruct S.K. to call  
 3 Jane Doe 3 by telephone to arrange for you to get a  
 4 massage?  
 5 MR. PIKE: Form.  
 6 THE WITNESS: Mr. Horowitz, I'd like to answer  
 7 each and every one of your questions, but I am  
 8 going to have to respond today like I've responded  
 9 to most of your other questions asked here today.  
 10 I am going -- by -- on the advice of counsel, I am  
 11 going to have to assert my Sixth Amendment,  
 12 Fourteenth Amendment and Fifth Amendment rights not  
 13 to answer any questions brought by you, your firm,  
 14 your partner that was disbarred from the Florida  
 15 Bar after bringing these lawsuits, and I am going  
 16 to have to refuse to answer that question, I'm  
 17 sorry.

18 BY MR. HOROWITZ:  
 19 Q Did you inform S.K. that the massage Jane Doe 3  
 20 was to give you would be sexual in nature?  
 21 MR. PIKE: Form.  
 22 THE WITNESS: I would like to answer that  
 23 question, but unfortunately, I am going to have to  
 24 answer that question as I've answered most of your  
 25 other questions here today. On advice of counsel,

1 creating and fabricating cases of a sexual nature  
 2 against me and other people, I cannot answer that  
 3 question today.  
 4 BY MR. HOROWITZ:  
 5 Q Did S.K. tell you that she confirmed by  
 6 telephone that Jane Doe 3 would be coming to your home  
 7 at a specific time to give you a massage?  
 8 MR. PIKE: Form.  
 9 THE WITNESS: I'd like to answer that question  
 10 Mr. Horowitz, as I'd like to answer most of your  
 11 other questions posed here today, but as I've  
 12 responded to mostly all your questions here today,  
 13 on advice of counsel, they've advised me I must  
 14 assert my Sixth Amendment, Fifth Amendment and  
 15 Fourteenth Amendment Rights provided by the U.S.  
 16 Constitution.  
 17 MR. HOROWITZ: Uh-huh.  
 18 THE WITNESS: And if I don't do so, I risk  
 19 losing their representation. And, though your firm  
 20 and its partner that was disbarred after bringing  
 21 these cases, Mr. Edwards's firm, his partner sits  
 22 in the jail accused of -- of the largest fraud in  
 23 South Florida's history, I would like nothing more  
 24 than to answer that question, but I must follow the  
 25 advice of counsel, or they've told me I risk losing

1 their representation.  
 2 BY MR. HOROWITZ:  
 3 Q Since you've mentioned my partner who you  
 4 describe as disbarred and you also mentioned  
 5 Mr. Rothstein's involvement, are you suggesting that  
 6 Jane Doe 3 fabricated her allegations of abuse after  
 7 coming into contact with one of these attorneys?  
 8 A I want --  
 9 MR. PIKE: Form.  
 10 THE WITNESS: I believe the jury will decide  
 11 that. I believe the jury will decide that  
 12 Mr. Rothstein, Mr. Edwards' partner who sits in  
 13 jail, accused by the U.S. Attorney of the largest  
 14 fraud in South Florida's history for crafting cases  
 15 of a sexual nature, crafting, fabricating -- it's  
 16 not my words -- it's words in the paper -- against  
 17 people like me and others, to try to get as much  
 18 money as they could according to the newspapers.  
 19 I'm sorry, but I would like to answer that question  
 20 asked to me before, but I cannot under advice of  
 21 counsel, who've told me I must in response to any  
 22 questions that may be relevant to your lawsuit,  
 23 today at least, to assert my Sixth Amendment,  
 24 Fourteenth Amendment and Fifth Amendment Rights  
 25 under the U.S. Constitution. May I take a break or

1 would like to answer every one of your questions;  
 2 however, my counsel has told me I cannot today, so  
 3 I must assert those rights, or risk losing their  
 4 representation.  
 5 BY MR. HOROWITZ:  
 6 Q Sir, are you testifying that my partner was  
 7 sued by a -- a former client?  
 8 A I don't remember -- I don't recall -- I believe  
 9 the -- S.G.'s parents, who the first was initially --  
 10 this is according to the newspapers -- your -- Mr.  
 11 Herman's clients, I believe. The other -- the parent --  
 12 the person who he represented said that in fact he never  
 13 represented her, but I don't have the full details.  
 14 BY MR. HOROWITZ:  
 15 Q But are you -- are you suggesting that he was  
 16 sued by her -- by a former client?  
 17 A I did not.  
 18 Q Pardon me?  
 19 A No, I did not.  
 20 Q Okay. During the course of Jane Doe 3's first  
 21 visit to your home, did you in fact persuade, induce or  
 22 entice her to engage in sexual activity with you?  
 23 A I just answered that question, didn't I?  
 24 MR. PIKE: Form.  
 25 THE WITNESS: Wasn't that the question I just

1 a rest?  
 2 MR. HOROWITZ: Yes.  
 3 THE WITNESS: Okay. Thank you.  
 4 THE VIDEOGRAPHER: Time off the record 11:52.  
 5 (Thereupon, a short break was taken.)  
 6 THE VIDEOGRAPHER: Time on the record 12:00.  
 7 BY MR. HOROWITZ:  
 8 Q Sir, we have been discussing Jane Doe 3. Was  
 9 it your intent during the course of Jane Doe 3's first  
 10 visit to your home that you would persuade, induce or  
 11 entice her to engage in sexual activity?  
 12 MR. PIKE: Form.  
 13 THE WITNESS: I'd like to answer that question,  
 14 as I'd like to answer every one of your questions  
 15 here today, Mr. Horowitz; however, on advice of  
 16 counsel, I've been informed I must assert my Sixth  
 17 Amendment, Fourteenth Amendment and Fifth Amendment  
 18 Rights as provided by the U.S. Constitution. And,  
 19 though I'd like to answer the questions provide --  
 20 asked by you, unfortunately, your -- the person who  
 21 filed the lawsuits on your firm's behalf, your  
 22 partner, Jeffrey Herman, who's been disbarred after  
 23 they filed this lawsuit, sued by one of your other  
 24 clients -- one of the girls' parents because he  
 25 brought a lawsuit -- some -- some craziness -- I

1 answered?  
 2 BY MR. HOROWITZ:  
 3 Q No. My earlier question was: Was it your  
 4 intent to engage in sexual activity. My question now,  
 5 it's a very specific one --  
 6 A Okay.  
 7 Q -- during the course of Jane Doe 3's first  
 8 visit to your home, did you in fact persuade, induce or  
 9 entice her to engage in sexual activity?  
 10 A I'd like to answer that question. I'd like to  
 11 answer every one of your questions here today,  
 12 Mr. Horowitz, and I think the answer is pretty obvious;  
 13 however, I cannot, because under advice of counsel,  
 14 they've advised me I must assert Fifth Amendment, Sixth  
 15 Amendment and Fourteenth Amendment Rights as provided by  
 16 the Constitution. And if I choose to answer, I risk  
 17 losing that representation no matter how much I'd like  
 18 to answer that question.  
 19 Q At no time did Jane Doe 3 tell you that she was  
 20 18 or older, correct?  
 21 MR. PIKE: Form.  
 22 THE WITNESS: I'd like to answer every one of  
 23 your questions. I'd like to answer that question  
 24 specifically. However, sitting here today, I've  
 25 been advised by my counsel that I cannot answer any

1 questions that may be relevant to your -- one of  
 2 your lawsuits. And, though it was brought, I  
 3 believe, your partner that was later disbarred and  
 4 had some association with Mr. Edwards who's sitting  
 5 there with his partner who sits in jail accused of  
 6 one of the largest frauds in South Florida's  
 7 history. The U.S. Attorney accused his firm while  
 8 he's sitting there accused of being a criminal  
 9 enterprise, I'd like to answer each one of your  
 10 questions; however, my counsel has advised me today  
 11 that I must assert my Sixth Amendment, Fourteenth  
 12 Amendment and Fifth Amendment Rights, so  
 13 unfortunately, I cannot.

14 BY MR. HOROWITZ:

15 Q Okay. In your own mind, when Jane Doe 3 was at  
 16 your home, you didn't believe that she was 18 or older,  
 17 did you?

18 MR. PIKE: Form.

19 THE WITNESS: I'd like to answer each one of  
 20 your questions, Mr. Horowitz, here today, but  
 21 unfortunately I'm going to have to respond to that  
 22 question, as I've responded to most of your other  
 23 questions here today, which is that at least for  
 24 today, my counsel has advised me that I cannot  
 25 answer any questions that may be relevant to any

1 was disbarred?

2 MR. PIKE: Form.

3 THE WITNESS: I would let the jury decide that  
 4 fact. My suggestions -- I'd like to answer every  
 5 one of your questions here today. I'd like to  
 6 respond regarding the -- her attorney that was  
 7 disbarred. I'd like to answer questions with  
 8 respect to Mr. Edwards' partner who sits in jail  
 9 for crafting cases of a sexual nature, making  
 10 allegations against people like me and others;  
 11 however today, on advice of counsel, Mr. Horowitz,  
 12 I am going to have to assert my -- under -- under  
 13 advice of counsel, I am going to have assert my  
 14 Sixth Amendment, Fourteenth Amendment and Fifth  
 15 Amendment Rights, and I'm told that if I choose to  
 16 answer that question, I risk losing their  
 17 representation, so unfortunately, I cannot answer  
 18 that today.

19 BY MR. HOROWITZ:

20 Q Is it your contention today that Scott  
 21 Rothstein fabricated Jane Doe 3's lawsuit?

22 MR. PIKE: Form.

23 MR. HOROWITZ: I would like to answer that  
 24 question. I would like to answer -- I believe your  
 25 partner, Mr. Herman, was disbarred after filing the

1 one of your lawsuits brought by your firm and your  
 2 partner whose -- who was disbarred after they  
 3 brought these lawsuits, or the questions Mr.  
 4 Edwards might pose via his partner sitting in jail,  
 5 or a new jail according to the newspapers, accused  
 6 of the largest fraud in South Florida's history for  
 7 crafting cases of sexual nature against people like  
 8 me and others. So, though I'd like to answer that  
 9 question, as your other questions, unfortunately, I  
 10 am going to have to assert my Fifth Amendment,  
 11 Sixth Amendment and Fourteenth Amendment Rights as  
 12 provided by the U.S. Constitution.

13 BY MR. HOROWITZ:

14 Q Do you base your assertion of the Fifth  
 15 Amendment privilege on the fact that Jane Doe 3's  
 16 attorney was supposedly disbarred?

17 THE REPORTER: "Jane Doe 3's attorney was" --

18 MR. HOROWITZ: "Supposedly disbarred."

19 MR. PIKE: I am going to object. That could  
 20 get into attorney-client work product information.  
 21 I am going to instruct him not to answer that  
 22 question, Mr. Horowitz.

23 BY MR. HOROWITZ:

24 Q Are you -- are you suggesting that Jane Doe 3  
 25 is lying because, in your mind, she has an attorney who

1 lawsuit. I'd like to answer every one of your  
 2 questions here today; however, on advice of my  
 3 counsel, I'm told that I must assert my Sixth  
 4 Amendment, Fourteenth Amendment and Fifth Amendmen  
 5 Rights, and if I choose to answer that question, I  
 6 risk losing their representation. So, though I  
 7 would like to answer that question, as you probably  
 8 understand, I cannot do so today.

9 BY MR. HOROWITZ:

10 Q When Jane Doe 3 was at your home, she told you  
 11 she attended Royal Palm Beach High School, didn't she?

12 MR. PIKE: Form.

13 THE WITNESS: I'd like to answer every one of  
 14 your questions here today, Mr. -- Horowitz, right,  
 15 Horowitz?

16 MR. HOROWITZ: (Nods head).

17 THE WITNESS: However, on advice of counsel, I  
 18 cannot answer those questions. They've asked me to  
 19 assert my Sixth Amendment, Fourteenth Amendment and  
 20 Fifth Amendment Rights. And if I choose to answer,  
 21 I risk losing their representation. Though your  
 22 partner after filing this lawsuit was disbarred  
 23 from the Florida Bar, the -- your -- the man  
 24 sitting to your right, his partner sits in jail  
 25 accused of the largest fraud in South Florida's

1 history for crafting --  
 2 MR. HOROWITZ: Uh-huh.  
 3 THE WITNESS: -- cases of a sexual nature  
 4 against me and people like me. I would like to  
 5 answer those questions, but unfortunately today, I  
 6 cannot do so.

7 BY MR. HOROWITZ:

8 Q You were nude in front of Jane Doe 3 in 2004,  
9 weren't you?

10 MR. PIKE: Form.

11 MR. HOROWITZ: I'd like to answer each and  
 12 every one of your questions here today, Mr.  
 13 Horowitz; however, on the advice of my counsel, I  
 14 cannot. They've advised me I must assert my Sixth  
 15 Amendment Rights, Sixth Amendment, Fourteenth  
 16 Amendment and Fifth Amendment Rights, so that to  
 17 any question that might be relevant to any of your  
 18 lawsuits crafted by your partner, who I believe has  
 19 been disbarred since filing the lawsuits, and  
 20 Mr. Edwards sitting there with his partner, Mr.  
 21 Rothstein, who's currently sitting in jail for  
 22 crafting cases of a sexual nature against people  
 23 like me and others, I'd like to answer each and  
 24 every one of your questions; however today, my --  
 25 on advice of counsel, I cannot do so.

1 BY MR. HOROWITZ:

2 Q In 2004 did you instruct Jane Doe 3 to pinch  
3 your nipples and rub your chest?

4 MR. PIKE: Form.

5 THE WITNESS: I'd like to answer that  
 6 question. I'd like to answer that question very  
 7 much. However, on advice of counsel, they've  
 8 instructed me that I cannot answer any questions  
 9 today that may be relevant to any of your lawsuits  
 10 filed by you, your partner, Jeffrey Herman, that  
 11 was disbarred by the Florida Bar Association after  
 12 filing these lawsuits, questions posed by Mr.  
 13 Edwards and his firm whose partner sits in jail  
 14 accused by the U.S. Attorney of perpetrating the  
 15 largest fraud in U.S. history by fabricating --  
 16 totally fabricating cases against people like me  
 17 and others. Though I would like to answer those  
 18 questions, I am going to have to assert my Sixth  
 19 Amendment, Fourteenth Amendment and Fifth Amendmen  
 20 Rights as advice of -- upon advice of counsel.

21 BY MR. HOROWITZ:

22 Q In 2004 did you ask Jane Doe 3 questions about  
23 her sexual experience and preferences?

24 MR. PIKE: Form.

25 THE WITNESS: I'd like to answer that

1 BY MR. HOROWITZ:

2 Q In 2004 did you instruct Jane Doe 3 to remove  
3 her clothing?

4 MR. PIKE: Form.

5 MR. HOROWITZ: Can you repeat the question?

6 BY MR. HOROWITZ:

7 Q Remember we -- we have been talking about Jane  
8 Doe 3.

9 A I'm doing my best.

10 Q In 2004 did you instruct Jane Doe 3 to remove  
11 her clothing?

12 MR. PIKE: Form.

13 THE WITNESS: I would like to answer that  
 14 question. I would like to answer each and every  
 15 one of your other questions here today. However,  
 16 upon advice of my counsel, they've advised me I  
 17 must assert my Sixth Amendment, Fourteenth  
 18 Amendment and Fifth Amendment Rights. So, though  
 19 I'd like to answer these questions posed by you --  
 20 your partner who's been disbarred, Mr. Edwards'  
 21 partner who sits in jail for crafting lawsuits of a  
 22 sexual nature against people like me and others --  
 23 so, though I would like to answer those questions  
 24 with great specificity, I cannot under the advice  
 25 of counsel, so therefore, I'm sorry.

1 question. I'd like to answer every question you've  
 2 asked here today. However, upon advice of counsel,  
 3 they've advised me I must assert my Sixth  
 4 Amendment, Fifth Amendment and Fourteenth Amendmen  
 5 Rights -- so that cases brought by attorneys like  
 6 you and your partner, Jeffrey Herman, who held a  
 7 press conference on the streets outside Palm Beach,  
 8 he was brought -- then later disbarred by the  
 9 Florida Bar Association -- I'd like to answer every  
 10 one of your questions. However, today, on advice  
 11 of counsel, I cannot.

12 BY MR. HOROWITZ:

13 Q In 2004 did you touch Jane Doe 3's breasts for  
14 your own sexual gratification?

15 MR. PIKE: Form.

16 THE WITNESS: I'd like to answer each and every  
 17 one of your questions posed today, Mr. Horowitz.  
 18 However, at least today upon advice of counsel, I  
 19 -- I cannot answer those questions, and I -- and I  
 20 must assert, on advice of my counsel, my Sixth  
 21 Amendment, Fifth Amendment and Fourteenth Amendmen  
 22 Rights under the U.S. Constitution. And though  
 23 this lawsuit brought by you and your partner who's  
 24 been disbarred by the Florida Bar Association after  
 25 bringing this lawsuit, sitting next to Mr. Edwards

1 whose partner sits in jail for bringing cases of a  
2 sexual nature, fabricated cases of a sexual nature,  
3 and fleecing investors out of millions of dollars  
4 in South Florida, I'd like to answer each and every  
5 one of your questions. However today, I cannot do  
6 so upon advice of counsel.

7 BY MR. HOROWITZ:

8 Q In 2004 did you touch Jane Doe 3's buttocks for  
9 your own sexual gratification?

10 MR. PIKE: Form.

11 THE WITNESS: I'd like to answer that  
12 question. I'd very much like to answer that  
13 question, like all the other questions you've asked  
14 here today, questions posed by your firm, your  
15 partner, Jeffrey Herman, whose been disbarred by  
16 the Florida Bar Association after bringing this  
17 case, Mr. Edwards' partner, Scott Rothstein, whose  
18 purpose was -- according to the U.S. Attorney, ran  
19 with Mr. Edwards and part of the firm, the largest  
20 fraud -- one of the largest frauds in South  
21 Florida's history for fabricating cases, misleading  
22 investors, fleecing unsuspecting investors out of  
23 millions of dollars by fabricating cases of a  
24 sexual nature against people like me and others.  
25 However, my counsel today has advised me that I

1 cannot answer those questions -- any questions that  
2 may be relevant to any of your lawsuits. So,  
3 though I would like to answer that question today,  
4 I am going to have to rely on my counsel's advice.

5 BY MR. HOROWITZ:

6 Q In 2004 did you rub Jane Doe 3's vagina?

7 MR. PIKE: Form.

8 THE WITNESS: Excuse me. I'd like to answer  
9 that question, as I would like to answer mostly  
10 every question you've asked me here today; however,  
11 upon advice of counsel, I cannot answer that  
12 question. They've advised me I must assert my  
13 Sixth Amendment, Fifth Amendment and Fourteenth  
14 Amendment Rights against self -- excuse me, against  
15 -- under the U.S. Constitution. And though your  
16 partner, Jeffrey Herman, was disbarred after filing  
17 this lawsuit, Mr. Edwards' partner sits in jail for  
18 fabricating cases of a sexual nature, fleecing  
19 unsuspecting Florida investors and others out of  
20 millions of dollars for cases of a sexual nature  
21 with -- I'd like to answer your questions; however,  
22 if I -- I'm told that if I do so, I risk losing my  
23 counsel's representation; therefore, I must accept  
24 their advise.

25 BY MR. HOROWITZ:

1 Q In 2004 did you try to insert your fingers into  
2 Jane Doe 3's vagina?

3 MR. PIKE: Form.

4 THE WITNESS: I'd like to answer that  
5 question. I'd like to answer every one of your  
6 questions here today; however, my counsel has  
7 advised me that I cannot answer any questions that  
8 may be relevant to any of your lawsuits brought by  
9 you and your disbarred partner, Jeffrey Herman, or  
10 the questions by Mr. Edwards' partner, Scott -- his  
11 firm, Scott Rothstein's firm, who -- Scott  
12 Rothstein sits in jail for fabricating cases of a  
13 sexual nature -- excuse me --

14 MR. HOROWITZ: Continue.

15 THE WITNESS: So, though I'd like to answer  
16 that question, as I'd like to answer each and every  
17 one of your questions today, I cannot do so on --  
18 upon advice of counsel.

19 BY MR. HOROWITZ:

20 Q In 2004 did you masturbate in front of Jane Doe  
21 3?

22 MR. PIKE: Form.

23 THE WITNESS: I'd like to answer each and every  
24 one of your questions, especially that one today;  
25 however, my counsel has advised me that I must

1 assert my Sixth Amendment, Fourteenth Amendment and  
2 Fifth Amendment Rights, not to answer that  
3 question. I'd like to answer it, though your  
4 partner who brought this lawsuit has been disbarred  
5 after bringing the lawsuit. Mr. Edwards' partner  
6 who sits next to you, his partner sits in jail for  
7 fabricating cases of a sexual nature against people  
8 like me, fleecing people out of millions of dollars  
9 because this is about -- about -- of money. Just a  
10 money, money case. I'd like to answer those  
11 questions, Mr. Horowitz. However, my counsel today  
12 has said, I cannot answer any questions today that  
13 may be relevant to this lawsuit, and I must accept  
14 their advice, or risk losing their representation.

15 BY MR. HOROWITZ:

16 Q In 2004 did you ejaculate in front of Jane Doe  
17 3?

18 MR. PIKE: Form.

19 THE WITNESS: I'd like to answer that question.  
20 However, today my counsel has advised me that I  
21 cannot answer any questions that may be relevant to  
22 your lawsuits, and I'm going to have to answer that  
23 question as I've answered most of your other  
24 questions here today. This is no different than  
25 the other questions I've had to answer where my

1 counsel has advised me that I have to take these  
 2 rights, but I prefer to answer, but if I do so, I  
 3 risk losing their representation. And, though  
 4 posed by you and your partner, Jeffrey Herman, that  
 5 was disbarred after filing these lawsuits, sitting  
 6 next to Mr. Edwards, whose partner sits in jail  
 7 accused of the largest -- perpetrating the largest  
 8 -- one of the largest frauds in South Florida's  
 9 history, accused by the U.S. Attorney of being a --  
 10 his firm of being a criminal enterprise, I'd like  
 11 to answer each and every one of your questions;  
 12 however, today under the advice of counsel, I  
 13 cannot.

14 BY MR. HOROWITZ:

15 Q Did you have sexual contact with Jane Doe 3  
16 during a massage in 2004?

17 MR. PIKE: Form.

18 THE WITNESS: I'd like to answer that question,  
 19 as I'd like to answer each and every one of your  
 20 other questions here today. However, upon the  
 21 advice of counsel, I cannot. And they've asked me  
 22 that -- they've required me to assert my Sixth  
 23 Amendment, Fourteenth Amendment and Fifth Amendmen  
 24 Rights as provided by the U.S. Constitution.  
 25 Though your firm's partner sits disbarred --

1 fabricating and falsely creating cases of a sexual  
 2 nature against people like me and others in order  
 3 to simply gain money. So, though I'd like to  
 4 answer your questions, Mr. Horowitz, I am going to  
 5 have to answer this question, as I've answered most  
 6 of your questions here today, which is on the  
 7 advice of counsel I cannot answer.

8 BY MR. HOROWITZ:

9 Q You never asked Jane Doe 3 for permission to  
10 touch her breasts and genitals, did you?

11 MR. PIKE: Form, asked and answered.

12 THE WITNESS: I'd like to answer that question,  
 13 as I would like to answer most of your other  
 14 questions here today. However, upon advice of my  
 15 counsel -- excuse me -- they've instructed me that  
 16 I must assert my Sixth Amendment, Fourteenth  
 17 Amendment and Fifth Amendment Rights of -- provided  
 18 by the U.S. Constitution. And, though you, your  
 19 partner, Jeffrey Herman -- excuse me -- who was  
 20 disbarred by the Florida Bar Association after  
 21 filing this case and your other cases, or Mr.  
 22 Edwards' partner who sits in jail -- sits in jail,  
 23 accused of perpetrating one of the largest frauds  
 24 in Florida's history by maliciously fabricating  
 25 cases of a sexual nature against me and other

1 Jeffrey Herman is disbarred after he brought this  
 2 case, Mr. Edwards' partner sits in jail accused by  
 3 the Attorney of perpetrating the largest fraud  
 4 in U.S. or south Florida's history for fabricating  
 5 cases of a sexually charged nature against me and  
 6 people like me. So, though I would like to answer  
 7 your questions with specificity, Mr. Horowitz, I  
 8 cannot do so here today upon advice of counsel.

9 BY MR. HOROWITZ:

10 Q During her first visit in 2004 to your home,  
11 did you pay \$200 to Jane Doe 3 after you had sexual  
12 contact with her?

13 MR. PIKE: Form.

14 THE WITNESS: I'd like to answer that  
 15 question. I'd really like to answer that  
 16 question. I cannot do so, however, because my  
 17 counsel has told me that I cannot answer any  
 18 questions relevant -- that may be relevant to any  
 19 of your lawsuits filed by you and your partner,  
 20 Jeffrey Herman, who was disbarred -- disbarred by  
 21 the Florida Bar Association after filing these  
 22 lawsuits, or Mr. Edwards' partner who sits in jail  
 23 accused of perpetrating one of the largest frauds  
 24 in South Florida's history, fleecing South Florida  
 25 investors of millions of dollars by crafting,

1 people like me. So as you might imagine, I would  
 2 like to answer these questions, but like the other  
 3 questions I've asked -- I've answered here today, I  
 4 am going to have to accept my attorney's counsel or  
 5 risk losing their representation.

6 BY MR. HOROWITZ:

7 Q In fact, sir, Jane Doe 3 indicated to you that  
8 she did not want you to touch her breasts; isn't that  
9 correct?

10 MR. PIKE: Form.

11 THE WITNESS: I'd like to answer all your  
 12 questions here today, Mr. Horowitz. I would really  
 13 like to answer that question specifically.  
 14 However, as I sit here today, my counsel has  
 15 advised me that I must assert my Sixth Amendment  
 16 Rights, my Fourteenth Amendment Rights and my Fifth  
 17 Amendment Rights as provided by the U.S.  
 18 Constitution. So, though you and your partner,  
 19 Jeffrey Herman, who filed this lawsuit, held a  
 20 press conference in Palm Beach months before he  
 21 became disbarred -- disbarred -- he's no longer an  
 22 attorney is my understanding now, but he was  
 23 disbarred by the Florida -- the Florida Bar  
 24 Association, or Mr. Edwards' partner who sits in  
 25 jail accused of fabricating cases strictly to get



1 money from Florida investors, from Florida people,  
2 I'd like to answer each and every one of your  
3 questions, Mr. Horowitz, but today, on advice of  
4 counsel, I cannot.

5 BY MR. HOROWITZ:

6 Q Sir, you touched Jane Doe 3's breasts, buttocks  
7 and genitals while she was still a minor after she told  
8 you she did not want you to touch her, isn't that right?

9 MR. PIKE: Form, asked and answered.

10 THE WITNESS: I'd like to answer each and every  
11 one of your questions today, Mr. Horowitz,  
12 however, upon advice of my counsel I cannot.  
13 They've asked me -- they've required me to assert  
14 my Sixth Amendment, Fourteenth Amendment and Fifth  
15 Amendment Rights as provided by the U.S.

16 Constitution to any questions that may be relevant,  
17 or may become relevant to this lawsuit. So, though  
18 your partner was disbarred after you filed this  
19 claim, or your firm filed this claim, Mr. Edwards  
20 who sits next to you, his partner sits in jail, so  
21 I'd like to answer each one of these questions.

22 However, today, on the advice of counsel, I cannot.

23 BY MR. HOROWITZ:

24 Q Did you try to persuade Jane Doe 3 that it was  
25 okay for you to touch her breasts and genitals?

1 MR. PIKE: Form.

2 THE WITNESS: I would like to answer each and  
3 every one of your questions here today,  
4 Mr. Horowitz, however, upon advice of counsel, I'm  
5 -- they've required me to assert my Fourteenth  
6 Amendment, Sixth Amendment and Fifth Amendment  
7 Rights as provided by the U.S. Constitution. So,  
8 although I would like to answer that question, and  
9 respond to questions posed by you, for, I guess,  
10 your partner, Mr. Herman, who has been disbarred by  
11 the Florida Bar Association after filing these  
12 cases, disbarred, or Mr. Edwards' partner who sits  
13 next to you, has filed other cases where his  
14 partner sits in jail for fabricating cases, trying  
15 to get money from Florida investors, I'd like to  
16 answer each one of your questions here today Mr.  
17 Horowitz, but upon advice of counsel, they've  
18 advised me that if I do so, I risk losing their  
19 representation, so I must accept their advice.

20 BY MR. HOROWITZ:

21 Q Mr. Epstein, you don't deny that you sexually  
22 abused Jane Doe 3 when she was a child, do you?

23 MR. PIKE: Form.

24 THE WITNESS: I would like to answer every one  
25 of your questions here today, Mr. Horowitz, but

1 like in response to most of your other questions  
2 here today, I cannot. On the advice of counsel,  
3 they've told me I must accept their advice or risk  
4 losing their representation. They've advised me  
5 that I must assert my Sixth Amendment, Fourteenth  
6 Amendment and Fifth Amendment rights. So, though  
7 your partner, Jeffrey Herman, was disbarred after  
8 filing these cases, disbarred, no longer an  
9 attorney, Mr. Edwards' partner who sits to your  
10 right, his partner sits in, I believe, Saint Lucie  
11 Jail according to today -- today's newspaper,  
12 accused of perpetrating the largest fraud in South  
13 Florida history against people like me, crafting,  
14 fabricating, malicious sexually charged -- cases of  
15 a sexually charged nature in order to fleece  
16 investors, I would like to answer that question.  
17 However today, I must accept my client's --  
18 attorney's advice.

19 BY MR. HOROWITZ:

20 Q Mr. Epstein, did you instruct S.K. to take Jane  
21 Doe 3's name and telephone number for the purpose of  
22 calling her home -- strike that.

23 Did you instruct S.K. to take Jane Doe 3's name  
24 and telephone number for the purpose of calling Jane Doe  
25 3 to come to your home for sexual activity?

1 MR. PIKE: Form, asked and answered.

2 THE WITNESS: I would like to answer every one  
3 of your questions, Mr. Horowitz, posed here today.  
4 Unfortunately, I guess, your -- your other partner  
5 who filed these lawsuits has been disbarred in the  
6 interim by the Florida Bar Association, so he's not  
7 here today. However, I'd like to answer those  
8 questions, but my counsel has told me that I have  
9 to assert my Sixth Amendment, Fifth Amendment and  
10 Fourteenth Amendment Rights as provided by the U.S.  
11 constitution. So, though I would like to answer  
12 your questions, Mr. Edwards' questions whose  
13 partner sits in jail for perpetrating one of the  
14 largest frauds in South Florida's history, accused  
15 by the U.S. Attorney -- his firm accused by the  
16 U.S. Attorney is now -- the firm is bankrupt by  
17 perpetrating the -- one of the largest frauds in  
18 South Florida's history and being called a criminal  
19 enterprise by the current South Florida's U.S.  
20 Attorney, I would like to answer every one of your  
21 question, very much so, however, my -- on advice of  
22 counsel, I cannot do so here today.

23 BY MR. HOROWITZ:

24 Q Sir, is there any reason in your mind that a  
25 jury should not infer from your assertion of the Fifth

1 Amendment privilege, that you sexually abused Jane Doe 3  
2 when she was a child?

3 MR. PIKE: Form, speculation, calls for a legal  
4 conclusion.

5 THE WITNESS: The Supreme Court has said that  
6 the Fifth Amendment should be used by people who  
7 are innocent, Mr. Horowitz. That's one of the  
8 benefits of the Fifth Amendment. My counsel has  
9 advised me I cannot answer your questions here  
10 today, though I'd like to. I'm sure this -- these  
11 sort of embarrassing questions posed for the jury  
12 where your partner has been disbarred since filing  
13 this claim, or Mr. Edwards' partner who sits in  
14 jail probably for the rest of his life for crafting  
15 cases of a sexual nature to fleece people for -- of  
16 money, just money, money, money. His firm is  
17 bankrupt. So, yes, I'd like to answer these  
18 questions, and all your questions here today, but  
19 unfortunately, on advice of counsel, I cannot.

20 BY MR. HOROWITZ:

21 Q Sir, are you asserting your Fifth, Sixth and  
22 Fourteenth Amendment privileges because you're  
23 innocent? Is that what you're telling us?

24 MR. PIKE: Form.

25 THE WITNESS: I would like to answer every one

1 like to answer every question you've posed here today  
2 about you -- about these girls you say came to my  
3 house. However, on advice of counsel, I cannot answer  
4 that question today. I have to assert, on the advice --  
5 my Sixth Amendment, Fifth Amendment and Fourteenth  
6 Amendment Rights.

7 I'd like to answer that question about Jane Doe  
8 4, and I believe she was represented by your partner,  
9 Jeffrey Herman, who after representing her was disbarred  
10 by the Florida Bar Association.

11 Mr. Rothstein -- or Mr. Edwards' partner,  
12 Mr. Rothstein, who sits in jail accused by the Florida  
13 U.S. Attorney of running a criminal enterprise in  
14 Mr. Edwards' firm, fabricating malicious cases to fleece  
15 investors out of millions of dollars, fabricating cases  
16 of a sexual nature, I would like to answer every one of  
17 your questions here today. However, on advice of  
18 counsel, I cannot do so.

19 MR. HOROWITZ: Did you want that break now?

20 THE WITNESS: Yes, please.

21 MR. PIKE: No, actually before we take a  
22 break --

23 MR. HOROWITZ: Okay.

24 MR. PIKE: -- my understanding was, is that you  
25 wanted to take a break around 12:30 or 12:45 for

1 of your questions posed by you, your partner, Mr.  
2 Herman, who's been disbarred by the Florida Bar  
3 after filing this claim, Mr. Edwards' partner who  
4 sits in jail, his firm accused by the U.S. Attorney  
5 -- accused by the U.S. Attorney of being a criminal  
6 enterprise, for fleecing South Florida investors  
7 out of millions of dollars by crafting, malicious,  
8 fabricated cases of a sexual nature against people  
9 -- other people -- me and others, I would like to  
10 answer each and every one of your questions.  
11 However today, on advice of counsel, I cannot  
12 answer any of your questions that may be relevant  
13 to this lawsuit.

14 BY MR. HOROWITZ:

15 Q Sir, you know I also represent Jane Doe Number  
16 4, do you understand that?

17 MR. PIKE: Form.

18 THE WITNESS: Yes.

19 BY MR. HOROWITZ:

20 Q Okay. Isn't it true, sir, that a girl named  
21 Jane Doe 4 came to your Palm Beach home on multiple  
22 occasions between 2003 and 2005?

23 A Could we take a break? Is that it?

24 Q I would like you to answer that question.

25 A Sorry. I'd like to answer that question. I'd

1 lunch. It is 12:35 right now. If you want to keep  
2 going for another 10 minutes, we'll go for another  
3 10 minutes, or if you want to just break now for 30  
4 minutes, go grab something to eat, and then come  
5 back.

6 MR. HOROWITZ: Yeah. I mean, this line of  
7 questioning is going to be more than 10 minutes, so  
8 I would suggest we take our break now.

9 MR. PIKE: You want to take lunch right now?

10 MR. HOROWITZ: Yeah.

11 MR. PIKE: Okay.

12 THE WITNESS: All right. Thank you.

13 THE VIDEOGRAPHER: Time off the record 12:30  
14 (Thereupon, a lunch break was taken.)

15 THE VIDEOGRAPHER: Time on the record 1:11.  
16 This is Tape 3.

17 BY MR. HOROWITZ:

18 Q Mr. Epstein, did you pay H.R. \$200 to bring a  
19 girl named Jane Doe 4 to your home so that you could  
20 engage Jane Doe 4 in sexual activity?

21 MR. PIKE: Form.

22 THE WITNESS: Mr. Horowitz, I'd like to answer  
23 that. I am going to have to answer that question,  
24 as I've answered most of your questions here today,  
25 which is upon advice of counsel, I am going to have

1 to assert my Sixth Amendment, Fourteenth Amendment  
2 and Fifth Amendment Right, though I'd like to  
3 answer that question.

4 I'd also like to correct some of the -- a  
5 previous statement I made regarding your partner  
6 that he had been disbarred. I understand he wasn't  
7 disbarred, but he was simply suspended for improper  
8 behavior, suspended by the Florida Bar. So I would  
9 like to make the correction that he's not totally  
10 disbarred, but he's no longer practicing for the  
11 time being. So -- but on advice of counsel, at  
12 least with respect to this question, or any  
13 question that may be relevant to this lawsuit, my  
14 counsel has told me I must assert those rights.

15 BY MR. HOROWITZ:

16 Q Okay. And if I'm hearing you correct, your  
17 testimony that Mr. Herman was disbarred is -- was  
18 erroneous; is that right?

19 MR. PIKE: Form.

20 THE WITNESS: My testimony that your partner  
21 who filed these lawsuits was disbarred seems to be  
22 incorrect. He was -- according to what I was told,  
23 he has only been disbarred for his greatly improper  
24 behavior, but -- and so he -- one day he will, in  
25 fact, be practicing law again in South Florida --

1 MR. HOROWITZ: Okay.

2 THE WITNESS: -- unlike Mr. Edwards' partner  
3 who currently sits in jail for perpetrating one of  
4 the largest frauds in South Florida's history.

5 BY MR. HOROWITZ:

6 Q Okay. I'm glad we got that squared away.

7 Did you pay Jane Doe 4 to bring other minor  
8 girls to your home for your own sexual gratification?

9 MR. PIKE: Form.

10 THE WITNESS: That question I believe would --  
11 is -- is -- I would like to answer that question.  
12 Unfortunately, my counsel has advised me that I  
13 cannot answer any questions today that may become  
14 relevant to any of your lawsuits filed by you and  
15 your currently suspended partner, suspended by the  
16 Florida Bar, or answer questions relevant to Mr.  
17 Edwards who is sitting on your right, his firm's  
18 partner who's sitting in jail for fabricating cases  
19 of a sexual nature against people like me and  
20 others.

21 I'd like to answer -- as you might imagine, I'd  
22 like to answer these questions, but I risk losing  
23 my counsel if you do so, so I must accept their  
24 advice today.

25 BY MR. HOROWITZ:

1 Q Mr. Epstein, at any time before May 2005, did  
2 you receive a phone call from H.R. that she was bringing  
3 Jane Doe 4 to your home so that Jane Doe 4 could give  
4 you a massage?

5 MR. PIKE: Form.

6 THE WITNESS: I'd like to answer that question,  
7 but unfortunately, I am going to have to answer  
8 that question as I've answered most of your  
9 questions here today, Mr. Horowitz, which is upon  
10 advice of counsel, they've told me I cannot answer  
11 your questions no matter how much I want to. They  
12 told me I have to assert my Sixth Amendment, Fifth  
13 Amendment and Fourteenth Amendment Rights.

14 Though you're currently suspended -- I keep  
15 saying "disbarred," but I'm not a lawyer, so I  
16 don't really understand the difference between  
17 disbarred and suspended -- he seems to be only  
18 suspended by the Florida Bar, I -- I cannot answer  
19 that question today upon advice of counsel.

20 BY MR. HOROWITZ:

21 Q Okay. Sir, at any time before May 2005, did  
22 you instruct S.K. to place a telephone call to H.R., so  
23 that H.R. could arrange for Jane Doe 4 to come to your  
24 home for sexual activity with you?

25 MR. PIKE: Form.

1 THE WITNESS: I'd like to answer that  
2 question. I'd like to answer every specific --  
3 every question you've asked me here today, but I am  
4 going to have to respond as I've done with most of  
5 your questions here today, Mr. Horowitz, which is  
6 that upon advice of counsel, I am going to have to  
7 assert my Sixth Amendment Rights, my Fourteenth  
8 Amendment Rights and my Fifth Amendment Rights.  
9 Though I'd like to answer the question, though I'm  
10 sure the jury will understand your partner has been  
11 suspended from practicing law in the State of  
12 Florida, Mr. Edwards' partner is in jail for  
13 fabricating cases of a sexual nature, so, though  
14 I'd like to answer that question as your other  
15 questions today with specificity, my counsel has  
16 advised me that if I do so, I risk losing their  
17 representation, so I must decline to answer.

18 BY MR. HOROWITZ:

19 Q Did you inform S.K. that the massage Jane Doe 4  
20 was to give you would be sexual in nature?

21 MR. PIKE: Form.

22 THE WITNESS: I'd like to answer that question,  
23 just like I'd like to answer each and every one of  
24 your questions here today, Mr. Horowitz.  
25 Unfortunately, my counsel has advised me I cannot

1 answer any questions that may become relevant to  
 2 this lawsuit, or any of the lawsuits filed by you,  
 3 or your partner that's been suspended by the  
 4 Florida Bar from practicing law in the State of  
 5 Florida after he's had conferences, held public  
 6 conferences accusing me of things, of Mr. Edwards'  
 7 partner who sits in jail probably for the rest of  
 8 his life for fabricating cases against people like  
 9 me and others. So, though I'd like to answer that  
 10 question, I'm going to have to answer that question  
 11 as I've answered most of your questions here today,  
 12 which is upon advice of counsel, I must refrain  
 13 from answering.

14 BY MR. HOROWITZ:

15 Q Did you either observe or overhear S.K.  
 16 speaking with H.R. making arrangements for Jane Doe 4 to  
 17 come to your home for sexual activity?

18 MR. PIKE: Form.

19 THE WITNESS: I'd like to answer that  
 20 question. I'd really like to answer that  
 21 question. However, today, my counsel has advised  
 22 me that I cannot. And they've advised me I must  
 23 assert my rights under the Sixth Amendment,  
 24 Fourteenth Amendment and Fifth Amendment of the  
 25 U.S. constitution. So, though I'd like to answer

1 Rights. So, though I'd would like to answer  
 2 questions posed by you, your partner who has been  
 3 suspended by the Florida Bar, Mr. Edwards' partner,  
 4 Scott Rothstein, that many people have read about,  
 5 has perpetrated the largest fraud in Florida  
 6 history, specifically for fabricating such cases of  
 7 a sexual nature, fabricating malicious cases in  
 8 order to get money, money, money from people here  
 9 in South Florida. I'd like to answer each and  
 10 every one of your questions, however, upon advice  
 11 of my counsel, they've advised me today I cannot do  
 12 so.

13 BY MR. HOROWITZ:

14 Q Prior to May 2005 did you ever observe S.K.  
 15 speaking with Jane Doe 4 by telephone to arrange for  
 16 Jane Doe 4 to come to your home so that Jane Doe 4 could  
 17 give you a massage?

18 THE WITNESS: May I -- excuse me, may I have a moment with my attorney?

19 MR. HOROWITZ: Yes.

20 THE VIDEOGRAPHER: Time off the record 1:20. (Thereupon, a short break was taken.)

21 THE VIDEOGRAPHER: Time on the record 1:23.

22 BY MR. HOROWITZ:

23 Q Mr. Epstein, you had a moment to speak with

1 questions posed by you, your partner that's been  
 2 suspended by the Florida Bar after filing these  
 3 types of cases, cases against me, Mr. Edwards who  
 4 sits next to you, his partner in jail for filing  
 5 cases, fabricating cases of a sexually charged  
 6 nature against me and others. The U.S. Attorney  
 7 has accused his firm, his former firm, the firm he  
 8 left now because the firm went bankrupt, for being  
 9 a criminal enterprise, perpetrated one of the  
 10 largest frauds in South Florida's history, fleecing  
 11 investors out of millions and millions of dollars.  
 12 I'd like to answer each and every one of your  
 13 questions, but my counsel has advised me today that  
 14 I cannot.

15 BY MR. HOROWITZ:

16 Q Prior to May 2005 didn't you instruct Jane Doe  
 17 4 to place phone calls to you on your home phone in  
 18 order to schedule visits to your home?

19 MR. PIKE: Form.

20 THE WITNESS: I'd like to answer each one of  
 21 your questions here today, Mr. Horowitz, that  
 22 question specifically. However, my counsel has  
 23 advised me that today I cannot, and he advised me I  
 24 must assert my Sixth Amendment Rights, my  
 25 Fourteenth Amendment Rights and my Fifth Amendment

1 counsel. Do you need me to repeat that question to  
 2 refresh your recollection?

3 A Yes, please.

4 Q Prior to May 2005 did you ever observe S.K.  
 5 speaking with Jane Doe 4 by telephone to arrange for  
 6 Jane Doe 4 to come to your home to give you a massage?

7 A I would like to answer that question -- I  
 8 assume this is the Jane Doe 4 who in her testimony wrote  
 9 a note to me that said "for a good time, call Jane Doe  
 10 4." I assume that's the same Jane Doe 4.

11 Unfortunately, I'd like to answer all your questions  
 12 with specificity today, Mr. Horowitz. However, on  
 13 advice of counsel, I cannot.

14 Q "Good time" --

15 A Excuse me?

16 Q Continue, please.

17 A So, therefore, the -- and I represent -- I  
 18 understand you represent Jane Doe 4. I understand your  
 19 partner that's been suspended by the Florida Bar who  
 20 represented Jane Doe 4 in this case -- I'd like to  
 21 answer each one of your questions with respect to Jane  
 22 Doe 4. However, I cannot based on advice of counsel,  
 23 and I must assert at their request my Sixth Amendment,  
 24 Fifth Amendment and Fourteenth Amendment Rights under  
 25 the U.S. Constitution.

1 Q When is it that you believe Jane Doe 4 wrote  
2 you the message you just referred to?

3 MR. PIKE: Form.

4 THE WITNESS: You know, I'd like to answer all  
5 those questions with respect to the note that she  
6 testified to that she wrote saying "for a good time  
7 call Jane Doe 4." However, on advice of counsel, I  
8 cannot answer any questions that may be relevant to  
9 this lawsuit. I'd like to answer each one of your  
10 questions, but as I've done with most of your other  
11 questions here today, or those to be posed by  
12 Mr. Edwards whose partner sits in jail probably for  
13 the rest of his life to try to get money from  
14 residents of South Florida, and the biggest fraud  
15 in South Florida's history, called by the U.S.  
16 attorney a criminal -- the firm is called a  
17 criminal enterprise, and I'd like -- so I'd surely  
18 like to answer your question, Mr. Horowitz,  
19 regarding Jane Doe 4, and -- however, on advice of  
20 counsel at least today, I cannot.

21 BY MR. HOROWITZ:

22 Q Sir, you said that Jane Doe 4 testified that  
23 she had written a note to you. Is -- was that truthful  
24 testimony? You acknowledge that she did write such a  
25 note?

1 U.S. Constitution. So in response to that  
2 question, as in response to most of your other  
3 questions here today, no matter how much I would  
4 like to answer those questions, answer those  
5 questions specifically with respect to Jane Doe 4  
6 and the -- your former partner -- wait -- as a  
7 current partner, you won't tell me -- but your  
8 partner who brought the lawsuit who the Florida Bar  
9 suspended for improper behavior, Mr. Edwards'  
10 partner who sits in jail for fabricating cases,  
11 stealing millions of dollars from unsuspecting  
12 Florida investors, I'd like to answer every one of  
13 your questions. However, my counsel told me today  
14 that I cannot answer any questions that may be  
15 relevant to the lawsuit.

16 BY MR. HOROWITZ:

17 Q Prior to May 2005 did you instruct S.K. to get  
18 Jane Doe 4's phone number, so that S.K. could  
19 communicate with Jane Doe 4 to schedule Jane Doe 4 for  
20 massages with you?

21 MR. PIKE: Form.

22 THE WITNESS: I'd like to answer that  
23 question. I would like to answer your other  
24 questions posed here today. However, my -- on  
25 advice of counsel, they've instructed me that I

1 MR. PIKE: Form.

2 THE WITNESS: Mr. Horowitz, I'd like to answer  
3 each and every one of your questions. However, on  
4 the advice of counsel, I can't answer any of your  
5 questions with respect to the note that she  
6 testified she wrote. I can't answer any questions  
7 separate from -- that may be relevant to your  
8 lawsuit. I can't answer any questions posed by  
9 you, the attorney sitting next to you whose partner  
10 sits in jail, your former partner suspended or --  
11 for improper behavior after filing this lawsuit,  
12 and suspended by the Florida Bar. I'd like to  
13 answer every question you ask. However today,  
14 Mr. Horowitz, I cannot because my counsel is  
15 telling me if I -- if I do, I risk losing their  
16 representation.

17 BY MR. HOROWITZ:

18 Q You've read the deposition transcript of Jane  
19 Doe 4; is that correct?

20 MR. PIKE: Form.

21 THE WITNESS: You know, again, Mr. Horowitz, I  
22 would like to answer every one of your questions;  
23 however, my counsel has told me I cannot. They  
24 told me I must assert my Fifth Amendment, Sixth  
25 Amendment and Fourteenth Amendment Rights under the

1 must assert my Sixth Amendment, Fourteenth  
2 Amendment and Fifth Amendment Rights. So then my  
3 -- I would like to answer questions posed by you.  
4 I know your partner could not be here since he was  
5 suspended by the Florida Bar after filing these  
6 cases, after holding press conferences he was  
7 suspended by the Florida Bar. Mr. Edwards, who  
8 sits on your right, his partner is sitting in jail,  
9 I'd like to answer every one of your questions.  
10 However, my counsel said at least today, I cannot.  
11 So I must accept their advice or risk losing their  
12 representation.

13 BY MR. HOROWITZ:

14 Q Did S.K. tell you that she confirmed by  
15 telephone that Jane Doe 4 would be coming to your home  
16 at a specific time to give you a massage?

17 MR. PIKE: Form.

18 THE WITNESS: Again. I'm sorry, could you  
19 repeat the question?

20 BY MR. HOROWITZ:

21 Q Did S.K. tell you that she had confirmed by  
22 telephone with Jane Doe 4 that Jane Doe 4 would be  
23 coming to your home at a particular time to receive a  
24 massage?

25 MR. PIKE: Form.

1 THE WITNESS: I assume when you say "Jane Doe  
 2 4," this is Jane Doe 4, a girl who testified that  
 3 she wrote a note to me that said "for a good time,  
 4 call Jane Doe 4." I assume that's the same Jane  
 5 Doe 4. I'd like to answer all questions about Jane  
 6 Doe 4, her notes, anything that she said. However,  
 7 my attorneys told me I cannot, and they advised me  
 8 I must assert my rights under the Sixth Amendment,  
 9 Fourteenth Amendment and Fifth Amendment, though  
 10 your partner who filed the lawsuit was suspended by  
 11 the Florida Bar after filing the lawsuit, holding  
 12 press conferences. Mr. Edwards' partner sits in  
 13 jail for fabricating cases of a sexual nature  
 14 against me and others. So, though I would like to  
 15 answer those questions, as you might imagine,  
 16 Mr. Horowitz, is I'd like to answer --  
 17 unfortunately, as I've had to answer most of your  
 18 questions here today, I cannot under advice of  
 19 counsel.

20 BY MR. HOROWITZ:

21 Q Was it your intent during the course of Jane  
 22 Doe 4's visits to your home that you would persuade,  
 23 induce or entice her to engage in sexual activity with  
 24 you?

25 MR. PIKE: Form.

1 questions. I'd love to answer the questions directly to  
 2 you.

3 I'd like to answer the questions to your  
 4 partner, Jeffrey Herman. Jeffrey Herman who was --  
 5 after he filed this Jane Doe 4 case against me -- was  
 6 suspended by the Florida Bar for improper behavior, or  
 7 Mr. Edwards' partner who sits in jail. I much prefer to  
 8 be talking to them. However, I cannot answer questions  
 9 to you, and on advice of counsel, I must assert my  
 10 rights, or risk losing their representation.

11 BY MR. HOROWITZ:

12 Q You knew that Jane Doe 4 was younger than 18  
 13 when she came to your home in 2003 and 2004, correct?

14 MR. PIKE: Form.

15 THE WITNESS: I'd like to answer that  
 16 question. I'd like to answer each and every one of  
 17 your questions. However, on advice of counsel,  
 18 they've instructed me that I cannot answer any  
 19 questions that may be relevant to any of your  
 20 lawsuits brought by either you, your partner that's  
 21 been suspended by the Florida Bar for improper  
 22 behavior, Mr. Edwards, who sits to your right,  
 23 whose partner sits in jail for bringing fabricated  
 24 cases of a sexual nature against people like me and  
 25 others, called -- his firm called a criminal

1 THE WITNESS: Well, I assume this the Jane Doe  
 2 4 who wrote a note to me, according to her  
 3 testimony that said, "for a good time, call Jane  
 4 Doe 4." I assume that's the same Jane Doe 4 you're  
 5 referring to.

6 Unfortunately, your partner couldn't be here  
 7 referring to it because he's been suspended by the  
 8 Florida Bar after filing Jane Doe 4's case.

9 Mr. Edwards' partner can't be here because he's  
 10 in jail for filing cases of a malicious nature, of  
 11 sexual cases, fabricated cases. The U.S. Attorney  
 12 Has referred to the entire firm as a criminal  
 13 enterprise, a criminal enterprise of the large --  
 14 purporting to have the largest fraud in South  
 15 Florida's history. So, though I would like to  
 16 answer each one of your questions, on advice of  
 17 Counsel today, I cannot.

18 BY MR. HOROWITZ:

19 Q During the course of Jane Doe 4's visits to  
 20 your home, did you in fact persuade, induce or entice  
 21 her to engage in sexual activity with you?

22 A I'd very much like to answer each one of your  
 23 questions here today, Mr. Horowitz. However, as I've  
 24 done for mostly all of your other questions, on advice  
 25 of counsel, they've told me I cannot answer those

1 enterprise by the U.S. attorney for stealing  
 2 millions of dollars from South Florida residents.

3 I'd like to answer every one of your questions.  
 4 However, today, under advice of counsel, I cannot.

5 BY MR. HOROWITZ:

6 Q Jane Doe 4 told you that she attended Royal  
 7 Palm Beach High School when she was in your home; is  
 8 that right?

9 MR. PIKE: Form.

10 THE WITNESS: I'd like to answer that  
 11 question. I'd like to answer every question you've  
 12 asked me here today. However, upon advice of  
 13 counsel at least today, I cannot, according to  
 14 their advice, answer any questions that may be  
 15 relevant to this lawsuit -- excuse me -- I would  
 16 prefer to have had your partner, Jeffrey Herman,  
 17 who -- who I actually believe filed the suit, but  
 18 he's been disbarred in the interim -- I'm sorry,  
 19 not disbarred. He's been suspended. I'm not  
 20 really sure what the difference is, but he's been  
 21 suspended from practicing law, while Mr. Edwards'  
 22 partner sits in jail for fabricating cases of a  
 23 sexual nature against people like me and others.  
 24 So, though I would like to answer that question, as  
 25 you probably understand, on the advice of counsel

1 today, I cannot.

2 BY MR. HOROWITZ:

3 Q Isn't it true, sir, that on multiple occasions  
4 Jane Doe 4 discussed her activities at Royal Palm Beach  
5 High School with you?

6 MR. PIKE: Form.

7 THE WITNESS: Again?

8 BY MR. HOROWITZ:

9 Q Isn't it true, sir, that on multiple occasions  
10 Jane Doe 4 discussed her activities at Royal Palm Beach  
11 High School with you?

12 MR. PIKE: Form.

13 THE WITNESS: Royal Palm Beach High School with  
14 me?

15 MR. HOROWITZ: Yes.

16 THE WITNESS: I don't understand the question.

17 BY MR. HOROWITZ:

18 Q Okay. You know, in your mind, who Jane Doe 4  
19 is, correct?

20 MR. PIKE: Form.

21 THE WITNESS: Jane Doe 4 is the one girl you  
22 told -- I believe was the one who testified that  
23 she wrote a note to me that said "for a good time,  
24 call Jane Doe 4." Is that the Jane Doe 4 -- you  
25 can't testify, I'm sorry. Yes, I believe that's

1 BY MR. HOROWITZ:

2 Q Jane Doe 4 told you she could not travel with  
3 you over -- overseas because she was not yet 18; isn't  
4 that true?

5 MR. PIKE: Form.

6 THE WITNESS: I'd like to answer that  
7 question. I'd like to answer every one of your  
8 questions. However, my attorneys today have  
9 instructed me, at least for today, I can't answer  
10 any questions that may become relevant to your --  
11 one of your lawsuits brought by your firm and at --  
12 your partner that's been suspended by the Florida  
13 Bar.

14 BY MR. HOROWITZ:

15 Q Between 2003 and May 2005, were you ever nude  
16 in front of Jane Doe 4?

17 MR. PIKE: Form.

18 THE WITNESS: I would like to answer that  
19 question. I'd like to answer every one of your  
20 questions here today. However, my attorneys, who  
21 have advised me, that I cannot answer any questions  
22 that may be relevant to this or any of your other  
23 lawsuits brought by you and your partner that was  
24 suspended from the practice of the law in Florida,  
25 so I must respectfully decline.

1 correct.

2 BY MR. HOROWITZ:

3 Q Is it your testimony that Jane Doe 4 did not  
4 write such a note after a massage at your house?

5 MR. PIKE: Form.

6 THE WITNESS: Which question would you like me  
7 to answer, the first one or --

8 MR. HOROWITZ: The one I just asked.

9 THE WITNESS: I'd like to answer every question  
10 with respect to everything with respect to Jane Doe  
11 4, every single thing. However, my attorneys today  
12 told me that I cannot, and they instructed me to  
13 assert the Sixth Amendment, Fourteenth and Fifth  
14 Amendment.

15 BY MR. HOROWITZ:

16 Q Isn't it true that Jane Doe 4 regularly  
17 discussed with you her activities at Royal Palm Beach  
18 High School?

19 MR. PIKE: Form.

20 THE WITNESS: My attorneys told me that, though  
21 I'd like to answer that question, as I'd like to  
22 answer all your other questions, I have to answer  
23 it the same way I've answered the others, which is  
24 asserting my Sixth Amendment, Fourteenth Amendment  
25 and Fifth Amendment Rights.

1 BY MR. HOROWITZ:

2 Q Between 2003 and May 2005, did you ever  
3 instruct Jane Doe 4 to remove her clothing?

4 MR. PIKE: Form.

5 THE WITNESS: Again, I would like to answer  
6 every one of your questions, every one, every  
7 specific one, but my attorneys have advised me that  
8 today at least, I cannot answer any questions  
9 relevant, or may be relevant to your lawsuit.  
10 They've instructed me that I must assert my Sixth  
11 Amendment, Fourteenth Amendment and Fifth Amendmen  
12 Rights. So, though I'd like to answer the  
13 question, Mr. Horowitz, I cannot do so.

14 BY MR. HOROWITZ:

15 Q Between 2003 and May 2005, did you instruct  
16 Jane Doe 4 to pinch your nipples --

17 MR. PIKE: Form.

18 BY MR. HOROWITZ:

19 Q -- and rub your chest?

20 MR. PIKE: Same objection.

21 THE WITNESS: Is it -- is it one or the other?

22 MR. HOROWITZ: It's both.

23 THE WITNESS: I see. No. I would --

24 BY MR. HOROWITZ:

25 Q No you did not, sir?

1 A I said -- I'm sorry, I couldn't hear.  
 2 Q I thought you said "no" to my question?  
 3 A No. I'll -- I'll tell when my -- I said no.  
 4 I'd like to answer that question. I'd like to answer  
 5 every one of your questions. I'd like to answer each  
 6 and every one. However, my counsel today told me I  
 7 cannot. They told me I have to assert my Sixth  
 8 Amendment, Fourteenth and Fifth Amendment Rights. And  
 9 if I didn't, and if I chose to answer the question, I  
 10 would risk losing their representation. So at least for  
 11 today, I have to assert those rights.

12 BY MR. HOROWITZ:

13 Q Prior to June of 2005, did you ask Jane Doe 4  
 14 questions about her sexual experience and preferences?

15 MR. PIKE: Form.

16 THE WITNESS: I would be happy to answer that  
 17 question, if I could. My attorneys have told me I  
 18 can't. They've instructed me that I have to assert  
 19 my Sixth Amendment, Fourteenth Amendment and Fifth  
 20 Amendment Rights. I would like to answer the  
 21 question. However, they told me that if I do, I  
 22 risk losing their representation.

23 BY MR. HOROWITZ:

24 Q Prior to June 2005 did you touch Jane Doe 4's  
 25 breasts?

1 MR. PIKE: Form.

2 THE WITNESS: I'd like to answer that  
 3 question. I'd like to answer all your other  
 4 questions here today. However, my counsel has told  
 5 me, at least today, I cannot. I have -- they've  
 6 instructed me to assert my Fourteenth Amendment, my  
 7 Sixth Amendment and my Fifth Amendment Right. And  
 8 they told me that if I chose to answer, I would  
 9 risk losing their representation, so therefore, I  
 10 must respectfully decline to answer them.

11 BY MR. HOROWITZ:

12 Q Prior to June 2005 did you rub Jane Doe 4's  
 13 vagina?

14 MR. PIKE: Form.

15 THE WITNESS: I would like to answer that  
 16 question with specificity. However, my attorneys  
 17 have told me at least today that I must  
 18 respectfully decline and assert my Fifth Amendment,  
 19 Sixth Amendment and Fourteenth Amendment Right. I  
 20 would have preferred that your partner, who after  
 21 he filed the lawsuit, was suspended by the Florida  
 22 Bar for improper practice, or Mr. Edwards' partner,  
 23 who sits in jail, to have been here to at least ask  
 24 some of the questions, but my attorneys have told  
 25 me I cannot answer those questions today, sir.

1 BY MR. HOROWITZ:

2 Q Prior to June 2005 did you perform oral sex on  
 3 Jane Doe 4?

4 MR. PIKE: Form.

5 A I'd like to answer that question. I'd very  
 6 much like to answer that question, but I cannot today,  
 7 because on advice of my counsel, they have told me that  
 8 I must assert my Sixth Amendment, Fourteenth Amendment  
 9 and Fifth Amendment Rights. And if I chose to answer,  
 10 if I did answer that question, I risk losing their  
 11 representation, so at least for that -- for today, I  
 12 must respectfully decline, sir.

13 BY MR. HOROWITZ:

14 Q Prior to June 2005 did you place your mouth on  
 15 Jane Doe 4's genitals?

16 MR. PIKE: Form.

17 THE WITNESS: You know, I'd like to answer that  
 18 question. I would have preferred that either your  
 19 partner, who was here, would have been here, the  
 20 one who filed the lawsuit, who is suspended by the  
 21 Florida Bar, or Mr. Edwards' partner, Scott  
 22 Rothstein, who sits in jail, was to be here. I  
 23 would prefer to respond to them. However, today, I  
 24 cannot answer those questions based on advice of  
 25 counsel, so I must respectfully decline.

1 BY MR. HOROWITZ:

2 Q Prior to June 2005 did you place a vibrator on  
 3 Jane Doe 4's genitals?

4 MR. PIKE: Form.

5 THE WITNESS: I'd like to answer that  
 6 question. I'd like to answer every question you've  
 7 asked here today. I'd like to respond to you -- to  
 8 your partner who's been suspended. I apologize,  
 9 before I said he was disbarred, but -- for improper  
 10 behavior after filing this lawsuit. On advice of  
 11 counsel, they've instructed me that I must assert  
 12 my Fourteenth Amendment, Fifth Amendment and Sixth  
 13 Amendment Rights to any question that may become  
 14 relevant to this lawsuit or risk losing their  
 15 representation, therefore, I would have to  
 16 respectfully, respectfully decline.

17 BY MR. HOROWITZ:

18 Q Prior to June 2005 did you give lingerie to  
 19 Jane Doe 4 to wear for you?

20 MR. PIKE: Form.

21 THE WITNESS: I would like to answer that  
 22 question. I would like to answer all your  
 23 questions. However, I am going to have to respond  
 24 to that question, as I responded to all your other  
 25 questions here today, Mr. Horowitz, which is on



1 advice of counsel, they've instructed me I must  
2 assert my Sixth Amendment, Fourteenth Amendment and  
3 Fifth Amendment Rights. And if I chose to answer,  
4 which I prefer to do, that question, I risk losing  
5 their representation.

6 BY MR. HOROWITZ:

7 Q Prior to June 2005 was Jane Doe 4 ever nude in  
8 front of you at your request?

9 A I'd like to answer that question. I'd very  
10 much like to answer that question. However, my  
11 attorneys have counseled me that I cannot answer that  
12 question or any question today that may be relevant to  
13 one of the lawsuits that you've brought, or your partner  
14 who has brought -- your partner who is suspended from  
15 practice in Florida. So, though I would like to answer  
16 the question, Mr. Horowitz, today under the advice of  
17 counsel, I cannot.

18 Q Prior to June 2005 did you coerce Jane Doe 4  
19 into putting her hands on your penis?

20 A Again, I'm sorry?

21 Q If -- if -- if -- if your attorney passing you  
22 notes is -- is causing you to be distracted from  
23 listening to my questions, I am -- I am going to ask  
24 that you not do it.

25 A I -- I understand.

1 MR. PIKE: Fine.

2 THE WITNESS: It was just the fact -- it wasn't  
3 that. It was, in fact, I had put my glasses on.

4 BY MR. HOROWITZ:

5 Q Your glasses were preventing you from hearing  
6 me?

7 A Yes.

8 MR. PIKE: First of all, you're not going to  
9 tell me how to communicate with my client. I'm  
10 trying not to take a break again, so that, you  
11 know, we don't -- we can keep going forward. If  
12 you'd like me to take a break, I can take another  
13 break right now.

14 MR. HOROWITZ: Well, I'm not here to tell you  
15 how to do your job, but the Rules of Civil  
16 Procedure do, and what they say -- let me finish --  
17 is that "if you interrupt an examination to  
18 communicate with your clients, you can be  
19 sanctioned for it."

20 MR. PIKE: Okay. Well, first of all,  
21 Mr. Horowitz, I didn't interrupt any examination.  
22 You interrupted the examination. I didn't say a  
23 word. So, let's just go ahead and proceed  
24 forward. The witness asked you to repeat the  
25 question, okay?

1 As you are well aware we have hyper-technical  
2 Constitutional privileges at issue here. If I  
3 choose to communicate with my client regarding  
4 those privileges, I will communicate with him. If  
5 you'd like me to take breaks, I will do so. But  
6 once again, we're here to answer your questions,  
7 and I would like to just move forward.

8 BY MR. HOROWITZ:

9 Q Prior to June 2005 did you coerce Jane Doe 4  
10 into putting her hands on your penis?

11 MR. PIKE: Form.

12 THE WITNESS: I'd like to answer that  
13 question. I cannot answer that question on advice  
14 of counsel, but I'd like to answer that question.  
15 My counsel has advised me that I must assert my  
16 Sixth Amendment, Fifth Amendment and Fourteenth  
17 Amendment Rights. And if I choose to answer that  
18 question, I risk waiving those rights, and risk  
19 losing their representation.

20 BY MR. HOROWITZ:

21 Q Prior to June 2005 did you insert your fingers  
22 into Jane Doe 4's vagina?

23 MR. PIKE: Form.

24 THE WITNESS: I'd like to answer that question  
25 about Jane Doe 4, and all the other girls you've

1 mentioned today. However, my counsel has told me I  
2 cannot answer any questions that may be relevant to  
3 the lawsuit. I'd like to answer that question  
4 directly to you, Mr. Edwards. Mr. Edwards'  
5 partner, unfortunately, is in jail, so I can't talk  
6 to him directly. Your partner has been suspended  
7 after filing a lawsuit against me. But, though I'd  
8 like to answer those questions, I risk losing their  
9 representation and waiving those rights, if I do  
10 so.

11 BY MR. HOROWITZ:

12 Q Prior to June 2005 did you masturbate in front  
13 of Jane Doe 4?

14 MR. PIKE: Form.

15 THE WITNESS: I'd like to answer that  
16 question. I'd like to answer all your other  
17 questions posed here today; however, I cannot do so  
18 on the advice of counsel. And they told me that if  
19 I do answer the questions, I may waive those  
20 rights, or risk losing their representation.

21 BY MR. HOROWITZ:

22 Q Prior to June 2005 did you ejaculate in front  
23 of Jane Doe 4?

24 MR. PIKE: Form.

25 THE WITNESS: I would like to answer that

1 question about Jane Doe 4, the girl who wrote "for  
2 a good time, call" -- I -- from her testimony, "for  
3 a good time, call Jane Doe 4" or "call Jane Doe  
4 4." I'm not actually sure. You maybe could clue  
5 me in. However, my counsel has told me today that  
6 I -- I must assert my Sixth Amendment, Fourteenth  
7 Amendment and Fifth Amendment Rights as provided by  
8 the U.S. constitution. And, though I would like to  
9 answer each and every one of your questions, I  
10 cannot do so. I risk waive -- risk losing or  
11 waiving those rights and losing their  
12 representation.

13 BY MR. HOROWITZ:

14 Q Did Jane Doe 4 come to your Palm Beach home on  
15 multiple occasions between 2003 and May 2005 to give you  
16 massages during which you engaged her in sexual  
17 activity?

18 MR. PIKE: Form.

19 THE WITNESS: I'd like to answer each and every  
20 one of your questions posed here today. I would  
21 like to answer that question, and all the other  
22 questions you've asked about Jane Doe 4. However,  
23 upon advice of my counsel, they've instructed me to  
24 assert my Fourteenth Amendment Rights, my Sixth  
25 Amendment Rights and my Fifth Amendment Rights as

1 provided by the constitution. So, though I'd like  
2 to answer, I don't. I've been instructed that I  
3 risk waiving those rights and losing their  
4 representation.

5 BY MR. HOROWITZ:

6 Q Prior to May of 2005 did you pay Jane Doe 4  
7 \$200 after having had sexual contact with her?

8 MR. PIKE: Form.

9 THE WITNESS: Again?

10 BY MR. HOROWITZ:

11 Q Prior to May 2005 did you ever pay Jane Doe 4  
12 \$200 after having had sexual contact with her?

13 MR. PIKE: Form.

14 THE WITNESS: I'd like to answer that  
15 question. I'd like to answer every one of your  
16 questions posed here today. However, according to  
17 my counsel, he's asked me to assert my rights under  
18 the Fourteenth Amendment, the Sixth Amendment, the  
19 Fifth Amendment of the U.S. Constitution, and he's  
20 instructed me that no matter how much I'd like to  
21 answer these questions, that if I do so, I may  
22 waive those rights and risk losing his  
23 representation.

24 BY MR. HOROWITZ:

25 Q Did you try to persuade Jane Doe 4 that it was

1 okay that you were touching her breasts and genitals  
2 while she was still a child?

3 MR. PIKE: Form.

4 THE WITNESS: I'd like to answer that  
5 question. I'd like to answer every question you've  
6 asked here today, every question. However, my  
7 counsel has instructed me at least today, I cannot  
8 answer those questions, and they've instructed me  
9 that I must assert my Fourteenth Amendment, Sixth  
10 Amendment and Fifth Amendment Rights as provided by  
11 the Constitution. And by not doing so, I may waive  
12 those rights or risk losing their representation.

13 BY MR. HOROWITZ:

14 Q Prior to June 2005 did you instruct S.K. to  
15 communicate with Jane Doe 4 by telephone to schedule  
16 Jane Doe 4 to come to your Palm Beach home for sexual  
17 activity?

18 MR. PIKE: Form.

19 THE WITNESS: I'd like to answer that  
20 question. I'd like to answer all your questions.  
21 I wish your partner that had been suspended from  
22 practice after he filed Jane Doe 4's lawsuit, or  
23 Mr. Edwards' who's -- who sits next to you, whose  
24 partner sits in jail, I would like nothing more  
25 than to answer these questions today, but upon

1 advice of my counsel, they've told me that I must  
2 assert my Fourteenth Amendment Rights, my Sixth  
3 Amendment Rights and my Fifth Amendment Rights.  
4 And by not doing so, I may waive those rights or  
5 risk losing their representation. Adam, may I take  
6 a quick five minutes?

7 MR. HOROWITZ: Sure.

8 THE VIDEOGRAPHER: Time off the record 1:50.  
(Thereupon, a short break was taken.)

9 THE VIDEOGRAPHER: Time on the record 2:00.

10 BY MR. HOROWITZ:

11 Q Prior to June 2005 you instructed Jane Doe 4 to  
12 call you at your Palm Beach home to confirm the specific  
13 dates and times you wanted her to come over for sexual  
14 activity, correct?

15 MR. PIKE: Form.

16 THE WITNESS: I'd like to answer that  
17 question. I'd like to answer every question you've  
18 asked me here today, but I'm going to have to  
19 respond the same way I've responded to most of your  
20 questions, Mr. Horowitz, which is on advice of  
21 counsel, I'm going to have to assert the Sixth  
22 Amendment, Fourteenth Amendment and Fifth Amendmen  
23 Rights. Though I'd like to answer that question,  
24 as all your other questions, I'm informed that if I  
25

1 do so, I risk waiving those rights and losing my  
2 representation.  
3 BY MR. HOROWITZ:  
4 Q Did you instruct Jane Doe 4 to lie to police  
5 investigators during their 2005 investigation into your  
6 criminal activities?  
7 MR. PIKE: Form.  
8 THE WITNESS: Did I instruct Jane Doe 4 to  
9 lie?  
10 MR. HOROWITZ: That's my question, yes.  
11 THE WITNESS: I'd like to answer that  
12 question. I'd like to answer every one of your  
13 questions here today. I'd like to answer questions  
14 of -- unfortunately, the -- I guess your partner  
15 that filed this lawsuit was suspended by the  
16 Florida Bar. I'd like to answer. However, my  
17 counsel has advised me at least today that I must  
18 assert my rights under the Fourteenth Amendment,  
19 Sixth Amendment and Fifth Amendment. And if I  
20 choose to answer that question, which I prefer to  
21 do, I risk losing their representation and waiving  
22 those rights, so I must respectfully decline.  
23 Sorry, Mr. Horowitz.  
24 BY MR. HOROWITZ:  
25 Q Are you suggesting that you have some

1 information that Jeffrey Herman was suspended from the  
2 practice of law because he made false statements in a  
3 lawsuit against you?  
4 MR. PIKE: Form.  
5 THE WITNESS: Jeffrey Herman was your partner.  
6 Are you asking me why he was suspended? I'm sorry,  
7 are you asking me --  
8 BY MR. HOROWITZ:  
9 Q I'm asking you why --  
10 THE REPORTER: Wait a second.  
11 THE WITNESS: Sorry. Are you asking why your  
12 partner was suspended from the practice of law in  
13 South Florida?  
14 BY MR. HOROWITZ:  
15 Q I'm asking you whether you have any information  
16 or you're suggesting here today that his suspension of  
17 practice of law had anything to do with you or the  
18 lawsuits against you?  
19 MR. PIKE: Form.  
20 THE WITNESS: Am I suggesting that his  
21 disbarment -- I'm sorry -- his suspension or -- I'm  
22 sorry -- can you do it again? Was he disbarred or  
23 suspended?  
24 BY MR. HOROWITZ:  
25 Q Are you suggesting today in your testimony

1 that --  
2 A Yeah.  
3 Q -- his suspension had anything to do with you  
4 or the lawsuits against you?  
5 MR. PIKE: Form.  
6 THE WITNESS: I'd like to answer that question,  
7 but my counsel has advised me I cannot today. I  
8 must assert the Fourteenth Amendment, Sixth  
9 Amendment and Fifth Amendment Rights, though  
10 obviously, I'd like to answer that question.  
11 BY MR. HOROWITZ:  
12 Q Did you instruct S.K. to tell Jane Doe 4 to lie  
13 to police investigators during their 2005 investigation  
14 into your criminal activity?  
15 MR. PIKE: Form.  
16 THE WITNESS: I'd very much like to answer that  
17 question. I'd very much like to answer all your  
18 questions here today, but as I've done with most of  
19 those questions, on advice of my counsel -- it's  
20 been a long day so far -- I am going to have to  
21 refrain from answering, at least today, to any  
22 questions that may be relevant to any of your  
23 lawsuits brought by you, your suspended partner,  
24 Mr. Edwards and his partner who's in jail. So,  
25 though I'd like to answer those questions, I risk

1 losing or waiving my rights and my counsel's  
2 representation, so I must respectfully decline  
3 today.  
4 BY MR. HOROWITZ:  
5 Q Did you instruct J.B. to rent a car for Jane  
6 Doe 4?  
7 MR. PIKE: Form.  
8 THE WITNESS: I'd like to answer that question  
9 -- Jane Doe 4 -- have we moved from a different  
10 person, I'm sorry?  
11 MR. HOROWITZ: We're on Jane Doe 4.  
12 THE WITNESS: Okay. I'd like to answer that  
13 question. I'd like to answer every one of your  
14 questions. However, my counsel has advised me, at  
15 least today, that I cannot do so. I must assert my  
16 Fourteenth Amendment, Fifth Amendment and Sixth  
17 Amendment Rights.  
18 BY MR. HOROWITZ:  
19 Q Did you intend for Jane Doe 4 to use the car  
20 that you rented for her, for her to come to your home to  
21 give you sexual massages?  
22 MR. PIKE: Form.  
23 THE WITNESS: Did I intend a car that was  
24 rented for Jane Doe 4 -- could you do the question  
25 again?

1 BY MR. HOROWITZ:

2 Q Sure. Did you intend for Jane Doe 4 to use the  
3 car you rented for her to come to your home to give you  
4 sexual massages?

5 MR. PIKE: Form.

6 THE WITNESS: You said I rented a car?

7 MR. HOROWITZ: I'm just asking the questions.

8 My --

9 THE WITNESS: I'm sorry, you have to ask the  
10 question again.

11 BY MR. HOROWITZ:

12 Q Sure. Previously I asked you if you rented a  
13 car, and you asserted the Fifth --

14 A I don't believe you did.

15 Q Okay. All right. Did you --

16 A You asked me if I instructed somebody --

17 Q That's right. You're correct. The car that  
18 you instructed J.B. to rent for Jane Doe 4. I'm talking  
19 about that -- that vehicle, okay? Did you intend for  
20 Jane Doe 4 to use that car to come to your home and give  
21 you sexual massages?

22 MR. PIKE: Form.

23 THE WITNESS: I'd like to answer that  
24 question. I'd like to answer every question about  
25 Jane Doe 4 that you asked me here today. My

1 -- a videotape of her and her boyfriend having sex?

2 MR. HOROWITZ: Yes.

3 THE WITNESS: Okay. I'd like to answer that  
4 question, but my counsel has instructed me that I  
5 must assert my Fourteenth Amendment, Sixth  
6 Amendment and Fifth Amendment Rights. And, though  
7 it's obvious I'd like to answer that question, my  
8 attorneys have counseled me that I -- by doing so,  
9 I waive those rights, or risk losing their  
10 representation.

11 May I get some -- a cup? Is this yours?

12 MR. HOROWITZ: No.

13 THE WITNESS: Okay.

14 MR. HOROWITZ: It's mine.

15 BY MR. HOROWITZ:

16 Q Sir, you don't deny that you sexually abused  
17 Jane Doe 4, do you?

18 MR. PIKE: Form, argumentative.

19 THE WITNESS: I'd like to answer that question  
20 very much so. However, my counsel has advised me  
21 today that I must assert -- at least today, I must  
22 assert Sixth Amendment, Fourteenth Amendment and  
23 Fifth Amendment Rights. And by choosing to answer,  
24 I may waive those rights or risk losing their  
25 representation.

1 counsel has advised me that I may not. And they've  
2 instructed me that I am to assert my Fourteenth  
3 Amendment, Sixth Amendment, Fifth Amendment  
4 Rights. And, though I'd like to answer each one of  
5 your questions, my counsel has advised me that if I  
6 choose to do so, which is my preference, I risk  
7 waiving those rights and/or losing their  
8 representation.

9 BY MR. HOROWITZ:

10 Q Isn't it true that you and Jane Doe 4 watched a  
11 videotape of Jane Doe 4 and her boyfriend having sexual  
12 intercourse?

13 MR. PIKE: Form.

14 THE WITNESS: Can you describe this videotape  
15 to me?

16 BY MR. HOROWITZ:

17 Q Would that refresh your recollection?

18 A I don't know. Would you want to tell me about  
19 it?

20 Q My question for you is: Isn't it true that you  
21 and Jane Doe 4 watched a videotape of Jane Doe 4 and her  
22 boyfriend having intercourse? Does that refresh your  
23 recollection?

24 MR. PIKE: Same objection, form.

25 THE WITNESS: I'd like to answer that question

1 So, though your partner after he filed that  
2 Jane Doe 4 lawsuit was suspended from the practice  
3 of law by the Florida Bar, or some of these other  
4 cases brought by Mr. Edwards' firm who is sitting  
5 next to you, whose partner sits in jail for  
6 bringing cases of a sexual nature, accusing people  
7 fallaciously, maliciously, simply to get money, I'd  
8 like to answer each one of your questions, but  
9 today, unfortunately, I must respectfully decline.

10 BY MR. HOROWITZ:

11 Q Sir, are you asserting your Fifth Amendment,  
12 Sixth Amendment and Fourteenth Amendment Rights to  
13 protect your innocence, or conceal your guilt?

14 MR. PIKE: Form. I'm going to instruct him not  
15 to answer that question.

16 BY MR. HOROWITZ:

17 Q Is there any reason that the jury should not  
18 infer that you did in fact have sexual contact with Jane  
19 Doe 4 when she was a child, given that you've asserted  
20 the Fifth Amendment?

21 MR. PIKE: Form.

22 THE WITNESS: The Fifth Amendment has been used  
23 many times to protect the innocent, especially  
24 people who've been falsely accused by people like  
25 your -- Mr. Edwards' partner, Scott Rothstein, who

1 sits in jail accused by the U.S. Attorney of  
2 running the biggest fraudulent scheme in South  
3 Florida's history, stealing millions of dollars  
4 from South Florida residents. The U.S. Attorney  
5 called his enterprise a criminal -- his firm,  
6 Mr. Edwards' firm, sitting next to you -- another  
7 one of the lawsuits, a criminal enterprise.

8 I'd like to answer that question very  
9 specifically. However, my attorneys have counseled  
10 me that today I may not, and I may risk losing my  
11 rights, my waiver -- excuse me - my rights, and  
12 risk losing my representation, if I choose to  
13 answer that question.

14 BY MR. HOROWITZ:

15 Q Okay. I don't want to know why other people  
16 assert the Fifth Amendment. I want to know why you're  
17 asserting it. Are you asserting it because you're an  
18 innocent man, or because you're a guilty man?

19 MR. PIKE: Form.

20 THE WITNESS: I'd love to answer that  
21 question. However, my attorneys have counseled me  
22 that I cannot and must assert my rights under the  
23 Sixth Amendment, Fourteenth and Fifth, even to that  
24 question. Though I would be more than happy to  
25 answer it, my attorneys have counseled me that by

1 2002?

2 MR. PIKE: Form.

3 THE WITNESS: I'd like to answer that question  
4 with respect to Miss Jane Doe 5.

5 Q I asked you the right -- I know you did write  
6 it down.

7 A I know. But how did you pronounce it?

8 Q Jane Doe 5.

9 A Okay. However, my attorneys have counseled me  
10 that at least today I cannot answer questions that may  
11 become relevant to any of your lawsuits that you have  
12 filed with respect to these girls, or your partner filed  
13 before he became suspended by the Florida Bar for  
14 improper behavior.

15 So, though I'd like to answer that question,  
16 Mr. Horowitz, as I would like to answer every one of  
17 your questions, at least today, I am going to have to  
18 assert the rights dictated to me by my counsel, either  
19 the Sixth Amendment, Fourteenth and -- or Fifth  
20 Amendment, or all of the above.

21 I mean, I would like to answer each and every  
22 one of your questions. If I do so, I'm told that I risk  
23 waiving those rights, or losing their representation.

24 BY MR. HOROWITZ:

25 Q All right.

1 doing so, I may waive those rights and risk losing  
2 their representation.

3 BY MR. HOROWITZ:

4 Q Okay. Sir, I'm going to ask you a few  
5 questions about a young woman named Jane Doe 5.

6 A Yes. Okay.

7 Q First name is Jane Doe 5.

8 MR. PIKE: You said her last name was Jane Doe  
9 5?

10 MR. HOROWITZ: Yes.

11 BY MR. HOROWITZ:

12 Q So you know her as Jane Doe 5?

13 MR. PIKE: Form, mischaracterizes the witness'  
14 testimony, move to strike. Let's not play with  
15 words.

16 BY MR. HOROWITZ:

17 Q Do you recognize her name as A.G. or Jane Doe  
18 5?

19 A I don't recognize her name.

20 Q Okay. Well, for the moment I would like you to  
21 hold on to that name, so -- because I'll be asking you a  
22 series of questions about it, okay?

23 A Okay.

24 Q Isn't it true that a girl named Jane Doe 5 came  
25 to your Palm Beach estate in approximately 2001 or

1 A Excuse me.

2 Q In either 2001 or 2002, did S.K. inform you  
3 that she had received a telephone call in which she was  
4 referred to an underage girl named Jane Doe 5 who would  
5 be willing to come to your home and give you a massage  
6 for money?

7 MR. PIKE: Form.

8 THE WITNESS: I'd like to answer that question,  
9 as I'd like to answer mostly every one of your  
10 questions here today. These questions, my  
11 attorneys have counseled me, I cannot answer today  
12 because -- as they may be relevant to the lawsuit.

13 They have instructed me that I must assert my  
14 Sixth Amendment, Fourteenth Amendment and Fifth  
15 Amendment Rights, though I'd very much like to  
16 answer that question.

17 BY MR. HOROWITZ:

18 Q Did S.K. inform you that she was provided with  
19 Jane Doe 5's telephone number?

20 MR. PIKE: Form.

21 THE WITNESS: Again?

22 BY MR. HOROWITZ:

23 Q Did S.K. inform you that she was provided with  
24 Jane Doe 5's telephone number?

25 A "Provided with" -- I -- I don't understand the

1 question.

2 MR. PIKE: Form to that. And I know you're  
3 going to ask it again.

4 THE WITNESS: Yes, he is.

5 BY MR. HOROWITZ:

6 Q Did -- I'll try and ask it as fundamentally as  
7 I can.

8 A Okay.

9 Q Did S.K. inform you that she had Jane Doe 5's  
10 telephone number?

11 A I'd like to answer that question. I've been  
12 have -- I'd like to answer every question you've asked  
13 here today. However, on advice of counsel, they've  
14 instructed me that I cannot answer that question today  
15 because it may be relevant to one of your lawsuits filed  
16 by either you, Mr. Edwards -- Mr. Edwards' partner who  
17 sits in jail, your partner who's been suspended from the  
18 Florida Bar.

19 So, though I'd like to answer that question, at  
20 least today, my counsel said I risk waiving those rights  
21 under the Sixth, Fourteenth and Fifth, or risk losing  
22 their representation.

23 Q Did you instruct S.K. to call Jane Doe 5 to  
24 come to your home and give you a massage in 2001 or  
25 2002?

1 MR. PIKE: Form.

2 THE WITNESS: This is the same Jane Doe 5 --  
3 whatever her name is?

4 MR. HOROWITZ: Yes, keep that same person in  
5 your head.

6 THE WITNESS: It's a little bit tough. I'd  
7 like to answer that question. I'd like to answer  
8 all your questions. However, today, my counsel has  
9 advised me that I cannot answer any questions that  
10 may be relevant to the lawsuit, and they've  
11 instructed me that I must assert my Fourteenth,  
12 Fifth and Sixth Amendment Rights.

13 And by answering those questions, that I choose  
14 -- that prefer to do so today, they've instructed  
15 me that I may waive those rights, or risk losing  
16 their representation.

17 BY MR. HOROWITZ:

18 Q Did you inform S.K. that the massage Jane Doe 5  
19 was to give you would be sexual in nature?

20 MR. PIKE: Form.

21 THE WITNESS: I'd like to answer each and every  
22 one of your questions. My counsel has advised me  
23 -- my counsel has advised me that I cannot today,  
24 and they've instructed me that I should assert my  
25 Fourteenth Amendment, Sixth Amendment and Fifth

1 Amendment rights.

2 And if I choose not to do so, I risk waiving  
3 those rights, or losing their representation. So,  
4 though I'd like to answer that question, I cannot.

5 BY MR. HOROWITZ:

6 Q Did you observe S.K. speaking with Jane Doe 5  
7 on the telephone to arrange for Jane Doe 5 to come to  
8 your home for a massage?

9 MR. PIKE: Form.

10 THE WITNESS: I'd like to answer each one of  
11 your questions, Mr. Horowitz, each and every one  
12 that you've posed here today, but I am going to  
13 have to answer that question, as I've answered most  
14 of your other questions here today, which is my  
15 counsel has advised me, at least today, at least  
16 today, that I cannot answer those questions and  
17 must assert my Fourteenth Amendment Rights, Sixth  
18 Amendment Rights and Fifth Amendment Rights or --

19 BY MR. HOROWITZ:

20 Q Did --

21 A I'm sorry.

22 Q I'm sorry, go ahead.

23 A -- or risk waiving those rights, or losing  
24 their representation.

25 Q Did S.K. tell you that she had confirmed by

1 telephone that Jane Doe 5 would be at your home at a  
2 specific time to give you a massage?

3 MR. PIKE: Form.

4 THE WITNESS: I'd like to answer that  
5 question. I'd like to answer every one of your  
6 questions posed here today, Mr. Horowitz. However,  
7 on advice of counsel, they've instructed me that I  
8 must assert my Fifth Amendment, Sixth Amendment and  
9 Fourteenth Amendment Right.

10 BY MR. HOROWITZ:

11 Q Was it your intent during the course of Jane  
12 Doe 5's visit to your home in either 2001 or 2002, that  
13 you would persuade, induce or entice her to engage in  
14 sexual activity?

15 MR. PIKE: Form.

16 THE WITNESS: It would give me great pleasure  
17 to be able to answer that question to you, as it --  
18 as all the other questions you've asked about these  
19 girls here today. My counsel has told me that I  
20 cannot answer those questions that may be relevant  
21 to any of the lawsuits brought by you, your partner  
22 that's been suspended or disbarred -- I'm not  
23 really sure what the difference is -- or  
24 Mr. Edwards' partner who sits in a Florida jail for  
25 fleecing people out of millions of dollars by

1 crafting cases of a sexual nature against people  
2 like me and others, and those are -- though I'd  
3 like to answer those questions, my counsel has  
4 advised me, at least today, that I cannot.

5 BY MR. HOROWITZ:

6 Q During the course of Jane Doe 5's visit to your  
7 home in 2001 or 2002, did you, in fact, persuade, induce  
8 or entice her to engage in sexual activity with you?

9 MR. PIKE: Form.

10 THE WITNESS: Though I'd like to answer that  
11 question, as well as every other question you've  
12 asked me here today, I am going to respond in a  
13 similar fashion, which is my counsel, at least  
14 today, has told me I may not, may not respond, and  
15 must assert my rights under the Fourteenth, Sixth  
16 and Fifth Amendment.

17 Though I'd like to respond to each question, my  
18 counsel has told me that if I choose to do so, I  
19 risk waiving those rights and losing their  
20 representation.

21 BY MR. HOROWITZ:

22 Q Did you pay for Jane Doe 5 to take a taxi to  
23 your home in either 2001 or 2002?

24 MR. PIKE: Form.

25 THE WITNESS: I'd like to answer each question

1 Florida.

2 I'd like to answer every question you've asked  
3 me here today, Mr. Horowitz, but my counsel has  
4 instructed me that I may not.

5 BY MR. HOROWITZ:

6 Q When Jane Doe 5 came to your home in either  
7 2001 or 2002, she appeared to you to be under the age of  
8 18; isn't that right?

9 MR. PIKE: Form.

10 THE WITNESS: I'd like to answer all your  
11 questions. I'd like to answer each and every one  
12 of your questions. However, my counsel has  
13 instructed me that I may not answer any questions  
14 that may be relevant to this lawsuit, or any of  
15 your lawsuits brought by your firm, your suspended  
16 partner or Mr. Edwards' firm, his partner who sits  
17 in jail -- excuse me.

18 So, though I'd like to answer those questions,  
19 I was told that -- by my counsel that if I choose  
20 to do so, I risk waive -- risk waiving my right and  
21 risk losing their representation.

22 BY MR. HOROWITZ:

23 Q During Jane Doe 5's visit to your home in 2001  
24 and 2002, she told you she attended Wellington High  
25 School; isn't that right?

1 you've asked me here today. However, on advice of  
2 counsel, they've asked -- they've instructed me to  
3 assert my Fifth Amendment, Sixth Amendment and  
4 Fourteenth Amendment Rights under the U.S.  
5 Constitution.

6 Though I'd like to answer each question, I have  
7 to respond, unfortunately, the same way I've  
8 responded to mostly every one of your questions  
9 here today, and assert those rights on counsel's  
10 advice, or risk waiving those rights and losing  
11 their representation.

12 BY MR. HOROWITZ:

13 Q During Jane Doe 5's visit to your home in  
14 either 2001 or 2002, Jane Doe 5 told you she was under  
15 18, didn't she?

16 MR. PIKE: Form.

17 THE WITNESS: I'd like to answer that  
18 question. I'd like to answer every question you've  
19 asked me here today. I'd like to answer the  
20 questions posed by you, Mr. Edwards, your partner,  
21 Mr. Herman, who unfortunately was suspended after  
22 he filed these cases, Mr. Edwards's partner who's  
23 sitting -- sitting in a jail for fabricating cases  
24 of a sexual nature against people like me and  
25 others for stealing money from people in South

1 MR. PIKE: Form.

2 THE WITNESS: I'd like to answer that  
3 question. I'd like to answer every question you've  
4 posed here today, but unfortunately, I am going to  
5 have to respond the same way I've responded to most  
6 of these other questions, which is my counsel has  
7 advised me that at least today, I cannot answer  
8 those questions. And if I choose to do so, I may  
9 waive my rights, but I -- so I must assert them  
10 under the Sixth, Fourteenth and Fifth Amendment.

11 BY MR. HOROWITZ:

12 Q During Jane Doe 5's visit to your home in 2001  
13 or 2002, were you nude in front of Jane Doe 5?

14 A I'd like to answer --

15 MR. PIKE: Form.

16 THE WITNESS: -- that question. I'd like to  
17 answer every question you've asked me here today.  
18 But my counsel has advised me that I may not answer  
19 any questions that may be relevant to your lawsuit,  
20 Mr. Edwards' lawsuit, his partner's lawsuit who  
21 sits -- his partner who sits in jail, and my  
22 counsel has advised me that, though his partner  
23 sits in jail for bringing fabricated cases of a  
24 sexual nature against people like me and others,  
25 that I still have to assert my rights under the

1 Sixth Amendment, Fifth -- Fourteenth Amendment and  
2 Fifth Amendment; otherwise, I risk waiving those  
3 rights, or losing their representation.

4 BY MR. HOROWITZ:

5 Q During the course of Jane Doe 5's visit to your  
6 home in either 2001 or 2002, did you instruct Jane Doe 5  
7 to remove all of her clothing?

8 MR. PIKE: Form.

9 THE WITNESS: I'd like to answer that  
10 question. I'd like to answer every question you've  
11 asked me here today with specificity. However, my  
12 counsel has told me that I may not answer any  
13 questions that may be relevant to this lawsuit,  
14 must assert my rights under the Fourteenth, Sixth  
15 and Fifth Amendment, so I must respectfully  
16 decline, Mr. Horowitz.

17 BY MR. HOROWITZ:

18 Q During the course of Jane Doe 5's visit to your  
19 home in 2001 or 2002, did you instruct Jane Doe 5 to  
20 pinch your nipples and rub your chest?

21 MR. PIKE: Form.

22 THE WITNESS: Like all the other questions --  
23 questions you've asked me here today, I'd love to  
24 answer that question. I'd love to answer each and  
25 every one of your questions here today, but my

1 Q During the course of Jane Doe 5's visit to your  
2 home in 2001 and 2002, did you remove Jane Doe 5's bra  
3 and rub her breasts?

4 MR. PIKE: Form.

5 THE WITNESS: The answer is: I'd like to  
6 answer that question. I believe Jane Doe 5  
7 testified that that was not the case, or you're  
8 asking me a question that she testified to  
9 something else? But, though I cannot answer those  
10 questions, my counsel has advised me that I have to  
11 assert my rights under the Fifth, Fourteenth and  
12 Sixth Amendment. So, though I'd like to answer  
13 that question, I may not.

14 BY MR. HOROWITZ:

15 Q Well, which version of events is true, that you  
16 did touch her breasts, or that you did not touch her  
17 breasts?

18 A Are you asking me whether she tells the truth  
19 or not in her deposition? Is that the question?

20 Q My question is: Which version of events is  
21 true, that she touched your breasts -- that you touched  
22 her breasts, or that you did not touch her breasts?

23 MR. PIKE: Form.

24 THE WITNESS: I'd like to answer that  
25 question. As you might imagine I'd like to answer

1 counsel has told me I cannot. They've instructed  
2 me that I have to assert my Fourteenth, Fifth and  
3 Sixth Amendment Rights. And, though I'd like to  
4 answer -- prefer to answer, that by doing so, I may  
5 waive those rights, and risk -- and/or risk losing  
6 their representation.

7 BY MR. HOROWITZ:

8 Q Okay. During the course of Jane Doe 5's visit  
9 to your home in 2001 or 2002, isn't it true you asked  
10 Jane Doe 5 questions about her sexual experience and  
11 preferences?

12 MR. PIKE: Form.

13 THE WITNESS: I'd like to answer each and every  
14 one of your question about Jane Doe 5 -- Jane Doe 5  
15 and her claims. However, my attorneys have told me  
16 I cannot, at least today, answer any of those  
17 questions that may be relevant to the lawsuit that  
18 you have filed, your suspended partner has filed,  
19 Mr. Edwards has filed, his partner in jail has  
20 filed.

21 Unfortunately, there's lots of things I cannot  
22 answer questions to. My partner -- my counsel has  
23 told me that I risk waiving my rights and losing  
24 their representations, if I choose to do so.

25 BY MR. HOROWITZ:

1 that question very much. However, my counsel has  
2 advised me I may not, today anyway, and I must  
3 assert my right under the Sixth, Fourteenth or --  
4 and/or Fifth Amendment.

5 And, though I'd like to answer that question  
6 specifically -- I'd like to answer it to you, I'd  
7 like to answer it to your partner who's not here  
8 because he's been suspended from the practice of  
9 law in South Florida after he filed this lawsuit.  
10 I'd like to answer that question specifically to  
11 Mr. Edwards' partner who remains in jail for  
12 perpetrating a fraud on people in South Florida,  
13 stealing money from them.

14 Unfortunately, under -- my counsel has told me  
15 that I must respectfully decline and assert my  
16 rights, or risk waiving those rights and losing  
17 their representation.

18 THE WITNESS: I'm going to have to take a  
19 break.

20 THE VIDEOGRAPHER: Going off the record. Time  
21 off the record 2:25.

22 (Thereupon, a short break was taken.)

23 THE VIDEOGRAPHER: Time on the record 2:37.  
24 This is Tape 4.

25 BY MR. HOROWITZ:



1 Q Okay. We've been discussing Jane Doe 5 for  
2 some time now. Okay. I'm going to ask you a few more  
3 questions about her. During the course of Jane Doe 5's  
4 visit to your home in 2001 and 2002, did you rub Jane  
5 Doe 5's vagina over her underwear?

6 MR. PIKE: Form, and assumes facts not in  
7 evidence.

8 THE WITNESS: I'd like to answer that  
9 question. I'd like to answer every question you've  
10 asked me here today. But on advice of counsel,  
11 they've instructed me, I must assert my Sixth  
12 Amendment, Fourteenth Amendment and Fifth Amendmen  
13 Rights.

14 BY MR. HOROWITZ:

15 Q During the course of Jane Doe 5's visit to your  
16 home in 2001 and 2002, did you rub her vagina under her  
17 underwear?

18 MR. PIKE: Form.

19 THE WITNESS: I'm afraid it's the same answer  
20 as most of the other answers I've given here  
21 today. Though I would like to answer these  
22 questions with specificity, especially that  
23 question, my counsel has advised me that I may not,  
24 and must assert my rights under the Sixth  
25 Amendment, Fourteenth and Fifth Amendment.

1 BY MR. HOROWITZ:

2 Q During the course of Jane Doe 5's visit to your  
3 home in 2001 or 2002, did you place a vibrator on her  
4 vagina?

5 MR. PIKE: Form.

6 THE WITNESS: I'd like to answer that

7 THE VIDEOGRAPHER: Hold on. There's major  
8 static. Time off the record 2:40.

9 (Thereupon, a short break was taken.)

10 THE VIDEOGRAPHER: Time on the record 2:41

11 MR. HOROWITZ: Back on the record. I don't  
12 know that we did or did not get an answer to this  
13 question, so I'm going to repeat it. And if you  
14 have to repeat your answer, I apologize.

15 MR. PIKE: Thank you.

16 BY MR. HOROWITZ:

17 Q During the course of Jane Doe 5's visit to your  
18 home in 2001 or 2002, did you place a vibrator on her  
19 vagina?

20 MR. PIKE: Form.

21 THE WITNESS: I'd like to answer the questions  
22 about Jane Doe 5. However, my attorneys have told  
23 me that I may not answer any questions regarding  
24 anything that may be relevant to any of the  
25 lawsuits brought by you, your firm, your partner

1 And if I chose to answer, which I prefer to do,  
2 they've advised me I may waive those rights, or  
3 risk losing their representation.

4 BY MR. HOROWITZ:

5 Q During the course of Jane Doe 5's visit to your  
6 home in 2001 and 2002, did -- did you insert your  
7 fingers into her vagina?

8 MR. PIKE: Form.

9 THE WITNESS: I'd very much like to answer that  
10 question as well, Mr. Horowitz, but my attorneys  
11 have advised me today that I cannot, and I must  
12 assert my rights under the Sixth, Fifth and  
13 Fourteenth Amendments.

14 Though it would -- I'd prefer to answer the  
15 question, they told me that if I choose to do so, I  
16 risk waiving those rights. I would prefer to have  
17 that conversation with your partner that was  
18 suspended or disbarred from the Florida Bar after  
19 filing the lawsuit on Jane Doe 5's behalf. I'd  
20 prefer to talk to Mr. Edwards' partner, if he was  
21 able to be here, except he's in jail for  
22 fabricating cases of a sexual nature against people  
23 like me. So, believe me, I'd like to answer those  
24 questions, but today my attorneys have told me I  
25 may not.

1 that was suspended or disbarred after he brought  
2 these lawsuits. So, though I'd like to answer the  
3 question, Mr. Horowitz, my attorneys have advised  
4 me, at least today, that I must assert my rights  
5 under the Sixth, Fourteenth and Fifteen -- Fifth  
6 Amendment, and I respectfully have to decline.

7 BY MR. HOROWITZ:

8 Q During the course of Jane Doe 5's visit to your  
9 home in 2001 or 2002, did you masturbate in her  
10 presence?

11 MR. PIKE: Form.

12 THE WITNESS: I'd very much like to answer  
13 every question, every single question regarding  
14 Jane Doe 5 and her claims. However, my attorneys  
15 have advised me, at least today, that I may not do  
16 so, and must assert my rights under the Sixth  
17 Amendment, Fourteenth and Fifth Amendment.

18 And, though I would prefer to answer, they have  
19 advised me that if I choose to do so, I risk  
20 waiving those rights and risk losing their  
21 representation.

22 BY MR. HOROWITZ:

23 Q During the course of Jane Doe 5's visit to your  
24 home in 2001 or 2002, did you ejaculate in her presence?

25 MR. PIKE: Form.

1 THE WITNESS: Did I ejaculate in Miss Jane Doe  
2 5's presence? I'd like to answer that question and  
3 that all her claims -- however, today, my attorneys  
4 have counseled me that I may not.

5 They've instructed me that I have to assert my  
6 Sixth Amendment, Fourteenth Amendment and Fifth  
7 Amendment Rights. Though I'd like to answer that  
8 question, I am going to have to respond as I've  
9 answered most of your other questions here today,  
10 which is by asserting those rights.

11 BY MR. HOROWITZ:

12 Q Did you have sexual contact with Jane Doe 5 in  
13 your Palm Beach home in either 2001 or 2002?

14 MR. PIKE: Form.

15 THE WITNESS: "Sexual contact"?

16 MR. HOROWITZ: Yes.

17 THE WITNESS: Can you tell me what you mean by  
18 that?

19 BY MR. HOROWITZ:

20 Q Contact, sexual -- of a sexual nature. Do you  
21 understand -- do you understand what that means?

22 A I've asked you --

23 Q Have you had sexual contact?

24 A I've asked you to clarify what you mean,  
25 please.

1 of Miss Jane Doe 5's complaints or claims. My  
2 attorneys have told me that, at least today, that I  
3 may not do so today, and must assert my rights  
4 under the Sixth Amendment, Fifth Amendment and  
5 Fourteenth, and I have to respond the same way I've  
6 responded to most of your -- my -- your other  
7 questions posed here today.

8 BY MR. HOROWITZ:

9 Q Did you pay Jane Doe 5 \$200 after you had  
10 sexual contact with her in your home?

11 MR. PIKE: Form.

12 THE WITNESS: I'd like to respond to every one  
13 of Jane Doe 5's claims, but my attorneys have  
14 advised me that at least today I must assert my  
15 rights under the Fifth, Sixth and Fourteenth  
16 Amendment. Though I'd like to answer that  
17 question, I am going to have to respond similarly  
18 that I've answered most of your other questions  
19 here today. This is no different.

20 And I -- though I would -- I've been advised by  
21 my attorneys, if I choose to answer, I risk waiving  
22 my rights and/or risk losing their representation.

23 BY MR. HOROWITZ:

24 Q You never asked Jane Doe 5 for permission to  
25 touch either her breasts or genitals, correct?

1 Q Well, I'm going to use a broad definition,  
2 okay?

3 A Yes.

4 Q That would involve touching someone's sexual  
5 organs, someone else touching your sexual organs, having  
6 sexual contact together, such as intercourse or oral sex  
7 or anal sex. Did you have any of those activities of a  
8 sexual nature with Jane Doe 5?

9 MR. PIKE: Form.

10 THE WITNESS: I'd like to respond to every one  
11 of Jane Doe 5's claims. However, today, my counsel  
12 has advised me that I may not. So I am going to  
13 have -- under their instructions have to assert my  
14 Sixth Amendment, Fourteenth Amendment and Fifth  
15 Amendment Rights. Though I'd like to answer that  
16 question, I've been told that if I choose to do so,  
17 I risks losing their representation and waiving  
18 those rights.

19 BY MR. HOROWITZ:

20 Q During the course of Jane Doe 5's visit to your  
21 home in 2001 or 2002, did you also touch another  
22 underage girl in a sexual manner in the presence of Jane  
23 Doe 5?

24 MR. PIKE: Form.

25 THE WITNESS: I'd like to respond to every one

1 MR. PIKE: Form.

2 THE WITNESS: I would like to respond to every  
3 single one of your client's claims. My attorneys  
4 have advised me at least today, I cannot answer any  
5 questions that may be relevant to those claims.  
6 And, though your partner who filed this lawsuit on  
7 Miss Jane Doe 5's behalf was disbarred -- suspended  
8 by the Florida Bar -- suspended by the Florida Bar  
9 after filing this claim, or Mr. Edwards', who filed  
10 similar claims, partner who sits in jail, I'd like  
11 to answer every single question. However, today,  
12 my attorneys told me that if I do so, choose to do  
13 so, I risk waiving my rights and risk losing their  
14 representation.

15 BY MR. HOROWITZ:

16 Q Mr. Epstein, Jane Doe 5 told you when she was  
17 in your home that she did not want you to touch her  
18 body, isn't that true?

19 MR. PIKE: Form.

20 THE WITNESS: I would very much like to answer  
21 every question regarding Jane Doe 5's claims, but  
22 today my attorneys have informed me that I may not  
23 answer, and must assert my rights under the Sixth,  
24 Fifth and Fourteenth Amendment. So, though I would  
25 like to answer those questions, I -- my attorneys

1 have informed me that if I choose to do so, which  
2 is my preference, I would risk losing their  
3 representation and waiving my rights.

4 BY MR. HOROWITZ:

5 Q Mr. Epstein, you made sexual contact with Jane  
6 Doe 5 after she indicated to you that she did not want  
7 to be touched by you, isn't that right?

8 MR. PIKE: Form.

9 THE WITNESS: I'd like to answer each and every  
10 one of your questions regarding Miss Jane Doe 5's  
11 claims. However, my attorneys have advised me that  
12 today at least, I may not answer those claims, and  
13 must assert my rights under the Fourteenth  
14 Amendment, Sixth Amendment and Fifth Amendment.

15 And, though as you might imagine, I would like  
16 to answer those claims with -- questions with  
17 specificity, my counsel has told me that if I  
18 choose to do so, I waive -- I might risk losing  
19 their representation and waive -- waiving some of  
20 my rights.

21 BY MR. HOROWITZ:

22 Q Did you try to persuade Jane Doe 5 that it was  
23 okay for you to touch her breasts and genitals while she  
24 was still a child?

25 (Videotaped deposition continued in Volume II.)

1  
2  
3 STATE OF FLORIDA )  
4 COUNTY OF BROWARD )

5  
6  
7 I, the undersigned authority, certify that  
8 Jeffrey Edward Epstein personally appeared before me and  
9 was duly sworn.

10  
11 WITNESS my hand and official seal this 22nd day  
12 of March, 2010.

13  
14  
15  
16  
17 Vicki L. Lima, Court Reporter  
18 Notary Public - State of Florida  
19 Commission No: DD 882608  
20 Expiration Date: May 26, 2013  
21 Job #92076-A  
22  
23  
24  
25

1  
2 CERTIFICATE  
3

4 STATE OF FLORIDA )  
5 COUNTY OF BROWARD )

6 I, Vicki L. Lima, Court Reporter, Notary Public  
7 in and for the State of Florida at Large, do hereby  
8 certify that the aforementioned witness was by me first  
9 duly sworn to testify to the whole truth; that I was  
10 authorized to and did report said deposition in  
11 stenotype; and that the foregoing pages are a true and  
12 correct transcription of my shorthand notes of said  
13 deposition.

14 I further certify that the said deposition was  
15 taken at the time and place hereinabove set forth and  
16 that the taking of said deposition was commenced and  
17 completed as hereinabove set out.

18 I further certify that I am not an attorney or  
19 counsel of any of the parties, nor am I a relative or  
20 employee of any attorney or counsel of any party  
21 connected with this action, nor am I interested in the  
22 action.

23 The foregoing certification of this transcript  
24 does not apply to any reproduction of the same by any  
25 means unless under the direct control and/or direction  
of the certifying reporter.

IN WITNESS WHEREOF, I have hereunto set my hand  
this 22nd day of March, 2010.

22  
23  
24  
25  
Vicki L. Lima, Court Reporter  
Notary Public - State of Florida  
Commission No: DD 882608  
Expiration Date: May 26, 2013  
Job #92076-A

1 UNIVERSAL LEGAL REPORTING  
2 888 EAST LAS OLAS BOULEVARD, SUITE 508  
3 FORT LAUDERDALE, FLORIDA 33301  
4 (954) 712-2600

5 March 22, 2010 Job #92076-A Volume I

6 Jeffrey Edward Epstein, witness  
7 Michael J. Pike, Esquire  
8 303 Banyan Boulevard, Suite 400  
9 West Palm Beach, Florida 33401  
10 RE: Jane Doe No. 2 vs. Jeffrey Epstein  
11 CASE NO: 08-CV-80119-MARRA/JOHNSON

12 Dear Mr. Epstein:

13 Please take notice that on March 8, 2008, you  
14 gave your deposition in the above-refered matter. At  
15 that time, you did not waive your signature. It is now  
16 necessary that you sign your deposition.

17 As previously agreed to, the transcript will be  
18 furnished to you through your counsel. Please read the  
19 following instructions:

20 At Page 189, you will find an errata sheet. As  
21 you read your deposition, any changes or corrections  
22 that you wish to make should be noted on the errata  
23 sheet, citing page and line number of said change. DO  
24 NOT write on the transcript itself. Once you have read  
25 the transcript and noted any changes, be sure to sign  
and date the errata sheet and return these pages to us  
at the address listed above. You need not return the  
entire transcript.

If you do not read and sign the deposition  
within thirty (30) days, the original, which has already  
been forwarded to the ordering attorney, may be filed  
with the Clerk of the Court. If you wish to waive your  
signature, sign your name in the blank at the bottom of  
this letter and return it to us.

Very truly yours,  
Universal Legal Reporting.

Vicki L. Lima  
Court Reporter - Notary Public

I do hereby waive my signature.

1 ERRATA SHEET

2 IN RE: Jane Doe No. 2 vs. Jeffrey Edward Epstein

3 DEPOSITION OF: Jeffrey Edward Epstein, Volume I

4 TAKEN: March 8, 2010

5 DO NOT WRITE ON TRANSCRIPT - ENTER CHANGES HERE

6 PAGE # LINE # CHANGE REASON

7	_____	_____	_____
8	_____	_____	_____
9	_____	_____	_____
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11	_____	_____	_____
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15	_____	_____	_____
16	_____	_____	_____
17	_____	_____	_____
18	_____	_____	_____
19	_____	_____	_____
20	_____	_____	_____

21 Please forward the original signed errata sheet to this

22 office so that copies may be distributed to all parties.

23 Under penalty of perjury, I declare that I have read my

24 deposition and that it is true and correct subject to

25 any changes in form or substance entered here.

DATE: \_\_\_\_\_ SIGNATURE OF DEPONENT \_\_\_\_\_

Job #92076-A

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

CASE NO: 08-CV-80119-MARRA/JOHNSON

JANE DOE NO. 2,  
Plaintiff,

vs.

JEFFREY EPSTEIN,  
Defendant.

Related Cases:  
08-80232, 08-80380, 08-80381, 08-80994,  
08-80993, 08-80811, 08-80893, 09-80469,  
09-80591, 09-80656, 09-80802, 09-81092.

VIDEOTAPED DEPOSITION OF JEFFREY EDWARD EPSTEIN  
VOLUME II  
(Pages 190 - 335)

Monday, March 8, 2010  
301 Clematis Street  
Suite 3000  
West Palm Beach, Florida 33401  
10:05 a.m. - 6:17 p.m.

Reported By:  
Vicki L. Lima, Court Reporter  
Notary Public, State of Florida  
Universal Legal Reporting  
Phone - (954) 712-2600  
Job #92076-B

VOLUME II  
(Pages 190 - 335)

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West Palm Beach, Florida 33401

ALSO PRESENT:  
Alex Ayala, Videographer

(Beginning of Volume II.)

MR. PIKE: Form.

THE WITNESS: I'd like to answer every question that you posed here today, Mr. Horowitz, regarding any of your clients, and especially Miss Jane Doe 5's claims. However, my attorneys have advised me that at least today, I must assert my rights under the Sixth, Fourteenth and Fifth Amendment, or risk losing those rights or the -- and/or their representation.

BY MR. HOROWITZ:

Q Did you tell Jane Doe 5 "to relax" and quote, just let it -- let it happen, end quote, when she resisted your sexual advances?

MR. PIKE: Form.

THE WITNESS: It would give me great pleasure to be able to answer Jane Doe 5's claims. However, my attorneys have advised me today, at least today, that I must assert my rights under the Sixth -- excuse me -- Fourteenth and Fifth Amendment. And, though I'd very much like to answer those questions, that question, and the other questions you've posed here today, I am going to have to assert those rights and respectfully decline.

BY MR. HOROWITZ:

1 Q Did you instruct S.K. to take Jane Doe 5's  
2 telephone number so you can call Jane Doe 5 to come to  
3 your home for more sexual activity?

4 MR. PIKE: Form.

5 THE WITNESS: I'd like to answer each one of  
6 your questions, these claims made by Jane Doe 5.  
7 However, today at least, my attorneys have advised  
8 me that I may not answer any questions that may be  
9 relevant to any of the lawsuits brought by you,  
10 your partner who's been suspended after he filed  
11 Miss Jane Doe 5's claim. He was suspended for  
12 improper behavior by the Florida Bar. I may not  
13 answer the questions of Mr. Edwards regarding his  
14 -- or his partner, Mr. Scott Rothstein, who was  
15 accused of the largest fraud by fabricating cases  
16 of a sexual nature of against people, me and  
17 others, in order to steal millions of dollars from  
18 unsuspecting people. So, although I would like to  
19 answer those questions, my attorneys have advised  
20 me that if I do so, I risk losing their  
21 representation and waiving my rights.

22 BY MR. HOROWITZ:

23 Q After Jane Doe 5 visited your home, did you  
24 instruct S.K. to call Jane Doe 5 on the telephone to  
25 arrange for her to come back for more sexual activity?

1 MR. PIKE: Form.

2 THE WITNESS: I'd like to answer each one of  
3 Miss Jane Doe 5's claims. I'd like to answer each  
4 one with specificity. However, my attorneys have  
5 advised me today, that I must assert my rights  
6 under the Fourteenth, Sixth and Fifth Amendment.  
7 And if I choose to answer, which is my preference,  
8 I risk losing their representation and waiving  
9 those specific rights.

10 BY MR. HOROWITZ:

11 Q Isn't it true, sir, that you sexually abused  
12 Jane Doe 5 when she was a child?

13 MR. PIKE: Form.

14 THE WITNESS: I'd very much like to answer that  
15 question, as I'd like to answer some of the others,  
16 that question in particular, it's been clear that  
17 your firm, your partner who's been suspended after  
18 filing such a claim of sexual abuse, Mr. Edwards'  
19 partner who's in jail for probably the rest of his  
20 life, probably the rest of his life for filing just  
21 those types of claims, sexual abuse claims, and  
22 sexual claims of -- claims of a sexual nature  
23 against people, me and others, to steal money, just  
24 -- it's about money from people in South Florida,  
25 so I'd like to answer those questions today.

1 However, my attorneys have counseled me that I may  
2 not. And if I choose to do so, contrary to their  
3 advice, I risk losing their representation and  
4 waiving those rights.

5 BY MR. HOROWITZ:

6 Q Okay. With respect to Jane Doe 5 and the  
7 questions that you have asserted your Fifth Amendment  
8 privilege, have you been asserting your Fifth Amendment  
9 privilege to protect your innocence, or to conceal your  
10 guilt?

11 MR. PIKE: Form.

12 THE WITNESS: That's a question obviously  
13 designed to try to embarrass me. It -- what -- I'd  
14 like to answer that question. However, my counsel  
15 has advised me that since your firm, your partner  
16 who was suspended for improper behavior since he  
17 filed this claim, Mr. Edwards' partner who sits in  
18 jail, the Supreme Court has said that people can  
19 claim the Fifth Amendment, and should claim the  
20 Fifth Amendment who are innocent. I respectfully  
21 decline to answer, based on my counsel's advice,  
22 because they've told me if I choose to answer, I  
23 may waive those rights, but I'd like to answer.

24 BY MR. HOROWITZ:

25 Q Sir, is there any reason you can think of as to

1 why the jury should not infer from your testimony today  
2 that you did, in fact, sexually abuse Jane Doe 5 when  
3 she was a child?

4 MR. PIKE: Form.

5 THE WITNESS: I believe the jury will be able  
6 to see what your firm, Mr. Edwards' firm, and what  
7 the newspapers have referred to as part of the  
8 largest fraud in South Florida's history by  
9 crafting cases of a sexual nature against people  
10 like me and others, simply to get money. His  
11 partner sits in jail. Your partner has been  
12 suspended. I'd rather -- the jury will make its  
13 own decision.

14 BY MR. HOROWITZ:

15 Q Great. The next individual I'd like to talk to  
16 you about is Jane Doe 6, and if you either write that  
17 down, or get that name in your head so that you remember  
18 it when I ask you some questions about her, I would  
19 appreciate it, okay --

20 THE WITNESS: Mr. Pike --

21 BY MR. HOROWITZ:

22 Q -- Jane Doe 6, okay?

23 MR. PIKE: Proceed.

24 BY MR. HOROWITZ:

25 Q All right. You don't deny that Jane Doe 6 came

1 to your home in Palm Beach County in August 2004, do  
2 you?

3 MR. PIKE: Form.

4 THE WITNESS: I would very much like to answer  
5 every claim made by your client, Jane Doe 6.

6 However, today, my attorneys have advised that I  
7 may not. I must assert my rights under the Sixth,  
8 Fourteenth and Fifth Amendment.

9 BY MR. HOROWITZ:

10 Q Now, Jane Doe 6 was only 13 years old when she  
11 came to your home; is that right?

12 MR. PIKE: Form.

13 THE WITNESS: Again, it would -- I would prefer  
14 to answer every single one of your client's -- Jane  
15 Doe 6's claims regarding this case, your claim  
16 against me. However, my attorneys have advised me  
17 I may not do so today. I must assert my rights  
18 under the Fourteenth, Fifth, and Sixth Amendment.  
19 Though I would like to answer each one of your  
20 questions, Mr. Horowitz, today, I must respectfully  
21 decline to do so.

22 BY MR. HOROWITZ:

23 Q Mr. Epstein, you paid for a taxi to bring  
24 13-year-old Jane Doe 6 to your home in 2004; isn't that  
25 right?

1 today have told me I may not, and must assert my  
2 rights, or waive -- potentially waive them, or risk  
3 losing their representation --

4 BY MR. HOROWITZ:

5 Q Okay.

6 A -- so, unfortunately, I must respectfully  
7 decline to answer that question.

8 Q Did you instruct S.K. to communicate by  
9 telephone with E.W. For the purpose of arranging for  
10 underage girls to come to your home to give you a  
11 massage?

12 MR. PIKE: Form.

13 THE WITNESS: I'd like to answer each one of  
14 your claims here today with specificity. E.W.  
15 represented by Mr. Edwards sitting next to you,  
16 represented by the man who's currently sitting in  
17 jail for the perpetrating of the largest fraud in  
18 Florida's history, for creating fictitious,  
19 malicious cases of a sexual nature against wealthy  
20 people in order to steal money, steal money. The  
21 U.S. Attorney called E.W.'s attorneys a criminal  
22 enterprise. So, though I'd like to answer that  
23 question, as all your other questions here today,  
24 my attorneys have instructed me I may not do so.

25 BY MR. HOROWITZ:

1 MR. PIKE: Form.

2 THE WITNESS: I'm sure, Mr. Horowitz, you're  
3 aware that I'd like to answer these questions with  
4 specificity. I'm sure you're aware that I would  
5 like to answer each one of these sexually charged  
6 questions, questions similar to the ones you've  
7 asked before. I have to respond in a similar way,  
8 which unfortunately, my counsel has advised me I  
9 must take their advice, which is to claim the  
10 Sixth, Fifth and Fourteenth Amendment Rights,  
11 because by not doing so, I may waive those rights,  
12 or risk losing their representation.

13 BY MR. HOROWITZ:

14 Q In 2004 did you receive a phone call from a  
15 girl named E.W. in which she told she was bringing Jane  
16 Doe 6 to your home for a massage?

17 MR. PIKE: Form.

18 THE WITNESS: E.W.? I believe E.W. is  
19 represented by the man sitting next to you,  
20 Mr. Edwards, though Mr. Edwards' partner, the one  
21 who's in jail for bringing cases of a sexual  
22 nature, sexually charged nature against people like  
23 me and others, so, though I'd like to answer all  
24 your questions regarding E.W., and like Miss Jane  
25 Doe 6 and her -- and their claims, my attorneys

1 Q Mr. Epstein, you paid E.W. to bring underage  
2 girls to your home so you could engage in sexual  
3 activity with these girls; isn't that right?

4 MR. PIKE: Form.

5 THE WITNESS: Again, E.W. represented by  
6 Mr. Edwards' firm, and former -- her former  
7 attorney, Mr. Scott Rothstein, sits in a county  
8 jail probably for the rest -- well, at least a  
9 federal jail for the rest of his life for  
10 fabricating cases of a sexual nature against  
11 wealthy people in South Florida in order to steal  
12 money from unsuspecting investors. It would give  
13 me pleasure to be answer -- to be able to answer  
14 your questions today with specificity. However, my  
15 attorneys have counseled me that at least today, I  
16 may not do so -- excuse me -- without waiving my  
17 rights and risking their representation -- risk  
18 losing their representation.

19 BY MR. HOROWITZ:

20 Q Mr. Epstein, in 2004 did you instruct S.K. to  
21 make contact with E.W. by telephone so that arrangements  
22 could be made for Jane Doe 6 to come to your home for  
23 your sexual gratification?

24 MR. PIKE: Form.

25 THE WITNESS: Okay. I would like to answer the

1 claims of Jane Doe 6. I would very much like to  
 2 answer the claims of your -- Mr. Edwards' E.W. It  
 3 would be nicer if Mr. -- or I would appreciate it  
 4 -- unfortunately -- but Mr. Edwards's partner who  
 5 represented E.W. along with him is in jail for  
 6 misrepresenting -- or the U.S. Attorney has called  
 7 his firm a criminal enterprise, the one  
 8 representing -- previously representing E.W. You  
 9 represent Jane Doe 6. I'd like to answer her  
 10 claims, but today my attorneys have counseled me  
 11 that I must respectfully decline and assert my  
 12 rights under the Fourteenth, Sixth and Fifth  
 13 Amendment.

14 BY MR. HOROWITZ:

15 Q Did you inform S.K. that the massage that Jane  
 16 Doe 6 was to give you would be sexual in nature?

17 MR. PIKE: Form.

18 THE WITNESS: Unfortunately, I am going to have  
 19 to respond to that question the way I've responded  
 20 to most of your questions and claims here today  
 21 regarding Jane Doe 6 and some of your other clients  
 22 that you filed suits for, post filing the suit your  
 23 partner was suspended by the Florida Bar, post  
 24 filing the suit Mr. Edwards' partner finds himself  
 25 in jail.

1 Doe 6's claim, which I would like to answer, but today,  
 2 under advice of counsel, they have instructed me that I  
 3 may not, and I should claim my Sixth Amendment,  
 4 Fourteenth Amendment and Fifth Amendment Right.

5 BY MR. HOROWITZ:

6 Q Did you confirm with S.K. that she did, in  
 7 fact, speak with E.W. by telephone to confirm a specific  
 8 time that Jane Doe 6 would be at your house?

9 MR. PIKE: Form.

10 THE WITNESS: I'd like to answer each and every  
 11 one of your questions, Mr. Horowitz, regarding the  
 12 claims of these -- of Jane Doe 6 and E.W. However,  
 13 today, on advice of counsel, I am going to have to  
 14 simply claim the Fifth, Sixth and Fourteenth  
 15 Amendment Right.

16 BY MR. HOROWITZ:

17 Q Was it your intent during the course of Jane  
 18 Doe 6's visit to your home that you would persuade,  
 19 induce or entice her to engage in sexual activity?

20 A I'd like to answer every question you've asked  
 21 me here today, every single question, especially with  
 22 respect to Jane Doe 6's claims. However, my attorneys  
 23 have instructed me that I must assert my rights under  
 24 the Sixth, Fourteenth and Fifth Amendment. Though these  
 25 claims of a sexual nature are not that surprising since

1 So, though I'd very much like to answer those  
 2 questions, my attorneys have counseled me today  
 3 that I cannot answer, at least today, any questions  
 4 relevant to these lawsuits. And if I decide or  
 5 choose to answer the questions, I risk losing their  
 6 representation and waiving those rights. Excuse  
 7 me, Adam, five?

8 THE WITNESS: Yeah, if you need it.

9 THE VIDEOGRAPHER: Time off the record 3:02.  
 10 (Thereupon, a short break was taken.)

11 BY MR. HOROWITZ:

12 Q Did you --

13 THE VIDEOGRAPHER: Time on the record 3:12.

14 BY MR. HOROWITZ:

15 Q Mr. Epstein, we're still talking about Jane Doe  
 16 6, okay?

17 A Yes.

18 Q Mr. Epstein, did you observe S.K. speaking with  
 19 E.W. by telephone and making arrangements for Jane Doe 6  
 20 to come to your home to give you a massage?

21 A I'd like to answer that question. I'd like to  
 22 answer all your questions here today. I believe Miss  
 23 E.W. is represented by Mr. Edwards, who's partner is in  
 24 jail for his wrongdoing, for creating cases of sexually  
 25 charged natures. You're asking me a question of Jane

1 Mr. Edwards and -- who he represents E.W., who's partner  
 2 sits in jail for perpetrating what the U.S. Attorney  
 3 called the largest fraud in South Florida's history,  
 4 stealing millions of dollars from unsuspecting local  
 5 investors. I'd very much like to answer each and every  
 6 one of your questions, but my attorney has told me that  
 7 if I choose to do so, I risk waiving my rights and risk  
 8 losing their representation.

9 MR. PIKE: I --

10 THE WITNESS: Sorry.

11 MR. PIKE: -- object to form to that question.

12 BY MR. HOROWITZ:

13 Q During the course of Jane Doe 6's visit to your  
 14 home, did you succeed in persuading, inducing or  
 15 enticing her to engage in sexual activity with you?

16 MR. PIKE: Form.

17 THE WITNESS: I would very much like to answer  
 18 every single question and claim of Jane Doe 6.  
 19 However, today, my attorneys have advised me that I  
 20 may not. I must assert my rights under the Sixth,  
 21 Fourteenth and Fifth Amendment. Now, I prefer to  
 22 answer. They've told me that if choose to do so, I  
 23 risk losing their representation and waiving those  
 24 rights.

25 BY MR. HOROWITZ:



1 Q All right. Did S.K. tell you that she spoke to  
2 anyone on the phone who arranged for Jane Doe 6 to come  
3 to your house?

4 MR. PIKE: Form.

5 THE WITNESS: Again? I'm sorry, Mr. Horowitz.

6 BY MR. HOROWITZ:

7 Q Did S.K. tell you she spoke to anyone on the  
8 phone -- on the phone to make arrangements for Jane Doe  
9 6 to come to your home?

10 MR. PIKE: Same objection.

11 THE WITNESS: I'd very much like to answer  
12 every question regarding these claims here today.  
13 However, my attorneys have advised me that at least  
14 today, I must assert my rights under the  
15 Fourteenth, Sixth and Fifth Amendment. And though  
16 I prefer to answer the question, if I choose to do  
17 so, I risk losing those rights and their  
18 representation.

19 BY MR. HOROWITZ:

20 Q Okay. You asked Jane Doe 6 how old she was  
21 when she came to your home; is that right?

22 MR. PIKE: Form.

23 THE WITNESS: Again, like the other questions  
24 you've asked me regarding your claims of Jane Doe  
25 6, I'd like to answer each one. However, today, my

1 BY MR. HOROWITZ:

2 Q Sir, when Jane Doe 6 came to your home in 2004  
3 when she was 13 years old, you didn't, in your own mind,  
4 believe her to be 18 years old or older, did you?

5 MR. PIKE: Form.

6 THE WITNESS: Repeat the question, please?

7 BY MR. HOROWITZ:

8 Q Sure. When you looked at Jane Doe 6 at age 13  
9 and she was in your home, you didn't believe her to be  
10 18 years old or older, did you?

11 THE WITNESS: I'd like to answer each one of  
12 your --

13 MR. PIKE: Same objection.

14 THE WITNESS: -- excuse me. I'd like to answer  
15 each one of your claims today. However, my  
16 attorneys have counseled me that I may not. They  
17 have instructed me to assert my rights under the  
18 Fourteenth, Sixth and Fifth Amendment.

19 Though I'd like to answer each one of those  
20 questions, I'd like to answer that question  
21 directly to your partner, Jeffrey Herman, that in  
22 fact brought this claim, but he has been suspended  
23 by the Florida Bar, or the claims directly to  
24 Mr. Edwards' partner who sits in jail for  
25 fabricating cases of a sexual nature against

1 attorneys have advised me that I may not. I must  
2 assert my rights under the Sixth, Fourteenth and  
3 Fifth Amendment. Though I prefer to answer that  
4 question, I prefer to answer that question directly  
5 to the -- your partner that brought this claim, but  
6 I guess he's been suspended or disbarred by the  
7 Florida Bar, or I'd like to answer it to  
8 Mr. Edwards' partner who sits in a jail for  
9 crafting, fabricating malicious claims simply to  
10 get money. I'd very -- as you probably recognize,  
11 I'd like to answer those questions today, but I --  
12 under the instructions of counsel, I must  
13 respectfully decline.

14 BY MR. HOROWITZ:

15 Q Sir, there was never a point in time when Jane  
16 Doe 6 told you that she was 18 years old or older; isn't  
17 that right?

18 MR. PIKE: Form.

19 THE WITNESS: Like all your other questions  
20 regarding Jane Doe 6 and her claims, I'd very much  
21 like to answer each and every one. However, today,  
22 my counsel has advised me that I may not, and must  
23 assert my rights under the Fourteenth, Fifth and  
24 Sixth Amendment. And if I choose to answer, I risk  
25 losing their counsel and waiving those rights.

1 wealthy people in South Florida.

2 I'd very much like to answer, but according to  
3 my counsel I may not answer those, or I may waive  
4 my rights or risk losing their representation.

5 BY MR. HOROWITZ:

6 Q During the course of Jane Doe 6's visit to your  
7 home in 2004, were you nude in her presence?

8 MR. PIKE: Form.

9 THE WITNESS: I'd very much would like to  
10 answer each and every question regarding Jane Doe  
11 6's claims. However, my attorneys have told me  
12 today that I may not. I must assert my rights  
13 under the Fourteenth, Sixth and Fifth Amendment.

14 Though I prefer to answer, I'm told that if I  
15 choose to do so, I risk losing their representation  
16 and waiving those rights.

17 BY MR. HOROWITZ:

18 Q During the course of Jane Doe 6's visit to your  
19 home in 2004, did you instruct Jane Doe 6 to remove her  
20 clothing?

21 MR. PIKE: Form.

22 THE WITNESS: I'd like to answer each and every  
23 one of your questions here today and the claims of  
24 Jane Doe 6. However, my attorneys have advised me,  
25 at least today, that I must assert my rights under

1 the Fourteenth, Sixth and Fifteenth -- and Fifth  
2 Amendments of the U.S. Constitution. Though I  
3 prefer to answer, they've instructed me that if I  
4 choose to do so, I risk waiving those rights and  
5 losing their representation.

6 BY MR. HOROWITZ:

7 Q During the course of Jane Doe 6's visit to your  
8 home in 2004, did you instruct Jane Doe 6 to pinch your  
9 nipples and rub your chest?

10 MR. PIKE: Form.

11 THE WITNESS: As I've answered most of your  
12 other questions here today, Mr. Horowitz, it would  
13 give me great pleasure to be able to answer these  
14 claims of Jane Doe 6. However, my attorneys have  
15 instructed me that I may not, and that I must  
16 assert my rights under the Fourteenth, Sixth and  
17 Fifth Amendment because they told me that if I do  
18 so, I risk losing their representation and waiving  
19 those rights.

20 BY MR. HOROWITZ:

21 Q During the course of Jane Doe 6's visit to your  
22 home in 2004, did you ask Jane Doe 6 about her sexual  
23 experience and preferences?

24 MR. PIKE: Form.

25 THE WITNESS: It would give me great pleasure

1 MR. PIKE: Form.

2 THE WITNESS: I'd very much like to answer each  
3 and every one of Jane Doe 6's claims. However, my  
4 attorneys today have instructed me that I may not  
5 answer today, and that I must assert my rights  
6 under the Sixth, Fourteenth and Fifth Amendment.  
7 Though I'd like to answer the question, they've  
8 instructed me that if I do, I risk losing their  
9 representation and waiving those rights.

10 BY MR. HOROWITZ:

11 Q In 2004 did you rub Jane Doe 6's vagina?

12 MR. PIKE: Form.

13 THE WITNESS: That question, like most of your  
14 other questions here today, I would prefer to  
15 answer. I'd like to answer. I'd like to answer  
16 directly to your partner who is no longer here  
17 because he's been suspended after he filed this  
18 claim, suspended by the Florida Bar for filing --  
19 not for filing, but after he filed the claim. I  
20 prefer to answer directly to Mr. Edwards' partner  
21 who sits in jail for the rest of his life, for the  
22 rest of his life, for filing and misleading --  
23 filing malicious claims, make -- fabricating claims  
24 against people like me and others in South Florida,  
25 stealing money -- millions of dollars from

1 to answer each one of your questions and Jane Doe  
2 6's claims. However, my attorneys have instructed  
3 me today that I may not, and that I must assert my  
4 rights under the Sixth -- excuse me -- Fifth and  
5 Fourteenth Amendment. Though I would prefer to  
6 choose to answer those questions, my attorneys have  
7 advised me that if I do so, I risk losing their  
8 representation and waiving those rights.

9 BY MR. HOROWITZ:

10 Q In 2004 did you touch Jane Doe 6's breasts?

11 MR. PIKE: Form.

12 THE WITNESS: Like many of your other questions  
13 here today, there be -- I'd very much prefer to  
14 answer that question, as your other questions with  
15 specificity. However, my counsel has advised me  
16 that I may not. I must assert my rights under the  
17 Fourteenth, Sixth and Fifth amendment. So though I  
18 choose -- would choose to answer that, my attorneys  
19 told me that if I do, I risk losing their  
20 representation and potentially waiving those  
21 rights.

22 BY MR. HOROWITZ:

23 Q Did you touch Jane Doe 6's breasts even after  
24 she made attempts to walk away from you during her visit  
25 in 2004?

1 investors. So I would like to answer each one of  
2 your questions with specificity. However, my  
3 attorneys have advised me today that I may not.

4 BY MR. HOROWITZ:

5 Q In 2004 -- in 2004 did you masturbate by  
6 stroking your penis in front of Jane Doe 6?

7 MR. PIKE: Form.

8 THE WITNESS: I'd like to answer each one of  
9 your questions regarding Jane Doe 6's claims.  
10 However, my attorneys have advised me that today I  
11 may not. And though your partner has been  
12 suspended after he filed this claim, Mr. Edwards'  
13 partner sits in jail, my attorneys have advised me  
14 still that I must assert my rights under the  
15 Fourteenth, Sixth and Fifth Amendment. And if I  
16 choose to answer, which is my preference, that I  
17 risk losing their representation and/or waiving  
18 those rights.

19 BY MR. HOROWITZ:

20 Q In 2004 did you ejaculate after stroking the  
21 shaft of your penis in front of Jane Doe 6?

22 MR. PIKE: Form.

23 THE WITNESS: I'd like to answer each one of  
24 Jane Doe 6's claims, and all the questions -- each  
25 and every question you've asked me here today. I'd

1 like to answer it directly to your partner.  
 2 However, he's been suspended by the Florida Bar  
 3 after he filed this claim. I'd like to answer it  
 4 directly to Mr. Edwards' partner who sits in jail  
 5 for fabricating cases of a sexual nature against  
 6 wealthy people in South Florida, in jail  
 7 potentially for the rest of his life. So though  
 8 I'd like to answer those questions, my attorneys  
 9 have counseled that I may not. I must assert those  
 10 rights or risk losing their representation and/or  
 11 waiving those rights.

12 BY MR. HOROWITZ:

13 Q In 2004 did you walk across the room naked and  
14 enter a shower in front of Jane Doe 6?

15 MR. PIKE: Form.

16 THE WITNESS: Again, as I've answered most of  
 17 your questions here today, it would give me great  
 18 pleasure, in fact, to answer the claims of Jane Doe  
 19 6. However, my attorneys have advised me that I  
 20 may not, and must assert my rights under the Sixth,  
 21 Fourteenth and Fifth Amendment. Though I prefer to  
 22 answer those questions, my attorneys have told me  
 23 that if I choose to do so, I risk losing their  
 24 representation. And I would prefer to tell your  
 25 partner directly who filed this claim, who's

1 as well as every other question you've asked me  
 2 here today, but I'm going to have to respond in a  
 3 similar manner to the other questions, which is  
 4 though I'd like to answer the question, my counsel  
 5 here has advised me that I may not, and must assert  
 6 the rights under the Sixth, Fourteenth and Fifth  
 7 Amendment; otherwise, risk losing their  
 8 representation and/or waiving those rights.

9 BY MR. HOROWITZ:

10 Q Did you ever ask Jane Doe 6 for permission to  
11 touch her breasts?

12 MR. PIKE: Form.

13 THE WITNESS: These claims of Jane Doe 6 would  
 14 give me great pleasure to answer, especially with  
 15 specificity with Jane Doe 6, your client. It's  
 16 unfortunate that your partner couldn't be here to  
 17 hear some of these responses since he's been  
 18 disbarred -- no, not disbarred -- you've corrected  
 19 me -- he's only been suspended by the Florida Bar  
 20 for improper behavior after he filed this case.

21 Mr. Edwards's partner sits in jail. Though I'd  
 22 like to answer -- as you might imagine, I'd like to  
 23 answer these questions. My counsel has advised me  
 24 that if I do so, I risk losing his representation.

25 BY MR. HOROWITZ:

1 subsequently suspended by the Florida Bar. I would  
 2 prefer to tell Mr. Edwards' partners, but he's in  
 3 jail with now -- I guess most of his other -- many  
 4 of his other partners are on their way for filing  
 5 malicious claims. So though I'd like to answer  
 6 that question, Mr. Horowitz, here today, I must  
 7 respectfully decline to do so.

8 BY MR. HOROWITZ:

9 Q Did you have sexual contact with Jane Doe 6 at  
10 your Palm Beach home in 2004?

11 MR. PIKE: Form.

12 THE WITNESS: I would like to answer each and  
 13 every claim of Jane Doe 6 and all your other  
 14 clients. It would be -- give me pleasure to be  
 15 able to answer those questions directly to your  
 16 partner, but he's been suspended after he filed  
 17 these claims. I must assert those rights, even  
 18 though I would prefer to answer the question, or  
 19 risk losing the representation of my counsel and  
 20 inadvertently waiving those rights.

21 BY MR. HOROWITZ:

22 Q Did you pay \$200 to Jane Doe 6 after having had  
23 sexual activity with her?

24 MR. PIKE: Form.

25 THE WITNESS: I'd like to answer that question,

1 Q Isn't it true, sir, that Jane Doe 6 indicated  
 2 to you that she did not want you to touch her body?

3 MR. PIKE: Form.

4 THE WITNESS: It would give me great pleasure  
 5 to answer each question and claim of Jane Doe 6 and  
 6 your client. However -- excuse me -- however, my  
 7 counselors advised me today that I may not, and  
 8 must assert my rights under Sixth, Fourteenth and  
 9 Fifth Amendment.

10 BY MR. HOROWITZ:

11 Q Isn't it true, sir, that you touched Jane Doe  
12 6's breasts after she indicated to you that you did not  
13 -- that she not want you to touch her?

14 MR. PIKE: Form.

15 MR. HOROWITZ: I am going to clean up that  
 16 question. I probably didn't ask it right.

17 BY MR. HOROWITZ:

18 Q Isn't it true, sir, that you touched Jane Doe  
19 6's breast after she indicated she did not want you to  
20 touch her?

21 MR. PIKE: Form.

22 THE WITNESS: I'd like to answer that question,  
 23 like every other question you've asked me here  
 24 today, mostly every question. It's unfortunate I  
 25 can't make that answer directly to your partner who

1 was suspended by the Florida Bar, or Mr. Edwards'  
2 partner who sits in jail. But though I'd like to  
3 answer those questions, my counsel has advised me I  
4 must assert my rights under the Sixth, Fourteenth  
5 and Fifth amendment. So though I'd like to answer,  
6 it would be my preference to answer. He's told me  
7 that if I do so, I risk losing his representation  
8 and/or waiving those rights.

9 BY MR. HOROWITZ:

10 Q Mr. Epstein, did you try to persuade 13-year-  
11 old Jane Doe 6 that it was okay for you to touch her  
12 breast and masturbate by stroking your penis in front of  
13 her?

14 MR. PIKE: Form.

15 THE WITNESS: Mr. Horowitz, it would give me  
16 great pleasure to answer every one of Jane Doe 6's  
17 claims, every one. However, my counsel has advised  
18 me I may not do so today, and that I must assert  
19 those rights. I would much prefer to answer it to  
20 your partner who filed this claim, Mr. Jeffrey  
21 Herman, but he's been suspended by the Florida Bar  
22 after he filed this claim for improper behavior, or  
23 Mr. Edwards' partner who sits in jail after he  
24 filed their claims. So though I'd prefer -- I  
25 would like to answer, my counsel has advised me

1 prostitute, and an admitted prostitute of  
2 Mr. Edwards' who sits there while his partner stays  
3 in jail -- yes, he finds it, I guess, very funny.  
4 I don't find it that funny.

5 Well, I'd like to answer each one of the  
6 questions about Miss E.W. and Miss Jane Doe 6.  
7 However, my attorneys have told me today that I may  
8 not, and that I must assert my rights under the  
9 Sixth, Fourteenth and Fifth Amendment. So, though  
10 I'd like to answer all the questions regarding ways  
11 that these girls are trying to get money, be it  
12 from me, or from Mr. Rothstein's other victims, I  
13 must assert those rights, or, in fact, according to  
14 my counsel, lose -- risk losing his representation  
15 and waiving those rights.

16 MR. PIKE: All right. Now, that -- now, that  
17 Mr. Epstein is done answering that particular  
18 question and responding, do we -- do we need a  
19 break, because I'm -- I'm not comfortable with the  
20 way in which the laughing is going forward and  
21 things of that sort?

22 MR. EDWARDS: Okay. Well, I -- I found that  
23 answer pretty funny, and I want to make sure that I  
24 understand the answer so that I know if I have to  
25 take any legal action whatsoever. What I

1 that if I choose to do so, I risk losing his  
2 representation and/or waiving those rights.

3 BY MR. HOROWITZ:

4 Q Okay. Sir, you don't deny that you sexually  
5 abused Jane Doe 6 when she was a child, do you?

6 MR. PIKE: Form.

7 THE WITNESS: The question about sexually  
8 abusing, which was in fact one of the cases that  
9 Mr. Rothstein's -- I mean, Scott Rothstein's --  
10 Mr. Edwards sits there -- Mr. Rothstein sits in  
11 jail for his accusing people of sexual harassment,  
12 sexual abuse, and in order to steal money from  
13 local Florida investors. I'd like to answer every  
14 question about Jane Doe 6's claim of sexual abuse.  
15 However, my counsel today has informed me that I --  
16 I may not answer today. And though as you might  
17 guess, I'd like to answer those questions, he's  
18 informed me if I choose to do so, I risk losing his  
19 representation and/or waiving those rights.

20 BY MR. HOROWITZ:

21 Q Sir, did you pay E.W. for bringing Jane Doe 6  
22 to your home in 2004?

23 MR. PIKE: Form.

24 THE WITNESS: I -- if E.W. -- so I'm clear, I  
25 believe E.W. has filed a claim as an admitted

1 understand the answer to be was that Mr. Epstein is  
2 making the accusation now that E.W. is my  
3 prostitute. That's --

4 THE WITNESS: Oh, no, that's not correct.

5 MR. EDWARDS: -- that's what I heard, right?  
6 That's what everybody in the room heard.

7 MS. EZELL: That's -- that's -- that's what I  
8 heard.

9 MR. PIKE: Okay. First of all --

10 MR. HOROWITZ: That's what I heard.

11 MR. EDWARDS: That is not true.

12 MR. PIKE: -- I'll tell you what, we're going  
13 to take a break -- we're going to take a break  
14 now. That is not the way that I interpreted the  
15 response. The response was that she made a --  
16 she's an admitted prostitute, and that she was a  
17 client of yours. If we're going to be playing  
18 games with semantics, then we will do that at  
19 another date by motion practice, but we're not  
20 going to -- this is not the form in which to do  
21 this, laughing, playing games with words.  
22 Everybody in this room knew exactly what the  
23 response was. And remember something, this is --

24 MR. EDWARDS: Right, it is --

25 MR. PIKE: Remember something, this is a case,

1 and you represent someone, and as a result, no  
 2 matter which way you interpret some response, there  
 3 are various privileges that attach to litigation.  
 4 If you want to threaten legal action here in  
 5 this form, then you can go ahead and do so on  
 6 record. So is that what you were doing?  
 7 MR. EDWARDS: Well --  
 8 MR. PIKE: Were you threatening -- were you  
 9 threatening -- I want to be clear --  
 10 MR. EDWARDS: If --  
 11 MR. PIKE: -- in this deposition right now,  
 12 were --  
 13 MR. EDWARDS: Oh, I'll be very clear.  
 14 MR. PIKE: -- were with threatening Mr. Epstein  
 15 with legal action?  
 16 MR. EDWARDS: If the accusation is that E.W. is  
 17 a prostitute of mine, then I want to know that that  
 18 is the -- the allegation, and that is clearly his  
 19 position, so that if legal action is to be taken,  
 20 it can be, but I was giving him a chance to clarify  
 21 that or correct that, if that was not the correct  
 22 interpretation, but that's what everybody in the  
 23 room heard. That's what's going to be very clear  
 24 on the record. Ms. Ezell is nodding her head.  
 25 Everybody heard --

1 -- if I misspoke, I apologize. Your client is an  
 2 admitted prostitute, and that's what I meant to  
 3 say.  
 4 MR. HOROWITZ: Okay. Move to strike. Okay. I  
 5 --  
 6 MR. PIKE: Wait, wait. Hold on one second.  
 7 MR. HOROWITZ: -- I know you want to take a  
 8 break, but --  
 9 MR. PIKE: No, I -- I -- I don't want to take a  
 10 -- you just moved to strike something that we just  
 11 spent seven minutes going back and forth with  
 12 pursuant to Mr. Edwards' request. Do you want to  
 13 withdraw that?  
 14 MR. HOROWITZ: No. But if you want to -- no.  
 15 MR. PIKE: Okay. All right. Next question.  
 16 BY MR. HOROWITZ:  
 17 Q Mr. Epstein, we've been -- we've been talking  
 18 about Jane Doe 6 a bit, and you've mentioned names like  
 19 Jeffrey Herman and Scott Rothstein. Are you suggesting  
 20 that in any way her allegations of sexual abuse were  
 21 fabricated or embellished by virtue of her attorney or  
 22 -- or somehow through Mr. Rothstein's dealings?  
 23 MR. PIKE: Form.  
 24 THE WITNESS: It's been validly reported that  
 25 Mr. Rothstein crafted, fabricated malicious

1 MR. PIKE: Listen --  
 2 MR. EDWARDS: -- that statement or sentence.  
 3 MR. PIKE: -- this --  
 4 MR. HOROWITZ: Can we -- can we move on?  
 5 MR. PIKE: No, we can't. Once again --  
 6 MR. HOROWITZ: It's not your deposition.  
 7 THE REPORTER: Wait a second.  
 8 MR. PIKE: Once again, this is not --  
 9 MR. EDWARDS: Let's read it back.  
 10 MR. PIKE: No, we're not going to reread it.  
 11 We're not going to go back and reread it.  
 12 Mr. Epstein not only answered the question, but  
 13 then he also corrected you and said that was not  
 14 the appropriate response.  
 15 MR. HOROWITZ: Okay.  
 16 MR. PIKE: Now, if you would --  
 17 MR. HOROWITZ: That's fine.  
 18 MR. PIKE: Now, if you would, you can rephrase  
 19 your response briefly to --  
 20 THE WITNESS: Mr. Edwards represents an  
 21 admitted prostitute, E.W. These claims are made by  
 22 admitted prostitutes. They filed claims under a  
 23 section of the Florida's law of admitted  
 24 prostitutes. So the claims here that -- it was his  
 25 client as opposed to his prostitute, and I -- if I

1 lawsuits of a sexual nature in order to steal  
 2 millions of dollars from local Florida investors.  
 3 With respect to any question with -- that may be  
 4 relevant to this lawsuit. However, my attorneys  
 5 have advised me today that I must respond by taking  
 6 the Sixth, Fourteenth and Fifth Amendment.  
 7 Though I choose to -- I would prefer to answer  
 8 the questions, Mr. Horowitz, that you've asked me  
 9 regarding your claims -- your client's claims, my  
 10 attorneys have told me that if I choose to do so, I  
 11 risk losing their representation and waiving those  
 12 rights.  
 13 BY MR. HOROWITZ:  
 14 Q All right. Are -- I want to be clear about  
 15 this one. Are you --  
 16 A Okay.  
 17 Q -- suggesting that Miss Jane Doe 6 in any way  
 18 fabricated or embellished her claim after retaining an  
 19 attorney?  
 20 MR. PIKE: Form, asked and answered.  
 21 THE WITNESS: The partner of -- your partner  
 22 has been suspended from the practice of -- Florida  
 23 Bar practice after he filed Jane Doe 6's claim.  
 24 Mr. Edwards' partner, Scott Rothstein, sits in  
 25 jail probably for the rest of his life for

1 fabricating malicious claims of a sexual nature  
2 against wealthy people in South Florida.

3 I'd like to answer your questions with more  
4 specificity. However, my attorneys have counseled  
5 me that I may not today; I must assert my rights  
6 under the Fourteenth, Sixth, Fifth Amendment. And  
7 I -- though I choose -- prefer to answer those  
8 questions, Mr. Horowitz, my attorney said that if I  
9 choose to do so, I risk losing their representation  
10 and waiving those rights.

11 BY MR. HOROWITZ:

12 Q Given that you have asserted your Fifth  
13 Amendment privilege, is there any reason a jury should  
14 not infer from your testimony that you did in fact  
15 sexually abuse Jane Doe 6 when she was just a 13-year-  
16 old girl?

17 MR. PIKE: Form.

18 THE WITNESS: The Fifth Amendment, of my  
19 understanding, is to be used as well to protect  
20 innocent people from claims, from malicious claims,  
21 from malicious false claims, including those made  
22 by Mr. Edwards' partner, Scott Rothstein, who sits  
23 in jail at the moment probably for the rest of his  
24 life for crafting these malicious false claims.  
25 The U.S Attorney called his firm one of the largest

1 privilege as anything but the rights of an  
2 American, to assert rights under the Constitution,  
3 I find disturbing. I find it disturbing that your  
4 partner who's been suspended, the claims of your  
5 clients, Mr. Edwards' client -- whose partner and  
6 his law firm -- his partner in jail and his law  
7 firm that's been called by the U.S. Attorney as the  
8 largest criminal enterprise, or the largest fraud  
9 in South Florida's history. I -- I find it  
10 disturbing that you'd question the reasons I would  
11 assert my Constitutional rights.

12 BY MR. HOROWITZ:

13 Q Okay. And you're -- but you're -- you're  
14 refusing to tell us why you're asserting the Fifth  
15 Amendment; is that right?

16 A I've answered your question.

17 MR. PIKE: It's attorney-client work product.

18 MR. HOROWITZ: How much time left on the tape?

19 THE VIDEOGRAPHER: Nine minutes on this tape.

20 MR. HOROWITZ: Nine minutes. Do you want to  
21 change tapes?

22 MR. PIKE: Yes.

23 MR. HOROWITZ: Let's change tapes because --

24 THE VIDEOGRAPHER: Time off the record 3:41.

25 MR. HOROWITZ: Great.

1 criminal enterprises in South Florida's history. I  
2 will be -- my -- I would prefer to answer your  
3 questions with specificity, but my counsel today  
4 has told me that I may not, and I must -- excuse me  
5 -- assert my rights under the Sixth, Fourteenth and  
6 Fifth Amendment. Though I prefer to answer those  
7 questions, he's advised me that if I choose to do  
8 so, I risk losing those rights and losing his  
9 representation.

10 BY MR. HOROWITZ:

11 Q In this case are you asserting the Fifth  
12 Amendment in order to protect your innocence or to  
13 conceal your guilt?

14 MR. PIKE: I am going to instruct him not to  
15 answer that question. It's attorney-client work  
16 product.

17 BY MR. HOROWITZ:

18 Q Isn't it true, sir, that you're asserting the  
19 Fifth Amendment privilege here to conceal your own  
20 wrongdoing?

21 MR. PIKE: Same objection.

22 THE WITNESS: May I answer?

23 MR. PIKE: This one, yeah.

24 THE WITNESS: I think -- I -- Mr. Horowitz, to  
25 assume simply that I'm asserting my Fifth Amendment

1 (Thereupon, a short break was taken.)

2 THE VIDEOGRAPHER: Time on the record 3:47.

3 This is Tape 5.

4 BY MR. HOROWITZ:

5 Q Mr. Epstein, my next series of questions  
6 involves a -- one of our clients by the name of Jane Doe  
7 7. You may know her as Jane Doe 7 as well. So if you  
8 can either write that name down or keep it in your mind  
9 so we're on the same page as to who -- who we're talking  
10 about, I would appreciate it, okay?

11 A (Witness complying).

12 Q Isn't it true that a girl named Jane Doe 7 came  
13 to your home on multiple occasions between 2003 and May  
14 of 2005?

15 MR. PIKE: Form.

16 THE WITNESS: I'd like to answer your -- those  
17 questions -- excuse me -- Mr. Horowitz, but today  
18 my attorney has counseled me that I must assert my  
19 Sixth Amendment, Fourteenth Amendment and Fifth  
20 Amendment Right.

21 BY MR. HOROWITZ:

22 Q Prior to May of 2005 did you receive a phone  
23 call from a girl named H.R. advising you that she was  
24 bringing Jane Doe 7 to your home to give you a massage?

25 MR. PIKE: Form.

1 THE WITNESS: I'd like to answer every one of  
2 the claims of your clients today. However, my  
3 attorneys have counseled me that today at least,  
4 that I must simply assert my Fifth, Sixth and  
5 Fourteenth Amendment Right.

6 BY MR. HOROWITZ:

7 Q At any time prior to 2005 did you instruct S.K.  
8 -- strike that.

9 At any time prior to 2005 did you instruct S.K.  
10 to communicate with H.R. by telephone to arrange for  
11 Jane Doe 7 to come to your home for a massage in which  
12 you would pay her money?

13 MR. PIKE: Form.

14 THE WITNESS: I would very much like to answer  
15 each and every question you've asked me here today,  
16 but like many of your other questions, I am going  
17 to have to assert my Fourteenth -- excuse me --  
18 Fourteenth, Fifth and Sixth Amendment Rights as  
19 advised by my counsel. Though I choose and prefer  
20 to answer that question, my attorney said that if I  
21 do so, I risk losing their counsel and waiving  
22 those rights.

23 BY MR. HOROWITZ:

24 Q Did you inform S.K. that the massage Jane Doe 7  
25 was to give you would be sexual in nature?

1 BY MR. HOROWITZ:

2 Q At any time prior to May 2005 did you confirm  
3 with S.K. that she had spoken to Jane Doe 7 by telephone  
4 and that Jane Doe 7 would be coming to your home to give  
5 you a massage?

6 MR. PIKE: Form.

7 THE WITNESS: I'd very much like to answer  
8 every one of Jane Doe 7's claims with specificity,  
9 but unfortunately, like many of your other  
10 questions today, Mr. Horowitz, my attorneys have  
11 counseled me that I may not answer any questions  
12 that may be relevant to a lawsuit, or any of your  
13 lawsuits.

14 Unfortunately, your partner after he filed this  
15 lawsuit was suspended by the Florida Bar, so he's  
16 not here. Mr. Edwards's partner, who sits in jail,  
17 is not here. So these claims of a sexual nature  
18 would give me great pleasure to be able to answer  
19 with specificity, but I'm told that if I choose to  
20 do so today, my -- I risk losing the representation  
21 of my counsel and waiving my rights.

22 BY MR. HOROWITZ:

23 Q Was it your intent during the course of Jane  
24 Doe 7's visit to your home, that you would either  
25 persuade, induce or entice her to engage in sexual

1 MR. PIKE: Form.

2 THE WITNESS: I'm sure the claims of sexual --  
3 the claims -- the sexual claims made by your  
4 client, Jane Doe 7, that would give me great  
5 pleasure to answer with specificity. However,  
6 today, I may -- I cannot do so on advice of my  
7 counsel who's instructed me to assert my Fifth,  
8 Sixth and Fourteenth Amendment Right. He told me  
9 that if I choose to answer those questions, which  
10 is my preference, that I would risk losing his  
11 representation and waiving those rights.

12 BY MR. HOROWITZ:

13 Q Did you observe S.K. speaking with H.R. by  
14 telephone while making arrangements for Jane Doe 7 to  
15 come to your home for a massage?

16 MR. PIKE: Form.

17 THE WITNESS: I would very much like to answer  
18 each and every one of your questions today  
19 especially with respect to Jane Doe 7 and her  
20 claims. However, today, on advise of my counsel,  
21 they've asked me to assert my Fourteenth, Sixth and  
22 Fifth Amendment Rights. So, though I'd prefer to  
23 answer those questions, I'm told that if I choose  
24 to do so, I risk losing their representation and  
25 waiving those rights.

1 activity with you?

2 MR. PIKE: Form.

3 THE WITNESS: I'd very much like to answer  
4 every one of Jane Doe 7's claims with respect to  
5 any sexual nature of any of her claims. However,  
6 my attorneys have counseled me that today at least,  
7 I may not, and must assert my rights under the  
8 Fifth, Fourteenth and Sixth Amendment. And though  
9 I'd prefer to answer those questions, they've told  
10 me that if I choose to do so, I risk losing those  
11 rights and their representation.

12 BY MR. HOROWITZ:

13 Q During the course of Jane Doe 7's visits to  
14 your home, did you succeed in persuading, inducing or  
15 enticing her to engage in sexual activity with you?

16 MR. PIKE: Form.

17 THE WITNESS: Mr. Horowitz, I'd like to answer  
18 each and every one of your questions posed here  
19 today, but like most of the other questions, I am  
20 going to have to answer the same way because my  
21 attorneys have counseled me that I must assert my  
22 Fifth, Sixth and Fourteenth Amendment Rights.  
23 Though I prefer to answer those questions, and I'd  
24 be -- much prefer the fact to answer it to your  
25 partner who filed this claim against me, but he's

1 been suspended since filing a claim by the Florida  
2 bar.

3 I would also like to speak directly to  
4 Mr. Edwards' partner, but he's in jail for  
5 falsifying claims of a sexual nature against  
6 wealthy people, stealing investors' monies and from  
7 people in South Florida, and Mr. Edwards' firm  
8 being accused by the U.S. Attorney of being a  
9 criminal enterprise, and perpetrating one of the  
10 largest frauds in South Florida histories by just  
11 these types of cases.

12 BY MR. HOROWITZ:

13 Q Mr. Epstein, you asked Jane Doe 7 how old she  
14 was in 2003; isn't that right?

15 MR. PIKE: Form.

16 THE WITNESS: I would like to answer each and  
17 every one of your questions, Mr. Horowitz.  
18 However, today, my attorneys have counseled me that  
19 I may not answer any questions that may be relevant  
20 to any of your lawsuits, so I must assert my Fifth,  
21 Sixth and Fourteenth Amendment Rights. And though  
22 I would prefer to answer those questions, each  
23 question, my attorneys have told me that if I  
24 choose to do so, I risk losing their representation  
25 and waiving those rights.

1 BY MR. HOROWITZ:

2 Q Jane Doe 7 told you she was in school at Royal  
3 Palm Beach High School; isn't that true?

4 MR. PIKE: Form.

5 THE WITNESS: As most of your other questions  
6 here today, Mr. Horowitz, I'd like to answer all of  
7 those questions, each question, especially with  
8 respect to Jane Doe 7. However, my attorneys have  
9 counseled me that at least today, I must assert my  
10 rights under the Sixth, Fifth and Fourteenth  
11 Amendment. Because though I prefer to answer the  
12 questions, they have told me that if I choose to do  
13 so, I risk losing their representation and/or  
14 waiving those rights.

15 BY MR. HOROWITZ:

16 Q Prior to May of 2005 were you ever nude in  
17 front of Jane Doe 7?

18 MR. PIKE: Form.

19 THE WITNESS: I'd like to answer each one of  
20 Jane Doe 7's claims, each one specifically.  
21 However, today, my attorneys have counseled me that  
22 I may not, and that I must assert my Fourteenth --  
23 my Fourteenth, Sixth and Fifth Amendment Rights as  
24 provided by the Constitution. They've told me that  
25 I choose to answer that question, which is my

1 BY MR. HOROWITZ:

2 Q Mr. Epstein, Jane Doe 7 never told you she was  
3 18 years old or older; isn't that true?

4 MR. PIKE: Form.

5 THE WITNESS: It would give me great pleasure  
6 to be able to answer every one of Jane Doe 7's  
7 claims here today. However, my attorneys have  
8 advised me that I must assert my Fourteenth, Sixth  
9 and Fifth Amendment Rights, because if I choose to  
10 answer those questions, I risk losing their  
11 representation and/or waiving those rights.

12 BY MR. HOROWITZ:

13 Q When Jane Doe 7 came to your home between 2003  
14 and May of 2005, she appeared to you -- to you to be  
15 younger than 18 years old; isn't that right?

16 MR. PIKE: Form.

17 THE WITNESS: I'd like to answer each and every  
18 one of your questions here today, Mr. Horowitz.  
19 However, my attorneys have counseled me that I may  
20 not; I must assert my Fifth Amendment, Fourteenth  
21 Amendment and Sixth Amendment Rights. And though  
22 I'd rather -- and I prefer to answer each one of  
23 Jane Doe 7's claims, my attorneys told me that if I  
24 choose to do so here today, I risk losing their  
25 representation and waiving those rights.

1 preference, I risk losing their representation  
2 and/or waiving those rights.

3 BY MR. HOROWITZ:

4 Q Prior to May of 2005 did you instruct Jane Doe  
5 7 to remove her clothing during your massage?

6 MR. PIKE: Form.

7 THE WITNESS: It would give me great pleasure  
8 to answer every one of Jane Doe 7's claims, each  
9 one, with specificity. However, today, my  
10 attorneys have counseled me that I may not, and  
11 they've instructed me that I must assert my Fifth  
12 Amendment, Fourteenth Amendment and Sixth Amendmen  
13 Rights under the U.S. Constitution. Though I'd  
14 like to answer the question, they told me that if I  
15 do so, I risk losing their representation and  
16 waiving those rights.

17 BY MR. HOROWITZ:

18 Q Prior to May of 2005 did you instruct Jane Doe  
19 7 to pinch your nipples and rub your chest?

20 MR. PIKE: Form.

21 THE WITNESS: I'd like to answer each one of  
22 Jane Doe 7's claims with specificity. However,  
23 today my attorneys have counseled me that I may  
24 not, and that I must assert my rights under the  
25 Fourteenth, Sixth and Fifth Amendment. Though I'd



1 prefer to answer the question, my attorneys have  
2 counseled me that if I choose to do so, I risk  
3 losing their representation and waiving those  
4 rights.

5 BY MR. HOROWITZ:

6 Q Did you prior to May 2005 ask Jane Doe 7  
7 questions about her sexual experience and preferences?

8 MR. PIKE: Form.

9 THE WITNESS: Mr. Horowitz, as you probably --  
10 probably know, I'd like -- I'd like to answer each  
11 one of your questions today, especially Jane Doe  
12 7's claims. However, my counsel has advised me  
13 that I must assert my rights under the Fourteenth,  
14 Fifth and Sixth Amendment. And though I would  
15 prefer to answer that question, he has counseled me  
16 that if I choose to do so, I risk losing his  
17 representation and waiving those rights.

18 BY MR. HOROWITZ:

19 Q Mr. Epstein, prior to May of 2005 did you touch  
20 Jane Doe 7's breasts?

21 MR. PIKE: Form.

22 THE WITNESS: Mr. Horowitz, I'd like to answer  
23 each one of your questions posed here today, but I  
24 am going to have to respond as I've done to most of  
25 your questions here today, the same exact way,

1 Q Prior to May 2005 did you touch Jane Doe 7's  
2 breasts, even after she made repeated attempts to stop  
3 you?

4 MR. PIKE: I apologize, form.

5 THE WITNESS: It would give me great pleasure  
6 to answer each and every one of Jane Doe 7's  
7 claims, each and every one. However, today, my  
8 counsel has advised that I may not. I must assert  
9 my rights under the Fourteenth, Sixth and Fifth  
10 Amendment. And though I prefer to answer, my  
11 counsel has told me that if I choose to do so, I  
12 risk losing his representation and/or waiving those  
13 rights.

14 BY MR. HOROWITZ:

15 Q Mr. Epstein, prior to May 2005 did you rub Jane  
16 Doe 7's vagina?

17 MR. PIKE: Form.

18 THE WITNESS: It would give me great pleasure  
19 to answer the questions and claims of Jane Doe 7,  
20 your questions. It would give me great pleasure to  
21 answer the questions of your partner, Jeffrey  
22 Herman, who filed Jane Doe 7's lawsuit before he  
23 was suspended by the Florida Bar. It would give me  
24 great pleasure to, in fact, answer the questions  
25 posed by Mr. Edwards' partner, Scott Rothstein, who

1 which is unfortunately my counsel has told me that  
2 I may not answer any questions that may be relevant  
3 to any one of the lawsuits filed by you or your  
4 partner that -- or your partner who was suspended  
5 from the -- by the Florida Bar, or Mr. Edwards' --  
6 Edwards' clients -- excuse me -- Mr. Edwards'  
7 partner, Scott Rothstein, who sits in jail. They  
8 said, "I'm sorry, you can't -- you have to assert  
9 your rights under the Fourteenth, Sixth and Fifth  
10 Amendment." And though I would choose to answer  
11 the question, I've been advised I risk losing their  
12 representation and/or waiving those rights.

13 BY MR. HOROWITZ:

14 Q Prior to May 2005 did you attempt to remove the  
15 bra off -- remove a bra off of Jane Doe 7?

16 MR. PIKE: Form.

17 THE WITNESS: I would very much like to respond  
18 to the claims made by Jane Doe 7 with specificity.  
19 However, today, my counsel has advised me that I  
20 must assert my rights under the Fourteenth, Sixth  
21 and Fifth Amendment. And though I'd prefer to  
22 answer those questions, I -- if I do so, I'm told  
23 that I risk losing their representation and/or  
24 waiving those rights.

25 BY MR. HOROWITZ:

1 sits in jail.

2 His other partner is on the way to jail for  
3 fabricating cases of a sexual nature against  
4 wealthy people. However, my attorneys have  
5 counseled me here today, I have to assert my  
6 Fourteenth, Sixth and Fifth Amendment Rights. And  
7 though I'd very much like to answer those  
8 questions, he's informed me that if I choose to do  
9 so, I risk losing his representation and/or waiving  
10 those rights.

11 BY MR. HOROWITZ:

12 Q Prior to May of 2005 did you rub Jane Doe 7's  
13 buttocks?

14 MR. PIKE: Form.

15 THE WITNESS: Again?

16 BY MR. HOROWITZ:

17 Q Prior to May of 2005 did you rub Jane Doe 7's  
18 buttocks?

19 MR. PIKE: Form.

20 THE WITNESS: It would give me great pleasure  
21 to be able to answer each one of Jane Doe 7's  
22 claims here today with specificity. However, my  
23 counsel has advised me that I must assert my  
24 Fourteenth, Sixth and Fifth Amendment Right, so I'm  
25 -- I'm going to respectfully refuse to answer.

1 BY MR. HOROWITZ:

2 Q Prior to May 2005 did you masturbate by  
3 stroking your penis in front of Jane Doe 7?

4 MR. PIKE: Form.

5 THE WITNESS: I'd like to answer each one of  
6 your sexually charged questions, Mr. Horowitz. I  
7 would -- I would -- it would give me pleasure to be  
8 able to respond directly to your other partner --  
9 at least in this question -- who's now been  
10 unfortunately suspended from practicing law in the  
11 State of Florida after he filed this claim, or the  
12 partner of Mr. Edwards who sits in jail for filing  
13 claims of a sexual nature against wealthy people in  
14 Florida in order to fleece unsuspecting South  
15 Floridians, his firm accused of filing and  
16 fabricating sexual cases, called by the U.S.  
17 Attorney a criminal enterprise. So, though I'd  
18 like to answer each one of your questions, my  
19 attorneys have said if I do so, I risk losing their  
20 representation and/or waiving those rights.

21 BY MR. HOROWITZ:

22 Q Prior to May of 2005 did you ejaculate after  
23 masturbating, stroking your penis in front of Jane Doe  
24 7?

25 MR. PIKE: Form.

1 questions about Jane Doe 7, okay?

2 A Thank you.

3 Q Prior to May 2005 did you walk across the room  
4 naked and enter a shower in front of Jane Doe 7?

5 MR. PIKE: Form.

6 THE WITNESS: I would greatly like to -- I  
7 would actually like to answer each one of your  
8 questions today, Mr. Horowitz, especially all the  
9 claims made by Jane Doe 7. However, at least  
10 today, my counsel has advised me that I must assert  
11 my rights under the Fifth, Sixth and Fourteenth  
12 Amendment. Though I prefer to answer the question,  
13 he's informed me that if I choose to do so, I risk  
14 losing his representation and/or waiving those  
15 rights.

16 BY MR. HOROWITZ:

17 Q Mr. Epstein, did you have sex -- sexual contact  
18 with Jane Doe 7 at your Palm Beach home on multiple  
19 occasions between 2003 and 2005?

20 MR. PIKE: Form.

21 THE WITNESS: Mr. Horowitz, these claims of a  
22 sexual nature I'd very much like to answer,  
23 especially with respect to Jane Doe 7. I'd like to  
24 answer those questions, if your partner was here  
25 who filed the claim, but he's been suspended by the

1 THE WITNESS: Again, your questions of a  
2 sexually charged nature in -- in order to either  
3 embarrass me -- I would greatly like to answer  
4 those questions. I'd like to answer it to your  
5 partner who has been disbarred -- sorry, not  
6 disbarred -- you've told me he's been suspended and  
7 not disbarred -- I keep getting it confused --  
8 after he filed this Jane Doe 7's claims, or similar  
9 claims filed by Mr. Edwards and his partner, Scott  
10 Rothstein, but his partner, Scott Rothstein, sits  
11 in jail. So, though I'd like to answer each one of  
12 these claims, my counsel has told me that at least  
13 today, at least today, I must assert my rights  
14 under the Fourteenth, Sixth and Fifth Amendment.  
15 And if I choose to answer, I risk losing his  
16 representation and/or waiving those rights. I'm  
17 going to need five minutes.

18 BY MR. HOROWITZ:

19 Q Prior -- do you need five minutes now?

20 THE WITNESS: Sure.

21 THE VIDEOGRAPHER: Time off the record 4:05  
22 (Thereupon, a short break was taken.)

23 THE VIDEOGRAPHER: Time on the record 4:14.

24 BY MR. HOROWITZ:

25 Q Mr. Epstein, I am going pick up with the

1 Florida Bar for improper behavior. I'd like to  
2 answer those questions to Mr. Edwards' partner, but  
3 he sits in jail for crafting cases -- and if I  
4 misspoke before, it's crafting cases where he told  
5 people that he had settled cases against me and  
6 others. Not filed cases, but crafted total  
7 fictitious cases of a sexual nature in order to  
8 convince and fleece people of thousands and  
9 millions of dollars in South Florida. So those I'd  
10 like -- though I'd like to answer these questions  
11 of a sexually charged nature, my counsel has  
12 advised me that today at least, I must assert my  
13 rights under the Sixth, Fifth and Fourteenth  
14 Amendment. And though I'd prefer to answer those  
15 questions, he has told me that if I choose to do so  
16 -- if I choose to so, I risk losing his  
17 representation and/or waiving those rights.

18 BY MR. HOROWITZ:

19 Q Did you pay \$200 to Jane Doe 7 after each  
20 occasion in which you had sexual contact with her --

21 MR. PIKE: Form.

22 BY MR. HOROWITZ:

23 Q -- between 2003 and 2000 -- and May 2005?

24 MR. PIKE: Form.

25 THE WITNESS: I'd like to answer that question,

1 as I'd like to answer each and every question  
2 regarding Jane Doe 7 and her claims. However, my  
3 counsel has advised me that at least today, I may  
4 not answer any questions relevant to this lawsuit  
5 or any other lawsuits, so that I must assert my  
6 rights under the Sixth, Fifth and Fourteenth  
7 Amendment. Though I'd prefer to answer, he's told  
8 me that if I choose to do so, I risk losing his  
9 representation and potentially waiving those  
10 rights.

11 BY MR. HOROWITZ:

12 Q Did you ask Jane Doe 7 for permission to touch  
13 either her breasts or vagina or both?

14 A Again, Mr. Horowitz, as I've answered most of  
15 your questions here today, I'd very much like to answer  
16 the claims of Jane Doe 7 and your firm and your partner,  
17 Jeffrey Herman, who was suspended by the Florida Bar  
18 after he filed these claims on behalf of Jane Doe 7.  
19 However, my counsel at least today has advised me that  
20 must assert my rights under the Fourteenth, Fifth and  
21 Sixth amendment. And though I prefer to answer those  
22 questions, he's told me that if I choose to do so, I  
23 risk losing his representation and/or waiving those  
24 rights.

25 MR. PIKE: Form to that question as well.

1 she indicated she did not want you to touch her?

2 MR. PIKE: Form.

3 THE WITNESS: Mr. Horowitz, I'd like to answer  
4 each one of Jane Doe 7's claims. However, today,  
5 my counsel has advised me that I must assert my  
6 rights under the Fourteenth, Sixth and Fifth  
7 Amendment. Though I'd prefer to answer these  
8 questions directly to your partner that was  
9 suspended or disbarred or -- I keep getting it  
10 confused -- since he filed these claims of Jane Doe  
11 7, or Mr. Edwards' partner who sits in jail for  
12 fabricating malicious claims of a sexual nature --  
13 I'm -- I'm -- I'm sorry, if you find this very  
14 funny. I don't. However, my attorneys have  
15 counseled me, I -- I must not answer that question  
16 today, and if I choose to do so, I risk losing his  
17 representation and/or waiving those rights.

18 BY MR. HOROWITZ:

19 Q When Jane Doe 7 was under the age of 18, did  
20 you try to persuade her that it was okay for you to  
21 touch her breasts and vagina and to masturbate in front  
22 of her?

23 MR. PIKE: Form.

24 THE WITNESS: Are you serious? Is -- can I  
25 hear that question again?

1 BY MR. HOROWITZ:

2 Q When Jane Doe 7 was still a minor, she  
3 indicated to you that she did not want you to touch her  
4 body; isn't that true?

5 MR. PIKE: Form.

6 THE WITNESS: It would give me -- I would like  
7 to answer those questions and claims of Jane Doe  
8 7. However, today, my attorneys have counseled me  
9 that I must assert my rights under the Sixth, Fifth  
10 and Fourteenth Amendment. Though I would prefer to  
11 give the answers directly to the -- your partner  
12 who filed this claim on behalf of Jane Doe 7, but  
13 the Florida Bar has suspended his license for  
14 improper behavior after he filed this claim. I'd  
15 prefer to give it to Mr. Edwards' partner, but he  
16 sits in jail, and his other partner is on the way  
17 to jail from -- for basically fabricating malicious  
18 claims of a sexual nature against people in South  
19 Florida. So, though I'd like to answer that  
20 question, I'd prefer to answer that question, I'm  
21 told that if I do so, I risk losing my counsel's  
22 representation and/or waiving those rights.

23 BY MR. HOROWITZ:

24 Q Isn't it true, sir, you touched Jane Doe 7's  
25 breasts and genitals when she was still a child after

1 BY MR. HOROWITZ:

2 Q Do you deny that when she was still a child --

3 A Can I -- I need to hear the question again,  
4 sorry.

5 Q Oh, I thought you said your hearing was okay.

6 MR. PIKE: Let's just go forward with the  
7 question --

8 BY MR. HOROWITZ:

9 Q When Jane Doe 7 was still --

10 MR. PIKE: -- and stop harassing the witness.

11 BY MR. HOROWITZ:

12 Q When --

13 MR. HOROWITZ: Harassing?

14 MR. PIKE: Yes.

15 MR. HOROWITZ: Is that what I'm doing, or is --  
16 -- or is harassing pinching --

17 MR. PIKE: Let's move to strike.

18 MR. HOROWITZ: -- the -- the --

19 MR. PIKE: All right. Let's just go.

20 MR. HOROWITZ: All right. I just want to know  
21 what's -- which is harassing.

22 BY MR. HOROWITZ:

23 Q Okay. When Jane Doe 7 was still a child, did  
24 you try to persuade her that it was okay for you to  
25 touch her vagina, breasts, and to masturbate?

1 MR. PIKE: Form.  
 2 THE WITNESS: I would very much like to answer  
 3 the claims of Jane Doe 7 and your firm, but your --  
 4 unfortunately your partner has -- is not here  
 5 because he's been suspended by the Florida Bar for  
 6 improper behavior. I'd prefer to answer that  
 7 question of a sexually charged nature to  
 8 Mr. Edwards' partner, who unfortunately couldn't be  
 9 here because he's in jail for potentially the rest  
 10 of his life for fabricating cases of a sexual  
 11 nature against people in South Florida, stealing  
 12 investors' monies, fleecing people out of millions  
 13 of dollars, creating sexually charged cases in  
 14 order to sort of fleece people. However, my  
 15 attorneys have told me that today I must assert my  
 16 rights under the Sixth, Fifth and fourteenth  
 17 Amendment. And if I choose to answer those  
 18 questions, which is my preference, I risk losing  
 19 his counsel and waiving those rights.  
 20 BY MR. HOROWITZ:  
 21 Q Did you pay H.R. to bring Jane Doe 7 to your  
 22 home for sexual activity?  
 23 MR. PIKE: Form.  
 24 THE WITNESS: I would very much like to answer  
 25 all questions regarding H.R. and Jane Doe 7's

1 BY MR. HOROWITZ:  
 2 Q Did you instruct S.K. to call Jane Doe 7 --  
 3 strike that.  
 4 Did you instruct S.K. to tell Jane Doe 7 to  
 5 mislead the police with regard to their investigation  
 6 into your criminal activity?  
 7 MR. PIKE: Form.  
 8 THE WITNESS: I'd like to answer every one of  
 9 your questions that you've posed here today  
 10 regarding Jane Doe 7 and her claims. However, my  
 11 attorneys have advised me at least today, I may not  
 12 do so, and I must assert my privileges under the  
 13 Sixth, Fifth and Fourteenth Amendment. Though I'd  
 14 prefer to answer those questions, I'm told that if  
 15 I choose to do so, I risk losing his representation  
 16 and potentially waiving those rights.  
 17 BY MR. HOROWITZ:  
 18 Q Mr. Epstein, is the telephone number  
 19 917-855-3363 a telephone number that S.K. used at your  
 20 expense in 2005?  
 21 MR. PIKE: Form.  
 22 THE WITNESS: I don't recall.  
 23 BY MR. HOROWITZ:  
 24 Q What telephone numbers did you use, or did you  
 25 pay to be used between 2001 and 2006?

1 claims regarding H.R. However, today, my counsel  
 2 has advised me that I must assert my rights under  
 3 the Fifth, Fourteenth and Sixth Amendment.  
 4 BY MR. HOROWITZ:  
 5 Q Did you instruct S.K. to write down Jane Doe  
 6 7's name and telephone number so that you could call  
 7 Jane Doe 7 to come to your home for more sexual  
 8 activity?  
 9 MR. PIKE: Form.  
 10 THE WITNESS: Again, these charges of a sexual  
 11 nature that you and your firm have lodged against  
 12 me, it would give me great pleasure to specifically  
 13 answer those questions with respect to Jane Doe 7's  
 14 claims. I would like to answer it directly to your  
 15 partner, Mr. Herman, who filed the claim, but he's  
 16 been suspended or disbarred by the Florida Bar.  
 17 I'd like to respond to these sexually charged  
 18 questions to Mr. Edwards' partner, Scott Rothstein,  
 19 but he's in jail for fabricating malicious cases of  
 20 a sexual nature against wealthy people in South  
 21 Florida. So, though I would like to answer these  
 22 questions, I have been informed by my attorneys  
 23 that I must assert my privileges. And if I choose  
 24 to answer, which is my preference, I risk losing  
 25 his representation and/or waiving my rights.

1 A I --  
 2 MR. PIKE: Form.  
 3 THE WITNESS: I don't recall.  
 4 BY MR. HOROWITZ:  
 5 Q Okay. Can you think of any telephone number  
 6 that you either used from your home, or paid someone  
 7 else to use between 2001 and 2006?  
 8 A I'd like to answer that question, but on advice  
 9 of counsel I am going to have to claim my privilege  
 10 under the Sixth, Fourteenth and Fifth Amendment.  
 11 Q Sir, you don't deny that you sexually abused  
 12 Jane Doe 7 when she was still a child, do you?  
 13 MR. PIKE: Form.  
 14 THE WITNESS: I'm sure these questions of a  
 15 sexually charged nature, Mr. Horowitz, are going to  
 16 be obvious to the jury. I'd like to answer each  
 17 one of the claims that you've made of sexual abuse.  
 18 I'd like to answer it to your partner, Mr. Jeffrey  
 19 Herman, but he can't be here because he's been  
 20 suspended or disbarred by the Florida Bar for  
 21 improper behavior after he filed these claims of  
 22 sexual abuse. I'd like to make -- respond to the  
 23 sexual abuse claims made by Mr. Edwards' partner,  
 24 Scott Rothstein, but he's in jail for the rest of  
 25 his life, and his other partner is on the way to

1 jail for fictitiously fabricating malicious claims  
2 of a sexual nature. So, though I'd like to answer  
3 those questions, my attorneys have counseled me  
4 that I may not today. And he's told me that if I  
5 do so, I risk losing his representation and/or  
6 waiving those rights.

7 BY MR. HOROWITZ:

8 Q Isn't it true, sir, that you are asserting the  
9 Fifth Amendment privilege with regard to my questions  
10 about Jane Doe 7 because you did, in fact, sexually  
11 abuse Jane Doe 7 when she was a child?

12 MR. PIKE: Form.

13 THE WITNESS: The polar trick of asking someone  
14 why they're asserting their Fifth Amendment Right,  
15 I'm -- I'm -- I'm surprised, Mr. Horowitz. The  
16 Supreme Court has made it very clear that the Fifth  
17 Amendment is a right of every American who --  
18 innocent American to use to protect themselves from  
19 people making malicious false claims, similar to  
20 the one that the U.S. Attorneys have put  
21 Mr. Edwards' partner in jail for, for the rest --  
22 potentially the rest of his life for making  
23 malicious claims against innocent people, making  
24 fictitious claims. Your partner has been suspended  
25 since filing this claim of a sexual nature. So,

1 losing his representation and waiving those rights.

2 BY MR. HOROWITZ:

3 Q Mr. Epstein, is there any reason why the jury  
4 should not infer from your testimony today that, in  
5 fact, you did sexually abuse Jane Doe 7?

6 MR. PIKE: Form.

7 THE WITNESS: Again, these questions of a  
8 sexually charged nature regarding my right to take  
9 the Fifth Amendment under the advise of counsel, I  
10 find disturbing. Not -- not so much disturbing  
11 than your partner who's been disbarred or suspended  
12 by the Florida Bar since he filed the claim here by  
13 these girls, or Mr. Edwards' partner who sits in  
14 jail potentially for the rest of his life, with his  
15 other partners on the way to jail for fictitious,  
16 malicious claims of a sexual nature. I'd like to  
17 answer your questions with great specificity,  
18 Mr. Horowitz, but my counsel has advised me that at  
19 least today, I may not. And if I do so, which is  
20 my preference, I risk losing their representation  
21 and/or waiving those rights.

22 BY MR. HOROWITZ:

23 Q Mr. Epstein, you're not suggesting that Jane  
24 Doe 7 fabricated or embellished her allegations of abuse  
25 in light of anything done by Jeffrey Herman or Scott

1 though I'd like to answer that question, my  
2 attorneys have advised me I may not.

3 BY MR. HOROWITZ:

4 Q Are you asserting the Fifth Amendment because  
5 you're an innocent man, or because you're a guilty man?

6 MR. PIKE: Form.

7 THE WITNESS: I'd like to answer that question  
8 as well. The Fifth Amendment is the right of an  
9 American to protect themselves from charges --  
10 false charges. It's a right that the Supreme Court  
11 says protects the innocent, Mr. Horowitz, the  
12 innocent. It's a Supreme Court case. It's the --  
13 you're the lawyer.

14 I would like to -- the jury to know that your  
15 partner has been suspended for improper behavior  
16 since he filed these sexual abuse claims.  
17 Mr. Edwards' partner sits in jail for potentially  
18 the rest of his life for fabricating malicious  
19 claims of a sexual nature against wealthy people in  
20 South Florida. I would like to answer your  
21 questions more specifically, but my attorneys will  
22 not allow me to. They told me I must assert my  
23 rights under the Sixth, Fifth and Fourteenth  
24 Amendment. Though I would very much like to answer  
25 that question, I'm told that if I do so, I risk

1 Rothstein, are you?

2 MR. PIKE: Form.

3 THE WITNESS: I think the jury is going to  
4 decide that Jeffrey Herman who's been disbarred or  
5 suspended by the Florida Bar for improper behavior  
6 after filing this claim, or Mr. Edwards' partner  
7 who sits in jail potentially for the rest of his  
8 life, Mr. Horowitz, for the rest of his life, for  
9 fabricating cases specifically of a sexual nature  
10 -- I think the jury will decide whether these are  
11 fabricated or embellished. I'd like to answer with  
12 great specificity today; however, my attorneys have  
13 advised that at least today, I must respond by  
14 taking -- asserting my Fifth Amendment, Fourteenth  
15 and Sixth Amendment privilege. And though I would  
16 very much like to respond to that question, he's  
17 told me that if I do so, I risk losing his  
18 representation and/or waiving those rights.

19 BY MR. HOROWITZ:

20 Q Well, what is it that you'd like the jury to  
21 infer exactly from the fact that Jane Doe 7 had Jeffrey  
22 Herman as an attorney?

23 MR. PIKE: Form.

24 THE WITNESS: Jeffrey Herman went -- was  
25 suspended after he filed a claim on behalf of Jane

1 Doe 7 and your other girls. Scott Rothstein went  
 2 to jail for filing fictitious, malicious claims of  
 3 a sexual nature in order to simply get money, steal  
 4 money, fleece people for money. I'd like to answer  
 5 every one of your questions today, Mr. Horowitz.  
 6 However, my attorneys have counseled me that today  
 7 at least I may not, and must assert my rights. And  
 8 if I choose to answer the question, which is my  
 9 preference, I potentially might lose his  
 10 representation and/or waive those rights.  
 11 BY MR. HOROWITZ:  
 12 Q Okay. Mr. Epstein, so we're on the same page,  
 13 my next series of questions will involve Jane Doe Number  
 14 8, okay? Have you got that name locked into your head?  
 15 A I'll do my best.  
 16 Q Okay. Isn't it true, sir, that a girl named  
 17 Jane Doe 8 came to your Palm Beach estate in  
 18 approximately 2001 or 2002?  
 19 MR. PIKE: Form.  
 20 A I would very much like to answer the claims of  
 21 a Jane Doe 8. However, my attorneys have counseled me  
 22 that I must assert my rights under the Fifth, Fourteenth  
 23 and Sixth Amendment. I'd like to answer these claims of  
 24 a Jane Doe 8, but they told me if I were to do so, I  
 25 would risk losing their representation and/or waiving

1 and Sixth Amendment. Though I'd very much like to  
 2 answer those questions, I'm told that if I choose  
 3 to do so, I risk losing his representation and/or  
 4 waiving those rights.  
 5 BY MR. HOROWITZ:  
 6 Q Was -- was C.M.A. your prostitute?  
 7 MR. PIKE: Form.  
 8 THE WITNESS: Again, I'm sure these -- these  
 9 questions you find very clever, Mr. Horowitz. So  
 10 it's -- it's questions of a sexually charged nature  
 11 brought by Mr. Edwards' firm, his partner sitting  
 12 in jail for bringing cases of a sexually charged  
 13 nature against wealthy people in South Florida,  
 14 sitting in jail for the rest of his life. Your  
 15 partner being suspended by the Florida Bar for  
 16 improper behavior after filing of cases on behalf  
 17 your Jane Doe 8. So though I'd like to answer each  
 18 one of your questions here today, my counsel has  
 19 advised me that I may not. And -- excuse me --  
 20 BY MR. HOROWITZ:  
 21 Q Go ahead.  
 22 A -- and though I would much prefer to do so,  
 23 he's told me that if I do so, I risk losing his  
 24 representation and or waiving those rights. I've got to  
 25 take five minutes, sorry.

1 those rights.  
 2 BY MR. HOROWITZ:  
 3 Q Did you receive a phone call from a girl named  
 4 C.M.A., wherein she told you she was bringing Jane Doe 8  
 5 to your home for the purpose of giving you a massage?  
 6 A I would very much like to answer any question  
 7 regarding C.M.A., I believe, an admitted prostitute.  
 8 Her claims of bringing a Jane Doe 8 -- a girl named Jane  
 9 Doe 8; is that right -- to my house. However, my  
 10 attorneys have counseled with respect to all questions  
 11 today, all questions, I must assert my rights under the  
 12 Fifth, Sixth and Fourteenth Amendment. Though I'd like  
 13 to answer these questions with specificity, my counsel  
 14 has told me that if I choose to do so, I risk losing his  
 15 representation -- excuse me -- or my -- and/or my --  
 16 waiving my rights.  
 17 Q Did you instruct S.K. to place a telephone call  
 18 C.M.A. to arrange for C.M.A. to bring underage girls to  
 19 your home for sexual activity?  
 20 MR. PIKE: Form.  
 21 THE WITNESS: I would like to answer each and  
 22 every one of your questions regarding a C.M.A., who  
 23 I believe is an admitted prostitute, and a Jane Doe  
 24 8, but my attorneys have advised me at least today,  
 25 I must assert my rights under the Fifth, Fourteenth

1 THE VIDEOGRAPHER: Time off the record 4:35.  
 2 (Thereupon, a short break was taken.)  
 3 BY MR. HOROWITZ:  
 4 Q Mr. Epstein, we're still --  
 5 THE VIDEOGRAPHER: Time on the record 4:42.  
 6 MR. HOROWITZ: Sorry.  
 7 BY MR. HOROWITZ:  
 8 Q Mr. Epstein, we're still going to talk about  
 9 Jane Doe 8 a little bit more, okay? Did you instruct  
 10 C.M.A. to bring underage girls to your home to engage in  
 11 sexual activity with you?  
 12 MR. PIKE: Form.  
 13 THE WITNESS: I'd like to answer each question  
 14 being posed here today about now C.M.A., I believe,  
 15 an admitted prostitute and drug addict, and her  
 16 claims of bringing a Jane Doe 8 -- I believe you  
 17 said her name was -- to my house. However, at the  
 18 -- in the -- at the insistence of my attorney, his  
 19 response -- he's required me to assert my Fifth  
 20 Amendment, Sixth Amendment and Fourteenth Amendmen  
 21 Right. Though I'd like to answer each and every  
 22 question about your Jane Doe 8, I unfortunately  
 23 could not do so today.  
 24 BY MR. HOROWITZ:  
 25 Q Mr. Epstein, you're not suggesting that

1 C.M.A.'s status as either a prostitute or drug user  
2 diminishes the credibility of Jane Doe 8's sexual abuse  
3 claim against you, are you?

4 A I'll let the --

5 MR. PIKE: Form.

6 THE WITNESS: -- jury decide that.

7 BY MR. HOROWITZ:

8 Q Okay. Well, I want to know what -- what --  
9 what you're trying to convey to the jury?

10 MR. PIKE: Form.

11 THE WITNESS: I'd like to answer that question,

12 Mr. Horowitz, like I'd like to answer every one of  
13 your questions, but I think it's going to be  
14 obvious about what C.M.A. and Jane Doe 8 are  
15 attempting to do. However, though I'd like to  
16 answer with more specificity, my attorneys have  
17 advise me I may not today, and I must assert my  
18 rights under the Fifth, Sixth and Fourteenth  
19 Amendment. Though I'd like -- I'd like to answer  
20 the question, my attorneys have counseled me today  
21 that if I choose to do so, I risk losing their  
22 representation and/or waiving those rights.

23 BY MR. HOROWITZ:

24 Q Did you instruct S.K. to communicate with  
25 C.M.A. by telephone in order to arrange for Jane Doe 8

1 brought this claim on behalf of Jane Doe 8, I  
2 believe. But since that claim was brought, he was  
3 suspended by the Florida Bar. I prefer to bring it  
4 whose -- Mr. Edwards' partner, who's sitting next  
5 to you, but he's in jail for the rest of his life  
6 for bringing fictitious claims of a sexual nature  
7 against wealthy people in Florida in order to get  
8 as much money as he could. He was accused -- and  
9 Mr. Edwards' firm was accused by the U.S. Attorney  
10 of being -- and perpetrating the largest fraud in  
11 South Florida's history being a criminal  
12 enterprise. And I'm -- so I'm sorry I can't answer  
13 these questions with specificity today,  
14 Mr. Horowitz. But on advice of counsel, he's told  
15 me that if I choose to answer, I risk losing his  
16 representation and/or waiving my rights.

17 BY MR. HOROWITZ:

18 Q Mr. Epstein, is it your sworn testimony that  
19 Jane Doe 8 retained Jeffrey Herman, and that he was  
20 suspended after he was retained?

21 MR. PIKE: Form.

22 THE WITNESS: I'm sorry, it's -- again?

23 BY MR. HOROWITZ:

24 Q My question is -- well, I'll break it up in two  
25 questions. Is it your sworn testimony that Jane Doe 8

1 to give you a massage?

2 MR. PIKE: Form.

3 THE WITNESS: I would like to answer every  
4 question about your Jane Doe 8 claim. I'd like to  
5 answer every question about your C.M.A. connection,  
6 whoever, to Jane Doe 8. However, my attorneys have  
7 advised me that I may not answer those questions  
8 today. I must assert my rights under the  
9 Fourteenth Amendment, Sixth Amendment and Fifth  
10 Amendment. Though I think the -- I'd like to  
11 answer those questions, my attorney has told me  
12 that if I choose to do so, I risk losing his  
13 representation and/or waiving those rights.

14 BY MR. HOROWITZ:

15 Q Mr. Epstein, did you inform S.K. that the  
16 massage that Jane Doe 8 was to give you would be sexual  
17 in nature?

18 MR. PIKE: Form.

19 THE WITNESS: I'd like to answer every one of  
20 your questions regarding the claims of your Jane  
21 Doe 8. However, my attorneys have counseled that I  
22 may not answer any questions that may be relevant  
23 to any of your lawsuits. I would prefer to have  
24 given it to your partner, Jeffrey Herman, testified  
25 in front of your partner, Jeffrey Herman, who

1 hired Jeffrey Herman to be her attorney?

2 A I only know that -- my only knowledge is that  
3 Jane Doe 8 is represented by the firm where Jeffrey  
4 Herman was -- used to be a partner.

5 Q Okay. And you're not suggesting to anyone that  
6 Jeffrey Herman was suspended after Jane Doe 8 decided to  
7 file a lawsuit, are you?

8 MR. PIKE: Form.

9 THE WITNESS: I do not know when Jane Doe 8  
10 decided to file a lawsuit. If you'd like to tell  
11 me, I'd be able to answer that question.

12 BY MR. HOROWITZ:

13 Q Okay.

14 A Would you like to tell me?

15 Q Did S.K. tell you that she confirmed by  
16 telephone that Jane Doe 8 would be coming to your home  
17 at a specific time to give you a massage?

18 MR. PIKE: Form.

19 THE WITNESS: I'd like to respond to every  
20 question regarding Jane Doe 8 and her claims;  
21 however, my attorney has counseled me today that I  
22 may not answer those questions today, Mr. Horowitz.  
23 I must assert my rights under the Fifth, Fourteenth  
24 and Sixth Amendment. I would like to -- I'd like  
25 to, in fact, know whether Mr. Herman's firm --

1 Mr. Herman who's been disbarred, or your firm or  
2 your partner, Mr. Herman, who was -- who was  
3 suspended -- sorry, not disbarred -- you keep  
4 correcting me. I'm not really sure of the  
5 difference -- or Mr. Edwards' partner who's in jail  
6 for crafting all these fictitious lawsuits, and  
7 fleecing people out of thousands of millions of  
8 dollars. I'd like to do that, however, my  
9 attorneys have counseled me that I may not do that  
10 today. And if I choose to answer those questions,  
11 which I prefer to do, I risk losing their  
12 representation and/or waiving those rights.

13 BY MR. HOROWITZ:

14 Q Was it your intent during the course of Jane  
15 Doe 8's visit to your home, that you would persuade,  
16 induce or entice her to engage in sexual activity with  
17 you?

18 MR. PIKE: Form. I didn't know if you were  
19 finished.

20 MR. HOROWITZ: I'm finished.

21 THE WITNESS: I'd like to answer every question  
22 with respect to your Jane Doe 8 claim, every one.  
23 However, today, my counsel has advised me that I  
24 may not, and must assert my Sixth, Fifth and  
25 Fourteenth Amendment Right. And though I'd prefer

1 years old or older, did she?

2 MR. PIKE: Form.

3 THE WITNESS: I'd like to answer each and every  
4 question about your Jane Doe 8 claim. However,  
5 today, my attorneys have counseled me that I may  
6 not, and I must assert my rights under the Sixth,  
7 Fourteenth and Fifth Amendment. Though I'd like to  
8 answer every question about Jane Doe 8 -- your Jane  
9 Doe 8 claim, my attorneys have counseled -- said to  
10 me that if I choose to answer those questions, I  
11 risk losing their representation and/or waiving  
12 those rights.

13 BY MR. HOROWITZ:

14 Q When -- when you met Jane Doe 8, she appeared  
15 to you to be younger than 18 years old; isn't that  
16 right?

17 MR. PIKE: Form.

18 THE WITNESS: Again, I'd like to answer every  
19 question I could possibly answer regarding your  
20 Jane Doe 8 claim, and every -- and the claims  
21 regarding your other people that you've brought up  
22 today, but I must respond the same way I've  
23 responded to most of your other questions here  
24 today, Mr. Horowitz, which is on advice of my  
25 counsel, I could not answer today, though I'd like

1 to answer the questions, he's told me that if I  
2 choose to do so, I risk losing his representation  
3 and/or waiving those rights.

4 BY MR. HOROWITZ:

5 Q During the course of Jane Doe 8's visit to your  
6 home, did you succeed in persuading her, inducing her,  
7 or enticing her to engage in sexual activity with you?

8 MR. PIKE: Form.

9 THE WITNESS: I would like to answer every  
10 question about your Jane Doe 8 -- Jane Doe 8 or  
11 Jane Doe 8 claim. However, my attorneys have  
12 counseled me that I may not answer any questions  
13 that may be relevant to any one of your lawsuits  
14 brought by you or your partner, Jeffrey Herman, but  
15 he's been suspended by the Florida Bar since he  
16 filed money -- many of your claims of a similar  
17 nature, or Mr. Edwards's partner who sits in jail  
18 for the rest of his life for crafting malicious  
19 fabricated sexual natured-type claims -- sexually  
20 charged claims against wealthy people in Florida in  
21 order to fleece investors out of millions of  
22 dollars. So though I'd like to answer those  
23 questions, Mr. Horowitz, today I cannot.

24 BY MR. HOROWITZ:

25 Q Okay. Jane Doe 8 never told you she was 18

1 to. They've instructed me that I must assert my  
2 rights under the Fourteenth, Sixth and Fifth  
3 Amendment. And if I choose to answer the  
4 questions, which is my preference, they tell me  
5 that I would risk losing their representation  
6 and/or waiving my rights.

7 BY MR. HOROWITZ:

8 Q Were you nude in front of Jane Doe 8 when she  
9 was still a child under the age of 18?

10 MR. PIKE: Form.

11 THE WITNESS: Mr. Horowitz, I'm going to have  
12 to answer that question the way I've answered most  
13 of your questions here today. It would give me  
14 pleasure to answer the claims of Jane Doe 8.  
15 However, my counsel has advised me that I may not  
16 answer any questions relevant -- that may be  
17 relevant to any of the lawsuits that you've  
18 brought, or your partner that was subsequently  
19 suspended from the practice of law in Florida has  
20 brought. And though I'd like to answer those  
21 questions specifically, my counsel has told me that  
22 if I do so, I risk losing his representation and/or  
23 waiving those rights.

24 BY MR. HOROWITZ:

25 Q Did you instruct Jane Doe 8 to remove her



1 clothing when she was still a child?

2 MR. PIKE: Form.

3 THE WITNESS: I'd like to answer each one of  
4 the questions you've posed about your Jane Doe 8  
5 claim; however, my attorneys have counseled me that  
6 I may not today -- excuse me -- I must assert my  
7 rights under the Fourteenth, Fifth and Sixth  
8 Amendment. Although I'd prefer to answer the  
9 question, my attorneys have counseled me that I may  
10 not.

11 BY MR. HOROWITZ:

12 Q When Jane Doe 8 was still a child, did you  
13 instruct her to pinch your nipples and rub your chest?

14 MR. PIKE: Form.

15 THE WITNESS: It would give me pleasure to be  
16 able to answer the questions regarding your Jane  
17 Doe 8 claims. However, my attorneys have counseled  
18 me that today I may not answer any question that  
19 may be relevant to any of the lawsuits brought by  
20 your firm, your firm, including your partner,  
21 Jeffrey Herman, who was subsequently suspended or  
22 disbarred by the Florida legal -- by the Florida  
23 Bar after bringing some of these claims, or  
24 Mr. Edwards' partner that sits in jail for the rest  
25 of his life for crafting and trying to convince

1 other people that these claims were real, I  
2 believe, claims -- claims like this were real, and  
3 fleeced investors out of millions of dollars. His  
4 firm, Mr. Edwards' firm, of being accused by the  
5 U.S. Attorney of being a criminal enterprise,  
6 perpetrating one of the largest frauds in South  
7 Florida's history against south Floridians. So  
8 though I'd like to answer each one of your  
9 questions with great specificity, my counsel has  
10 told me today at least, I may not. And if I do so,  
11 I risk losing their representation and/or waiving  
12 those rights.

13 BY MR. HOROWITZ:

14 Q During the course of her visit, did you ask  
15 Jane Doe 8 questions about her sexual experience and  
16 preferences?

17 MR. PIKE: Form.

18 THE WITNESS: I would very much like to answer  
19 every question regarding the claims of your Jane  
20 Doe 8 -- your Jane Doe 8 claim. However, today, my  
21 attorneys have counseled me that I may not, and I  
22 must assert my rights under my Fourteenth, Sixth  
23 and Fifth Amendment. Though I'd like to answer  
24 each claim, today I am going to respectfully  
25 decline.

1 BY MR. HOROWITZ:

2 Q During the course of her visit to your home,  
3 did you touch Jane Doe 8's breasts?

4 MR. PIKE: Form.

5 THE WITNESS: Unfortunately my attorneys have  
6 counseled me that today, though I'd like to answer  
7 every one of your questions specifically, I'd have  
8 to answer this question like I've answered most of  
9 the other questions with respect to Jane Doe 8 and  
10 the Jane Doe 8 claims, which is I'd have to assert  
11 my rights under the Sixth, Fourteenth and Fifth  
12 Amendment. Because if I don't do so, and I choose  
13 to answer, which is my preference, my counsel has  
14 advised me I am in risk of losing their  
15 representation and waiving those rights.

16 BY MR. HOROWITZ:

17 Q During the course of her visit to your home,  
18 did you rub Jane Doe 8's vagina?

19 MR. PIKE: Form.

20 THE WITNESS: Again?

21 BY MR. HOROWITZ:

22 Q During the course of Jane Doe 8's visit to your  
23 home, did you rub her vagina?

24 MR. PIKE: Form.

25 THE WITNESS: I'd like to answer every one of

1 your Jane Doe 8 claims, especially your Jane Doe 8  
2 claims with respect to the details of what -- these  
3 questions. However, my attorneys have counseled me  
4 that today, I cannot answer those questions, at  
5 least today, and I must assert my rights under the  
6 Fourteenth, Fifth and Sixth Amendment. And though  
7 I'd prefer to answer those questions, especially  
8 the questions of a sexually charged nature, similar  
9 to the ones where Mr. Edwards, who's sitting next  
10 to you, whose partner is in jail for -- for  
11 crafting malicious claims of a sexual nature, or  
12 your partner who you smile about while you think  
13 he's been disbarred or suspended. It's okay. I'd  
14 like to answer those questions, but today, I  
15 cannot, because though I choose to do so my -- I --  
16 if I choose to do so, my counsel said I risk losing  
17 his representation and/or waiving those rights.

18 BY MR. HOROWITZ:

19 Q When Jane Doe 8 was at your home, did you  
20 masturbate in her presence?

21 MR. PIKE: Form.

22 THE WITNESS: I'd like to answer that Jane Doe  
23 8 question as much as -- it's Jane Doe 8, right --  
24 Jane Doe 8 question, as well as every other Jane  
25 Doe 8 claim that you've put on the table here

1 today, Mr. Horowitz. However, on the advice of my  
2 counsel, I am going to have to assert my rights  
3 under the Fourteenth Amendment, Sixth Amendment and  
4 Fifth Amendment. Though -- because I'd like to  
5 answer that question, I'm told by my counsel that  
6 if I choose to do so, I risk losing his  
7 representation and/or waiving those rights.

8 BY MR. HOROWITZ:

9 Q When Jane Doe 8 was still a child under the age  
10 of 18, isn't it true, sir, you masturbated to the point  
11 of ejaculation in front of her?

12 MR. PIKE: Form.

13 THE WITNESS: I'm sure these questions of a  
14 sexually charged nature, that hopefully the jury  
15 will be able to see through them, Mr. Horowitz.  
16 I'd like to answer all those questions. However,  
17 my counsel today has told me that I must respond by  
18 asserting my rights under the Sixth, Fifth and  
19 Fourteenth Amendment.

20 Sexually charged cases, similar to the ones  
21 where Mr. Roth -- excuse me -- which Scott  
22 Rothstein had fictitiously fabricated, who's -- he  
23 is Mr. Edwards' partner, who's in jail.  
24 Mr. Edwards' partners are on the way to jail for  
25 simply fabricating -- trying to steal money from

1 would prefer to answer those questions, today I may  
2 not because I've been told that if I do so, I risk  
3 losing his representation and/or waiving my rights.

4 BY MR. HOROWITZ:

5 Q Mr. Epstein, when Jane Doe 8 was at your home  
6 and was still a child, did you tell her that you wanted  
7 her to give you oral sex, otherwise known as a blow  
8 job?

9 MR. PIKE: Form.

10 THE WITNESS: Mr. Horowitz, I'd like to answer  
11 -- answer every question and claim made by your  
12 Jane Doe 8. However, my attorneys have counseled  
13 me that at least today, I have to assert my rights  
14 under the Fourteenth Amendment, the Sixth Amendment  
15 and the Fifth Amendment. I'm told that though I'd  
16 like to answer those questions, if I choose to do  
17 so, I risk losing his representation and/or waiving  
18 my rights.

19 I prefer to answer questions like this -- of a  
20 -- sexually charged nature to your partner, Jeffrey  
21 Herman, but he's been suspended by the Florida Bar  
22 for improper behavior after filing many of your  
23 claims.

24 I'd prefer to answer those questions to  
25 Mr. Edwards' partner, Scott Rothstein, but he's in

1 investors in South Florida.  
2 Your partner after he filed this -- or sometime  
3 during these claims has been suspended by the  
4 Florida Bar. So, though I'd like to answer these  
5 questions with great specificity, my attorneys have  
6 told me if I do so, I risk losing their  
7 representation and/or waiving those rights.

8 BY MR. HOROWITZ:

9 Q When Jane Doe 8 was still a child and she was  
10 in your home, did you tell her that you wanted her to  
11 touch your penis?

12 MR. PIKE: Form.

13 THE WITNESS: Again, I would like to answer  
14 every question about your Jane Doe 8 claims with  
15 great specificity, and I'm sure the ladies and  
16 gentlemen of the jury will understand that these  
17 sexually charged cases, similar to the ones where  
18 Mr. Edwards' partner has gone to jail for  
19 fabricating cases, trying to steal money from  
20 people in South Florida, your partner after filing  
21 some of these cases has been suspended, will see  
22 through it. And though I'd like to be able to  
23 answer with great specificity, my counsel has told  
24 me I may not and must assert my rights under the  
25 Sixth, Fifth and Fourteenth Amendment. So though I

1 jail for the rest of his life -- it appears the  
2 rest of his life. Many of Mr. Edwards' partners  
3 are on the way to jail for the rest of their life  
4 for crafting cases of a sexually charged nature,  
5 fictitious cases, in order to steal millions of  
6 dollars from local investors. So though I'd like  
7 to answer that question, I'm told that if I do so,  
8 I risk losing the representation of my counsel and  
9 waiving those rights.

10 BY MR. HOROWITZ:

11 Q Mr. Epstein, did you engage in sexual activity  
12 with Jane Doe 8 during the course of a massage at your  
13 Palm Beach home in 2001 or 2002?

14 MR. PIKE: Form.

15 THE WITNESS: When?

16 MR. HOROWITZ: Let me start over.

17 THE REPORTER: 2001, 2002 you said.

18 MR. HOROWITZ: I'll -- I'll -- I'll ask the  
19 question again, so that the record is a little bit  
20 clearer.

21 BY MR. HOROWITZ:

22 Q Did you engage in sexual activity with Jane Doe  
23 8 during the course of a massage at your Palm Beach home  
24 in 2001 and 2002?

25 MR. PIKE: Form.

1 THE WITNESS: I'd like answer that question.  
2 I'd like to answer all the questions with respect  
3 to your Jane Doe 8 claims. However, my counsel has  
4 advised me today that I must, at least today,  
5 assert my rights under the Fifth, Sixth and  
6 Fourteenth Amendment. So though I'd like to answer  
7 those questions, I'm told that if I do so, I risk  
8 losing his representation and/or waiving those  
9 rights.

10 BY MR. HOROWITZ:

11 Q Did you --

12 THE VIDEOGRAPHER: Three minutes --

13 MR. HOROWITZ: I'm sorry?

14 THE VIDEOGRAPHER: I'm sorry, three minutes of  
15 tape remaining.

16 MR. HOROWITZ: Okay.

17 BY MR. HOROWITZ:

18 Q Did you ask Jane Doe 8 for permission to touch  
19 her in a sexual manner when she was still a child?

20 MR. PIKE: Form.

21 THE WITNESS: I'd like to answer every one of  
22 your questions, but unfortunately I am going to  
23 have to answer the same way I've answered most of  
24 those here today, which is my counsel has advised  
25 me that I must assert my rights under the

1 Fourteenth Amendment, the Sixth Amendment and Fifth  
2 Amendment. However, I'd like to answer those  
3 questions, but he's told me that if I do so, I risk  
4 losing his representation.

5 I'd like answering those questions to your  
6 partner, Jeffrey Herman, but he's not here because  
7 he's been suspended for improper behavior after he  
8 filed these cases, after he had a press conference  
9 in Palm Beach, in the streets of Palm Beach, called  
10 the media.

11 I'd like to express the same answer to  
12 Mr. Edwards' partner, but he's in jail for the rest  
13 of his life for creating fictitious cases. So,  
14 Mr. Horowitz, though I'd like to answer the  
15 question today, I must deny -- I must refrain from  
16 doing so at the advice of counsel.

17 MR. HOROWITZ: Let's change tapes.

18 THE VIDEOGRAPHER: Time off the record 5:01.  
19 (Thereupon, a short break was taken.)

20 THE VIDEOGRAPHER: Time on the record 5:09.

21 This is Tape 6.

22 BY MR. HOROWITZ:

23 Q Mr. Epstein, in 2001 and 2002, Jane Doe 8  
24 indicated to you that she did not want you to touch her  
25 body; isn't that right?

1 MR. PIKE: Form.

2 THE WITNESS: In 2001, 2002 -- I'd like to  
3 answer every one of your questions regarding your  
4 Jane Doe 8 claims. However, my attorneys have  
5 counseled me today that I must assert my Sixth  
6 Amendment, Fifth Amendment and Fourteenth Amendmen  
7 Right. Though I'd prefer to answer every one of  
8 your questions regarding Jane Doe 8, today I'm  
9 going to have to refuse to do so.

10 BY MR. HOROWITZ:

11 Q You touched Jane Doe 8's breasts, you touched  
12 her genitals, and you did that after she indicated to  
13 you that she did not want to be touched by you; isn't  
14 that right?

15 MR. PIKE: Form.

16 THE WITNESS: I'd prefer -- excuse me -- if I  
17 -- if I understood, in fact, when your partner,  
18 Jeffrey Herman, filed most of his cases against me,  
19 because I know he was disbarred or suspended after  
20 he filed these cases of a sexual nature. I'm not  
21 sure of the time frame, or when Mr. Edwards'  
22 partner got involved who's now in jail for filing  
23 -- for fabricating -- sorry -- for fabricating  
24 malicious cases of a sexual nature against many  
25 people in South Florida, called by the U.S.

1 Attorney -- his firm called by the U.S. Attorney, a  
2 criminal enterprise. His partner is in jail for  
3 the rest of his life. Many of his partners are on  
4 the way to jail for the rest of their lives  
5 potentially. So though I'd like to answer every  
6 question with respect to your Jane Doe 8 sexual  
7 claim -- your Jane Doe 8 claims of a sexual nature,  
8 I've been advised by my counsel at least today that  
9 I may not do so. And if I choose to do so, which  
10 is my preference, I risk losing their  
11 representation or waiving those rights.

12 BY MR. HOROWITZ:

13 Q Mr. Epstein, is it your testimony that Jane Doe  
14 8 has in any way fabricated or embellished her  
15 allegations that you sexually abused her during her  
16 childhood?

17 MR. PIKE: Form.

18 THE WITNESS: I believe the jury will make that  
19 decision, Mr. Horowitz. I believe that they will  
20 understand that many of these claims put together  
21 by your partner who was suspended for improper  
22 practice in the State of Florida, who could no  
23 longer practice law at least temporarily -- I  
24 understand that Mr. Edwards' partner who's in jail  
25 for potentially the rest of his life for

1 fabricating cases of a sexual nature. Many of  
2 Mr. Edwards' partners on their way to jail for the  
3 rest of their life for fabricating cases of a  
4 sexual nature. I'd like to answer each one of your  
5 questions regarding Jane Doe 8 and your other  
6 women, however, on advice of counsel today, I  
7 cannot. And I am told that if I choose to do so,  
8 and not assert my rights under the Sixth, Fifth and  
9 Fourteenth Amendment, I risk waiving those rights  
10 and losing his representation.

11 BY MR. HOROWITZ:

12 Q Mr. Epstein, did you pay C.M.A. to bring Jane  
13 Doe 8 to your home?

14 MR. PIKE: Form.

15 THE WITNESS: I believe -- again, I would like  
16 to answer all questions regarding C.M.A., I  
17 believe, an admitted prostitute, drug addict and  
18 her -- and anything to do with your Jane Doe 8  
19 claims. However, today, my counsel has advised me  
20 that I must, at least today, assert my rights under  
21 the Fifth, Sixth and Fourteenth Amendment. And  
22 though I would prefer to answer each one of your  
23 questions, Mr. Horowitz, he's told me that if I  
24 choose to do so, I risk losing his representation  
25 and/or waiving my rights.

1 Q Mr. Epstein, you don't deny that you sexually  
2 abused --

3 A Huh?

4 Q Mr. Epstein, you don't deny that you sexually  
5 abused Jane Doe 8, do you?

6 MR. PIKE: Form.

7 THE WITNESS: Mr. Horowitz, these sexually --  
8 this sexual abuse types of questions, which I'd be  
9 more than happy to answer, had it not been for my  
10 attorneys instructing me that I must assert my  
11 Fourteenth Amendment, Sixth Amendment and Fifth  
12 Amendment Rights, I -- I wish I could answer the  
13 question because Mr. Edwards' partner, Scott  
14 Rothstein, who's in jail for fabricating cases of a  
15 sexual nature against wealthy individuals in South  
16 Florida -- it's no secret. Most of the people --  
17 many of the people here, I'm sure, know that his  
18 partners are -- many of them are in jail, many are  
19 on the way to jail. Though -- though -- so though  
20 I would like to answer the questions regarding  
21 questions of a sexual nature, my attorneys at least  
22 for today, at least for today, have said I may  
23 not. And if I choose to do so, which they know is  
24 my preference, they have told me I risk losing  
25 their represent and/or waiving my rights.

1 BY MR. HOROWITZ:

2 Q Mr. Epstein, did you instruct S.K. to call  
3 C.M.A. on the telephone to arrange for Jane Doe 8 to  
4 come back and give you another massage?

5 MR. PIKE: Form.

6 THE WITNESS: To give me -- excuse me?

7 BY MR. HOROWITZ:

8 Q One more time. Did you instruct S.K. to call  
9 C.M.A. on the telephone to make arrangements for Jane  
10 Doe 8 to come back to your home for more sexual  
11 activity?

12 MR. PIKE: Form.

13 THE WITNESS: I'd like to answer every question  
14 that you posed today regarding your Jane Doe 8  
15 claims, of her relationship with C.M.A. However,  
16 my attorneys have counseled me that at least today  
17 I must assert my Fourteenth Amendment, Sixth  
18 Amendment and Fifth Amendment Rights. Though I'd  
19 prefer to answer each one of the questions, my  
20 attorneys told me that if I choose to do so, I risk  
21 losing his representation and/or waiving those  
22 rights.

23 I believe the air conditioning has just gone  
24 off.

25 BY MR. HOROWITZ:

1 BY MR. HOROWITZ:

2 Q Isn't it true, sir, that you are asserting your  
3 Fifth Amendment privilege today with regard to questions  
4 about Jane Doe 8 because you did in fact sexually abuse  
5 Jane Doe 8 during her childhood?

6 MR. PIKE: Form.

7 THE WITNESS: I'm asserting my Fifth Amendment  
8 Sixth Amendment and Fourteenth Amendment Right as  
9 advised by my counsel, as a right of every American  
10 to protect themselves from malicious, false claims,  
11 similar to the ones that your colleague here,  
12 Mr. Edwards' partner is in jail for, fabricating by  
13 sexual -- cases of a sexual nature, called by the  
14 U.S. Attorney the largest fraud in South Florida's  
15 history, his firm of 70 partners considered a  
16 criminal enterprise for basically fabricating case  
17 -- cases of a sexual nature -- sexually charged  
18 nature. So though I would like nothing more than  
19 to answer the questions that you've posed here  
20 today regarding your cases, Mr. Horowitz, I've been  
21 told that if I choose to answer those questions, I  
22 risk losing my counsel's representation and waiving  
23 those rights.

24 BY MR. HOROWITZ:

25 Q Mr. Epstein, in -- in your mind, why shouldn't

1 the jury infer from your testimony today that you did,  
2 in fact, sexually abuse Jane Doe 8 when she was a child  
3 given that you've been asserting a Fifth Amendment  
4 privilege?

5 MR. PIKE: Form.

6 THE WITNESS: I -- I believe the jury will see  
7 through your meager attempt that simply suggesting  
8 that my asserting a Fifth Amendment privilege  
9 that's used to protect innocent people from  
10 malicious sexually charged cases similar to the  
11 ones where Mr. Edwards' partner is in jail for the  
12 rest of his life, with many of his other partners  
13 on the way to spend the rest of their life in jail  
14 for the cases of a -- for fabricating a malicious  
15 case and stealing money from local Floridians. So  
16 I'd like to answer each and every one of the  
17 questions posed by you here today, Mr. Horowitz.  
18 However, my attorneys have instructed me that I  
19 must assert my Fifth Amendment, Sixth Amendment and  
20 Fourteenth Amendment Right. So though I'd prefer  
21 to answer the question, my counsel has told me that  
22 if I do so, I risk losing his representation and  
23 potentially waiving those rights.

24 BY MR. HOROWITZ:

25 Q Mr. Epstein, your counsel indicated to me that

1 an answer. He never gave an answer.

2 MR. HOROWITZ: Okay. Are you withdrawing the  
3 objection?

4 MR. PIKE: I am going to let him respond to  
5 your question.

6 MR. HOROWITZ: So are you withdrawing the  
7 objection?

8 MR. PIKE: There's no reason to withdraw the  
9 objection prior to. You're asking the question  
10 again. I'm allowing him to answer.

11 MR. HOROWITZ: I'll ask the question -- just to  
12 be -- have a clear record, I am going to ask the  
13 question again.

14 MR. PIKE: Yes.

15 BY MR. HOROWITZ:

16 Q Mr. Epstein, identify all of your health care  
17 providers for the past ten years, including, without  
18 limitation, psychologists, psychiatrists, mental health  
19 counselors, physicians, hospitals and treatment  
20 facilities?

21 MR. PIKE: With respect to the order -- I  
22 believe the order said psychiatrists and  
23 psychologists. I don't think it went on -- I think  
24 it actually limited, and if you recall, the  
25 additional hospitals and providers. So having

1 you wanted to possibly change an answer that you had  
2 given me earlier concerning your health care providers  
3 that you've had in the past ten years. My question for  
4 you is --

5 MR. PIKE: Well --

6 MR. HOROWITZ: Let me finish the question, then  
7 you could --

8 MR. PIKE: Go ahead.

9 BY MR. HOROWITZ:

10 Q -- identify for us your health care providers  
11 for -- in the past ten years, including without  
12 limitation, psychologists, psychiatrists, mental health  
13 counselors, physicians, medical doctors, hospitals and  
14 treatment facilities?

15 MR. PIKE: Wait a second, let me be clear. I  
16 did not tell you that Mr. Epstein wanted to change  
17 his answer. Basically I objected and instructed  
18 him not to answer a particular question because you  
19 did not have the order or the interrogatory or the  
20 request for production that you were referencing.  
21 At a break you had showed me those particular  
22 documents -- two of them. Not the order itself.  
23 And as a result, I agreed to allow you to ask  
24 Mr. Epstein the question so we didn't have to come  
25 back as a courtesy. So I didn't tell him to change

1 stated that, Mr. Epstein can identify for you the  
2 psychologist and/or psychiatrist that he has been  
3 seen by within the last ten years, but he will not  
4 elaborate on his answer if it would invade  
5 attorney-client work product.

6 MR. HOROWITZ: Okay. So you answer -- as to a  
7 portion of the question, you're instructing him not  
8 to answer; is that right?

9 MR. PIKE: Consistent with the order.

10 MR. HOROWITZ: That's your version of the  
11 order.

12 MR. PIKE: Do you have the order.

13 MR. HOROWITZ: You do. It was mailed to you.

14 MR. PIKE: Do you have the order here today?

15 MR. HOROWITZ: No.

16 MR. PIKE: Okay.

17 MR. HOROWITZ: I know what it says, though.  
18 Can -- can we -- can we just get a question -- an  
19 answer to the question?

20 MR. PIKE: Sure.

21 MR. HOROWITZ: Did you understand the question?

22 THE WITNESS: Dr. Steve Alexander and  
23 Dr. Steven Strumwasser.

24 BY MR. HOROWITZ:

25 Q Okay. And Dr. Steven Alexander, what is his

1 area of practice?  
 2 A Psychology.  
 3 Q And where does he practice?  
 4 A In Palm Beach.  
 5 Q And between what period of time -- during what  
 6 period of time did you receive a -- either treatment or  
 7 a consultation from him?  
 8 MR. PIKE: I'm going to instruct him not to  
 9 answer because that's attorney-client work product.  
 10 MR. HOROWITZ: Okay. It's attorney-client as  
 11 to --  
 12 MR. PIKE: And work product.  
 13 MR. HOROWITZ: Okay. All right.  
 14 MR. PIKE: You didn't ask him who hired those  
 15 individuals.  
 16 MR. HOROWITZ: Okay. I don't need to know  
 17 that.  
 18 MR. PIKE: Sure, if -- you're raising your  
 19 eyebrows as if you're concerned with regard to the  
 20 objection. That shows -- --  
 21 MR. HOROWITZ: I'm not going to deal with it  
 22 today with you --  
 23 THE REPORTER: One at a time.  
 24 MR. PIKE: -- that shows some sort of  
 25 bewilderment as to why I'm raising the objection.

1 So what I'm doing is, just allowing you the  
 2 opportunity to ask the appropriate question so you  
 3 understand the objection, that's all.  
 4 BY MR. HOROWITZ:  
 5 Q Okay. Were you under the care of Steven  
 6 Alexander before any investigation into criminal  
 7 activity began?  
 8 MR. PIKE: I'm going to instruct him not to  
 9 answer that question.  
 10 BY MR. HOROWITZ:  
 11 Q Were you under the other doctor -- am I saying  
 12 this right, Strumwasser?  
 13 A Yes, sir.  
 14 Q What is his area of specialty?  
 15 A Psychology.  
 16 Q Does he have a subspecialty?  
 17 A I don't know.  
 18 Q Were you under his care or treatment before any  
 19 investigation into a criminal activity occurred?  
 20 MR. PIKE: Again, I'm going to instruct him not  
 21 answer, work product.  
 22 BY MR. HOROWITZ:  
 23 Q Okay. And where is Dr. Strumwasser's office  
 24 located?  
 25 A Somewhere in Florida.

1 Q Do you go to his office --  
 2 A No.  
 3 Q -- or does he come to you?  
 4 A I've --  
 5 MR. PIKE: I'm going to instruct him not to  
 6 answer that question.  
 7 BY MR. HOROWITZ:  
 8 Q Does Doctor -- do you see Dr. Alexander at his  
 9 office --  
 10 MR. PIKE: I'm going to instruct him --  
 11 BY MR. HOROWITZ:  
 12 Q -- or does he come see you?  
 13 MR. PIKE: I'm going to instruct him not to  
 14 answer that question, also overbroad.  
 15 BY MR. HOROWITZ:  
 16 Q Okay. Between 2001 and 2006, using those two  
 17 years as sort of a bookmark, did your sexual interests  
 18 include looking at girls under the age of 18 while they  
 19 were undressed?  
 20 MR. PIKE: Form.  
 21 MR. HOROWITZ: I'd like to answer each and  
 22 every one of your questions here today,  
 23 Mr. Horowitz. I'm going to answer that question  
 24 like I've answered mostly all your other questions,  
 25 which is on advice of counsel, they've asked me to

1 assert my Fourteenth Amendment Right, my Sixth  
 2 Amendment Right, my Fifth Amendment Right. So  
 3 though I'd like to answer each and every one of  
 4 your questions, I'm going to have to assert those  
 5 rights today.  
 6 BY MR. HOROWITZ:  
 7 Q Between 2001 and 2006 did your sexual interests  
 8 include looking at the breasts and vaginal area of girls  
 9 between the ages of 12 and 17?  
 10 MR. PIKE: Form.  
 11 THE WITNESS: I'm going to answer that question  
 12 like I've answered any -- most of your other  
 13 questions here today, which is on advice of  
 14 counsel, I'm going to have to assert my rights  
 15 under the Fourteenth Amendment, the Sixth Amendment  
 16 and Fifth Amendment.  
 17 BY MR. HOROWITZ:  
 18 Q Between 2001 and 2006 did your sexual interests  
 19 include digitally penetrating the vaginas of girls  
 20 between the ages of 12 and 17?  
 21 MR. PIKE: Form.  
 22 THE WITNESS: I find these questions -- I'd  
 23 like to answer every one of those questions.  
 24 However, my counsel has told me I may not today. I  
 25 wish I could answer those questions with respect --

1 or directly to your partner that filed most of  
2 these lawsuits, however, he's been suspended from  
3 the Florida Bar.

4 I'd like to answer these questions to  
5 Mr. Edwards' partner, but he's in jail for  
6 fabricating cases of a sexually charged nature  
7 against wealthy people and stealing millions of  
8 dollars from local South Floridians. So though I  
9 would prefer to answer these question, I've been  
10 told by my counsel that if I choose to do so, I  
11 risk losing his representation and waiving my  
12 rights.

13 BY MR. HOROWITZ:

14 Q Between 2001 and 2006 did your sexual interests  
15 include masturbating on a massage table in the presence  
16 of girls under the age of 18?

17 MR. PIKE: Form. And -- and -- and let me --  
18 let me interject here for a second. I -- I noticed  
19 that the tenor of the questions has changed since  
20 we've been in deposition for over seven hours, and  
21 I noticed that you have a list of questions toward  
22 the back of your outline there (indicating) that  
23 seems to be not really detailed or relevant to your  
24 clients. Now --

25 MR. HOROWITZ: I don't know what outline you're

1 MR. PIKE: Form.

2 THE WITNESS: I'd like to answer every one of  
3 your questions here today regarding all your claims  
4 of these girls, however, my attorneys have  
5 counseled me today that I must assert my Fourteenth  
6 Amendment, Sixth Amendment and Fifth Amendment  
7 Right. So though I would like to answer the  
8 question, I'm told that if I do so, I risk losing  
9 his representation and/or waiving those rights.

10 BY MR. HOROWITZ:

11 Q Mr. Epstein, between 2001 and 2006 did your  
12 interest include paying girls under the age of 18 for  
13 massages of a sexual nature?

14 MR. PIKE: Form.

15 THE WITNESS: I would really like to answer  
16 every one of your questions here today,  
17 Mr. Horowitz. Unfortunately I am going to have to  
18 answer that question like I've answered many of  
19 your other questions, on advice of my counsel who's  
20 suggested that I must assert my rights under the  
21 Fourteenth, Fifth Amendment and Sixth Amendment.  
22 Though I would greatly prefer to answer these  
23 questions, my attorneys told me that if I choose to  
24 do so, I risk losing his representation and waiving  
25 my rights.

1 looking at. Are you looking at my outline?

2 MR. PIKE: -- I'm not finished --

3 MR. HOROWITZ: Continue.

4 MR. PIKE: -- I just want to make a clean  
5 record, okay? Mr. Edwards is very -- is very well  
6 aware, and I'm very well aware, that no matter what  
7 your understanding as of -- as of this case and  
8 what you're trying to prove and what burden you're  
9 trying to meet, cannot use this deposition as a  
10 means to harass Mr. Epstein or any other client.

11 His sexual interests in general, as you're  
12 asking them, is argumentative and it's harassing,  
13 and I'm only going to let it go on for a little bit  
14 longer, okay?

15 MR. HOROWITZ: Okay.

16 MR. PIKE: So if you would, try to rephrase  
17 your question --

18 MR. HOROWITZ: Okay.

19 MR. PIKE: -- because we've been here a long  
20 time, and -- and -- and I know what you're trying  
21 to do here.

22 BY MR. HOROWITZ:

23 Q Between 2001 and 2006, Mr. Epstein, would it  
24 arouse you to have underage girls talk about their sex  
25 life while they're undressed?

1 BY MR. HOROWITZ:

2 Q Between 2001 and 2006 did you have a room in  
3 your home in Palm Beach County where you received  
4 massages?

5 MR. PIKE: Form.

6 THE WITNESS: I am going to have to answer that  
7 question the same way I've answered most of your  
8 other questions here today, Mr. Horowitz, which is  
9 on advice of my counsel I'm told that I must assert  
10 my rights under the Sixth Amendment, Fourteenth  
11 Amendment and Fifth Amendment. And though I'd  
12 prefer to answer those questions, my attorneys told  
13 me that if I choose to do so, I risk losing their  
14 representation or waiving my rights.

15 BY MR. HOROWITZ:

16 Q Between 2001 and 2006, at your home in Palm  
17 Beach, did you have sexual contact with over 30 girls  
18 under the age of 18 in your massage room?

19 MR. PIKE: Form.

20 THE WITNESS: I would like to answer each one  
21 of your claims today, Mr. Horowitz. However, my  
22 attorneys have counseled me that I may not answer  
23 any questions that may be relevant to any of your  
24 lawsuits brought by you, your partner who's been  
25 suspended from the practice of law in South

1 Florida, Mr. Edwards' partner, Scott Rothstein, who  
2 sits -- spending the rest of his life in jail for  
3 fabricating cases. I'd like to answer every one of  
4 your questions, but today, my attorney told me I  
5 cannot, at least today. And if I choose to do so,  
6 I risk losing his representation and/or waive my  
7 rights.

8 BY MR. HOROWITZ:

9 Q Isn't it true, sir, that between 2000 -- isn't  
10 it true, sir, that between 2001 and 2006, you had a very  
11 specific method for sexually abusing girls between the  
12 ages of 12 and 13 in your Palm Beach County home?

13 A You continue to use --

14 MR. PIKE: Form.

15 THE WITNESS: -- huh. Again, these questions,  
16 I believe the jury is going to see through,  
17 Mr. Horowitz. These are questions similar to the  
18 ones that people have suggested Mr. Edwards'  
19 partner, Scott Rothstein, who's spending the rest  
20 of his life in jail for fabricating cases of a  
21 sexually charged nature, has tried to convince  
22 investors in South Florida, that he stole millions  
23 of dollars based on sexually charged cases similar  
24 to these claims that you've made. I'd like to  
25 answer each one of your questions today. However,

1 fictitious cases part of the perpetration of the  
2 largest fraud in South Florida's history, calling  
3 Mr. Edwards' firm a criminal enterprise.

4 Your partner is not here today because he's  
5 been suspended after he filed these cases. So  
6 though I'd like to answer each and every one of  
7 your questions, my counsel has advised me that I  
8 may not today. And though I'd prefer to do so, he  
9 said if I choose to do so, I would risk losing his  
10 representation and/or waiving my rights.

11 BY MR. HOROWITZ:

12 Q Mr. Epstein, between 2001 and 2006 you paid  
13 people to recruit and solicit girls to come to your home  
14 who were between the ages of 13 and 17, whereupon you  
15 would engage in sexual activity with them; isn't that  
16 right?

17 MR. PIKE: Form.

18 MR. HOROWITZ: Again, I'm sure, Mr. Horowitz,  
19 the jury will be able to see through your questions  
20 of a sexually charged nature. I'd like to answer  
21 each one of your questions. However, my attorneys  
22 have counseled me that today at least, I may not.  
23 I must assert my rights under the Fourteenth, Sixth  
24 and Fifth Amendment. The questions of a sexually  
25 charged nature don't surprise me. They're similar

1 my attorneys have counseled me that I may not  
2 answer any questions that may be relevant to any of  
3 your lawsuits.

4 BY MR. HOROWITZ:

5 Q Between 2000 --

6 A Excuse me.

7 Q Go ahead.

8 A And though I'd prefer to answer the question,  
9 my attorneys have counseled me that if I do so, I ask --  
10 excuse me -- bless you -- I risk losing their  
11 representation and/or waiving my rights.

12 BY MR. HOROWITZ:

13 Q Between 2001 and 2006 you targeted a specific  
14 age of girls between 13 and 17 for sexual abuse in your  
15 home; isn't that right?

16 MR. PIKE: Form.

17 THE WITNESS: These type of questions, sexually  
18 charged questions, I believe the jury will be able  
19 to see through, Mr. Horowitz. They're similar to  
20 the claims and charges and that Mr. Roth --  
21 Mr. Edwards' partner, Scott Rothstein, sits  
22 currently in jail for the rest of his life,  
23 fabricating cases of a sexual nature simply in  
24 order to steal millions of dollars from local  
25 Floridians. The U.S. Attorney called some of these

1 in nature to the sexually charged cases that  
2 Mr. Edwards' partner currently sits in jail for --  
3 for the rest of his life.

4 A 70-man law firm filed bankruptcy, called by  
5 the U.S. Attorney a criminal enterprise,  
6 perpetrating one of the largest frauds in South  
7 Florida history by crafting cases of a sexually  
8 charged nature in order to fleece local Floridians  
9 of thousands and thousands of dollars. So though  
10 I'd like to answer each one of your questions,  
11 today at the advice of counsel, I cannot. And  
12 though I'd like to answer it, my counsel has told  
13 me that if I choose to do so, I risk losing his  
14 representation and/or waiving my rights.

15 BY MR. HOROWITZ:

16 Q Mr. Epstein, between 2001, 2006 you paid  
17 someone to schedule appointments by telephone for girls  
18 between the ages of 13 and 17 to come to your home for  
19 sexual activity with you; isn't that right?

20 MR. PIKE: Form.

21 THE WITNESS: These claims of a sexually  
22 charged nature I would very much like to answer  
23 today with great specificity. But as most of your  
24 questions have been answered today, I, on the  
25 advice of counsel, have had to invoke my Sixth



1 Amendment, Fourteenth Amendment and Fifth Amendment  
2 Rights. Though I'd prefer to speak to your partner  
3 who's not here because he's been suspended from the  
4 practice of law in South Florida after he's filed  
5 these cases, held a big press conference.

6 Mr. Edwards' partner who's in jail for the rest  
7 of his life it appears for fabricating fictitious  
8 cases of a sexually charged nature. So though I'd  
9 like to answer every one of your questions with  
10 great specificity, I've been told by my counsel if  
11 I choose to do so, I risk losing his representation  
12 and waiving those rights. Five minutes?

13 MR. HOROWITZ: If that's what you need.

14 THE WITNESS: Is that okay? Is that okay?

15 MR. EDWARDS: Break.

16 THE WITNESS: Five minutes?

17 MR. EDWARDS: Break as long as you want.

18 THE VIDEOGRAPHER: Okay. Time off the record  
19 5:33.

20 (Thereupon, a short break was taken.)

21 THE VIDEOGRAPHER: Back on the record 5:41.

22 BY MR. HOROWITZ:

23 Q Mr. Epstein, with regard to the girls who were  
24 at your Palm Beach County home between 2001 and 2006  
25 with whom you had sexual activity, nearly all of these

1 be relevant to any of the lawsuits brought by you,  
2 your partner of your firm who's been found after he  
3 filed these claims to have committed improper acts  
4 and has been suspended from the practice of law in  
5 South Florida, or the cases brought by Mr. Edwards'  
6 whose those firm has been described by the U.S.  
7 Attorney as a criminal enterprise of a -- of 70  
8 attorneys, where his senior partner is spending the  
9 rest of his life in jail for fabricating cases of a  
10 sexually charged nature against people in South  
11 Florida, wealthy people, in order to fleece  
12 unsuspecting investors out of their life savings.  
13 So though I'd like to answer that question,  
14 Mr. Horowitz, very much so like to answer that  
15 question, I've been informed that if I chose to do  
16 so, I risk losing the representation of my counsel  
17 and waiving my rights.

18 BY MR. HOROWITZ:

19 Q Okay. And with regard to the underage girls  
20 who you had sexual contact with at your home between  
21 2001 and 2006, you had a common scheme of paying them  
22 between 2 to \$300 each, each time they came; is that  
23 right?

24 MR. PIKE: Form.

25 THE WITNESS: I would very much like to answer

1 girls were high school students in Palm Beach County;  
2 isn't that right?

3 MR. PIKE: Form.

4 THE WITNESS: I'd like to answer all of your  
5 questions here today, Mr. Horowitz, about all the  
6 claims made by the girls you represent. However,  
7 on advice of my counsel at least today, they've  
8 instructed me to assert my Fourteenth Amendment  
9 Right, my Sixth Amendment Right and my Fifth  
10 Amendment Right. So though I would prefer to  
11 answer the questions, if I choose to do so, I'm  
12 informed that I risk losing my counsel's  
13 representation and/or waiving my rights.

14 BY MR. HOROWITZ:

15 Q And with regard to the girls under the age of  
16 18 who came to your home in 2001 through 2006, your  
17 purpose in having them come to your home was for sexual  
18 activity, but they were told they were coming to your  
19 home to give a massage; isn't that right?

20 MR. PIKE: Form.

21 THE WITNESS: I'd like to answer each and every  
22 one of your questions about the claims of your  
23 girls. However, today, my counsel has informed me  
24 that I must assert my rights under the Fourteenth,  
25 Sixth and Fifth Amendment to any question that may

1 all the questions about the claims -- the so-called  
2 claims of all your girls, of all your young women,  
3 represented by your firm, represented initially by  
4 your partner who was suspended by the Florida Bar  
5 for improper behavior. He's not here because of  
6 that -- excuse me -- the claims of Mr. Edwards'  
7 clients, some admitted prostitutes. His partner is  
8 in jail for the rest of his life for fabricating  
9 cases of a sexually charged nature against people  
10 in South Florida in it -- in order to fleece some  
11 of the people out of their life savings. Yes, I'd  
12 very much like to answer each and every one of your  
13 questions, however, today, on advice of counsel, I  
14 cannot.

15 BY MR. HOROWITZ:

16 Q With regard to the underage girls who came to  
17 your home between 2001 and 2006 --

18 A Would you let me finish? Would you mind if I  
19 finish. I'm sorry. I choose -- I would -- I haven't  
20 finished.

21 Q You have not finished. Would you like to  
22 finish?

23 A Yes, if I could.

24 Q Go ahead.

25 A And though I'd like to respond to those

1 questions, my counsel has told me that if I do so, I  
2 risk losing his representation and potentially waiving  
3 my rights. Sorry. Go ahead.

4 Q With regard to the girls who came to your home  
5 between 2001 through 2006 who were under the age of 18  
6 you knew that each of them was not a trained masseuse,  
7 correct?

8 MR. PIKE: Form.

9 THE WITNESS: I would like to answer each one  
10 of the claims brought by your various girls.

11 However, today, my counsel has told me that I must  
12 not answer any questions that may be relevant to  
13 any of the lawsuits brought by your firm, or Mr.  
14 Edwards' firm whose partner sits in jail accused by  
15 the U.S. Attorney of South Florida of his firm  
16 being a criminal enterprise, his partner being in  
17 jail for the rest of his life accused by the United  
18 States Government of fabricating cases of a  
19 sexually charge nature in order to fleece local  
20 investors out of their life savings. So though I'd  
21 like to answer those questions, Mr. Horowitz --  
22 very much so, in fact, my attorneys have told me  
23 that if I choose to do so, I risk losing their  
24 representation and waiving my rights.

25 BY MR. HOROWITZ:

1 MR. PIKE: Form.

2 THE WITNESS: I'd like to answer that question,  
3 like I'd like to answer most of your other  
4 questions here today with respect to the claims of  
5 all these girls. However, my attorneys have told  
6 me I may not answer those questions today and must  
7 assert my rights under the Fourteenth, Fifth and  
8 Sixth Amendment.

9 So though your partner can't be here -- the  
10 partner that filed most of your cases -- because  
11 he's been suspended from practicing law by the  
12 Florida Bar, or Mr. Edwards' partner who sits to  
13 your right can't be here because he's in jail for  
14 fleecing people out of their entire life savings by  
15 crafting cases of a sexually charged nature. As  
16 you might imagine, I would like to answer each and  
17 every one of your questions, but at least today, I  
18 cannot, because if I choose to do so, I'm told by  
19 my counsel that I risk losing their representation  
20 and waiving my rights.

21 BY MR. HOROWITZ:

22 Q With regard to all of the underage girls who  
23 came to your home between 2001 and 2006, isn't it true  
24 that you touched all of them on either their breasts,  
25 vagina, buttocks, or some combination of those three

1 Q Okay. With regard to all of the underage girls  
2 who came to your home between 2001 and 2006, you knew  
3 each them was under the age of 18; is that right?

4 MR. PIKE: Form.

5 THE WITNESS: I am going to have to respond to  
6 that question the way I've responded to most of  
7 your questions here today. I'd like to respond to  
8 every one of your questions with respect to all  
9 these claims made by your clients, claims filed by  
10 your partner who's not here because he's been  
11 suspended from practicing law in the State of  
12 Florida -- in fact, practicing law anywhere, or  
13 Mr. Edwards' partner who's in jail for the rest of  
14 his life for fleecing local investors out of their  
15 life savings by crafting cases of a sexually  
16 charged nature. I'd like to answer every one of  
17 your questions, but my counsel has advised me I may  
18 not today. And if I choose to do so, which is my  
19 preference, I risk losing his representation and/or  
20 waiving my right.

21 BY MR. HOROWITZ:

22 Q And with regard to all of the underage girls  
23 who came to your home between 2001 and 2006, you asked  
24 each of them to undress in your presence while giving  
25 you a massage; isn't that right?

1 parts?

2 MR. PIKE: Form.

3 THE WITNESS: I'd like to answer every one of  
4 those questions with great specificity, however,  
5 today, my attorneys have advised me that any  
6 question that may be relevant to any of the  
7 lawsuits filed by your firm, your firm whose  
8 partner has been suspended by the Florida Bar for  
9 improper behavior, cases filed by Mr. Edwards' firm  
10 whose partner sits in jail for the rest of his  
11 life, accused and pled guilty, I believe, to  
12 fleecing investors out of some of their life  
13 savings and like crafting cases of a sexually  
14 charged nature. I'd like to answer every one of  
15 your questions with great specificity. However,  
16 I'm told by my counsel if I choose to do so, I risk  
17 losing his representation and waiving my rights.

18 BY MR. HOROWITZ:

19 Q Between 2001 and 2006 did you keep sexual toys  
20 for your own use in your Palm Beach County home?

21 MR. PIKE: Form.

22 THE WITNESS: I'd like to answer that  
23 question. I'd like to answer the questions of all  
24 your claims regarding your girls that you're  
25 representing. Unfortunately your partner can't be

1 here because he's been suspended from practicing  
2 law. So though I'd like to answer your questions,  
3 I've been advised by my counsel that I cannot  
4 today. I must assert my rights under the  
5 Fourteenth, Sixth and Fifth Amendment. And though  
6 I'd like to answer each one of these questions with  
7 great specificity, I'm told that if I choose to do  
8 so, I risk losing his representation and waiving my  
9 rights.

10 BY MR. HOROWITZ:

11 Q Between 2001 and 2006, isn't it true that you  
12 used sexual toys on underage girls in Palm Beach  
13 County?

14 MR. PIKE: Form.

15 THE WITNESS: I would like to answer every one  
16 of your questions regarding these claims by your  
17 girls, but on advice of counsel today, I've been  
18 told that I must assert my rights under the Fifth,  
19 Sixth and Fourteenth Amendment. I'd prefer to, in  
20 fact, assert those rights to your partner who has  
21 been suspended by the Florida Bar since filing  
22 these sexually charged cases, or Mr. Edwards'  
23 partner who sits next to you, for his partner who's  
24 now sitting -- spending the rest of his life in  
25 jail accused of stealing the life savings of many

1 assert the Fifth --

2 MR. PIKE: Well, you want -- you want to be  
3 here asking the same question -- let me -- let me  
4 get this straight. Despite the fact that the Court  
5 has -- because I'm working on time, all right? So  
6 despite the fact that the Court has already made a  
7 ruling on a number of issues covered by the Fifth  
8 Amendment, you still want to ask those questions  
9 again while you're here at deposition just to have  
10 Mr. Epstein invoke the Fifth Amendment, correct?

11 MR. HOROWITZ: Well, you don't know what  
12 questions I intend to ask. I have some very  
13 specific questions about his net worth that have  
14 not been addressed by any Court.

15 BY MR. HOROWITZ:

16 Q Okay. Is your net worth over one billion  
17 dollars, sir?

18 THE WITNESS: On advise of counsel, I am going  
19 to have to invoke the Fifth Amendment, Sixth  
20 Amendment and Fourteenth Amendment.

21 BY MR. HOROWITZ:

22 Q Do you either own or have a beneficial interest  
23 in the property located at 358 Brillo (phonetic) Way in  
24 Palm Beach, Florida?

25 A I'm going to have to invoke my Fifth Amendment

1 Floridians by crafting sexually -- cases of a  
2 sexually charged nature. So though I would like to  
3 answer each and every one of your questions,  
4 Mr. Horowitz, today, I'm told if I choose to do so,  
5 I risk losing the representation of my counsel and  
6 waiving my rights.

7 BY MR. HOROWITZ:

8 Q What is your net worth at the present time?

9 MR. PIKE: Form. I'm going to instruct him not  
10 to answer that question. There's no -- the Court  
11 has already ruled on that. Pursuant to the Court's  
12 order, your order, and Mr. Edwards' order.

13 MR. HOROWITZ: Are you instructing him not to  
14 answer?

15 MR. EDWARDS: My order?

16 MR. PIKE: Yeah.

17 MR. HOROWITZ: Are you instructing him not to  
18 answer?

19 MR. PIKE: It's already -- it's already been  
20 ruled on by the Court that Mr. Epstein does not  
21 have to answer any net worth information. That  
22 order just came out. What's the purpose in --

23 MR. HOROWITZ: I believe what the Court said is  
24 that it sustained his Fifth Amendment privilege, so  
25 he's got to assert the Fifth. He can -- he can

1 Sixth Amendment and Fourteenth Amendment Right.

2 Q Do you either own or have a beneficial interest  
3 in the property located at 9 East 71st Street in New  
4 York, New York?

5 A On advice of my counsel, I am going to have to  
6 invoke my Fifth Amendment, Sixth Amendment and  
7 Fourteenth Amendment Right.

8 Q Do you either own or have a beneficial interest  
9 in the property located at 49 Zorro (phonetic) Ranch  
10 Road in Stanley, New Mexico?

11 A On advice of my counsel, Mr. Horowitz, though  
12 I'd like to answer these questions, my counsel has  
13 advised me that I must invoke my Fifth Amendment, Sixth  
14 Amendment and Fourteenth Amendment Right.

15 Q Do you either own or have a beneficial interest  
16 in a property located at 301 East 66th Street in New  
17 York, New York?

18 A Again, Mr. Horowitz, I'll have to answer that  
19 question, as I've answered mostly all your other  
20 questions here today, though I'd like to answer each one  
21 with specificity, my counsel has advised me that I must  
22 invoke my -- excuse me -- my Sixth Amendment Right, my  
23 Fifth Amendment Right and Fourteenth Amendment Right, so  
24 on the -- if I -- though I'd prefer to answer these  
25 questions, I'm told that if I choose to do so, I risk

1 losing the representation of my counsel and waiving  
2 those rights.

3 MR. PIKE: Before -- before you start another  
4 question there, I just want to be clear for the  
5 record that you said on the record that these  
6 questions that you had prepared were going to be  
7 specifically detailed, and that they were not  
8 addressed by the Court, but, in fact, you've gone  
9 on with seven to eight questions, and all of which  
10 have been directly addressed by the Court.

11 Now, I'm here. I'm here. I'm here. I've  
12 unbuttoned my tie. I've -- my button -- I've  
13 pulled my tie out. I'm here for the nights for  
14 you, but are you really going to waste our time  
15 with questions that the Court has already ruled  
16 on?

17 MR. HOROWITZ: All right. I'm not here for the  
18 entire night with you, okay? I've got places to  
19 be. I've got a plane to catch. I'm going to try  
20 to get through as much as I can, but there's a  
21 point in time where I've got to go, okay?

22 MR. PIKE: Okay. I understand.

23 MR. HOROWITZ: I'm not going to get into a  
24 banter with you right now. We're going to continue  
25 with these questions. We're going to get done with

1 MR. PIKE: Form to all these net worth  
2 questions. Are we in agreement there?

3 MR. HOROWITZ: No, I -- I think you waived it  
4 when you didn't answer -- assert those before.

5 MR. PIKE: That's fine.

6 THE WITNESS: I'd like to answer each one of  
7 those questions, but today, under advice of  
8 counsel, I'm going to have to assert my Fourteenth  
9 Amendment, Fifth Amendment and Sixth Amendment  
10 Right, Mr. Horowitz.

11 BY MR. HOROWITZ:

12 Q Do you either own or have a beneficial interest  
13 in -- in islands known as Little St. James in the U.S.  
14 Virgin Islands?

15 MR. PIKE: Form, and for the record I can't  
16 waive Fifth. Go ahead.

17 THE WITNESS: Excuse me, but I'd like to answer  
18 that question, but on advice of counsel, I'm going  
19 to assert my Fifth Amendment, Sixth Amendment and  
20 Fourteenth Amendment Right.

21 BY MR. HOROWITZ:

22 Q Do you either own or have a beneficial interest  
23 in the property located -- in a property located in the  
24 Westminster neighborhood in London, England?

25 MR. PIKE: Form.

1 as much as we can.

2 MR. PIKE: That's fine. I just want to bring  
3 it up with the Court that you've gone on and you've  
4 asked a ton of questions here today that have  
5 already been covered by the Court's order that --  
6 that of which you and I have spent a lot of time on  
7 with regard to motion practice.

8 BY MR. HOROWITZ:

9 Q Okay. Do you either own or have a beneficial  
10 interest in the property located at 457 Madison Avenue,  
11 Fourth Floor?

12 A Though I'd like to answer each and every one of  
13 your questions with respect to these issues, on advice  
14 of counsel, I'm going to have to invoke my Fourteenth  
15 Amendment, Sixth Amendment and Fifth Amendment Right.

16 Q Do you either own or have a beneficial interest  
17 in the property located at 14 Wall Street?

18 A As I said before, I'm going to -- as I've  
19 answered most of these other questions, I'm going to  
20 have to invoke my Sixth Amendment, Fifth Amendment and  
21 Fourteenth Amendment Right, though I'd prefer to answer  
22 these questions.

23 Q Do you either own or have a beneficial interest  
24 in the property located at 8000 Walton Parkway in New  
25 Albany, Ohio?

1 THE WITNESS: On advice of counsel, I'm going  
2 to invoke my Fifth Amendment, Sixth Amendment and  
3 Fourteenth Amendment Right.

4 BY MR. HOROWITZ:

5 Q Do you either own or have a beneficial interest  
6 in the property located -- at a -- strike that.

7 Do you either own or have a beneficial interest  
8 in any property located on Avenue Folk (phonetic) in  
9 Paris, France?

10 MR. PIKE: Form.

11 THE WITNESS: I'm going to answer that  
12 question, as I've answered all your other questions  
13 with respect to these issues, which is I am going  
14 to have to invoke my Fifth Amendment, Sixth  
15 Amendment and Fourteenth Amendment Right.

16 BY MR. HOROWITZ:

17 Q Sir, I am going to hand you a document -- we'll  
18 mark it as Exhibit 1 -- it's -- it's -- it's from the  
19 Florida Department of Law Enforcement Sexual Offender's  
20 and Predator's Flyer bearing your name, and on top it  
21 says, "Vehicle and Vessel Information." You can take a  
22 look at it for a moment with your -- you and counsel.  
23 My question is simply going to be: Is this an accurate  
24 list of the vehicles and vessels that you own as of  
25 today's date?

1 A I am going to respond to that question,  
2 Mr. Horowitz, as I've responded to every other question  
3 today virtually, which is I am going to have to invoke  
4 my Fifth Amendment, Sixth Amendment and Fourteenth  
5 Amendment Right.

6 MR. HOROWITZ: Okay.

7 MR. PIKE: Form.

8 BY MR. HOROWITZ:

9 Q With respect to the vehicles and vessels listed  
10 on Document 1 -- Exhibit 1, are there any vehicles on  
11 that list that you do not own or have a beneficial  
12 interest in at the present time?

13 MR. PIKE: Form.

14 THE WITNESS: I'm going to assert my Fifth  
15 Amendment, Sixth Amendment and Fourteenth Amendment  
16 Rights.

17 BY MR. HOROWITZ:

18 Q And with respect to the vehicles and vessels on  
19 Exhibit 1, are there any other vehicles or vessels not  
20 on that list which you -- which you own?

21 MR. PIKE: Form.

22 THE WITNESS: I'm going to answer that  
23 question, as I've answered most of your other  
24 questions here today, which is I am going to have  
25 to invoke my Fifth Amendment, Sixth Amendment and

1 MR. PIKE: Form.

2 THE WITNESS: I would like to answer that  
3 question, but I am going to have to answer the same  
4 way I've answered most of your other questions  
5 today, which is my counsel has informed me that any  
6 questions relevant to these lawsuits, I must invoke  
7 my Sixth Amendment, Fifth Amendment and Fourteenth  
8 Amendment Right.

9 BY MR. HOROWITZ:

10 Q Since the first lawsuit was filed against you  
11 alleging childhood sexual abuse, isn't it true that your  
12 efforts to conceal your assets have included placing  
13 money in the accounts of corporations in which you have  
14 a beneficial interest?

15 MR. PIKE: Form.

16 THE WITNESS: Mr. Horowitz, I'm going to answer  
17 that question, as I've answered most of your other  
18 questions here today. My counsel has informed me  
19 that I cannot answer any questions that may be  
20 relevant to your lawsuits, so therefore, I must  
21 invoke my Fourteenth Amendment Rights, my sixth  
22 Amendment Rights and my Fifth Amendment Rights.

23 BY MR. HOROWITZ:

24 Q Since the filing of the first lawsuit against  
25 you in which it was alleged that you committed sexual

1 Fourteenth Amendment Right.

2 BY MR. HOROWITZ:

3 Q And in the past two years isn't it true, sir,  
4 that you have transferred vehicles and -- vehicles,  
5 vessels or aircrafts out of your own name to other  
6 parties in an effort to defraud potential creditors?

7 MR. PIKE: Form.

8 THE WITNESS: Unfortunately I'd like to answer  
9 all of those questions, but on the advice of  
10 counsel here today, I cannot answer any questions  
11 that may be relevant to any of the lawsuits.

12 BY MR. HOROWITZ:

13 Q All right. Since the first civil lawsuit was  
14 filed against you alleging childhood sexual abuse, have  
15 you been taking steps to hide and conceal your assets?

16 MR. PIKE: Form.

17 THE WITNESS: I would like to answer that  
18 question with specificity, however, my counsel has  
19 advised me that I must invoke my Fourteenth  
20 Amendment, Sixth Amendment and Fifth Amendment  
21 Right.

22 BY MR. HOROWITZ:

23 Q Isn't it true, sir, that your efforts to  
24 conceal your assets have included placing money in  
25 accounts of other people?

1 abuse --

2 THE REPORTER: Committed -- I'm sorry?

3 MR. HOROWITZ: I'm sorry, I'll slow down a  
4 little bit.

5 BY MR. HOROWITZ:

6 Q Since the filing of the first lawsuit against  
7 you in which it was alleged that you committed childhood  
8 sexual abuse, have you expended money to pay for the  
9 lawyers of witnesses in -- in the lawsuit?

10 MR. PIKE: Form.

11 THE WITNESS: Mr. Horowitz, I'm going to answer  
12 that question the way I've answered most of your  
13 other questions here today, which is though I'd  
14 like to answer those questions, I've been advised  
15 by my counsel that I may not. And if I choose to  
16 do so, and not invoke my Fourteenth, Sixth and  
17 Fifth Amendment Rights which I am hereby doing,  
18 that if I answer those questions I lose --  
19 potentially lose his representation and/or waive my  
20 rights.

21 BY MR. HOROWITZ:

22 Q Did you have surveillance cameras in either the  
23 interior or exterior of your home on -- at Brillo Way  
24 between 2001 and 2006?

25 MR. PIKE: Form.

1 THE WITNESS: Mr. Horowitz, I'm going to answer  
 2 that question the same way I've answered most of  
 3 your other questions here today. I'd like to  
 4 answer each one of your questions regarding your  
 5 claims with great specificity, however, my counsel  
 6 has advised me that I may not today, and thereby  
 7 have to invoke my Fourteenth Amendment Rights, my  
 8 Sixth Amendment Rights and Fifth Amendment Rights  
 9 as provided by the U.S. Constitution. So though  
 10 I'd like to answer those questions, I've been  
 11 informed that if I do so, I risk losing his  
 12 representation and/or waive my rights.

13 BY MR. HOROWITZ:

14 Q Sir, have you had sexual contact with girls  
 15 under the age of 18 in New York State in the past ten  
 16 years?

17 MR. PIKE: Form.

18 THE WITNESS: I'm sorry?

19 BY MR. HOROWITZ:

20 Q Have you, Jeffrey Epstein, had sexual contact  
 21 with girls under the age of 18 in New York State within  
 22 the past ten years?

23 MR. PIKE: Form.

24 THE WITNESS: Mr. Horowitz, I'd like to answer  
 25 every one of your questions here today about the

1 questions of a sexual nature, I would refer to, in  
 2 fact, direct it to your partner who's been  
 3 suspended after he filed some of these cases from  
 4 practicing law -- he got suspended from filing --  
 5 practicing law in Florida.

6 Mr. Edwards' partner who's in jail for crafting  
 7 cases of a sexual nature, defrauding investors,  
 8 local people, out of their life savings by  
 9 fabricating malicious sexually charged cases. So  
 10 though I would like to answer each and every one of  
 11 your questions, today I cannot do so. And I'm told  
 12 that if I choose to do so, I risk losing the  
 13 representation of my counsel.

14 BY MR. HOROWITZ:

15 Q Was it your practice between 2001 and 2006 to  
 16 use your power to influence minor girls into having  
 17 sexual contact with you?

18 MR. PIKE: Form.

19 THE WITNESS: I would like to answer each and  
 20 every one of your questions. However, my counsel  
 21 has told me I may not. And though I would prefer  
 22 to answer, he's told me that if I choose to, I --  
 23 if -- potentially will lose his representation or  
 24 waive my rights, therefore, I must invoke the  
 25 rights as protected -- under the Constitution of

1 claims made by all your girls. However, on advice  
 2 of my counsel, I've been told that I must invoke my  
 3 Fourteenth Amendment, Sixth Amendment and Fifth  
 4 Amendment Rights. Though I would like to answer  
 5 those questions, I've been told if I choose to do  
 6 so, I risk losing my counsel's representation  
 7 and/or waive those rights.

8 BY MR. HOROWITZ:

9 Q Have you had sexual contact with girls under  
 10 the age of 18 in the State of New Mexico in the past ten  
 11 years?

12 MR. PIKE: Form.

13 THE WITNESS: Mr. Horowitz, I'm going to answer  
 14 that question the same way I've answered virtually  
 15 all of your questions here today. On advice of my  
 16 counsel -- though I would like to answer those  
 17 questions -- he's informed me that I must invoke my  
 18 Sixth Amendment, Fifth Amendment and Fourteenth  
 19 Amendment Right under the U.S. Constitution.

20 BY MR. HOROWITZ:

21 Q Sir, between 2001 and 2006 was it your practice  
 22 to use your wealth to influence minor girls to have  
 23 sexual contact with you?

24 MR. PIKE: Form.

25 THE WITNESS: Mr. Horowitz, these types of

1 the Fourteenth Amendment, Sixth Amendment and Fifth  
 2 Amendment.

3 BY MR. HOROWITZ:

4 Q Isn't it true, sir, that the real reason that  
 5 you brought underage girls to your home in Palm Beach  
 6 County between 2001 to 2006, was that you could get  
 7 sexual satisfaction?

8 MR. PIKE: Form.

9 THE WITNESS: Mr. Horowitz, I would like to  
 10 answer each and every one of your questions that  
 11 you've raised here today. Unfortunately my counsel  
 12 has advised me that I cannot, and they have  
 13 instructed me to assert my rights as the -- as  
 14 under the Fourteenth Amendment, Sixth Amendment and  
 15 Fifth Amendment of the U.S. constitution. I would  
 16 prefer to answer those questions. I'd really  
 17 prefer to answer those questions, but my attorney  
 18 has told me I may not. But if I choose to do so, I  
 19 will risk losing his representation and/or waiving  
 20 those rights. Five minutes?

21 MR. HOROWITZ: Sure.

22 THE VIDEOGRAPHER: Time off the record 6:05  
(Thereupon, a short break was taken.)

23 MR. HOROWITZ: All right. Let me just --

24 THE VIDEOGRAPHER: Time on the record 6:11.

1 MR. HOROWITZ: All right. Let me just get this  
2 on the record. It's now 6:11 p.m. We've been  
3 working all day, as best we can, plowing through so  
4 far the claims of my seven clients, and though I  
5 have done my very best on my part to get through as  
6 much material as I can, I simply cannot finish  
7 today, number one, because we've already been  
8 working an eight-hour day, and two, maybe more  
9 importantly, I have a plane to catch in about a  
10 little bit over an hour. So with that said, I  
11 cannot complete today. You know, you can file what  
12 you need to, and I'll file what I need to, but --

13 MR. EDWARDS: Well --

14 MR. HOROWITZ: Do you want to say anything?

15 MR. EDWARDS: Yeah. For the purposes of the  
16 record, I'd just like to make the record in that  
17 the deposition was set in nine cases today, I  
18 believe. I was unable to ask any questions today,  
19 and I think the record is going to be clear as to  
20 the reason why that happened, both the video and  
21 the transcript, in a case like this where the  
22 options are answer questions, or take the Fifth,  
23 and the election for the most part was take the  
24 Fifth, it should be a short abbreviated  
25 deposition. Instead the types of answers that we

1 received were obstructionist in nature. I think  
2 that that's -- that's going to be something that  
3 the Court is going to rule upon, but that's going  
4 to be our position. And that after every -- nearly  
5 every question, there was some injection into the  
6 record by Mr. Epstein about Jeffrey Herman and some  
7 discipline that he had with the Florida Bar, as  
8 well as Scott Rothstein and his being in jail, as  
9 well as something to do with other partners going  
10 to jail, despite the fact that I haven't asked a  
11 single question, nor have any questions been asked  
12 about my clients.

13 In addition to the mockery that was made of  
14 this deposition by Mr. Epstein and of the overall  
15 discovery process today because of the way he chose  
16 to answer questions and that his counsel did not  
17 instruct him to do otherwise, and instead seemed to  
18 encourage those types of responses, we're unable to  
19 finish today. It's going to take another day.

20 And one other thing that I think is going to be  
21 clear, but I want to put on the record, is that we  
22 probably took fifteen -- no exaggeration -- breaks,  
23 each one of them initiated by Mr. Epstein, which  
24 just also served only to obstruct the deposition  
25 and cause us not to finish today. So I just want

1 to put that on the record, so that it's clear why  
2 we're not finishing, at least from my vantage  
3 point.

4 MS. EZELL: And I'd to add that I had cross-  
5 noticed on behalf of our client in the one filed  
6 case we have. We also represent three other  
7 clients, and we do not yet have filed cases. We  
8 certainly want a chance to ask our questions as  
9 well. I do think we wasted a great deal of time  
10 today in very self-serving answers that did nothing  
11 to advance the discovery in this matter.

12 MR. PIKE: Is everybody done?

13 MR. HOROWITZ: Yes.

14 MR. EDWARDS: I'll just join in on the comments  
15 by defense counsel.

16 MR. PIKE: Okay. I'm just going to move to  
17 strike for purposes of the trial. I understand  
18 that everybody is trying to make a record for any  
19 future motion, but I move to strike everybody's  
20 comments for purpose -- purposes of the trial in  
21 this matter.

22 We're here right now, Mr. Edwards, for you to  
23 begin and finish your deposition. We're here right  
24 now for you, Mrs. Ezell, to begin and finish your  
25 deposition of Mr. Epstein. And Mr. Horowitz, this

1 case has been -- this deposition has been set for  
2 some time, and, you know, whether or not you have a  
3 flight plan, or whether or not it was prearranged,  
4 I do not know. But we are here right now to finish  
5 your deposition for your clients. So I see that  
6 everybody is standing, with the exception of  
7 Ms. Ezell. I'm sitting, and I'm ready to finish  
8 this deposition and let you guys commence.

9 MS. EZELL: We've been going for eight hours  
10 and fifteen minutes. The facility we're in is all  
11 closed down. The lights are off everywhere. We  
12 can't get in and out of doors. I think to suggest  
13 we proceed for what would be another eight hours at  
14 this point is just not workable.

15 MR. EDWARDS: And I probably have five hours of  
16 questions, and that's assuming that the answers  
17 that we receive were less elongated than the ones  
18 we received already. So given the circumstances  
19 and the nature of the responses and how long it  
20 takes to respond, we would not finish until next  
21 Thursday at this pace so I just don't think it  
22 would be fruitful to continue.

23 MR. PIKE: I understand your statement.

24 MR. EDWARDS: Right.

25 MR. PIKE: The facility here we have arranged

1 to have it after hours. Our particular area is --  
2 is -- area is not closed down, so if you'd like to  
3 go forth with the deposition, we are here, as I've  
4 said.

5 MR. HOROWITZ: Let me say this. You know, my  
6 -- nearly all of my clients have had two days of  
7 depositions, despite the fact that they're parties  
8 to only one case. Mr. Epstein is a party to a  
9 dozen cases just for -- on the lawyers who are here  
10 today. So given the practice of parties' appearing  
11 for two days of depositions in the past, it makes  
12 sense particularly in the case of Mr. Epstein who's  
13 a party in multiple cases to do at least two days  
14 of depositions for the same reasons. There's just  
15 a lot of material to cover.

16 MR. PIKE: I think everybody has said their  
17 piece.

18 MR. EDWARDS: Yep.

19 MR. PIKE: Are we going off the record?

20 MR. HOROWITZ: Yes, we can go off the record.

21 THE VIDEOGRAPHER: Time off the record 6:17.  
22 (Videotaped deposition was concluded.)  
23 (Thereupon, Exhibit No. 1 was marked for  
24 identification.)

25 THE REPORTER: Do you want to order this,

1  
2  
3 STATE OF FLORIDA )  
4 COUNTY OF BROWARD )

5  
6  
7 I, the undersigned authority, certify that  
8 Jeffrey Edward Epstein personally appeared before me and  
9 was duly sworn.

10  
11 WITNESS my hand and official seal this 22nd day  
12 of March, 2010.  
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Vicki L. Lima, Court Reporter  
Notary Public - State of Florida  
Commission No: DD 882608  
Expiration Date: May 26, 2013  
Job #92076-B

1 Mr. Horowitz?

2 MR. HOROWITZ: Yes.

3 MS. EZELL: We'll take a copy.

4 MR. PIKE: We'll take a copy.

5 MR. EDWARDS: Copy, please.

6 (Proceedings were concluded.)  
7  
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1 CERTIFICATE

2  
3 STATE OF FLORIDA )  
4 COUNTY OF BROWARD )

5 I, Vicki L. Lima, Court Reporter, Notary Public  
6 in and for the State of Florida at Large, do hereby  
7 certify that the aforementioned witness was by me first  
8 duly sworn to testify to the whole truth; that I was  
9 authorized to and did report said deposition in  
10 stenotype; and that the foregoing pages are a true and  
11 correct transcription of my shorthand notes of said  
12 deposition.

13 I further certify that the said deposition was  
14 taken at the time and place hereinabove set forth and  
15 that the taking of said deposition was commenced and  
16 completed as hereinabove set out.

17 I further certify that I am not an attorney or  
18 counsel of any of the parties, nor am I a relative or  
19 employee of any attorney or counsel of any party  
20 connected with this action, nor am I interested in the  
21 action.

22 The foregoing certification of this transcript  
23 does not apply to any reproduction of the same by any  
24 means unless under the direct control and/or direction  
25 of the certifying reporter.

IN WITNESS WHEREOF, I have hereunto set my hand  
this 22nd day of March, 2010.

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Vicki L. Lima, Court Reporter  
Notary Public - State of Florida  
Commission No: DD 882608  
Expiration Date: May 26, 2013  
Job #92076-B



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FORT LAUDERDALE, FLORIDA 33301  
(954) 712-2600

March 22, 2010 Job #92076-B Volume II

Jeffrey Edward Epstein, witness

Michael J. Pike, Esquire

303 Banyan Boulevard, Suite 400

West Palm Beach, Florida 33401

RE: Jane Doe No. 2 vs. Jeffrey Epstein

CASE NO: 08-CV-80119-MARRA/JOHNSON

Dear Mr. Epstein:

Please take notice that on March 8, 2008, you gave your deposition in the above-referred matter. At that time, you did not waive your signature. It is now necessary that you sign your deposition.

As previously agreed to, the transcript will be furnished to you through your counsel. Please read the following instructions:

At Page 335, you will find an errata sheet. As you read your deposition, any changes or corrections that you wish to make should be noted on the errata sheet, citing page and line number of said change. DO NOT write on the transcript itself. Once you have read the transcript and noted any changes, be sure to sign and date the errata sheet and return those pages to us at the address listed above. You need not return the entire transcript.

If you do not read and sign the deposition within thirty (30) days, the original, which has already been forwarded to the ordering attorney, may be filed with the Clerk of the Court. If you wish to waive your signature, sign your name in the blank at the bottom of this letter and return it to us.

Very truly yours,  
Universal Legal Reporting,

Vicki L. Lima  
Court Reporter - Notary Public

I do hereby waive my signature.

ERRATA SHEET

IN RE: Jane Doe No. 2 vs. Jeffrey Edward Epstein  
DEPOSITION OF: Jeffrey Edward Epstein, Volume II  
TAKEN: March 8, 2010  
DO NOT WRITE ON TRANSCRIPT - ENTER CHANGES HERE  
PAGE # LINE # CHANGE REASON

7	_____	_____	_____	_____
8	_____	_____	_____	_____
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18	_____	_____	_____	_____
19	_____	_____	_____	_____
20	_____	_____	_____	_____

Please forward the original signed errata sheet to this office so that copies may be distributed to all parties. Under penalty of perjury, I declare that I have read my deposition and that it is true and correct subject to any changes in form or substance entered here.  
DATE: \_\_\_\_\_ SIGNATURE OF DEPONENT \_\_\_\_\_  
Job #92076-B

# ATTACHMENT 9

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

CASE NO. 08-CV-80893-CIV-MARRA/JOHNSON

JANE DOE,

Plaintiff,

vs.

JEFFREY EPSTEIN, et al.,

Defendants.



---

Related Cases:

08-80119, 08-80232, 08-80380, 08-80381,  
08-80994, 08-80811, 08-80893, 09-80469,  
09-8-591, 09-80656, 09-80802, 09-81092

VIDEOTAPED DEPOSITION OF NADIA MARCINKOVA  
TAKEN ON BEHALF OF THE PLAINTIFF

DATE: April 13, 2010

U.S. Legal Support  
(561) 835-0220

1 A I take the Fifth.

2 Q I represent a lady named, a young female  
3 named E.W.; you know who that is, right?

4 MR. YAREMA: Object to the form.

5 A The Fifth.

6 Q Jeffrey Epstein made you have sex with  
7 E.W., didn't he?

8 MR. YAREMA: Object to the form.

9 A The Fifth.

10 Q You did, in fact, engage in sexual  
11 activity with E.W. when she was only 16 years  
12 old; isn't that true?

13 MR. YAREMA: Object to the form.

14 A The Fifth.

15 Q Back to my original question: And I'll  
16 ask you this way: Do you consider yourself  
17 heterosexual, bi-sexual, or can you answer that  
18 question?

19 MR. YAREMA: Object to the form.

20 MR. GOLDBERGER: Same objection. Do not  
21 answer the question.

22 A Fifth.

23 Q How did you meet Jeffrey Epstein?

24 A Fifth.

25 Q When did you become one of Jeffrey

# ATTACHMENT 8

1 UNITED STATES DISTRICT COURT  
2 SOUTHERN DISTRICT OF FLORIDA

3 JANE DOE NO. 2, CASE NO: 08-CV-80119  
4 Plaintiff,  
5 Vs.  
6 JEFFREY EPSTEIN,  
7 Defendant.  
\_\_\_\_\_ /

8 JANE DOE NO. 3, CASE NO: 08-CV-80232  
9 Plaintiff,

10 Vs. **CONDENSED**

11 JEFFREY EPSTEIN,  
12 Defendant.  
\_\_\_\_\_ /

13  
14 JANE DOE NO. 4, CASE NO: 08-CV-80380  
15 Plaintiff,

16 Vs.  
17 JEFFREY EPSTEIN,  
18 Defendant.  
\_\_\_\_\_ /

19 JANE DOE NO. 5, CASE NO: 08-CV-80381  
20 Plaintiff,

21 Vs  
22 JEFFREY EPSTEIN,  
23 Defendant.  
24 \_\_\_\_\_ /  
25

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1 JANE DOE NO. 6, CASE NO: 08-CV-80994  
 2 Plaintiff,  
 3 Vs.  
 4 JEFFREY EPSTEIN,  
 5 Defendant.

---

6 JANE DOE NO. 7, CASE NO: 08-CV-80993  
 7 Plaintiff,  
 8 Vs.  
 9 JEFFREY EPSTEIN,  
 10 Defendant.

---

11 C.M.A., CASE NO: 08-CV-80811  
 12 Plaintiff,  
 13 Vs.  
 14 JEFFREY EPSTEIN,  
 15 Defendant.

---

16 JANE DOE, CASE NO: 08-CV-80893  
 17 Plaintiff,  
 18 Vs.  
 19 JEFFREY EPSTEIN,  
 20 Defendant.

---

21  
 22  
 23  
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 25

Page 273

1 IN THE CIRCUIT COURT OF THE 15TH  
 2 JUDICIAL CIRCUIT IN AND FOR  
 3 PALM BEACH COUNTY, FLORIDA  
 4 CASE NO. 502008CA037319XXX0MB AB

5 B.B.,  
 6 Plaintiff,  
 7 Vs.  
 8 JEFFREY EPSTEIN.  
 9 Defendant.

---

10  
 11  
 12 1031 Ives Dairy Road  
 13 Suite 228  
 14 North Miami, Florida  
 15 August 7, 2009  
 16 1:15 p.m. to 5:30 p.m.

17 CONTINUED  
 18 VIDEOTAPED  
 19 DEPOSITION  
 20 of  
 21 ALFREDO RODRIGUEZ

22 taken on behalf of the Plaintiffs pursuant  
 23 to a Re-Notice of Taking Continued Videotaped  
 24 Deposition (Duces Tecum)  
 25 ---

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1 JANE DOE NO. II, CASE NO: 08-CV-80469  
 2 Plaintiff,  
 3 Vs.  
 4 JEFFREY EPSTEIN,  
 5 Defendant.

---

6 JANE DOE NO. 101 CASE NO: 08-CV-80591  
 7 Plaintiff,  
 8 Vs.  
 9 JEFFREY EPSTEIN,  
 10 Defendant.

---

11 JANE DOE NO. 102, CASE NO: 08-CV-80656  
 12 Plaintiff,  
 13 Vs.  
 14 JEFFREY EPSTEIN,  
 15 Defendant.

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Page 274

1 APPEARANCES:  
 2  
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 7 Miami, Florida 33160  
 8 Attorney for Jane Doe 2, 3, 4, 5,  
 9 6, and 7.

10 ROTHSTEIN ROSENFELDT ADLER  
 11 BY: BRAD J. EDWARDS, ESQ., and  
 12 CARA HOLMES, ESQ.  
 13 Las Olas City Centre  
 14 Suite 1650  
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 17 Attorney for Jane Doe and E.W.  
 18 And L.M.

19 PODHURST ORSECK  
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 24 Attorney for Jane Doe 101 and 102.

25 LEOPOLD-KUVIN  
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6 Lake Worth, Florida 33461  
7 Attorney for C.M.A.  
8 Appeared via telephone.

9  
10 BURMAN, CRITTON, LUTTIER &  
11 COLEMAN, LLP  
12 BY: ROBERT CRITTON, ESQ.  
13 515 North Flagler Drive  
14 Suite 400  
15 West Palm Beach, Florida 33401  
16 Attorney for Jeffrey Epstein.

17 ALSO PRESENT:

18 JOE LANGSAM, VIDEOGRAPHER  
19  
20  
21  
22  
23  
24  
25

1 Deposition taken before MICHELLE PAYNE, Court  
2 Reporter and Notary Public in and for the State of  
3 Florida at Large, in the above cause.  
4 - - -

5 THE VIDEOGRAPHER: This is a continuation  
6 of the deposition of Alfredo Rodriguez.  
7 Today is Friday, August the 7th, the year  
8 2009, starting time approximately 1:15 p.m.  
9 Will the court reporter please swear in  
10 the witness?

11 Thereupon,

12 ALFREDO RODRIGUEZ,  
13 having been first duly sworn or affirmed, was  
14 examined and testified as follows:

15 MR. CRITTON: Before we get started just  
16 with regard to Ms. Ezell represents Jane Doe  
17 101 and 102, the alleged time of her  
18 incidents as of least have been plead in the  
19 complaint for 101 is '99 -- I'm sorry, '98  
20 through 2002, with Jane Doe 102 the Spring  
21 of -- Spring/Summer of 2003. Mr. Rodriguez  
22 never even began employment until '04 and  
23 '05. I think her questioning I think -- I  
24 can't say she doesn't have standing based on  
25 the court order, but I would say it's

1 CONTINUED INDEX OF EXAMINATION

2 WITNESS DIRECT CROSS REDIRECT RECROSS

3 ALFREDO RODRIGUEZ

4 (By Ms. Ezell) 278 441, 467

5 (By Mr. Willits) 334 453, 469

6 (By Mr. Critton) 338 464

7 (By Mr. Edwards) 419, 454, 468

8 (By Mr. Langino) 452  
9  
10  
11

12 CONTINUED INDEX OF EXHIBITS

13 PLAINTIFF'S PAGE

14 3 Drawing 315

15 4 Photograph 327

16 5 Photograph 331

17 6 Photograph 331

18 7 Photograph 331

19 8 Photograph 331

20 9 Report 446

21 (Exhibits 4, 5, 6, 7, and 8 were retained by Ms.  
22 Ezell.)  
23  
24  
25

1 completely irrelevant and immaterial and has  
2 no probative value with regard to this  
3 particular witness based upon the two  
4 clients at least that are in suit at this  
5 point in time.

6 MS. EZELL: As Mr. Critton well knows I  
7 represent a number of other clients whose  
8 cases have not been filed and I believe we  
9 do have standing to ask questions, and I do  
10 intend to do that today.

11 EXAMINATION

12 BY MS. EZELL:

13 Q. Mr. Rodriguez, you stated last time that  
14 there were guests at the house, frequent guests,  
15 friends from Harvard.

16 Do you remember that testimony?

17 A. Yes, ma'am.

18 Q. And was there a lawyer from Harvard named  
19 Alan Dershowitz?

20 A. Yes, ma'am.

21 Q. And are you familiar with the fact that  
22 he's a famous author and famous lawyer?

23 A. Yes, ma'am.

24 Q. How often during the six months or so  
25 that you were there was Mr. Dershowitz there?



1 A. Two or three times.  
 2 Q. And did you have any knowledge of why he  
 3 was visiting there?  
 4 A. No, ma'am.  
 5 Q. You don't know whether or not he was a  
 6 lawyer -- acting as a lawyer or whether he was  
 7 there as a friend?  
 8 A. I believe as a friend.  
 9 Q. Were there also young ladies in the house  
 10 at the time he was there?  
 11 MR. CRITTON: Form.  
 12 THE WITNESS: Yes, ma'am.  
 13 BY MS. EZELL:  
 14 Q. And would those have included, for  
 15 instance, Sarah Kellen and Nadia Marcenacova?  
 16 A. Yes, ma'am.  
 17 Q. Were there other young ladies there when  
 18 Mr. Dershowitz was there?  
 19 MR. CRITTON: Form.  
 20 THE WITNESS: Yes, ma'am.  
 21 BY MS. EZELL:  
 22 Q. Do you have any idea who those young  
 23 women were?  
 24 A. No, ma'am.  
 25 Q. Were any of those the young women that

1 Q. Can you tell me where those were?  
 2 A. One in the kitchen, and the one in the  
 3 formal -- the main entrance. And there was one  
 4 more added later on, but there is two when I was  
 5 working there.  
 6 Q. Could you just give me a rough sketch of  
 7 the house of where the main entrance was and where  
 8 the kitchen was?  
 9 A. I'm not an architect but it's something  
 10 like this. This is the kitchen, this is the main  
 11 entrance.  
 12 Q. Will you mark the kitchen with a K,  
 13 please, and the main entrance with ME?  
 14 A. This is the pool.  
 15 Q. The pool?  
 16 A. Yes, ma'am.  
 17 Q. And in the upper left?  
 18 A. In the terrace, yeah, there was a balcony  
 19 here.  
 20 Q. And where were the staircases?  
 21 A. This is one, the kitchen, one in the  
 22 foyer, and the pool.  
 23 Q. Okay. And would you just put an F where  
 24 the foyer staircase began? And KS where the  
 25 kitchen staircase began.

1 you have said came to give massages?  
 2 A. Yes, ma'am.  
 3 Q. And do you have any idea whether or not  
 4 Mr. Dershowitz was also receiving massages?  
 5 A. I don't know, Ma'am.  
 6 Q. I want to ask you to take this piece of  
 7 paper, please, and a pencil --  
 8 MR. WILLITS: Can anybody hear me?  
 9 MS. EZELL: Yes. Can you hear me?  
 10 MR. WILLITS: I've heard nothing for  
 11 about a minute or so.  
 12 MR. CRITTON: Can you hear me now?  
 13 MR. WILLITS: Yes.  
 14 MS. EZELL: I'm asking questions, I'm  
 15 sorry.  
 16 MR. CRITTON: Why don't we go off the  
 17 record for a second.  
 18 (Thereupon, a discussion was held off the  
 19 record.)  
 20 THE VIDEOGRAPHER: We're back on the  
 21 record.  
 22 BY MS. EZELL:  
 23 Q. Mr. Rodriguez, you indicated that there  
 24 were several staircases in the house?  
 25 A. Yes, ma'am.

1 And you said that later another staircase  
 2 was added?  
 3 A. Yeah, we rehabilitated this, you know,  
 4 but you asked me how many stairs there were, to  
 5 answer your question there were three.  
 6 Q. Three. So where was the third one?  
 7 A. The pool, this leads to the pool.  
 8 Through the outside master bedroom you could go  
 9 downstairs to the pool.  
 10 Q. Okay. A stairway then from the outside,  
 11 from outside the master bedroom?  
 12 A. Yes, ma'am.  
 13 Q. Down to the pool?  
 14 A. Yes, ma'am.  
 15 Q. One of your duties was to answer the  
 16 door. Is that correct?  
 17 A. Yes, ma'am.  
 18 Q. Which door would you answer?  
 19 A. Mainly the kitchen.  
 20 Q. And why was that, why would people mainly  
 21 come to the kitchen?  
 22 A. I'll say it was for practicable reasons  
 23 because not to go to the main -- it was shorter  
 24 because the entrance was here, so this was the  
 25 driveway and we used to take into the back door of

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1 engaging in sex acts with these young girls?  
2 MR. CRITTON: Form.  
3 THE WITNESS: No, I don't know.  
4 BY MR. EDWARDS:  
5 Q. No one ever told you that?  
6 A. No.  
7 Q. Well, since you've been keeping up with  
8 what's been written in the newspapers, at some  
9 point in time you've read that Nadia Marcenacova  
10 joined in some of these sex acts with some of  
11 these girls. Right?  
12 MR. CRITTON: Form.  
13 THE WITNESS: I believe so.  
14 BY MR. EDWARDS:  
15 Q. I'm not the first person telling you  
16 that?  
17 A. No, no, no, I read it in the newspaper.  
18 MR. CRITTON: He read your press release.  
19 MR. EDWARDS: Long before I ever had  
20 anything to do with this case.  
21 BY MR. EDWARDS:  
22 Q. Were you surprised when you read that?  
23 MR. CRITTON: Form.  
24 THE WITNESS: No.  
25 BY MR. EDWARDS:

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1 Q. Were you surprised when the story started  
2 coming out that these girls that were coming over  
3 to the house were under the age of 18 and Mr.  
4 Epstein was engaging in sex acts with them?  
5 MR. CRITTON: Form.  
6 THE WITNESS: No.  
7 BY MR. EDWARDS:  
8 Q. When was the first time that you knew for  
9 sure 100 percent that -- well, let me say it this  
10 way.  
11 When was the first time that you read  
12 that information?  
13 A. Underage?  
14 Q. Yes.  
15 A. When this scandal broke out when the Palm  
16 Beach Police Department --  
17 Q. Contacted you?  
18 A. Yeah.  
19 MR. CRITTON: Why don't you let him  
20 finish his answer instead of suggesting or  
21 giving him the answer.  
22 THE WITNESS: The West Palm Beach Police  
23 Department got involved.  
24 BY MR. EDWARDS:  
25 Q. Skipping to the second paragraph of

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1 page 72, Rodriguez stated the amount of girls that  
2 came to the house was approximately 15.  
3 That's the estimate that you gave back --  
4 A. All the girls that I saw coming in and  
5 out.  
6 Q. Well, when I read this, you can tell me  
7 what it actually means, when I read this I  
8 interpreted that as because they were talking  
9 about masseuses I interpreted that as the number  
10 of girls of the Palm Beach area that came over and  
11 you labeled masseuses. Is that correct?  
12 MR. CRITTON: Form.  
13 THE WITNESS: Yes.  
14 BY MR. EDWARDS:  
15 Q. Okay. Could you name -- I mean, I know  
16 that we've named T. and C., could you name any of  
17 the other --  
18 A. C. comes all the time, you know, I  
19 remember her.  
20 Q. Okay. No other names pop out though?  
21 A. To be honest with you, no.  
22 Q. A.?  
23 A. Yeah, because I remember because the car.  
24 Q. All right. It goes on to say, when asked  
25 to identify these girls, so somebody else asked

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1 you the same question I just did, Rodriguez stated  
2 he could not at the moment but knew he wrote their  
3 names down on a journal he kept during his employ  
4 with Mr. Epstein. Is that true?  
5 A. Yes.  
6 MR. CRITTON: Form.  
7 BY MR. EDWARDS:  
8 Q. Did you ever find that journal?  
9 A. Probably has some pages at home.  
10 Q. Because later on it seems like you met up  
11 with the police officer and produced a green  
12 folder that contained documents, but that's not  
13 the same thing as the journal. Right?  
14 A. No, this is my writings.  
15 Q. Okay. So if we want to obtain that  
16 journal from you what's the best way to go about  
17 getting it?  
18 A. I probably have to look in my house.  
19 Q. Okay. Well, it looks like we're going to  
20 come back for a second part of this, so by next  
21 time maybe you could find it. Right?  
22 A. Okay.  
23 Q. All right. Mr. Mermelstein asked you if  
24 anybody had contacted you about this case that was  
25 either an -- that was an investigator with Mr.

1 Epstein's investigators that you felt there was  
 2 more going on in the bedroom than just massages?  
 3 MR. CRITTON: Form.  
 4 THE WITNESS: Because they were more  
 5 interested in how much I know, they didn't  
 6 ask me anything else, and I told them  
 7 exactly what I knew and what I was doing.  
 8 BY MR. EDWARDS:  
 9 Q. Okay. You were asked by Mr. Mermelstein  
 10 when he was asking you about the meeting with Mr.  
 11 Epstein's investigators he said, did they make any  
 12 threat or did they threaten you, and you paused  
 13 and said I don't believe so.  
 14 A. Yeah, I think they didn't tell me  
 15 anything that I will feel -- they told me that  
 16 they want to know what I know and if I need an  
 17 attorney.  
 18 Q. Okay. Did you find that strange at all  
 19 that they offered you an attorney?  
 20 A. I went to have dinner at my house and I  
 21 told this to my wife and she told me, Alfredo, you  
 22 don't need an attorney, so I called him the next  
 23 day and that was it.  
 24 Q. You called the investigators?  
 25 A. Yes. I declined, I don't need an

1 massage with a handle with two rubber things  
 2 that you can do massage yourself, this was  
 3 always on the floor, maybe one or two.  
 4 BY MR. EDWARDS:  
 5 Q. Okay. When you say this is always on the  
 6 floor, do you mean 24 hours a day it's on the  
 7 floor?  
 8 A. No, no, no, after each massage. Because  
 9 I assume the masseuses or anybody they were doing,  
 10 they were taken out of the closet wherever they  
 11 belong and they would leave there. So Louella and  
 12 myself, we always find this on the floor.  
 13 Q. And this is a massager that belongs to or  
 14 is owned by Mr. Epstein?  
 15 A. Yes.  
 16 Q. This isn't something that these girls  
 17 would bring over to the house?  
 18 A. No, no, it's in the house, it's part of  
 19 the inventory.  
 20 Q. And that statement is a few statements  
 21 after you felt that there was a lot more going on  
 22 than just massages, is there something about that  
 23 object being left on the ground and the type of  
 24 object that it was that also lead you to believe  
 25 that there is something more going on here than

1 attorney.  
 2 Q. If we want to know the exact names of the  
 3 investigators that you met at Don Shula's and at  
 4 your house, how would we get that information, do  
 5 you have it somewhere?  
 6 A. Probably I have it in the house.  
 7 Q. So if we do have to come back here and  
 8 finish this up, the next time would you be able to  
 9 bring that?  
 10 A. I think so.  
 11 Q. Okay. Do you know where in your house  
 12 that you have it, I mean, have you kept it in a  
 13 certain place?  
 14 A. I have to look.  
 15 Q. All right. After the sentence that we  
 16 left off it says, he, speaking of Mr. Rodriguez,  
 17 would clean Mr. Epstein's bedroom after the  
 18 alleged massages and would discover massagers  
 19 slash vibrators and sex toys scattered on the  
 20 floor.  
 21 Can you tell us what types of sex toys  
 22 that you found scattered on the floor after the  
 23 massages with these young girls?  
 24 MR. CRITTON: Form.  
 25 THE WITNESS: Like I explain, there was a

1 just massages?  
 2 MR. CRITTON: Form.  
 3 THE WITNESS: Yes.  
 4 BY MR. EDWARDS:  
 5 Q. What about it, just tell us?  
 6 MR. CRITTON: Form.  
 7 THE WITNESS: I thought they were having  
 8 a good time, I never thought it was  
 9 something done against anybody's will, but  
 10 of course, you know that it's more than  
 11 massage.  
 12 BY MR. EDWARDS:  
 13 Q. Right, I'm just asking you to explain how  
 14 you know that.  
 15 MR. CRITTON: Let me just move to strike  
 16 his last answer as speculation. Form as to  
 17 your statement.  
 18 THE WITNESS: You're 50 years old and  
 19 it's -- you're an old -- you know, it's just  
 20 instinct.  
 21 MR. CRITTON: Move to strike.  
 22 BY MR. EDWARDS:  
 23 Q. It was obvious to you?  
 24 A. Yes.  
 25 MR. CRITTON: Form.

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1 BY MR. EDWARDS:  
2 Q. He also said he would wipe down the  
3 vibrators and sex toys and put them away in the  
4 armoire.  
5 MR. CRITTON: Form.  
6 THE WITNESS: These things have a tip,  
7 they have the cream, they have all kinds of  
8 cream for giving massage.  
9 BY MR. EDWARDS:  
10 Q. How many of these massagers or vibrators  
11 would you wipe down?  
12 MR. CRITTON: Form.  
13 THE WITNESS: This big one all the time.  
14 BY MR. EDWARDS:  
15 Q. Right. Other than the big one all the  
16 time did you wipe down at any time any of the  
17 other sex toys or vibrators?  
18 A. No.  
19 MR. CRITTON: Form.  
20 BY MR. EDWARDS:  
21 Q. So if there were any other sex toys or  
22 vibrator's or I believe you used the term diido  
23 earlier that were ever used, those are items that  
24 you did not find on the floor and were put away in  
25 the armoire?

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1 MR. CRITTON: Form.  
2 THE WITNESS: Louella told me I did this,  
3 I did that.  
4 BY MR. EDWARDS:  
5 Q. So tell us what did Louella tell you?  
6 A. She find toys on the floors, she have to  
7 clean them.  
8 Q. Did she tell you when she found the toys  
9 on the floor?  
10 A. After his massages, you know.  
11 Q. With the young girls that we're talking  
12 about?  
13 A. Yes.  
14 Q. Okay. And when did Louella tell you  
15 that?  
16 A. Almost every other time when she found  
17 it, you know, Alfredo I found this thing again  
18 because she despised to clean this, she had to put  
19 the gloves or whatever.  
20 Q. Okay. So it sounds like you had an  
21 actual conversation about this where she's  
22 describing she doesn't want to clean it.  
23 A. Because I told her to tell me up to date  
24 on things that are not normal, so she told me, you  
25 know, I found this, I found that, or some

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1 underwear she brought it to the laundry and we  
2 used to label it.  
3 Q. Just so that the record is clear as to  
4 what we're talking about with this and that, I  
5 want you to tell us what Louella would tell you  
6 specifically, I found this and then would she show  
7 you what it was?  
8 A. No, she didn't show me, she said I  
9 cleaned this and I put it away, it was a vibrator.  
10 Q. Did she describe the vibrator for you so  
11 that you knew which one she was talking about?  
12 A. The vibrator that a female would use for  
13 personal use.  
14 Q. Not the same long one that you've been  
15 describing?  
16 A. No.  
17 Q. One that is a penis shaped vibrator.  
18 MR. CRITTON: Form.  
19 THE WITNESS: Yes.  
20 BY MR. EDWARDS:  
21 Q. That's what she was talking about?  
22 A. Yes.  
23 Q. And did she tell you on how many  
24 occasions after these --  
25 A. Several times.

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1 Q. And can you explain to us why it is that  
2 -- and maybe it's just I don't understand the  
3 process of cleaning the room who went in first and  
4 second and whatever, but my question is why is it  
5 that she would always be the one to encounter the  
6 penis shaped vibrators and you would encounter  
7 this other longer vibrator?  
8 MR. CRITTON: Form.  
9 THE WITNESS: Because it was her job to  
10 clean the room. When she was busy she will  
11 ask me, Alfredo, can you help me carry, I  
12 have a lot of towels, because there were  
13 mountains because being an older woman I  
14 help her carry to the -- and put the towels  
15 downstairs, take it to the laundry. But she  
16 told me I found these things, I clean it, I  
17 put it in that armoire, they're over there.  
18 So she will give me -- we used to  
19 communicate all those little details, but it  
20 was her job to be in the room first.  
21 BY MR. EDWARDS:  
22 Q. And what did she say about liking or  
23 disliking the fact that she had to clean these  
24 vibrators?  
25 A. She didn't like to clean those.

1 Q. Did she tell you why?  
 2 A. Because, you know, she knew what they  
 3 were for and probably she despised to clean  
 4 objects.  
 5 Q. Did she ever make any comments about how  
 6 young the girls were that were in the room with  
 7 Mr. Epstein just before she had to go in and clean  
 8 these vibrators?  
 9 MR. CRITTON: Form.  
 10 THE WITNESS: No.  
 11 BY MR. EDWARDS:  
 12 Q. Is the age of the girls that were coming  
 13 over and going behind closed doors with Mr.  
 14 Epstein a subject that ever came up between you  
 15 and Louella?  
 16 A. Sometimes.  
 17 Q. And what would the conversation consist  
 18 of?  
 19 A. She will be surprised and say some of the  
 20 girls are too young, and I said -- we just wonder,  
 21 you know, but we comment each other.  
 22 Q. Did it ever -- as a father did it ever  
 23 occur to you that maybe I should say something or  
 24 I shouldn't be here or I shouldn't be apart of  
 25 this considering how young they are and how old he

1 a lack of respect. So, you know, she was  
 2 shocked. So obviously she needed a job but  
 3 she expressed her --  
 4 MR. WILLITS: I'm sorry, I did not hear  
 5 that, could the witness repeat that?  
 6 THE WITNESS: I was just talking about  
 7 Louella, deeply religious staff member that  
 8 worked with me and she told me one occasion  
 9 that she was crying because the picture of  
 10 the Pope was next to a naked girl.  
 11 MR. WILLITS: Okay.  
 12 BY MR. EDWARDS:  
 13 Q. Okay. Besides Louella did you ever have  
 14 a conversation with anybody else that works in the  
 15 house about the young age of the girls and Mr.  
 16 Epstein being in the bedroom and the fact that  
 17 there are sex toys on the floor afterwards being  
 18 wrong?  
 19 MR. CRITTON: Form.  
 20 THE WITNESS: Nobody else inside the  
 21 house was allowed except just the two of us,  
 22 so I never commented on this with anybody.  
 23 BY MR. EDWARDS:  
 24 Q. All right. The next sentence starts a  
 25 new paragraph, Epstein ordered Rodriguez to go to

1 is?  
 2 MR. CRITTON: Form.  
 3 THE WITNESS: Yes.  
 4 BY MR. EDWARDS:  
 5 Q. Is that something that on more than one  
 6 occasion you thought to yourself this is just  
 7 wrong?  
 8 MR. CRITTON: Form.  
 9 THE WITNESS: Yes.  
 10 BY MR. EDWARDS:  
 11 Q. And did you ever have a conversation with  
 12 Louella about the fact that that's not right?  
 13 A. We had.  
 14 Q. And Louella stayed there and she's still  
 15 employed there?  
 16 A. I believe she was.  
 17 Q. And did she ever mention to you that she  
 18 thought that the situation was wrong and that she  
 19 was contemplating --  
 20 A. She was a deeply religious --  
 21 MR. CRITTON: Form to the last question.  
 22 THE WITNESS: -- Catholic Filipino girl  
 23 -- lady, and one day she came crying because  
 24 she found a picture of the Pope next to  
 25 naked girl, both pictures, and she said it's

1 the Dollar Rent a Car and rent a car for the same  
 2 girl he brought the roses to.  
 3 I guess we're talking about A.  
 4 So that she could drive herself to  
 5 Epstein's house without incident. Rodriguez said  
 6 the girl always needed rides to and from the  
 7 house.  
 8 Are those statements you agree with?  
 9 MR. CRITTON: Form.  
 10 THE WITNESS: I took her a few times to  
 11 her house.  
 12 BY MR. EDWARDS:  
 13 Q. You took A. to and from her house?  
 14 A. In Royal Palm Beach.  
 15 Q. Okay. Did she say anything in the car to  
 16 you about what was going on in the bedroom with  
 17 Mr. Epstein?  
 18 A. I always try to keep the conversation to  
 19 a minimum when I was with them because it was my  
 20 job, you know, I didn't want to talk so the  
 21 conversation was minimal.  
 22 Q. And these are girls that you're talking  
 23 to that are roughly the same age as a daughter  
 24 that you have?  
 25 A. Yeah.

# ATTACHMENT 7

IN THE CIRCUIT COURT OF THE  
FIFTEENTH JUDICIAL CIRCUIT, IN AND FOR  
PALM BEACH COUNTY, FLORIDA

CASE NO. 50-2008-CA-028051 XXXX MB AB

L.M.,

Plaintiff,

vs.

JEFFREY EPSTEIN,

Defendant.

\_\_\_\_\_ /

VIDEOTAPED DEPOSITION OF JEFFREY EPSTEIN  
TAKEN ON BEHALF OF THE PLAINTIFF

DATE: February 17, 2010

2

1 February 17, 2010  
 2 INDEX  
 3 WITNESS DIRECT CROSS REDIRECT RECROSS  
 4 JEFFREY EPSTEIN  
 5 BY MR. EDWARDS 4  
 6

EXHIBITS

7 FOR IDENTIFICATION PAGE  
 8 1 Jane Doe number 102 versus Jeffrey  
 Epstein complaint. 35  
 9  
 2 Document, Nonprosecution Agreement. 135  
 10  
 11

CERTIFIED QUESTIONS

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3

1 The videotaped deposition of JEFFREY  
 2 EPSTEIN in the above-entitled and numbered cause,  
 3 was taken before me, TERRI BECKER, a Registered  
 4 Professional Reporter and Notary Public for the  
 5 State of Florida at Large, at 444 West Railroad  
 6 Avenue, in the City of West Palm Beach, Palm  
 7 Beach County, in the State of Florida, beginning  
 8 at the hour of 11:15 o'clock a.m., pursuant to  
 9 the Notice in said cause for the taking of said  
 10 deposition which is annexed to the court file  
 11 herein, on behalf of the PLAINTIFF in the  
 12 above-entitled action pending in the above-named  
 13 court.  
 14 The appearances at said time and place  
 15 were as follows:  
 16 FARMER, JAFFE, WEISSING,  
 EDWARDS, FISTOS & LEHRMAN, P.L.  
 17 Attorneys for Plaintiff  
 425 North Andrews Avenue, Suite 2  
 18 Fort Lauderdale, Florida 33301  
 Tel: (954) 524-2820  
 19 BY: BRADLEY J. EDWARDS  
 STEVEN R. JAFFE, ESQ.  
 20  
 BURMAN, CRITTON, LUTTIER & COLEMAN  
 21 Attorneys for Defendant  
 303 Banyon Boulevard, Suite 400  
 22 West Palm Beach, Florida 33401  
 Tel: (561) 842-2820  
 23 BY: MICHAEL PIKE, ESQ.  
 24 ALSO PRESENT:  
 JOE ROVNER, Videographer  
 25 (U.S. Legal Support)

4

1 THEREUPON,  
 2 JEFFREY EPSTEIN  
 3 being by Terri Becker first duly sworn to tell  
 4 the whole truth, as hereinafter certified,  
 5 testified as follows:  
 6 DIRECT EXAMINATION  
 7 BY MR. EDWARDS:  
 8 Q Can you give us your name.  
 9 A Jeffrey Epstein.  
 10 Q Mr. Epstein, you made a comment when you  
 11 came in the room that you were appreciative of me  
 12 being respectful to your housekeeper yesterday  
 13 and I intend for that to be the same with you  
 14 today.  
 15 I want to start by asking you, at this  
 16 point we've gone through a lot of discovery in  
 17 this case. There aren't many disputed facts as  
 18 to what actually happened at your house.  
 19 Generally I think you would agree that you  
 20 derived a way for young females to come to your  
 21 house and engage in varying degrees of sexual  
 22 activity, some of the girls as young as 12, some  
 23 of them as old as seventeen or so, most in  
 24 between, but as of yet you haven't provided an  
 25 explanation.

5

1 I want to provide you an opportunity to  
 2 tell the jury at this time why you did it.  
 3 MR. PIKE: I'm going to object.  
 4 Confusing, compound and irrelevant, as  
 5 worded.  
 6 A You know, I would like to answer that  
 7 question, frankly. However, at this time, my  
 8 attorneys have told me that I can't and I must  
 9 invoke my Fifth, Sixth and Fourteenth Amendment  
 10 rights or I risk losing their counsel.  
 11 Accordingly, I therefore assert those rights.  
 12 Sorry.  
 13 MR. PIKE: In addition to that I'll move  
 14 to strike counsel's statement as a  
 15 narrative, as well.  
 16 MR. EDWARDS: I understand. I wanted to  
 17 provide him an opportunity, if today was  
 18 going to be the day.  
 19 MR. PIKE: Same thing, move to strike.  
 20 Q Mr. Epstein, how long have you been  
 21 sexually attractive to underage minor females?  
 22 MR. PIKE: Objection, harassing,  
 23 argumentative.  
 24 A Are you kidding?  
 25 Q No, I mean, I don't feel like I'm



6

1 **divulging any secrets here, right?**  
 2 MR. PIKE: Move to strike.  
 3 **Q That's the question that's pending.**  
 4 A I would like to answer that question as  
 5 well, as all your other questions today, however,  
 6 I have to follow my attorneys' advice. They have  
 7 told me I must invoke my Fifth, Sixth and  
 8 Fourteenth Amendment right to not answer those  
 9 questions today, or any questions relevant to  
 10 this lawsuit, so accordingly, I'm going to assert  
 11 those rights and -- under the constitution  
 12 guaranteed by the Fifth and Sixth, and Fourteenth  
 13 amendment.  
 14 **Q Would you consider yourself addicted to**  
 15 **sex with minor females?**  
 16 MR. PIKE: Same objections.  
 17 A You know, Mr. Edwards, again, I want to  
 18 be very respectful. As the current U.S. Attorney  
 19 has described your law firm as a criminal  
 20 enterprise and part of one of the largest frauds  
 21 in Florida's history, it has been reported that  
 22 your firm has fabricated multiple cases against  
 23 me in order to fleece unsuspecting investors out  
 24 of millions and millions of dollars, so  
 25 unfortunately at this time, although I would like

7

1 to answer that question, on advice of counsel I  
 2 will have to refrain and assert my Fifth, Sixth  
 3 and Fourteenth Amendment right.  
 4 **Q Can you then provide an explanation for**  
 5 **what relevance that soliloquy of yours has to,**  
 6 **whether or not you engaged in sex acts with L.M.**  
 7 **When she was a minor?**  
 8 MR. PIKE: Objection, no, he cannot.  
 9 Argumentative. Compound, harassing.  
 10 MR. EDWARDS: Mr. Pike, with all due  
 11 respect, it was not my idea for him to give  
 12 this speech about a former RRA law firm I  
 13 was asking to elaborate on that.  
 14 MR. PIKE: Counsel, I'm working with  
 15 your follow-up question.  
 16 MR. EDWARDS: I understand.  
 17 MR. PIKE: I'm objecting, object to the  
 18 form and stating the reasons on the record  
 19 why the form is required to be objected to,  
 20 based upon your question.  
 21 MR. EDWARDS: Will he elaborate on the  
 22 relevance of that soliloquy to his touching  
 23 L.M. when she was 13, 14 and 15 years old in  
 24 a sexual manner?  
 25 MR. PIKE: I'm going to object again,

8

1 argumentative, compound, harassing and  
 2 irrelevant.  
 3 **Q You can answer.**  
 4 A I would like to answer, however, I'm  
 5 going to have to assert my Fifth Amendment, Sixth  
 6 Amendment, Fourteenth Amendment right as advised  
 7 by my counsel, otherwise I risk losing their  
 8 advice.  
 9 **Q Mr. Epstein, have you ever been**  
 10 **diagnosed with a sex addiction to minors by a**  
 11 **psychologist or other medical professional?**  
 12 A I intend to respond to all of your  
 13 questions at some relevant time; however, today  
 14 at the present time, my attorneys have counseled  
 15 me that I cannot provide answers to any questions  
 16 relevant to this lawsuit and I must accept their  
 17 advice or risk losing my Sixth Amendment rights  
 18 to effective representation.  
 19 Accordingly, I assert my Fifth,  
 20 Federal -- Fifth and Sixth and Fourteenth  
 21 Amendment rights, to the United States  
 22 Constitution.  
 23 MR. PIKE: In addition to that, Mr.  
 24 Edwards, as the Court has ruled on several  
 25 matters, Mr. Epstein's medical history is

9

1 not relevant at this time nor has he placed  
 2 same at issue in this case.  
 3 MR. EDWARDS: Understood.  
 4 **Q Mr. Epstein, were you sexually abused as**  
 5 **a minor?**  
 6 A Again?  
 7 **Q Were you sexually abused, as a minor?**  
 8 A You know, again, I would like to respond  
 9 to all -- if any questions seem to be relevant.  
 10 I would like to respond to any relevant question  
 11 at this time; however, my attorneys have  
 12 counseled me that I cannot provide answers to the  
 13 questions relevant to this lawsuit today. I must  
 14 accept their advice or risk losing my Sixth  
 15 Amendment right to effective representation.  
 16 Accordingly then, I assert my Fifth, Sixth and  
 17 Fourteenth Amendment right to the United States  
 18 Constitution.  
 19 **Q Isn't it true that you have engaged in**  
 20 **some sexual interaction with hundreds of underage**  
 21 **minor females in the last ten years of your**  
 22 **life? Is that true?**  
 23 MR. PIKE: Objection, relevance.  
 24 A Mr. Edwards, the current U.S. Attorney  
 25 has described your law firm as a criminal

10

1 enterprise and part of the largest fraud in  
2 Florida's history. It has been reported that  
3 your firm fabricated multiple cases, many, many  
4 multiple cases against me in order to fleece  
5 unsuspecting investors out of millions and  
6 millions of dollars. Unfortunately, at this time  
7 in response to your question, my attorneys have  
8 advised me that I must assert my Sixth Amendment,  
9 Fifth Amendment, Fourteenth Amendment right.  
10 Though, I believe, you know, that I would really  
11 like to answer your questions today, but at this  
12 moment I must assert those rights or risk having  
13 my attorneys resign.

14 **Q You're invoking your Fifth Amendment**  
15 **rights to each of these questions because you**  
16 **know your answers will incriminate you and you**  
17 **feel it will result in you being prosecuted for**  
18 **your crimes; isn't that right?**

19 MR. PIKE: Objection, argumentative,  
20 harassing. Calls for a legal conclusion.

21 **Q You can answer.**

22 A No, in fact, the Supreme Court recently  
23 said the Fifth Amendment right is there to  
24 protect the innocent, so, that's the way I would  
25 like to answer that.

11

1 **Q Are you actually telling the jury that**  
2 **you didn't commit the crimes that have been**  
3 **alleged against you by the various females that**  
4 **were under age when you engaged in sex with**  
5 **them? Are you telling the jury that right now?**

6 MR. PIKE: Objection, argumentative,  
7 harassing.

8 A I would like to respond to that  
9 question, as you know, however, at the present  
10 time my attorneys have counseled me that I cannot  
11 provide answers to any questions relevant to this  
12 lawsuit and I must accept their advice or risk  
13 losing my Sixth Amendment right to effective  
14 representation. Accordingly, I assert my Fifth,  
15 Sixth and Fourteenth Amendment right under the  
16 United States Constitution.

17 **Q Mr. Epstein, you understand that this is**  
18 **the video that will be played to the jury in**  
19 **L.M.'s trial against you and L.M. wants answers.**  
20 **The jury is going to want answers, so I know that**  
21 **you're telling us that you're going to respond at**  
22 **some time in the future; but the time is now.**  
23 **Would you like this opportunity to explain why**  
24 **you engaged in sexual activity with L.M.**  
25 **beginning when she was 13 years old and you were**

12

1 **50 years old?**

2 MR. PIKE: I'm going to object once  
3 again. We are getting way too argumentative  
4 with the questioning. The questioning is  
5 compound. It is speculative and it is also  
6 harassing. Whether or not this deposition  
7 video, thereof is played in front of a jury  
8 is a question of fact, and it will be  
9 determined by a judge pursuant to a motion  
10 in limine, various portions thereof may or  
11 may not be played, so having placed those  
12 objections on the record I'm going to  
13 instruct Mr. Epstein not to answer that  
14 question.

15 MR. EDWARDS: Mr. Pike, I don't know if  
16 you watched the 13 hours of harassing  
17 questions to L.M., that she sometimes  
18 invoked her Fifth Amendment rights, I  
19 understand the adverse advice that would be  
20 given and she was made to answer these  
21 questions and these exact same questions  
22 were asked of her, in fact, I'm using the  
23 phraseology from Mr. Luttier. I'm not  
24 trying to harass him.

25 **Q I'm simply asking him to explain to the**

13

1 **jury. If you're saying it didn't happen, if**  
2 **you're saying it did happen, explain to the jury**  
3 **why you did it. That's all I want to hear. I'm**  
4 **being respectful about this.**

5 MR. PIKE: In an effort to keep a clean  
6 record be respectful to the to the court  
7 reporter rather than having a diatribe back  
8 and forth between you and myself, I'll move  
9 to strike your last statement as  
10 irrelevant. Let's move on.

11 **Q Is it true, Mr. Epstein, you were born**  
12 **January 20, 1953?**

13 A Yes.

14 **Q Where?**

15 A New York.

16 **Q Where in New York?**

17 A Brooklyn.

18 **Q Did you go to high school there?**

19 A Yes, sir.

20 **Q Where?**

21 A Lafayette High School.

22 **Q After high school did you attend**  
23 **college?**

24 A Yes.

25 **Q Where was that?**

14

1 A New York.

2 **Q What college did you attend?**

3 A Cooper Union.

4 **Q Sorry, I didn't hear.**

5 A Cooper Union.

6 **Q Did you get a degree from Cooper Union?**

7 A No, sir.

8 **Q How many years were you in college?**

9 A I believe, two.

10 **Q What did you study?**

11 A Physics.

12 **Q Why did you leave college early?**

13 A I intend to respond to all relevant

14 questions regarding this lawsuit, however, at the

15 present time my attorneys have counseled me that

16 I cannot provide answers to questions that may be

17 relevant to this lawsuit, so accordingly I assert

18 my constitutional rights as guaranteed by the

19 Fifth, Sixth and Fourteenth Amendment.

20 **Q Are you invoking your Fifth Amendment**

21 **rights as to why you left college, is it safe**

22 **then to presume that that answer you believe**

23 **would incriminate you in some way?**

24 MR. PIKE: I'm going to move to strike,

25 speculative, argumentative, harassing.

15

1 Calls for a legal conclusion, and I know

2 exactly what you're trying to do here, Mr.

3 Edwards, is lace the record with questions

4 that would ultimately give you an adverse

5 inference at any potential trial of this

6 matter, so having put that on the record,

7 I'm going to instruct him not to answer that

8 question, based upon his Fifth, Sixth and

9 Fourteenth Amendment rights to the United

10 States Constitution.

11 MR. EDWARDS: With all due respect you

12 cannot invoke his Fifth Amendment rights,

13 your attorneys instructed me in that fact --

14 MR. PIKE: He can.

15 MR. EDWARDS: That L.M. Had to do it

16 herself, so, I would like to hear it from

17 Mr. Epstein.

18 **Q Can we assume you're invoking your Fifth**

19 **Amendment rights as to why you left college**

20 **early, that that answer you feel would**

21 **incriminate you?**

22 MR. PIKE: Once again, move to strike

23 for the same reasons.

24 You can answer.

25 A I've already answered the question.

16

1 I'll restate the answer. I would like to

2 respond, intend to respond, and would like to

3 respond to all questions today. However, counsel

4 has advised me I must take the Fifth, Sixth and

5 Fourteenth Amendment right under the U.S.

6 Constitution.

7 **Q After college where were you employed?**

8 A You know, I would like to respond to all

9 your questions today, however, on advice of

10 counsel, I intend to take the Fifth, Sixth and

11 Fourteenth Amendment rights provided by the

12 United States Constitution or risk losing my

13 counsel's representation.

14 **Q Isn't it true that you were a teacher at**

15 **the Dalton School in New York after college?**

16 A Again, I would like to respond to all

17 your questions; however, my attorneys have

18 counseled me that I cannot provide answers to any

19 questions today regarding to this lawsuit so I

20 must accept their advice or risk losing my Sixth

21 Amendment right to effective representation.

22 Accordingly, I assert my Constitutional rights as

23 guaranteed by the Fifth, Sixth and Fourteenth

24 Amendment of the constitution.

25 **Q Mr. Epstein, did you have sex with any**

17

1 **underage students while teaching at the Dalton**

2 **School?**

3 A Could you repeat that?

4 **Q Yes. Did you have sex with any underage**

5 **students while teaching at the Dalton School in**

6 **New York?**

7 A Mr. Edwards, your firm has been

8 described by the U.S. Attorney as one of the

9 largest -- as a criminal enterprise, perpetrating

10 one of the largest frauds in Florida's history.

11 It has been reported that your firm fabricated

12 multiple cases against me and others in order to

13 fleece unsuspecting investors out of millions and

14 millions of dollars.

15 Unfortunately at this time in response

16 to your question, my attorneys have advised me I

17 must assert my Fifth Amendment, Sixth Amendment

18 and Fourteenth Amendment rights, though I believe

19 you know I would like -- really like to answer

20 your questions but at this time I must assert

21 those rights or have my attorneys resign.

22 MR. EDWARDS: Mr. Pike, I think you know

23 he has a couple of options here. He can

24 answer questions or he can invoke his Fifth

25 Amendment rights. This nonresponsive

18

1 verbiage regarding the RRA law firm is not  
 2 one of the options, it's inappropriate in  
 3 the deposition and I would ask you to  
 4 instruct your client not to obstruct this  
 5 process any further. I am not going to  
 6 terminate the deposition. I want it to  
 7 finish, but obviously this is going to be  
 8 the subject matter of some motion in the  
 9 courts and you know the judges will not  
 10 appreciate this. I would like to just move  
 11 this process along by eliminating that  
 12 portion of his answer. I understand what he  
 13 is saying. I get it, but that's not  
 14 something responsive to any of the questions  
 15 and I think you know it is inappropriate.  
 16 MR. PIKE: I think the deponent is  
 17 answering the questions. If you believe the  
 18 responses are inappropriate and feel you can  
 19 take it up with the Court with the motion  
 20 you are speaking of, as you've done then you  
 21 can, as you've done several times before.  
 22 **Q After leaving the Dalton School, is it**  
 23 **true that you began working as a money manager at**  
 24 **Bear Stearns?**  
 25 A I intend to respond to all your

19

1 questions regarding this lawsuit at some relevant  
 2 time, however, at the present time my attorneys  
 3 have counseled me that I cannot provide answers  
 4 to any questions relevant to this lawsuit. Since  
 5 the U.S. Attorney has described your law firm as  
 6 a criminal enterprise, Mr. Edwards, and a part of  
 7 the largest fraud in Florida's history, I am  
 8 going to assert my Sixth Amendment, Fifth  
 9 Amendment and Fourteenth Amendment rights to the  
 10 U.S. Constitution.  
 11 **Q Isn't it true that while you were**  
 12 **working at Bear Stearns you were already engaging**  
 13 **in sex with underage minors?**  
 14 A Again, I believe you know the answers to  
 15 those questions, but --  
 16 **Q Yes.**  
 17 A May I finish?  
 18 **Q I do.**  
 19 MR. PIKE: Move to strike. Let the  
 20 witness --  
 21 **Q Sure --**  
 22 MR. PIKE: Let the witness answer your  
 23 question.  
 24 MR. EDWARDS: I would love for him to  
 25 finish the questions.

20

1 MR. PIKE: Mr. Edwards, as you know  
 2 there are serious Fifth, Sixth and  
 3 Fourteenth Amendment constitutional rights  
 4 at issue here, and the witness is attempting  
 5 to answer your questions to the best of his  
 6 ability, despite how laced they are with  
 7 adverse inference presumptions.  
 8 MR. EDWARDS: I don't want the adverse  
 9 inferences. I want the answers, that's it.  
 10 I don't want the adverse inferences.  
 11 MR. PIKE: Having said that, please  
 12 allow the witness to answer to answer the  
 13 question.  
 14 A Can you please repeat the question?  
 15 **Q Isn't it true while working at Bear**  
 16 **Stearns you were already engaging in sex with**  
 17 **underage minor females?**  
 18 A As your firm has been described by the  
 19 U.S. Attorney, as a criminal enterprise, using  
 20 some of the cases fabricated against me,  
 21 personally, I would like to answer that question  
 22 today; however, upon advice of counsel I must  
 23 assert my Fifth, Sixth and Fourteenth Amendment  
 24 rights under the U.S. Constitution or, in fact,  
 25 risk losing their representation.

21

1 **Q At some point in time while at Bear**  
 2 **Stearns you met and managed the money for a**  
 3 **fellow named Leslie Wexler, correct?**  
 4 A Again, I would like to answer all  
 5 questions relevant to this lawsuit, but today I  
 6 must assert my Fifth Amendment, Sixth Amendment  
 7 and Fourteenth Amendment right to the U.S.  
 8 Constitution.  
 9 **Q In fact, I read in another deposition of**  
 10 **yours that you do not consider yourself to be**  
 11 **homosexual, correct?**  
 12 A (No response.)  
 13 **Q You've answered that question before,**  
 14 **correct?**  
 15 A Correct.  
 16 **Q Do you consider yourself to be**  
 17 **bisexual?**  
 18 A No.  
 19 **Q In any event, you did develop a sexual**  
 20 **relationship with Leslie Wexler at some point in**  
 21 **time; is that true?**  
 22 A No.  
 23 **Q Did you have a business relationship**  
 24 **with Mr. Wexler?**  
 25 A I intend to respond to all relevant

22

1 questions. I would like to answer most of your  
 2 questions, Mr. Edwards, today, however,  
 3 especially since your firm has been described by  
 4 the United States Attorney in South Florida as a  
 5 criminal enterprise purported to -- purported to  
 6 have put -- pulled off the largest fraud in  
 7 Florida's history, I would like to answer it,  
 8 however, my attorneys here today counseled me I  
 9 must assert my Fifth, Sixth and Fourteenth  
 10 Amendment right under the U.S. Constitution,  
 11 therefore I'm going to do that.

12 **Q Are you saying because Rothstein,**  
 13 **Rosenfeld, Adler was determined to be a criminal**  
 14 **enterprise or somebody was running a criminal**  
 15 **enterprise out of that law firm, that is the**  
 16 **reason why you are not going to answer these**  
 17 **questions today? You linked that together in**  
 18 **that answer. I just want to make sure I'm**  
 19 **understanding that right?**

20 A I'm going to take the Fifth -- I intend  
 21 to respond to all relevant questions today. I  
 22 would like to respond; unfortunately my attorneys  
 23 have counseled me I can't, I must assert my  
 24 Fifth, Sixth and Fourteenth Amendment rights  
 25 under the U.S. Constitution.

23

1 **Q Because other law firms have asked very**  
 2 **similar questions and you haven't responded to**  
 3 **any of theirs either. I just want to understand**  
 4 **what the relationship between Rothstein,**  
 5 **Rosenfeld, Adler is to you invoking your Fifth**  
 6 **Amendment rights today, if you can articulate**  
 7 **that for me.**

8 MR. PIKE: Form, compound,  
 9 argumentative.

10 A Rothstein, Rosenfeld, Adler has been  
 11 described by the U.S. Attorney as a criminal  
 12 enterprise and as part of the largest fraud in  
 13 Florida's history. It has been reported that  
 14 your firm fabricated multiple cases using me, and  
 15 against me in order to fleece unsuspecting  
 16 investors out of millions of dollars.

17 **Q Another long time friend of yours is**  
 18 **Ghislaine Maxwell, right?**

19 A I intend to respond to all relevant  
 20 questions. I would like to answer most of these  
 21 questions today, but I can't because my attorneys  
 22 have counseled me that I cannot provide answers  
 23 to any questions relevant to this lawsuit. I  
 24 must accept their advice or risk losing my Sixth  
 25 Amendment right to effective representation.

24

1 Therefore I'll assert my Constitutional  
 2 rights under the Fifth, Sixth and Fourteenth  
 3 Amendment.

4 THE WITNESS: Excuse me, could we take a  
 5 break?

6 MR. EDWARDS: Already?

7 THE WITNESS: Restroom.

8 THE VIDEOGRAPHER: Going off the video  
 9 record 11:38 a.m.

10 THE WITNESS: Thank you.  
 11 (Pause in the proceedings.)

12 THE VIDEOGRAPHER: We're back on the  
 13 video record at 11:48 a.m.

14 **Q How did you meet Ghislaine Maxwell?**  
 15 A I intend to respond to all relevant  
 16 questions to this lawsuit; however, at the  
 17 present time my attorneys have counseled me that  
 18 I cannot provide answers to any questions  
 19 relevant to this lawsuit, and must accept this  
 20 advice or risk losing effective -- my right to  
 21 effective representation. Accordingly,  
 22 therefore, I assert my Fifth, Sixth and  
 23 Fourteenth Amendment rights to the U.S.  
 24 Constitution.

25 **Q You would agree, would you not, that**

25

1 **Ghislaine Maxwell shares your sexual obsession**  
 2 **for underage minor females?**

3 MR. PIKE: Argumentative, speculation,  
 4 harassing.

5 A You know, Mr. Edwards, the current U.S.  
 6 Attorney has described your law firm as a  
 7 criminal enterprise, and as taking part in one of  
 8 the largest frauds in Florida's history. It has  
 9 been widely reported that your firm fabricated  
 10 multiple cases of a sexual nature against  
 11 people -- other people and me, in order to fleece  
 12 unsuspecting investors out of millions of  
 13 dollars, so unfortunately at this time in  
 14 response to your questions, my attorneys have  
 15 advised me I must assert my Sixth Amendment,  
 16 Fifth Amendment and Fourteenth Amendment rights,  
 17 though I believe, as you know, I would really  
 18 like to answer these questions, but at this  
 19 moment, although at this time I have to assert  
 20 those rights or risk losing effective counsel.

21 **Q Do you know Annie Farmer?**  
 22 A I intend to respond to all relevant  
 23 questions regarding this lawsuit; however, at the  
 24 present time my counsel has advised me that I  
 25 cannot provide answers to any questions relevant

26

1 to this lawsuit. Your firm has been described as  
 2 a criminal enterprise, and is part of the largest  
 3 fraud in Florida's history fabricating sexual  
 4 cases against me and others. Therefore,  
 5 unfortunately, although I would like to answer  
 6 all of your questions today, I'm going to have to  
 7 assert my Fifth, Sixth and Fourteenth Amendment  
 8 right.

9 **Q Did you and Ghislaine Maxwell sexually  
 10 assault Annie Farmer at Leslie Wexler's house?**

11 A I intend to respond to all relevant  
 12 questions regarding this lawsuit; however, at the  
 13 present time my attorneys have counseled me I  
 14 cannot provide answers to any questions relevant  
 15 to this lawsuit and must accept this right or  
 16 risk losing my Sixth Amendment rights to  
 17 effective presentation. Accordingly, I assert my  
 18 Constitutional rights as guaranteed by the Fifth,  
 19 Sixth and Fourteenth amendments to the U.S.  
 20 Constitution.

21 **Q Stating Ghislaine Maxwell and you had  
 22 devised several schemes to lure underage girls to  
 23 you for sex; isn't that correct?**

24 MR. PIKE: Form, argumentative,  
 25 harassing?

27

1 A Mr. Edwards, your firm has fabricated  
 2 multiple cases of sexual harassment claims and  
 3 other types of sexual cases against me and others  
 4 in order to be part of what the U.S. Attorney has  
 5 described as the largest fraud, the largest fraud  
 6 in Florida's history. I would like to answer all  
 7 your questions; however, my attorneys have  
 8 counseled me that at least today, I must assert  
 9 my Fifth, Sixth and Fourteenth Amendment rights  
 10 under the U.S. Constitution.

11 **Q Do you own a home in Manhattan?**

12 A I intend to respond to all relevant  
 13 questions to this lawsuit; however, at the  
 14 present time my attorneys have counseled me that  
 15 I cannot provide answers to any questions  
 16 relevant to this lawsuit, and I must accept their  
 17 advice or risk losing my Sixth Amendment right to  
 18 effective representation.

19 Accordingly, therefore, I have to assert  
 20 my Fifth, Sixth and Fourteenth Amendment right  
 21 under the U.S. Constitution.

22 **Q Do you own an island in the U.S. Virgin  
 23 Islands?**

24 A I intend to respond to all relevant  
 25 questions regarding this lawsuit; however, at the

28

1 present time my attorneys have counseled me that  
 2 I cannot provide answers to any questions  
 3 relevant to this lawsuit, no matter how much I  
 4 would like to.

5 Therefore, I must accept their advice or  
 6 risk losing my Sixth Amendment right to effective  
 7 representation; therefore, I have to assert my  
 8 Fifth, Sixth and Fourteenth Amendment right under  
 9 the U.S. Constitution.

10 **Q Do you own a home in New Mexico?**

11 A I intend to respond to all relevant  
 12 questions regarding this lawsuit and as I've had  
 13 to do with most of your questions here today, I'm  
 14 going to have to take my attorneys' advice and  
 15 assert my Fifth, Sixth and Fourteenth Amendment  
 16 right under the U.S. Constitution or risk losing  
 17 effective representation.

18 **Q Is it true that you have had underage  
 19 females, at each of those homes, for orgies with  
 20 you and Ghislaine Maxwell?**

21 MR. PIKE: Form, argumentative,  
 22 speculation and harassing.

23 A I would like to answer that question. I  
 24 really would. However, as your firm has been  
 25 described by the U.S. Attorney as a criminal

29

1 enterprise, which its principal purpose was  
 2 racketeering conspiracy to generate money for the  
 3 firm and its co-conspirators through the  
 4 operation of enterprise and through various  
 5 activities including mail fraud, wire fraud and  
 6 money laundering, and fabricating multiple sex  
 7 cases against me and others, though I would like  
 8 to answer your question today, Mr. Edwards, my  
 9 counsel has advised me I must take the Fifth,  
 10 Sixth and Fourteenth Amendment right provided by  
 11 the U.S. Constitution.

12 **Q Do you know somebody named Galitsea  
 13 (phonetic)?**

14 MR. PIKE: Can you spell that, for the  
 15 record?

16 MR. EDWARDS: No.

17 MR. PIKE: Or for the court reporter?

18 A No.

19 **Q You don't know the name?**

20 A No. Could you spell it?

21 **Q (Witness shrugs.)**

22 A Okay.

23 **Q Did your sexual obsession with underage  
 24 minor females grow at some point in time to allow  
 25 you access to these underage minors every single**

30

1 **day for sex?**  
2 MR. PIKE: Overbroad. Speculation,  
3 argumentative, compound, harassing and  
4 confusing as well; as worded. Do you want  
5 to break it down, Mr. Edwards?  
6 **Q Isn't it true that for the past ten**  
7 **years you have found a way to engage in sexual**  
8 **conduct with underage minors on an every day**  
9 **basis?**  
10 MR. PIKE: Speculation. Argumentative.  
11 A As your firm has been described as a  
12 criminal enterprise by the United States Attorney  
13 and is part of the scheme to defraud people in  
14 South Florida of millions of dollars, you have  
15 fabricated sexual cases and sexual claims against  
16 people like me and others. Unfortunately at this  
17 time although I would like to answer your  
18 questions, Mr. Edwards, my counsel has advised me  
19 I cannot. They have advised me I must assert my  
20 Fifth, Sixth and Fourteenth Amendment rights  
21 under the U.S. Constitution.  
22 **Q Isn't it true that you have promised**  
23 **underage minors money or other benefits to engage**  
24 **in sexual conduct with you over the past ten**  
25 **years?**

31

1 A Again, as I've answered many of your  
2 questions today, and unfortunately will probably  
3 end up not answering most of your questions  
4 today, as your firm has been described, the firm  
5 bringing this lawsuit, I believe, if I'm wrong  
6 please, correct me --  
7 **Q You're wrong.**  
8 A This is the firm that didn't notice this  
9 deposition?  
10 **Q Did not?**  
11 A Did not?  
12 **Q No.**  
13 A I apologize. Though your former firm  
14 has been described, and the person you represent,  
15 L.M., in this case was represented by the firm  
16 that was described by the U.S. Attorney as  
17 perpetrating one of the largest frauds in South  
18 Florida's history, fabricating multiple sexual  
19 cases against me and others in order to fleece  
20 unsuspecting investors out of millions and  
21 millions of dollars, so though unfortunately, I  
22 would like to answer each one of your questions  
23 today, my counsel has advised me I must assert my  
24 Sixth Amendment, Fourteenth Amendment and Fifth  
25 Amendment right, though I believe you know, I

32

1 would like to answer those questions, though at  
2 this moment I must assert those rights or risk  
3 losing my attorneys.  
4 **Q Sure, let's test that answer.**  
5 A Okay.  
6 **Q Let's talk about Jane Doe 102, Jane Doe**  
7 **102, V.R., who was represented by Bob**  
8 **Josephberg's firm, had nothing to do with**  
9 **Rothstein, Rosenfeld, Adler. Do you know V.R.?**  
10 A Who?  
11 **Q V.R.**  
12 A Can you spell it?  
13 **Q Common spelling [REDACTED] like the**  
14 **State --**  
15 A Can you spell it for me, please?  
16 **Q [REDACTED]**  
17 A What's the last name, how is it  
18 spelled?  
19 **Q [REDACTED] I believe.**  
20 A I intend to respond to all relevant  
21 questions regarding this lawsuit; however, at the  
22 present time my attorneys have counseled me that  
23 I cannot provide answers to any questions that  
24 may be relevant to this lawsuit and I must accept  
25 this advice or risk losing my Sixth Amendment

33

1 right to effective representation. Accordingly,  
2 I assert my Constitutional rights as guaranteed  
3 by the Fifth, Sixth and Fourteenth Amendment to  
4 the Constitution.  
5 **Q Just for the record, I can only spell it**  
6 **the way it was spelled in your flight logs from**  
7 **your airplane. I don't know exactly how she**  
8 **spells her name, only how your pilot would spell**  
9 **her name.**  
10 MR. PIKE: Form, speculating.  
11 **Q If I misspell it --**  
12 MR. PIKE: Form, speculation,  
13 argumentative, harassing.  
14 MR. EDWARDS: That's harassing?  
15 MR. PIKE: It assumes facts currently  
16 not in evidence in this particular  
17 deposition; therefore, I move to strike.  
18 MR. EDWARDS: I was responding to his  
19 question asking me how to spell her name. I  
20 don't know how other than his own pilot.  
21 MR. PIKE: Mr. Edwards, he asked you to  
22 spell the name, you then spelled the name,  
23 then went on with another narrative and  
24 there wasn't a question posed, on the floor.  
25 **Q You would agree you interacted with V.R.**

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1 every day in a sexual way, when she was 15 years  
2 old, right?  
3 A Again, I'm sorry?  
4 Q Sure. You would agree that you  
5 interacted with V.R. sexually on an every day  
6 basis when she was 15 years old?  
7 A You know, again, Mr. Edwards, I would  
8 like to answer all your questions here today. My  
9 attorneys have asked me -- advised me that I must  
10 assert my Sixth Amendment, Fourteenth Amendment  
11 and Fifth Amendment rights provided by the U.S.  
12 Constitution and the fact that the current U.S.  
13 Attorney has described your law firm as a  
14 criminal enterprise, is one of the largest frauds  
15 in Florida's history for fabricating sexual --  
16 cases of a sexual nature against me and others.  
17 Unfortunately, although I would like to answer  
18 those questions, if I do I risk losing my  
19 attorneys' counsel. Therefore, I must assert my  
20 right.  
21 MR. EDWARDS: Madam court reporter, I'll  
22 attach as an exhibit, the Jane Doe number  
23 102 versus Jeffrey Epstein complaint, at  
24 some point in time. It will be Exhibit 1,  
25 as I'm going to go through some of the facts

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1 as alleged in the complaint and as will be  
2 testified to by the plaintiff.  
3 (Jane Doe number 102 versus Jeffrey  
4 Epstein complaint was deemed marked as  
5 Exhibit number 1 for identification, as of  
6 this date.)  
7 MR. PIKE: Counsel, do you have an extra  
8 copy of that for me?  
9 MR. EDWARDS: No.  
10 MR. PIKE: May I look at it real quick?  
11 MR. EDWARDS: No. It has my notes on  
12 it.  
13 MR. PIKE: I understood, I saw the  
14 highlights.  
15 MR. EDWARDS: The notes are highlighted  
16 so when we copy it, it will not show up.  
17 MR. PIKE: Just for the record, that's a  
18 current, operative pleading, correct?  
19 MR. EDWARDS: Correct.  
20 THE WITNESS: What does that mean?  
21 MR. PIKE: There may have been some  
22 amendments to a complaint and I want to make  
23 sure that's the operative complaint at issue  
24 that he is speaking of today.  
25 THE WITNESS: Can I go off the record

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1 for a second?  
2 May I ask you a question?  
3 MR. PIKE: Sure. Can we take a break  
4 for a second?  
5 MR. EDWARDS: Again?  
6 THE WITNESS: Just a question.  
7 MR. PIKE: He wants to speak with me for  
8 a second.  
9 THE VIDEOGRAPHER: Off the video record  
10 12:01 p.m.  
11 (Pause in the proceedings.)  
12 THE VIDEOGRAPHER: We are back on the  
13 video record at 12:02 p.m.  
14 Q Is it true, Mr. Epstein, that you and  
15 Ghislaine Maxwell forced V.R. to have sex with  
16 you on a daily basis?  
17 MR. PIKE: Form, argumentative,  
18 harassing.  
19 A Unfortunately at this time, though I  
20 would really like to answer those questions, and  
21 like I have done for most of your questions here  
22 today, Mr. Edwards, your firm was described as a  
23 criminal enterprise, a serious criminal  
24 enterprise by the current U.S. Attorney. Part of  
25 that criminal enterprise was fabricating cases of

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1 a sexual nature against me and others in order to  
2 fleece unsuspecting investors out of millions of  
3 dollars. Though, unfortunately at this time no  
4 matter how I would like to respond to your  
5 questions, I must assert my Sixth Amendment,  
6 Fifth Amendment and Fourteenth Amendment rights  
7 under the U.S. Constitution or risk having my  
8 attorneys resign.  
9 Q Isn't it true that V.R. was yours and  
10 Ghislaine Maxwell's sex slave from the time she  
11 was 15 through the time she escaped when she was  
12 19?  
13 MR. PIKE: Again objection,  
14 argumentative, harassing.  
15 A Mr. Edwards, your firm has been  
16 described as -- excuse me, as a criminal  
17 enterprise by the current U.S. Attorney and part  
18 of the largest fraud in Florida's history. Part  
19 of that fraud was fabricating multiple cases  
20 against people like me and others, of a sexual  
21 nature, in order to fleece unsuspecting investors  
22 out of millions and millions of dollars, so  
23 though I would like to answer that question, my  
24 attorneys have told me today I must assert my  
25 Sixth Amendment, Fourteenth Amendment and Fifth



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1 Amendment right.

2 **Q** Isn't it true that you and Ghislaine

3 Maxwell celebrated her 16th birthday with her and

4 had sex with her on that day?

5 MR. PIKE: Form. Compound, confusing,

6 argumentative, harassing.

7 A Mr. Edwards, I would like to answer that

8 question. My attorneys have told me today, I

9 have to at least today assert my Fifth Amendment,

10 Sixth Amendment and Fourteenth Amendment rights

11 to the U.S. Constitution, especially my concern

12 is, that your firm has filed fraudulent lawsuits,

13 fabricated lawsuits, and the U.S. Attorney, the

14 current U.S. Attorney has described your firm as

15 a criminal enterprise that -- whose main purpose

16 was to generate money for the firm and its

17 co-conspirators through the operation of various

18 criminal activities, including mail fraud, wire

19 fraud and money laundering.

20 **Q** Are you saying that the complaint of

21 L.M. against you, the allegation in that

22 complaint, are false?

23 MR. PIKE: Form. Misinterprets the

24 witness's testimony.

25 **Q** Or saying it is true?

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1 MR. PIKE: Same objection.

2 **Q** It is either true or false?

3 A I'll repeat myself, unfortunately, but

4 the current U.S. Attorney has described your law

5 firm that filed that filed L.M.'s claim -- was

6 involved in the filing of L.M.'s claim,

7 motions -- I'm sorry, do you want to tell me what

8 it was then? Would you like to tell me the

9 firm's involvement in this lawsuit, since we will

10 be here the rest of the day?

11 **Q** Answer the question.

12 A All right.

13 The U.S. Attorney has described that

14 firm as a criminal enterprise perpetrating one of

15 the largest frauds in Florida's history against

16 unsuspecting investors, fleecing them out of

17 millions of dollars by creating, crafting and

18 fabricating fellacious (sic) sexual claims

19 against people like me and others, so

20 unfortunately, though I would like to answer your

21 questions, Mr. Edwards, my counsel has advised me

22 that at least today I must assert my Sixth

23 Amendment, Fifth Amendment and Fourteenth

24 Amendment rights under the U.S. Constitution.

25 **Q** Isn't it true, sir, and I'm reading from

40

1 the complaint filed by V.R. against you, isn't it

2 true, sir, that a friend of yours sent you three,

3 12-year old females for you to sexually abuse on

4 one of your birthdays?

5 MR. PIKE: Form, argumentative,

6 harassing, and irrelevant to this lawsuit.

7 THE WITNESS: Excuse me.

8 A You're saying it is part of the

9 lawsuit?

10 **Q** Yes, I'll read it.

11 "On one of the defendant Epstein's

12 birthdays, a friend of defendant Epstein sent him

13 three, 12-year old girls from France who spoke no

14 English for defendant to sexually exploit and

15 abuse? After doing so they were sent back to

16 France the next day."

17 Isn't that true?

18 MR. PIKE: Once again, move to strike,

19 irrelevant, argumentative, harassing, and

20 for the record, the exhibit that's being

21 read from is a complaint that's unrelated to

22 the instant matter and not filed or

23 incorporated by the current plaintiff, L.M.,

24 in this matter.

25 A I would like to answer that question, I

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1 really would; however, today my attorneys have

2 told me I have to assert my Fifth Amendment,

3 Sixth Amendment and Fourteenth Amendment rights

4 of the U.S. Constitution, especially because your

5 firm involved in this lawsuit has fabricated,

6 widely reported, multiple cases of sexual

7 harassment cases against individuals like me and

8 others, perpetrating what the U.S. Attorney

9 called one of the largest frauds in Florida's

10 history, fleecing people out of millions of

11 dollars, so though I would like to answer that

12 question, today I have to assert those rights or

13 risk losing my attorneys' counsel.

14 **Q** Isn't it true that you forced V.R. as a

15 15-year old girl to have sex with numerous

16 friends of yours?

17 A Are you kidding?

18 **Q** Reading from a lawsuit.

19 A Sorry, Mr. Edwards. Though I would like

20 to answer that question as well, as I've answered

21 most of your other questions here today, I would

22 like to respond; however, my attorneys here today

23 have advised me I have to assert my Fifth

24 Amendment, Sixth Amendment and Fourteenth

25 Amendment rights under the U.S. Constitution,

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1 especially as your firm has been accused by the  
2 U.S. Attorney as being a criminal enterprise, and  
3 part of the largest fraud in Florida's history.  
4 Basically -- sorry, if I didn't read correctly,  
5 um.... the operation of the enterprise through  
6 various criminal activities including mail fraud,  
7 wire fraud and money laundering, fabricating  
8 sexual harassment cases against people like me  
9 and others.

10 **Q By the way --**  
11 **A Yes, sir?**

12 **Q -- didn't V.R. receive a round trip**  
13 **ticket paid for by you to Thailand, and she**  
14 **ultimately did not get back on the plane but**  
15 **instead escaped to Australia?**

16 **A I would like to answer that question,**  
17 **but today I would have to assert my Sixth**  
18 **Amendment rights, my Fifth Amendment rights and**  
19 **my Fourteenth Amendment rights under the U.S.**  
20 **Constitution, especially since your firm has been**  
21 **described as perpetrating one of the largest**  
22 **frauds in Florida's history, fleecing investors**  
23 **out of millions of dollars, being described by**  
24 **the U.S. Attorney of South Florida, as a criminal**  
25 **enterprise engaged in various criminal activities**

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1 including mail fraud, wire fraud and money  
2 laundering.

3 **Q Do you know a man named Jean Luc**  
4 **Brunel?**

5 **A Can you spell it?**

6 **Q He was at your house last week, does**  
7 **that remind you?**

8 **MR. PIKE: Form, move to strike,**  
9 **speculation, argumentative, harassing.**

10 **Is there a question on the table, Mr.**  
11 **Edwards?**

12 **MR. EDWARDS: Yes.**

13 **Q Do you know him?**  
14 **A Can you spell his name for me, please?**

15 **Q I don't need to spell his name. Do you**  
16 **know who I'm talking about, Mr. Brunel?**

17 **A Sorry, Mr. what?**

18 **Q B-r-u-n-e-l.**

19 **A I would like to answer that question as**  
20 **well, but my attorneys have counseled me today I**  
21 **have to assert my Sixth Amendment rights, Fifth**  
22 **Amendment rights and Fourteenth Amendment rights**  
23 **under the U.S. Constitution or risk losing my**  
24 **right to effective representation.**

25 **Q What's the purpose for you asking me to**

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1 **spell his name? Are you acting like you don't**  
2 **know him?**

3 **MR. PIKE: Form, move to strike,**  
4 **argumentative and irrelevant as worded.**

5 **Mr. Edwards, you know that there are**  
6 **various standing orders, if not in this**  
7 **case, in various other cases, that**  
8 **specifically describe the protections of the**  
9 **Fifth Amendment. Federal Courts have**  
10 **ordered that certain questions that you are**  
11 **asking shall not be answered or Mr. Epstein**  
12 **would risk losing his Fifth Amendment**  
13 **right --**

14 **MR. EDWARDS: I understand that. He is**  
15 **asking to spell people's names.**

16 **MR. PIKE: -- under the United States**  
17 **Constitution. A lot of these questions here**  
18 **today that you're asking have already been**  
19 **ruled on by various Courts, that the Fifth**  
20 **Amendment protects any response thereto, so**  
21 **I would like -- I'm giving you some leeway**  
22 **here with regard to the argumentative**  
23 **questions. We've already -- and I'm not**  
24 **obviously testifying for the witness, but**  
25 **we've already handled a lot of these issues**

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1 in court and we have already adjourned one  
2 deposition for being argumentative, and I  
3 think you understand what the Court said  
4 there, so having said that, and I understand  
5 that you have a job to do, but having said  
6 that, I would like to caution you  
7 professionally, if you continue with the  
8 argumentative questions, I am going to have  
9 to terminate this deposition --

10 **MR. EDWARDS: I completely understand.**

11 **MR. PIKE: Okay. We are here today**  
12 **to --**

13 **MR. EDWARDS: Mr. Brunel --**

14 **MR. PIKE: I want the Court to know we**  
15 **are here today to allow you to ask your**  
16 **questions, but the harassing and**  
17 **argumentative tone is not going to be**  
18 **tolerated.**

19 **MR. EDWARDS: We have a video. We can**  
20 **show the Court the tone. It is obviously**  
21 **not harassing.**

22 **MR. PIKE: That's fine.**

23 **Q Mr. Brunel is a long-term friend of**  
24 **yours, right?**

25 **A I intend to respond to all relevant**

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1 questions of this lawsuit; however, today my  
2 attorneys have counseled me I cannot provide  
3 answers to any questions that may be relevant to  
4 this lawsuit and I must accept their advice or  
5 risk losing my Sixth Amendment right to effective  
6 representation.  
7 **Q You know him as somebody who has been**  
8 **caught engaging in sex with underage minors in**  
9 **the past; is that correct?**  
10 MR. PIKE: Form.  
11 A You will have to repeat the question,  
12 I'm sorry.  
13 **Q You know Mr. Brunel as somebody who has**  
14 **been caught engaging in sex with minors in the**  
15 **past; is that correct?**  
16 MR. PIKE: Form.  
17 A I intend to respond to all relevant  
18 questions regarding this lawsuit; however, at the  
19 present time my attorneys have counseled me that  
20 I cannot provide answers to any questions  
21 relevant to this lawsuit, and I must accept their  
22 advice or risk losing my Sixth Amendment right to  
23 effective representation as your firm has been  
24 described by the U.S. Attorney as a criminal  
25 enterprise and part of one of the largest frauds

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1 in Florida's history specifically said you have  
2 been fabricating -- the law firm has been  
3 fabricating multiple cases of a sexual nature in  
4 order to fleece unsuspecting investors out of  
5 millions of dollars, including mail fraud, wire  
6 fraud and money laundering, so unfortunately,  
7 though I would like to answer all your questions  
8 here today, I must assert my Sixth Amendment,  
9 Fourteenth Amendment and Fifth Amendment right.  
10 **Q You were involved in a modeling business**  
11 **with him called M.C. Squared; is that correct?**  
12 A Again?  
13 **Q You were involved in a modeling agency**  
14 **with --**  
15 A What do you mean --  
16 **Q -- with Mr. Brunel called M.C. Squared?**  
17 A "Involved" means what, what do you  
18 mean?  
19 **Q You tell the jury your involvement with**  
20 **the modeling agency. You can clarify for me,**  
21 **I'll let you do that.**  
22 MR. PIKE: Object to the form.  
23 A I intend to respond to all relevant  
24 questions regarding this lawsuit. However, at  
25 the present time my attorneys have counseled me

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1 that I cannot provide answers to any questions  
2 relevant to this lawsuit and I must accept their  
3 advice or risk losing my Fifth, Sixth and  
4 Fourteenth Amendment rights under the U.S.  
5 Constitution.  
6 **Q When you were being criminally**  
7 **investigated and V.R. was in Australia, is it**  
8 **true that you made a personal telephone call to**  
9 **her telling her not to come forward with any of**  
10 **the information she knew?**  
11 MR. PIKE: Form.  
12 A Again?  
13 **Q Putting a time frame on it, the time**  
14 **frame where you were being criminally**  
15 **investigated --**  
16 A What time frame is that?  
17 **Q In her complaint it is not specific,**  
18 **but, let's just make it whenever. At some point**  
19 **in time did you place a telephone call to V.R. in**  
20 **Australia warning her not to come forward with**  
21 **any information about you engaging in sex with**  
22 **her while she was a minor?**  
23 MR. PIKE: Form.  
24 A I intend to respond to all relevant  
25 questions regarding this lawsuit; however, at the

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1 present time my attorneys have counseled me that  
2 I cannot provide answers to any questions  
3 relevant to this lawsuit and I must accept their  
4 advice or risk losing my Sixth Amendment right to  
5 effective representation.  
6 **Q With respect to underage females, isn't**  
7 **it true that you have made the statement, in**  
8 **quotes, "the younger the better"?**  
9 MR. PIKE: Form.  
10 A Again, as your firm has been described  
11 by the current U.S. Attorney as a criminal  
12 enterprise involved in mail fraud, wire fraud,  
13 money laundering, and specifically crafting,  
14 fabricating multiple cases of sexual -- of a  
15 sexual nature against people like me, and others,  
16 in order to fleece many, many unsuspecting  
17 investors out of millions of dollars; I would  
18 like to answer your questions here today, Mr.  
19 Edwards, but unfortunately, my attorneys have  
20 counseled me that I must assert my Fifth, Sixth  
21 and Fourteenth Amendment right or they will  
22 resign.  
23 **Q Who are your current employees?**  
24 MR. PIKE: Form.  
25 A Say that again.

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1 **Q Who are your current employees, people**  
2 **who work for you, that you pay?**  
3 A I intend to respond to all relevant  
4 questions regarding this lawsuit; however, at the  
5 present time my attorneys have counseled me that  
6 I cannot provide answers to any questions that  
7 may be relevant to this lawsuit, or risk losing  
8 my Sixth Amendment right to effective  
9 representation. Accordingly, therefore, I must  
10 assert my Sixth Amendment, Sixth Amendment and  
11 Fourteenth Amendment rights as provided by the  
12 U.S. Constitution.

13 **Q Isn't it true you pay your employees to**  
14 **bring you underage minor females for sex?**  
15 MR. PIKE: Form, argumentative,  
16 speculation, harassing.  
17 A Mr. Edwards, your firm has been  
18 described the current U.S. Attorney as a criminal  
19 enterprise, a criminal enterprise, part of the  
20 largest fraud in South Florida's history; but  
21 part of that fraud was fabricating, um,  
22 fictitious cases against me -- excuse me, against  
23 people like me, of a sexual nature, in order to  
24 fleece unsuspecting investors out of millions of  
25 dollars.

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1 Unfortunately at this time, though, I  
2 would like to answer every one of your  
3 questions. My attorney has advised me I must  
4 assert my Sixth Amendment, Fourteenth Amendment  
5 and Fifth Amendment rights or risk losing them as  
6 my attorneys.

7 **Q Isn't it true when underage females were**  
8 **brought to you, you would engage in sex with them**  
9 **and pay them?**  
10 MR. PIKE: Form, argumentative,  
11 harassing.  
12 A (Witness shakes head.)  
13 **Q Are you shaking your head to say "no" --**  
14 **A Excuse me.**  
15 **Q Are you shaking your head to say "no, I**  
16 **don't know how to interpret that answer?"**  
17 A I didn't realize I was shaking my head.  
18 MR. EDWARDS: I thought he was actually  
19 answering a question.  
20 MR. PIKE: We'll just strike. The rules  
21 are well-known to every lawyer who practices  
22 in the State of Florida, that it is clear  
23 that a nod of the head or shake of the head  
24 is not understood by the record, so  
25 therefore Mr. Epstein was clearly not

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1 responding to one of your questions and you  
2 know that, Mr. Edwards.  
3 MR. EDWARDS: This is on the video.  
4 MR. PIKE: Nonetheless you know the  
5 rules. Nonetheless. If we have a question  
6 on the table, would you please repeat it so  
7 I can recall it and Mr. Epstein can endeavor  
8 to answer it.  
9 MR. EDWARDS: Sure, and if it was only  
10 the court reporter, I would agree, but the  
11 jury is going to see a video and everybody  
12 knows commonly, if somebody shakes their  
13 head, they are saying "no," and if that was  
14 the answer, I wanted to give him a chance to  
15 elaborate on it, that's it.

16 **Q Isn't it true that when underage females**  
17 **would come to your house, you would engage in**  
18 **sexual activity with them and then pay them?**  
19 MR. PIKE: Same objections.  
20 A Unfortunately I would like to answer  
21 that question today, but my attorneys have  
22 counseled me that I must assert my Sixth  
23 Amendment right, my Fifth Amendment right and my  
24 Fourteenth Amendment right under the U.S.  
25 Constitution.

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1 The fact that your firm has been  
2 described as a criminal enterprise and part of  
3 one of the largest frauds in Florida's -- South  
4 Florida's history, part of that fraud has been  
5 described as fabricating cases of sexual nature  
6 against me and others in order to fleece  
7 unsuspecting investors out of millions of  
8 dollars. I would like to answer that question,  
9 Mr. Edwards; however, today, I must assert my  
10 Fifth, Sixth and Fourteenth Amendment right.  
11 **Q In addition to paying these underage**  
12 **females for sexual activity, you also paid them**  
13 **to bring their underage friends to you, to also**  
14 **engage in sexual activity with them?**  
15 MR. PIKE: Form.  
16 **Q Is that correct?**  
17 A I intend to respond to all relevant  
18 questions regarding this lawsuit; however, at the  
19 present time my attorneys have counseled me that  
20 I may not, and I must assert -- they have advised  
21 me I must assert my Sixth Amendment right, my  
22 Fifth Amendment right and my Fourteenth Amendmen  
23 rights under the U.S. Constitution.  
24 **Q You would pay underage females 200 to**  
25 **\$300 for engaging in sexual activity with you or**

1 **for procuring another underage female to engage**  
2 **in sexual activity with you; is that correct?**

3 MR. PIKE: Form, move to strike.

4 Assumes facts not in evidence and calls for  
5 a legal conclusion as well, argumentative.

6 A I intend to respond to all relevant  
7 questions regarding this lawsuit; however, at the  
8 present time my attorneys have counseled me that  
9 I cannot provide answers to any questions that  
10 may be relevant to this lawsuit, and I must  
11 accept their advice or risk losing my Sixth  
12 Amendment right to effective representation.

13 Accordingly, therefore, I must assert my  
14 constitutional rights as guaranteed by the Fifth,  
15 Sixth and Fourteenth Amendment to the U.S.  
16 Constitution.

17 **Q Would you agree that your scheme was**  
18 **devised to coerce these underage minors to bring**  
19 **you as many other underage minors, as were**  
20 **available for you to engage in sexual activity**  
21 **with?**

22 MR. PIKE: Form.

23 A Can you repeat the question?

24 **Q Yes. Would you agree that your scheme**  
25 **was devised to coerce underage girls into**

1 Attorney, and as part of the largest fraud in  
2 South Florida's history, and as part of the fraud  
3 fabricating malicious cases of sexual harassment  
4 and other cases of sexual nature against people  
5 like me and others, although I would like to  
6 answer that question today, my attorneys have  
7 advised me I must assert my Sixth Amendment,  
8 Fourteenth Amendment and Fifth Amendment rights  
9 of the U.S. Constitution. Although I believe you  
10 know I would really like to answer your  
11 questions, but at this moment if I don't assert  
12 those rights, I risk having my attorneys resign.

13 **Q Isn't it true with this method you were**  
14 **able to interact sexually with underage girls**  
15 **every single day?**

16 MR. PIKE: Form, asked and answered.

17 Same objections.

18 **Q Go ahead.**

19 A Oh, I'm sorry. Can you repeat it?

20 **Q Sure. With this method of --**

21 A "This method" being what, sorry?

22 **Q Your method of using underage minors to**  
23 **bring you other underage minors for sex; isn't it**  
24 **true that that method resulted in you engaging in**  
25 **sexual activity with underage minors on an every**

1 **bringing as many other underage girls to you, as**  
2 **were available for sexual purposes?**

3 MR. PIKE: Form.

4 A Did you say "for sexual purposes"?

5 **Q Yes, for sexual purposes.**

6 A I'm not surprised. Since your firm was  
7 described as perpetrating one of the largest  
8 frauds in Florida's history by crafting,  
9 fabricated sexual harassment cases against people  
10 like me and others in order to fleece  
11 unsuspecting investors out of millions of  
12 dollars, I would like to answer that question.  
13 However, today my attorneys have advised me I  
14 must assert my Sixth Amendment, Fifth Amendment  
15 and Fourteenth Amendment right under the U.S.  
16 Constitution, and if I don't do so, I risk  
17 losing -- uh... losing effective representation.

18 **Q Utilizing this method of using underage**  
19 **minors to bring you other underage minors, you**  
20 **were able to engage in sex with hundreds of**  
21 **underage minor females. Is that true?**

22 MR. PIKE: Form, argumentative,  
23 harassing and calls for speculation.

24 A Since, Mr. Edwards, your firm has been  
25 described as a criminal enterprise by the U.S.

1 **day basis?**

2 MR. PIKE: Same objections.

3 A Your firm has been described by the  
4 current U.S. Attorney as a criminal enterprise  
5 engaged in one of the largest frauds in South  
6 Florida's history, and as part of that fraud,  
7 creating, fabricating, malicious cases of sexual  
8 nature against people like me and others, so  
9 unfortunately, though I would like to answer that  
10 question today, I must assert my Sixth Amendment,  
11 Fourteenth Amendment and Fifth Amendment rights  
12 to my counsel's advisement to do, although I  
13 believe you know I would really like to answer  
14 those questions today, I must assert those rights  
15 or risk losing my attorney's representation.

16 **Q To keep track of all these underage**  
17 **minors, you stored their names and telephone**  
18 **numbers in your home computer; isn't that**  
19 **correct?**

20 MR. PIKE: Form, argumentative,  
21 speculation.

22 A Again? Sorry.

23 **Q Are you going to answer the question or**  
24 **just read? If you are going to answer the**  
25 **question, of course, I'll keep reading it as many**

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1 times.  
2 A Excuse me?  
3 MR. PIKE: The witness is attempting to  
4 answer your question. He asked you to  
5 repeat the question.  
6 MR. EDWARDS: He is?  
7 MR. PIKE: He asked you to repeat the  
8 question.  
9 MR. EDWARDS: I don't mind going through  
10 that, Mike, because I do want answers, but  
11 if I'm going to repeat the question multiple  
12 times and get the same answer, we are  
13 wasting time. I want to stop us wasting  
14 time repeating questions if I'm getting the  
15 same nonresponsive answer.  
16 MR. PIKE: I understand your intention  
17 here.  
18 MR. EDWARDS: Yeah.  
19 MR. PIKE: -- however, these questions  
20 are similar in nature, if not identical to  
21 various questions that you've asked in other  
22 indications, so you coming here today is of  
23 no surprise that Mr. Epstein is required to  
24 invoke his Fifth, Sixth and Fourteenth  
25 Amendment rights under the United States

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1 Constitution --  
2 MR. EDWARDS: I understand that.  
3 MR. PIKE: -- if you came here today  
4 thinking you were going to pull a rabbit out  
5 of a hat, and Mr. Epstein was going to  
6 waive his Fifth, Sixth and Fourteenth  
7 Amendment rights to the U.S. Constitution,  
8 at least not today. That will not be  
9 occurring.  
10 **Q Isn't it true that to keep track of the**  
11 **names and phone numbers of these underage minor**  
12 **females, to interact with sexually, you stored**  
13 **those names and phone numbers in your home**  
14 **computer?**  
15 A Thank you. I've heard the question  
16 now. It didn't surprise -- again, I've now heard  
17 the question and the fact that your firm has been  
18 described as a criminal enterprise by the current  
19 U.S. Attorney in South Florida, and part of one  
20 of the largest frauds in Florida's history, it is  
21 reported that your firm fabricated malicious  
22 cases of a sexual nature against people and  
23 against me, in order to fleece unsuspecting  
24 investors out of millions of dollars.  
25 Unfortunately, though I would like to

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1 answer each one of your questions today, Mr.  
2 Edwards, my attorneys have advised me that I must  
3 assert my Sixth Amendment, Fifth Amendment and  
4 Fourteenth Amendment rights under the U.S.  
5 Constitution. So although I would like to  
6 answer, I must assert those rights or risk having  
7 my attorneys resign.  
8 **Q Do you know Sarah Kellen?**  
9 A I intend to respond to all relevant  
10 questions regarding this lawsuit; however, at the  
11 present time my attorneys have counseled me that  
12 I cannot provide answers to any questions  
13 relevant to this lawsuit and must accept their  
14 advice or risk losing my Sixth Amendment right to  
15 effective representation.  
16 **Q Isn't it true you employed Sarah Kellen**  
17 **to contact underage minor females and make them**  
18 **appointments to be at your house?**  
19 A Sorry, again?  
20 **Q Isn't it true you employed Sarah Kellen**  
21 **for the purposes of contacting underage minor**  
22 **females and scheduling them appointments to be at**  
23 **your house?**  
24 A The current U.S. Attorney has described  
25 your law firm, Mr. Edwards, as a criminal

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1 enterprise engaged in one of the largest frauds  
2 in South Florida's history. It has been reported  
3 that your firm fabricated multiple cases of a  
4 sexual nature against me and others, in order to  
5 fleece unsuspecting investors out of millions and  
6 millions of dollars, so, though unfortunately I  
7 would like to answer every one of your questions  
8 today my attorneys have counseled me that today I  
9 must assert my Sixth Amendment, Fifth Amendment  
10 and Fourteenth Amendment rights under the U.S.  
11 Constitution. Though I believe you know I would  
12 like to answer those questions, although today I  
13 must assert those rights or risk having my  
14 attorneys resign.  
15 **Q Tell the jury how you know Nadia**  
16 **Marcinkova.**  
17 MR. PIKE: Form move to strike.  
18 MR. EDWARDS: Move to strike my  
19 question?  
20 MR. PIKE: (Nods.)  
21 MR. EDWARDS: What basis?  
22 \*\* MR. PIKE: Do I have to state a  
23 basis? Usually I'm just required to state  
24 "form."  
25 MR. EDWARDS: You have done more than

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1 that today.

2 MR. PIKE: If I went on a diatribe of

3 explaining, you know, what's confusing,

4 compound and relevant, then you would blame

5 for testifying for the witness. So I just

6 move to strike the question.

7 MR. EDWARDS: Make sure you mark that

8 somewhere on this transcript, somehow.

9 **Q Tell the jury how you know Nadia**

10 **Marcinkova?**

11 MR. PIKE: Move to strike.

12 A I intend to respond to all relevant

13 questions regarding this lawsuit. However, at

14 the present time my attorneys have counseled me

15 that I cannot provide answers to any questions

16 relevant to this lawsuit and must accept their

17 advice or risk losing my Sixth Amendment right to

18 effective representation. Accordingly, I assert

19 my Fifth Amendment, Sixth Amendment and

20 Fourteenth Amendment right under the U.S.

21 Constitution.

22 **Q Isn't it true that you brought her to**

23 **this country when she was underage and made her**

24 **your sex slave, and you've bragged about this?**

25 MR. PIKE: Form, argumentative,

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1 compound, harassing and calls for

2 speculation.

3 A I intend to respond to all relevant

4 questions regarding this lawsuit; however, at the

5 present time my attorneys have counseled me that

6 I cannot provide answers to any questions

7 relative to this lawsuit and I must accept this

8 advice or risk losing my Sixth Amendment right to

9 effective representation. However, I would like,

10 so I'm clear, the question was, did I bring her

11 here? Specifically --

12 **Q Your answer is fine.**

13 A Okay.

14 **Q Is it true that you demanded numerous**

15 **underage minor females to have sex with Nadia**

16 **Marcinkova inside your home while you watched,**

17 **masturbating?**

18 MR. PIKE: Same objections.

19 A You have to repeat the question.

20 **Q Isn't it true that you have ordered**

21 **several underage minor females to have sex with**

22 **Nadia Marcinkova in your home while you watched,**

23 **masturbating?**

24 MR. PIKE: Same objections.

25 A The current U.S. Attorney has described

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1 your firm, Mr. Edwards, as a criminal enterprise

2 involved in mail fraud, wire fraud, money

3 laundering and, in fact, fabricating multiple

4 cases of a sexual nature against me, others, in

5 order to fleece unsuspecting investors in South

6 Florida out of millions and millions of dollars.

7 Unfortunately, though I would like to

8 answer each one of your questions here today, my

9 attorneys have advised me I must assert my Sixth

10 Amendment, Fourteenth Amendment and Fifth

11 Amendment right under the U.S. Constitution,

12 although I believe you know I would like to

13 answer your questions, but at this moment I must

14 assert those rights or risk having my attorneys

15 resign.

16 **Q Isn't it true that with each of these**

17 **underage minor females that were brought to your**

18 **house, your method of sexually exploiting them**

19 **was nearly identical; is that correct?**

20 MR. PIKE: Objection, argumentative,

21 confusing, overbroad and vague.

22 A I don't even understand the question.

23 **Q Okay. When a 14 or 15-year old would be**

24 **led into your bedroom, you would appear from the**

25 **shower first, usually naked; is that correct?**

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1 MR. PIKE: Objection, argumentative,

2 assumes facts not in evidence, and

3 harassing.

4 A I intend to respond to all relevant

5 questions regarding this lawsuit; however, today

6 my attorneys have advised me that I cannot

7 provide answers to any questions relevant to this

8 lawsuit and must accept their advice or risk

9 losing my Sixth Amendment right to effective

10 representation. Accordingly, therefore, I must

11 assert my Constitutional rights -- the Fifth

12 Amendment, Sixth Amendment and Fourteenth

13 Amendments to the U.S. Constitution.

14 MR. PIKE: Can we go off the record for

15 a second?

16 MR. EDWARDS: If it is necessary.

17 MR. PIKE: Yes, let's go off the

18 record.

19 THE VIDEOGRAPHER: Going off the video

20 record at 12:35 p.m.

21 (Pause in the proceedings.)

22 THE VIDEOGRAPHER: Back on the video

23 record 12:44 p.m.

24 MR. EDWARDS: Can you tell me what my

25 last question is?

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1 THE COURT REPORTER: Certainly.  
2 (The record was read.)  
3 **Q After appearing from the shower naked,**  
4 **you would order the underage minor female to**  
5 **disrobe; isn't that true?**  
6 MR. PIKE: Same objections. Form.  
7 A I intend to respond to all relevant  
8 questions regarding this lawsuit; however, at the  
9 present time my attorneys have counseled me I  
10 cannot provide answers to any questions relevant  
11 to this lawsuit and must accept their advice or  
12 risk losing my Sixth Amendment right to effective  
13 representation.  
14 **Q You would then order them to, or order**  
15 **her to begin providing you a massage; is that**  
16 **correct?**  
17 MR. PIKE: Form.  
18 A I intend to respond to all relevant  
19 questions regarding this lawsuit and I would like  
20 to answer each and every one of your questions  
21 today, Mr. Edwards; however, my attorneys have  
22 told me that I cannot do that today unless and I  
23 must assert my Sixth Amendment, Fifth Amendment  
24 and Fourteenth Amendment rights under the U.S.  
25 Constitution or risk losing my counsel.

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1 Therefore, I'm going to assert those rights as  
2 guaranteed by the Fifth Amendment, Sixth  
3 Amendment and Fourteenth Amendment.  
4 **Q You would then roll over and continue**  
5 **with masturbating; is that correct?**  
6 MR. PIKE: Form.  
7 A I intend to respond to all relevant  
8 questions regarding this lawsuit. It is -- it is  
9 my understanding that the current U.S. Attorney  
10 has described your law firm as a criminal  
11 enterprise, yours and Mr. Jaffe's firm, as a  
12 criminal enterprise and part of the largest fraud  
13 in Florida's history, fabricating malicious cases  
14 of a sexual nature against me and others, in  
15 order to fleece investors out of millions of  
16 dollars, through bogus schemes including  
17 conspiracy to -- excuse me -- to commit mail  
18 fraud, wire fraud and money laundering, so though  
19 I would like to answer each and every one of your  
20 questions here today, my attorneys have counseled  
21 me I cannot, and must assert my Fifth, Sixth and  
22 Fourteenth Amendment rights under the U.S.  
23 Constitution.  
24 **Q You would then rub the underage minor**  
25 **female's vagina and/or insert your fingers into**

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1 **her vagina; is that correct?**  
2 MR. PIKE: Form.  
3 A I intend to respond to all relevant  
4 questions regarding this lawsuit. Unfortunately,  
5 today my attorneys have advised me I cannot, must  
6 assert my rights under the U.S. Constitution,  
7 under the Fifth Amendment and Sixth amendment and  
8 Fourteenth amendments of the U.S. Constitution,  
9 especially since your firm has been described as  
10 a criminal enterprise by the current U.S.  
11 Attorney perpetrating one of the largest frauds  
12 in South Florida's history, fleecing investors  
13 out of millions of dollars by fabricating  
14 malicious cases, malicious cases of a sexual  
15 nature against people like me and others.  
16 **Q With many of these underage minors you**  
17 **would use vibrators on them; is that correct?**  
18 MR. PIKE: Form.  
19 A I would like to respond to that question  
20 as I would like to respond to all your other  
21 questions today. However, my attorneys have  
22 counseled me that I must assert my Sixth  
23 Amendment rights, my Fifth Amendment rights and  
24 my Fourteenth Amendment rights under the U.S.  
25 Constitution.

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1 **Q And with many of these underage minors,**  
2 **you would give and/or receive oral sex from them**  
3 **is that correct?**  
4 MR. PIKE: Form.  
5 A I intend to respond to all relevant  
6 questions regarding this lawsuit, and I would  
7 like to answer each and every one of your  
8 questions; however, my attorneys have counseled  
9 me that today I must assert my Sixth Amendment,  
10 Fifth Amendment and Fourteenth Amendment rights  
11 under the U.S. Constitution, especially since  
12 your firm has been described by the current U.S.  
13 Attorney as perpetrating one of the largest  
14 frauds in Florida -- in Florida's history, by  
15 fabricating malicious cases of a sexual nature  
16 against me and others.  
17 **Q In June of 2008 you pled guilty to a**  
18 **couple of felonies, right?**  
19 MR. PIKE: Form, vague and confusing.  
20 A Again?  
21 **Q In June of 2008, you pled guilty to two**  
22 **felonies; is that correct?**  
23 MR. PIKE: Same objection.  
24 A Yes.  
25 **Q And what were those felonies that you**



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1 **pled guilty to?**  
2 A Solicitation of prostitutes, not  
3 underage prostitutes but simply prostitutes.  
4 Solicitation of prostitutes and one count of  
5 procuring a minor for underage sex.  
6 **Q You have taken the Fifth as to questions**  
7 **related to many of these underage minors, but the**  
8 **underage minors that were the victims in the**  
9 **cases where you pled guilty, were A.H.; is that**  
10 **one of them?**  
11 MR. PIKE: Form, mischaracterizes the  
12 witness's testimony. Calls for a legal  
13 conclusion?  
14 A Again.  
15 **Q What was the name of the any of the**  
16 **underage minors that were the subject of the**  
17 **criminal charges to which you pled guilty?**  
18 A I don't know.  
19 **Q So, tell me about those charges. What**  
20 **were the allegations of those charges?**  
21 MR. PIKE: Form.  
22 A Solicitation of prostitution, not  
23 underage prostitution... Prostitution.  
24 **Q Were the victims or the prostitutes, as**  
25 **you would say, were they minors?**

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1 MR. PIKE: Form.  
2 A I pled guilty to solicitation of  
3 prostitution.  
4 **Q Okay, so tell me what those cases were**  
5 **about. What happened?**  
6 MR. PIKE: Form again.  
7 A I... (Witness shrugs.) I can't tell you  
8 any more than that.  
9 **Q You don't know what you pled guilty to?**  
10 A I just told you --  
11 MR. PIKE: Object to the form, asked and  
12 answered.  
13 **Q Do you know what you pled guilty to, the**  
14 **facts?**  
15 A Solicitation of prostitution.  
16 **Q I understand that that's the charge.**  
17 **What were the underlying facts? What did you do,**  
18 **did you pull up in a car, talk to the person, did**  
19 **they come over to your house, how did you get**  
20 **them, those kinds of things. Tell the jury what**  
21 **were the underlying facts about the charges you**  
22 **pled guilty to?**  
23 MR. PIKE: Object to the form. Move to  
24 strike.  
25 A I don't know.

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1 **Q You don't know what you pled guilty to?**  
2 A I pled guilty to solicitation of  
3 prostitution, not underage prostitution, but  
4 prostitution.  
5 **Q My understanding from reading the court**  
6 **files that one of these females was A.H. Do you**  
7 **know who that is?**  
8 A I intend to respond to all relevant  
9 questions in this lawsuit. However, at the  
10 present time my attorneys have counseled me that  
11 I cannot provide answers to any of these  
12 questions today. So accordingly, I must assert  
13 my constitutional rights under the Fifth, Sixth  
14 and Fourteenth Amendments of the U.S.  
15 Constitution.  
16 **Q You're aware A.H. is somebody that**  
17 **alleges she was at your house on more than 100**  
18 **occasions; is that true?**  
19 MR. PIKE: Form.  
20 A Can you repeat the question, sir?  
21 **Q Are you aware that A.H. is a female that**  
22 **alleges that when she was underage, she was at**  
23 **your house on more than 100 occasions?**  
24 MR. PIKE: Form, predicate.  
25 A I intend to respond to all relevant

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1 questions to this lawsuit, Mr. Edwards. However,  
2 today my attorneys have counseled me that I must  
3 respond by invoking my Fifth Amendment right, my  
4 Sixth Amendment right and my Fourteenth Amendment  
5 right under the U.S. Constitution or risk losing  
6 them as my attorneys, so therefore I must assert  
7 those rights.  
8 **Q You understand that her complaint was**  
9 **that Epstein turned H. on to her stomach on the**  
10 **massage bed and inserted his penis in to her**  
11 **vagina, H. Stated Epstein began to pump his penis**  
12 **in her vagina and, she became upset over this.**  
13 **She said her head was being held against the bed**  
14 **forcibly as he continued to pump inside of her**  
15 **while she screamed "no."**  
16 **Are you aware of those allegations?**  
17 MR. PIKE: Form, predicate.  
18 A I'm sorry, did you say there is a  
19 complaint?  
20 **Q In the incident report that led to a**  
21 **charging document, that led to a charge that you**  
22 **have pled guilty to. Are you aware of that**  
23 **information coming from A.H.?**  
24 MR. PIKE: I'm sorry, Mr. Edwards; what  
25 are you reading from?

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1 MR. EDWARDS: The 87-page Palm Beach  
 2 Police Department incident report where  
 3 there are numerous underage females  
 4 describing their interaction with Mr.  
 5 Epstein at his house. I'm reading  
 6 specifically from page 41 related to A.H.,  
 7 who was one of the victims he pled guilty  
 8 to.

9 MR. PIKE: Is that the same document  
 10 that you're seeking production of, in this  
 11 same exact case?

12 MR. EDWARDS: I don't know what you're  
 13 talking about. This is something from the  
 14 State Attorney's file.

15 MR. PIKE: Okay. Sorry. What's the  
 16 question?

17 **Q Are you aware of that allegation? What**  
 18 **I just read to you.**

19 A I would like to answer that question,  
 20 but, however, today my attorneys have advised me  
 21 I must assert my Fifth Amendment, Sixth Amendment  
 22 and Fourteenth Amendment rights under the U.S.  
 23 Constitution.

24 **Q Assuming your attorneys have advised you**  
 25 **but because of Res Judicata, double jeopardy, you**

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1 cannot be charged for any crimes that you have  
 2 already pled guilty to relating to A.H., so I  
 3 would like you to explain to the jury, in your  
 4 words, or your version of the story, what was  
 5 your interaction with A.H. at your house when she  
 6 was a minor?

7 MR. PIKE: Object to the form as  
 8 worded. Could disclose attorney/client  
 9 communications.

10 A I intend to respond to all relevant  
 11 questions regarding this lawsuit. I would like  
 12 to answer each of your questions today, however,  
 13 my attorneys have counseled me that I may not.  
 14 They've advised me that I must assert my Fifth  
 15 Amendment, Sixth Amendment and Fourteenth  
 16 Amendment rights under the U.S. Constitution.  
 17 Therefore, if I don't, I risk losing their  
 18 counsel. Therefore, I must assert those rights  
 19 here today, Mr. Edwards.

20 **Q Are you aware that A.H. Advised police**  
 21 **that she was ripped and torn in her vagina area**  
 22 **and had difficulty walking to the car after this**  
 23 **episode where you forcibly inserted your penis**  
 24 **into her vagina?**

25 MR. PIKE: Objection, relevance,

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1 argumentative, compound, harassing.  
 2 A This was who?  
 3 **Q The question is, are you aware A.H.?**  
 4 A A.H.  
 5 The current U.S. Attorney, since he has  
 6 described your firm as a criminal enterprise and  
 7 part of one of the largest frauds in Florida's  
 8 history by fabricating, fabricating, malicious  
 9 cases of a sexual nature against people like me  
 10 and others, and fleecing investors out of  
 11 millions of dollars by using means described in  
 12 the complaint against your firm, including mail  
 13 fraud, wire fraud, money laundering; I'm afraid  
 14 today, though I would like to answer each one of  
 15 your questions, my attorneys have counseled me  
 16 that I must not, I must assert my Sixth  
 17 Amendment, Fifth Amendment and Fourteenth  
 18 Amendment rights under the U.S. Constitution, and  
 19 I believe you know I would like to answer those  
 20 questions. I must assert those rights or risk  
 21 losing my attorney's representation.

22 **Q Do you know S.G.?**  
 23 A Spell it, please.  
 24 **Q I don't know how to spell her name, but**  
 25 **do you know a S.G.? I don't know that she would**

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1 have ever spelled her name for you.  
 2 MR. PIKE: Form, move to strike.  
 3 **Q Her name is "S.G."**  
 4 A I intend to respond to all relevant  
 5 questions regarding this lawsuit. However, at  
 6 the present time my attorneys have counseled me  
 7 that I may not provide answers today, though I  
 8 would like to, and I must, in fact, take their  
 9 advice or risk losing their representation, so  
 10 therefore, I must assert those rights under the  
 11 U.S. Constitution.

12 **Q Do you know the names of any of the**  
 13 **females that you allegedly solicited for**  
 14 **prostitution and pled guilty to?**

15 MR. PIKE: Relevance.  
 16 A Sitting here today, no, I do not.  
 17 **Q You asked me to spell S.G.'s name.**  
 18 **That's somebody that your attorneys took her**  
 19 **deposition about a year and a half ago. Does**  
 20 **that help to refresh your recollection as to who**  
 21 **S.G. is?**

22 A I would like to answer that question but  
 23 today, according to my attorneys, I must assert  
 24 my Fifth Amendment, Sixth Amendment and  
 25 Fourteenth Amendment rights under the U.S.

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1 Constitution. I must accept their advice or risk  
2 losing my Sixth Amendment right to effective  
3 representation, Mr. Edwards, so though I would  
4 like to answer the question, today I must assert  
5 those rights.  
6 **Q There is another victim, her name is**  
7 **A.D., that was listed as one of the females at**  
8 **your house and you pled guilty to the**  
9 **solicitation of.**  
10 **I would like to ask you if you remember**  
11 **her?**  
12 MR. PIKE: Form, confusing, compound.  
13 A A.D.?  
14 **Q I don't know her first time, initial "A"**  
15 **last name is "D."**  
16 MR. PIKE: Same objection.  
17 A I intend to respond to all relevant  
18 questions regarding this lawsuit. However, at  
19 the present time my attorneys have counseled me  
20 that I cannot provide answers to any questions  
21 relevant to this lawsuit, and I must accept their  
22 advice or risk losing my right to effective  
23 representation. Therefore, though I would like  
24 to answer the questions, I must assert those  
25 rights.

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1 **Q With each case that results in a**  
2 **charge --**  
3 THE WITNESS: Excuse me, is there some  
4 water?  
5 THE VIDEOGRAPHER: Off the record?  
6 MR. EDWARDS: Stopping again?  
7 THE WITNESS: Can I get some water? Mr.  
8 Jaffe, can you pass some water?  
9 THE VIDEOGRAPHER: There is no water  
10 here.  
11 THE WITNESS: Sorry.  
12 **Q With each conviction, charge, or with**  
13 **each charge that leads to a conviction, there are**  
14 **facts and circumstances that lead up to that plea**  
15 **of guilty.**  
16 MR. PIKE: Form.  
17 **Q What are the facts and circumstances**  
18 **that led to you pleading guilty to the two**  
19 **felonies that you've described?**  
20 MR. PIKE: Form, overbroad, compound,  
21 confusing, calls for a legal conclusion.  
22 A I would like to respond to that  
23 question. I would like to respond to that  
24 question, but today my attorneys have advised me  
25 I must assert my Fifth Amendment, Sixth Amendment

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1 and Fourteenth Amendment rights to the U.S.  
2 Constitution or risk losing effective  
3 representation. Accordingly, I must assert my  
4 rights as guaranteed by the Constitution.  
5 **Q Just so you are clear, since your**  
6 **attorney made it an objection that it was**  
7 **unclear, then you invoked your Fifth Amendment**  
8 **rights --**  
9 A Sorry.  
10 **Q I'm talking about the cases where you**  
11 **already pled guilty and you can't be charged**  
12 **again. What were the facts and circumstances**  
13 **that led up to you pleading guilty to these**  
14 **felonies?**  
15 A I've answered the question.  
16 MR. PIKE: Same objection, asked and  
17 answered.  
18 THE VIDEOGRAPHER: Counsel.  
19 (Indicating five minutes left on tape.)  
20 MR. EDWARDS: Okay.  
21 **Q Just so the jury understands, these**  
22 **three females that were the subject of the guilty**  
23 **pleas in State Court, were procured by your**  
24 **method of having underage minor females locate**  
25 **other underage minor females and bring them to**

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1 **your house; isn't that correct?**  
2 MR. PIKE: Objection, argumentative,  
3 compound, harassing, assumes facts not in  
4 evidence. I move to strike.  
5 A You have to repeat the question.  
6 **Q Okay, A.H., A.D., S.G. are all people**  
7 **that were, at the time you engaged in sexual**  
8 **activity with them, were underage and were**  
9 **brought by other underage minor females; is that**  
10 **true?**  
11 MR. PIKE: Same objections incorporated  
12 as well as motion to strike.  
13 A I don't understand -- I'm sorry, I don't  
14 understand the question.  
15 **Q Isn't it true that you used underage**  
16 **minor females to bring other underage minor**  
17 **females to your house for sex?**  
18 MR. PIKE: Asked and answered.  
19 A (Witness shrugs.)  
20 MR. PIKE: Way earlier on.  
21 MR. EDWARDS: He doesn't understand the  
22 question --  
23 MR. PIKE: You can answer the question.  
24 **Q I'm going through the progression.**  
25 MR. PIKE: You can answer, but it is

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1 asked and answered.

2 A As your firm, Mr. Edwards and Mr.

3 Jaffe's has been described by the U.S. Attorney

4 as perpetrating one of the largest frauds in

5 South Florida's history by crafting malicious

6 cases of a sexual nature against people like me

7 and others, in order to fleece, using bogus

8 schemes, in the U.S. Attorney's words, investment

9 schemes. Unfortunately, though I would like to

10 answer every one of your questions if I'm able,

11 my attorneys have advised me I must assert my

12 Sixth Amendment, Fourteenth Amendment and Fifth

13 Amendment rights under the U.S. Constitution.

14 Therefore, at the moment I cannot answer that

15 question.

16 Q The acts related to your guilty plea

17 occurred at your Palm Beach house; is that

18 correct?

19 MR. PIKE: Form.

20 A Again, sorry.

21 Q If you were soliciting prostitutes, it

22 wasn't out on the street, it wasn't at a hotel.

23 These were girls that you solicited to be

24 prostitutes at your house in Palm Beach,

25 correct?

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1 MR. PIKE: Objection, relevance,

2 argumentative. Calls for speculation as

3 worded and assumes facts not in evidence.

4 A Though I would like to answer that

5 question, my attorneys today have advised me I

6 cannot answer you today, and they've advised me I

7 must assert my Sixth Amendment, Fifth Amendment

8 and Fourteenth Amendment rights under the U.S.

9 Constitution. Otherwise I risk losing their

10 representation. So, accordingly I must assert

11 those rights, Mr. Edwards, and Mr. Jaffe.

12 Q In what county did you plead guilty to

13 these felony offenses?

14 A Palm Beach County.

15 Q These were crimes that occurred here in

16 Palm Beach County?

17 MR. PIKE: Form.

18 Q Is that correct?

19 A ... I pled guilty in Palm Beach County.

20 Q Isn't it true that you kept a calendar

21 or schedule --

22 THE VIDEOGRAPHER: I have to change the

23 tape.

24 MR. EDWARDS: Change it.

25 THE VIDEOGRAPHER: Off the video record

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1 1:05 p.m.

2 (Pause in the proceedings.)

3 THE VIDEOGRAPHER: Back on the video

4 record 1:15 p.m.

5 Q Mr. Epstein, as it relates to the

6 charges you pled guilty to, are you saying today

7 that those females that you interacted with

8 sexually, were prostitutes prior to meeting you?

9 A I'm saying I pled guilty to the

10 solicitation of prostitution.

11 Q Right, and you would certainly agree

12 that that would require yourself and one other

13 individual for that act of prostitution,

14 correct?

15 MR. PIKE: Form. Also calls for a legal

16 conclusion.

17 A I pled guilty to solicitation of

18 prostitution.

19 Q Are you saying that those females that

20 were the victims, at least listed as victims by

21 the State, were prostitutes prior to meeting

22 you?

23 MR. PIKE: Form. Vague. Irrelevant?

24 A I pled guilty to solicitation of

25 prostitution.

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1 Q Do you have any remorse for your

2 actions --

3 MR. PIKE: Form.

4 Q -- against these victims that led to

5 your plea of guilty?

6 MR. PIKE: Form, argumentative.

7 A I pled guilty to solicitation of

8 prostitution, not underage prostitution, simply,

9 prostitution.

10 Q Are you saying now that the subjects of

11 that, which were called victims, were not

12 underage when you engaged in sex with them?

13 MR. PIKE: Form, argumentative,

14 speculation, assumes facts not in evidence,

15 as well as mischaracterizes the witness's

16 testimony.

17 A I pled guilty to solicitation of

18 prostitution, not underage prostitution,

19 solicitation of prostitution.

20 Q I was under the impression you pled

21 guilty to a second degree felony, that being

22 procuring a minor for the purposes of

23 prostitution.

24 A That's correct.

25 Q So a minor is somebody under the age of

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1 18, and I'm asking for the guilty plea related to  
2 that count; are you at all remorseful for your  
3 interactions with that minor?  
4 MR. PIKE: Same objections.  
5 A What minor?  
6 Q The charge is procuring a minor. You  
7 tell me. Who was that minor?  
8 A I don't know.  
9 Q You were never told during the State  
10 Attorney's prosecution of you, who this person  
11 was?  
12 A No.  
13 Q Why did you plead guilty to a felony  
14 charge that resulted in you going to jail,  
15 without even knowing who the victim was?  
16 MR. PIKE: Form. That question calls  
17 for attorney/client information, and  
18 therefore, I'm going to instruct him not to  
19 answer that.  
20 Q If it has anything to do with any  
21 conversations with your attorney, I don't want to  
22 know. I'm just going off of the plea colloquy  
23 between you and the Judge, where you understood  
24 the charges and have been advised and apprised of  
25 the charges and you still willingly, willfully

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1 pled guilty to the charges. I'm taking now that  
2 you're saying, you don't even know what those  
3 charges were about?  
4 MR. PIKE: What was the question? I  
5 don't know the question on the table now.  
6 Q Who was the minor?  
7 A I don't know.  
8 Q You were never told the name or initials  
9 of that minor victim by the State Attorney's  
10 Office or the prosecutor?  
11 A Not that I recall.  
12 Q Just so the jury understands, this  
13 method of paying underage minor females to bring  
14 you other underage minor females for sex, is  
15 something that you do in New York, and New  
16 Mexico, Florida, everywhere, not just West Palm  
17 Beach; isn't that right?  
18 MR. PIKE: Again, form, compound, again  
19 assumes facts not in evidence.  
20 Argumentative and harassing, and moreover,  
21 we have already been down this road before  
22 in separate related questions that have  
23 already been asked and answered.  
24 A I would like to respond to each one of  
25 your questions; however, today my attorneys have

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1 advised me I cannot and they've advised me I must  
2 assert my Sixth Amendment right, my Fifth  
3 Amendment right and my Fourteenth Amendment right  
4 under the U.S. Constitution, therefore, that's  
5 what I'm going to do.  
6 Q Where is the calendar or schedule of  
7 your underage sex appointments?  
8 MR. PIKE: Form, speculation.  
9 A You said where is...  
10 MR. PIKE: "Again."  
11 Q Where is the calendar or schedule that  
12 Sarah Kellen kept for you for your appointments  
13 for sex with underage females?  
14 MR. PIKE: Same objection.  
15 Q If there is not one, you can tell me  
16 there is not one.  
17 A I would like to answer each one of your  
18 questions today. However, I have been advised by  
19 counsel that I must assert my Fifth Amendment,  
20 Sixth Amendment and Fourteenth Amendment rights  
21 under the U.S. Constitution or risk losing their  
22 representation. Therefore, I'm going to have to  
23 assert those constitutional rights, though I  
24 would like to answer that question.  
25 Q Are you still in possession of the

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1 computers that were taken from your house prior  
2 to the execution of the search warrant?  
3 A Again. Am I still...?  
4 Q Are you still in possession of the  
5 computers that were removed from your house just  
6 prior to the execution of the search warrant?  
7 A I intend to respond to all relevant  
8 questions regarding this lawsuit. However, at  
9 the present time my attorneys have counseled me I  
10 cannot respond to any questions that may be  
11 relevant to this lawsuit, no matter how much I  
12 might want to. I must accept this advice or risk  
13 losing my Sixth Amendment right to  
14 representation. Therefore, I must assert my  
15 rights under the Fifth, Sixth and Fourteenth  
16 Amendments of the U.S. Constitution.  
17 Q Who is it that removed those computers  
18 from your house prior to the execution of the  
19 search warrant?  
20 MR. PIKE: Objection, predicate.  
21 A I intend to respond to all relevant  
22 questions regarding this lawsuit. However, at  
23 the present time my attorneys have counseled me  
24 that I cannot provide answers to any questions  
25 that may be relevant to this lawsuit, no matter

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1 how much I would like to, and I must accept their  
2 advice or risk losing their representation.  
3 Accordingly, therefore, I would have to assert  
4 those rights, Mr. Edwards.  
5 **Q It is my understanding, through**  
6 **information and belief, it is my understanding**  
7 **that this computer system contained the complete**  
8 **list of names of underage minor females with whom**  
9 **you engaged in sexual activity; is that correct?**  
10 A You're --  
11 MR. PIKE: Objection.  
12 A -- you're asking for my understanding?  
13 **Q No --**  
14 A Are you asking me to tell you what your  
15 understanding is?  
16 **Q Did the computers that were removed from**  
17 **your home just prior to the execution of the**  
18 **search warrant contain the complete list of**  
19 **underage minor females with whom you engaged in**  
20 **sexual activity?**  
21 MR. PIKE: Form.  
22 A Though I would like to answer that  
23 question, like all your other questions here  
24 today, unfortunately my attorneys have counseled  
25 me that I'm going to have to assert my Sixth

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1 Amendment, Fifth Amendment and Fourteenth  
2 Amendment rights under the U.S. Constitution. I  
3 point -- excuse me. I would point out that your  
4 firm was described by the current U.S. Attorney  
5 as a criminal enterprise involved in money  
6 laundering, creating and fabricating malicious  
7 cases of a sexual nature against people like me  
8 and others, in order to fleece local investors  
9 out of millions of dollars.  
10 I believe the senior partner of that  
11 firm currently sits in jail. Unfortunately  
12 though I would like to answer all of your  
13 questions, today my attorneys have counseled me I  
14 must assert my rights under the Sixth Amendment,  
15 Fourteenth Amendment and Fifth Amendment of the  
16 U.S. Constitution.  
17 **Q Isn't it true, you and Sarah Kellen and**  
18 **Ghislaine Maxwell and Nadia Marcinkova operated**  
19 **as an organized criminal enterprise designed to**  
20 **sexually exploit minor?**  
21 MR. PIKE: Objection, argumentative,  
22 speculation, calls for a legal conclusion  
23 and continues to assume facts not in  
24 evidence.  
25 A Though I would like to answer that

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1 question, Mr. Edwards, like most of your other  
2 questions here today... and hopefully will get to  
3 do so at some point, my lawyers have advised me I  
4 must today assert my constitutional rights under  
5 the Sixth Amendment, Fifth Amendment and  
6 Fourteenth Amendment of the U.S. Constitution and  
7 I must accept their advice or risk losing  
8 effective representation.  
9 **Q And as part of that organization you**  
10 **developed code terms such as "Work" or "Massage"**  
11 **as opposed to engage in sex with minors; is that**  
12 **true?**  
13 MR. PIKE: Form, argumentative,  
14 speculation, harassing, assumes facts not in  
15 evidence.  
16 A Can you... you...?  
17 **Q You developed code terms such as you --**  
18 **A "You" me?**  
19 **Q Yes, you, would ask these girls if they**  
20 **would like to give you a massage or work for you,**  
21 **rather than asking them to do what was going to**  
22 **be done, which is engage in sexual activity with**  
23 **you; isn't that true?**  
24 MR. PIKE: Same objections.  
25 A Are you asking if I developed code

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1 words? Is that the question?  
2 **Q Right. Code words.**  
3 A I would like to respond to that  
4 question, but unfortunately today my attorneys  
5 told me I have to respond by taking -- invoking  
6 my Sixth Amendment, Fourteenth Amendment and  
7 Fifth Amendment rights of the U.S. Constitution,  
8 or risk losing my amendment right to effective  
9 representation. Accordingly I assert my  
10 Constitutional rights as guaranteed by those  
11 amendments.  
12 **Q What did it mean within your**  
13 **organization when someone, some underage minor**  
14 **female was coming over to work for you?**  
15 MR. PIKE: Form.  
16 A What did it mean?  
17 **Q Right, what did it mean? What did it**  
18 **mean to you was going to happen when an underage**  
19 **minor female would either call to work or Sarah**  
20 **Kellen would tell you this person was coming to**  
21 **work for you at a specific time?**  
22 MR. PIKE: Objection, vague,  
23 speculative, assumes facts not in evidence.  
24 A I would like to answer that question, as  
25 most of your other questions today. However,

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1 today my attorneys have counseled me that I must  
2 invoke my Sixth Amendment, Fourteenth Amendment  
3 and Fifth Amendment right, or risk -- and if I  
4 don't, I risk losing them as my attorneys so,  
5 therefore, I must assert those rights.

6 **Q You're laughing as if my questions are**  
7 **ludicrous right now but you're aware that there**  
8 **were trash pulls from your home where there were**  
9 **message pads, messages taken by various employees**  
10 **of yours, where these terms, "Massage," "Work"**  
11 **were used in conjunction with underage minor**  
12 **females coming over to your house, weren't you?**

13 MR. PIKE: Same objections, form, as  
14 well. Move to strike, and also assumes  
15 facts not in evidence. Lack predicates.

16 **Q You're aware of the trash pull and the**  
17 **message pads, correct?**

18 MR. PIKE: Same objections.

19 Do you have any documents with you here  
20 today that you speak of?

21 MR. EDWARDS: No, but at this point in  
22 time in the trial, they will already about  
23 in evidence.

24 A I'm aware of a trash pull? What's a  
25 "trash pull"? I'm sorry.

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1 **Q Are you aware of -- I'll ask it of you**  
2 **this way: When Sarah Kellen would take a phone**  
3 **message for you, what did she write it down**  
4 **with?**

5 MR. PIKE: Form.

6 A The question makes no sense to me,  
7 sorry.

8 **Q If another employee of yours were to**  
9 **answer the telephone, be it your housekeeper,**  
10 **housemanager, would answer the phone, take a**  
11 **message for you and write it down so that you**  
12 **could read it later, what would that message be**  
13 **written on?**

14 A Most likely paper.

15 **Q Okay, is that paper typically in the**  
16 **form of a message pad that has a carbon copy**  
17 **sheet to the back?**

18 A No.

19 **Q You're unfamiliar with the documents**  
20 **that I'm talking about, that being a message pad**  
21 **that informs you as to who called, the time they**  
22 **called and the purpose for calling?**

23 MR. PIKE: For purposes of the question  
24 you're specifically talking about a message  
25 pad, nothing related to what you're defining

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1 as a trash pull, just what someone takes as  
2 a message at Mr. Epstein's home and --

3 A Do I know what a message pad is?

4 **Q No. In your home, do you typically have**  
5 **your housekeeper, housemanager, or somebody else,**  
6 **when they take a message for you, write on a**  
7 **specific pad that informs you as to who is**  
8 **calling, the time they are calling and the**  
9 **purpose for their calling, and there is a carbon**  
10 **copy sheet evidencing that message?**

11 MR. PIKE: Objection, asked and  
12 answered.

13 **Q You know what I'm talking about?**

14 A I know what a message pad is.

15 **Q Do you use them commonly in your home or**  
16 **did you back prior to your arrest?**

17 A I would like to answer that question,  
18 but today my attorneys have advised me I have to  
19 assert my Fifth Amendment, Sixth Amendment and  
20 Fourteenth Amendment rights under the U.S.  
21 Constitution, so therefore, I'm going to do that  
22 or I risk losing their representation.

23 **Q Is my question to you confusing? Do you**  
24 **know what I'm talking about?**

25 MR. PIKE: Form.

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1 A Not specifically, no.

2 **Q Okay.**

3 The information --

4 A Is there something you have to show me,  
5 so I know what you're talking about?

6 **Q I don't have it to show you today, but**  
7 **if the information and evidence that I have**  
8 **learned through this process is accurate and**  
9 **correct, it would seem a foregone conclusion that**  
10 **you and I would be on the same page, at least**  
11 **about this document, so --**

12 A Okay.

13 **Q -- if we are going to get to a point you**  
14 **tell me "This document doesn't exist" or "I don't**  
15 **know what you're talking about," okay, that's**  
16 **fine, but that's something we can hash out.**

17 Here is my question: When a  
18 housekeeper/housemanager would take a message for  
19 you from any caller, is there a specific message  
20 pad that has a carbon copy located near your  
21 telephone, for them to write down the name of the  
22 caller, the purpose for the call and the time  
23 called?

24 MR. PIKE: Form.

25 **Q Is that something you're familiar with?**

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1 A I would like to respond to that  
 2 question. Today my attorneys have counseled me I  
 3 must assert my Sixth Amendment, Fifth Amendment  
 4 and Fourteenth Amendment right under the U.S.  
 5 Constitution.

6 **Q You're invoking your Fifth Amendment  
 7 right is not that you understand the question.  
 8 You understand my question and are electing to  
 9 invoke your Fifth Amendment rights; is that  
 10 correct?**

11 A Yes.

12 **Q When Sarah Kellen or a housekeeper or  
 13 housemanager, whoever happened to be employed at  
 14 the time, would take messages, what form would  
 15 you normally or typically receive them in?**

16 A (Witness shrugs.)

17 MR. PIKE: Same objections.

18 A I don't understand the question.

19 **Q When a caller would call the home,  
 20 housemanager or housekeeper or Sarah Kellen, I  
 21 don't know what you would call her, assistant,  
 22 would answer the phone, and take a message for  
 23 you so that you would know who called, what would  
 24 they typically write down the message on so that  
 25 you would have it?**

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1 MR. PIKE: Objection. Object to the  
 2 form, lacks predicate. You have not  
 3 established anything here today relative to  
 4 a housekeeper or housemanager or the like.  
 5 Um... And I'm trying to understand the  
 6 question. But --

7 MR. EDWARDS: Really?

8 MR. PIKE: -- it lacks predicate.

9 MR. EDWARDS: This will play well.

10 A Piece of paper.

11 **Q Normally they would write it down on a  
 12 piece of paper and give it to you?**

13 A I didn't say that.

14 **Q Have you ever been given a message that  
 15 is ripped out of a message pad that has a carbon  
 16 copy to it?**

17 A Oh, I see. Okay. I intend -- I would  
 18 like to answer that question, but today my  
 19 attorneys have advised me I must respond by  
 20 invoking my Sixth Amendment right, my Fifth  
 21 Amendment right and my Fourteenth Amendment  
 22 rights under the U.S. Constitution. Though I  
 23 would like to answer these questions, accordingly  
 24 I must assert those rights or I risk losing my  
 25 representation here today.

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1 **Q Between the years 2002 and 2005, who was  
 2 your house manager?**

3 A (No response.)

4 **Q If there is more than one, tell us  
 5 that.**

6 A The question is unclear. I'm sorry.

7 **Q Okay, let me start with between 2002 and  
 8 2005, did you employ a housemanager?**

9 MR. PIKE: Form.

10 A Where?

11 **Q At your Palm Beach home.**

12 A I intend to respond to all relevant  
 13 questions here today, Mr. Edwards. Hopefully we  
 14 will get some. But my attorneys have advised me  
 15 that today I must invoke my Sixth Amendment,  
 16 Fifth Amendment and Fourteenth Amendment rights  
 17 under the U.S. Constitution; or risk losing them  
 18 as counsel. So today I have to assert those  
 19 privileges.

20 **Q Do you know L.M.?**

21 A I intend to respond to all relevant  
 22 questions regarding this lawsuit. However, at  
 23 the present time no matter how much I would like  
 24 to answer that question, I cannot, because my  
 25 counsel -- the attorneys have told me that I have

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1 to invoke my Sixth Amendment, Fifth Amendment and  
 2 Fourteenth Amendment or, in fact, risk losing  
 3 their representation. Therefore, I'm going to  
 4 have to assert my rights under those.

5 **Q L.M. is a female that was born in July  
 6 of 1988.**

7 A Is that a question?

8 **Q Not yet. When is the first time that  
 9 you met her?**

10 MR. PIKE: Objection, speculation.

11 MR. EDWARDS: That assumes that he did  
 12 meet her; is that what you're saying?

13 MR. PIKE: Your question assumes --

14 MR. EDWARDS: He met her?

15 MR. PIKE: -- exactly what he just said  
 16 which hasn't been established on the record  
 17 yet pursuant to the appropriate Florida  
 18 Rules of Civil Procedure and the Evidence  
 19 Code. Lacks predicate.

20 A That being said, I would like to answer  
 21 that question, but today my attorneys have  
 22 counseled me that I cannot, and they've advised  
 23 me I must assert my Sixth Amendment right, my  
 24 Fourteenth Amendment right, and my Fifth  
 25 Amendment right under the U.S. Constitution.



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1 THE WITNESS: Can you throw me one of  
2 the suckey candies, please  
3 Thank you.  
4 MR. EDWARDS: (Handing candy.)  
5 THE WITNESS: Appreciate it.  
6 **Q Isn't it true you met L.M. for the first**  
7 **time in July or August of 2002 just before her**  
8 **fourteenth birthday?**  
9 MR. PIKE: Same objections.  
10 A You know, your firm has been accused by  
11 the U.S. Attorney of perpetrating one of the  
12 largest frauds in South Florida history by  
13 crafting sexually charged lawsuits against people  
14 like me and others in order to fleece  
15 unsuspecting investors here in South Florida out  
16 of millions of dollars. The firm of you and Mr.  
17 Jaffe. The U.S. Attorney described it as bogus  
18 schemes contrived by your firm.  
19 I would like to answer every one of your  
20 questions here today; however, my attorneys have  
21 counseled me that I may not, and have advised me  
22 that I have to invoke my Sixth Amendment, Fifth  
23 Amendment and Fourteenth Amendment rights under  
24 the U.S. Constitution. Therefore, that's what I  
25 will do, otherwise I risk losing their

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1 representation.  
2 **Q Isn't it true L.M. as a 13 or 14-year**  
3 **old girl was taken to your house by another**  
4 **underage minor female, that being Carolyn**  
5 **Andriano?**  
6 MR. PIKE: Form.  
7 THE WITNESS: Tissue, please.  
8 MR. EDWARDS: (Handing tissue.)  
9 A I would like to answer that question  
10 like all the other questions you've asked me here  
11 today, but today my attorneys have counseled me  
12 that I have to invoke my Sixth Amendment right,  
13 my Fifth Amendment right and Fourteenth Amendment  
14 rights under the U.S. Constitution; therefore  
15 that's what I will do.  
16 **Q Do you know who Carolyn Andriano is,**  
17 **right, she had a lawsuit against you previously?**  
18 MR. PIKE: Form.  
19 A Again the last name?  
20 **Q Carolyn Andriano.**  
21 A Could you spell it for me?  
22 **Q Well, the pseudonym that she used in her**  
23 **lawsuit against you alleging similar facts to**  
24 **those alleged in L.M. versus Jeffrey Epstein was**  
25 **C.M.A. versus Jeffrey Epstein.**

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1 A And now the question?  
2 **Q You know who she is, correct?**  
3 MR. PIKE: Form.  
4 A I would like to answer that question  
5 here, Mr. Edwards, but unfortunately today my  
6 attorneys have counseled me I must invoke my  
7 Fifth Amendment, Sixth Amendment and Fourteenth  
8 Amendment rights under the U.S. Constitution, and  
9 if I don't, I risk losing their representation,  
10 therefore I must assert those rights.  
11 **Q When I asked you about L.M. or Carolyn**  
12 **Andriano, you sat there for a while thinking hard**  
13 **about whether or not you knew them. Do you**  
14 **remember either L.M. or Carolyn Andriano?**  
15 MR. PIKE: I move to strike counsel's  
16 statement because the statement as worded  
17 assumes facts certainly not in evidence. It  
18 is argumentative, speculates as to what is  
19 "thinking hard," and, counsel, I don't  
20 understand the question on the table,  
21 combined with your narrative. If you could  
22 repeat the question?  
23 MR. EDWARDS: Sure.  
24 **Q I'm asking if during this questioning**  
25 **process, has it refreshed your recollection as to**

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1 **who L.M. is or do you really have no idea who**  
2 **that is?**  
3 MR. PIKE: Form. Asked and answered.  
4 **Q Do you remember L.M.?**  
5 A Are you going to ask one question?  
6 Which question would you like answered first?  
7 **Q Do you remember L.M.?**  
8 A I would like to answer that question. I  
9 would like to answer that question today; however  
10 my attorneys today have advised me that I must  
11 assert my Fourteenth Amendment, Fifth Amendment  
12 and Sixth Amendment rights under the U.S.  
13 Constitution, no matter how much I would like to  
14 answer these questions. So unfortunately, I'm  
15 going to assert those rights.  
16 **Q When you first met L.M., isn't it true**  
17 **that she was just about to begin her ninth grade**  
18 **year in high school?**  
19 MR. PIKE: Same objections. Form.  
20 A I believe her testimony in front of the  
21 FBI, in a sworn deposition says something else,  
22 but I don't recall exactly what. I don't have  
23 any recollection.  
24 **Q Of L.M.**  
25 MR. PIKE: Form.

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1 A You asked the question when I met her, I  
2 think, if I met her.

3 Q You have no recollection as to when you  
4 met her?

5 A I don't have recollection if I ever met  
6 her. I just told you, I did read her FBI  
7 statement, so I know what she has said and it is  
8 not what you've just represented to me.

9 Q Your only knowledge of any interaction  
10 you may have had with L.M. is derived from an FBI  
11 statement that she gave; is that true?

12 A I believe what you just represented she  
13 said was not what she had sworn to.

14 Q I'm not asking what she said. I'm  
15 asking do you independently remember if she was  
16 entering into her ninth grade year of high school  
17 when you met her? Independent of anything you've  
18 read.

19 MR. PIKE: All right, let me just move  
20 to strike the... Diatribe between Mr.  
21 Edwards and Mr. Epstein. I'm confused as to  
22 what question is on the table now.

23 MR. EDWARDS: Okay.

24 Q Independent of anything you've ever  
25 read -

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1 A Okay.

2 Q -- do you remember meeting L.M., just  
3 before she entered into her ninth grade year in  
4 high school?

5 A I would like to answer that question,  
6 however my attorneys today have advised me that  
7 though her own statements are contradictory to  
8 what you just said, her sworn statements to the  
9 FBI contradict what you just said. I have to  
10 invoke my Sixth Amendment, Fifth Amendment and  
11 Fourteenth Amendment rights to the U.S.  
12 Constitution.

13 Q Just a few minutes ago when you asked  
14 when you met her, you said, "I don't know if I've  
15 ever met her," so is that your testimony, that  
16 you don't know if you ever met L.M.?

17 A My testimony is very clear. I must  
18 assert the rights my attorneys have asked me to  
19 assert today, though her testimony under oath to  
20 the FBI is not what you represented it to be, to  
21 me, and the ladies and gentlemen of the jury who  
22 are watching this, hopefully.

23 MR. PIKE: Form.

24 Q We will get into that.

25 A Okay.

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1 Q When you first came into the room today,  
2 didn't you look at me and say "I like L.M." Isn't  
3 that the statement that you made to me?

4 MR. PIKE: Form. Move to strike.

5 A I don't believe I said that.

6 Q What is it that you believe you did say  
7 referencing L.M. when you sat down in that seat  
8 prior to the cameras rolling?

9 MR. PIKE: Form. Counsel, I was here  
10 during that whole time and I don't recall  
11 any such statement.

12 MR. EDWARDS: You weren't in the room.

13 A I don't remember. I don't know.  
14 Sorry.

15 Q So is it your testimony right now that  
16 you did not say to me "I like L.M."?

17 A That's --

18 MR. PIKE: Objection.

19 A -- that's correct.

20 Q Do you like L.M.?

21 MR. PIKE: Form, predicate, and  
22 relevance.

23 A I would like to answer all your  
24 questions here as I've... tried to do my best,  
25 however, my attorneys have advised me that I must

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1 assert my Sixth Amendment, Fourteenth Amendment  
2 and Fifth Amendment rights under the U.S.  
3 Constitution.

4 Q When you first met L.M., isn't it true  
5 that you knew she was an economically  
6 disadvantaged girl that needed money?

7 MR. PIKE: Objection, speculation,  
8 assumes facts not in evidence, and it is  
9 argumentative as worded.

10 A I would like to answer all your  
11 questions here today, Mr. Edwards, and Mr.  
12 Jaffe. However, on advice of counsel I have to  
13 assert my Sixth Amendment, Fifth Amendment and  
14 Fourteenth Amendment rights under the U.S.  
15 Constitution, or risk losing my right to  
16 effective representation. So accordingly I must  
17 assert those rights as guaranteed by the Sixth,  
18 Fifth and Fourteenth amendments.

19 Q When she was a 14-year old girl, she was  
20 taken into your bedroom and you ordered her to  
21 take her clothes off; is that correct?

22 MR. PIKE: Objection, vague, confusing.  
23 As to "her," I'm not quite sure who you...

24 Q When L.M. was a 14-year old girl, she  
25 was taken up to your bedroom and you ordered her

<p style="text-align: right;">110</p> <p>1 <b>to take her clothes off; isn't that true?</b></p> <p>2 MR. PIKE: Objection, speculation, and</p> <p>3 assumes facts not in evidence. Lacks</p> <p>4 predicate.</p> <p>5 A Though once again what you've just</p> <p>6 represented to me is a total contradiction to the</p> <p>7 FBI sworn statement that I read of L.M., I must</p> <p>8 unfortunately respond by asserting the rights</p> <p>9 demanded by my attorneys today, which is my Sixth</p> <p>10 Amendment, Fifth Amendment and Fourteenth</p> <p>11 Amendment right against -- sorry, given by the</p> <p>12 U.S. Constitution, though her testimony is</p> <p>13 exactly -- does not purport in any way to what</p> <p>14 you've just said.</p> <p>15 <b>Q And when L.M. was 14 years old, you</b></p> <p>16 <b>ordered she begin to give you a massage while she</b></p> <p>17 <b>was naked and you were naked; isn't that true?</b></p> <p>18 MR. PIKE: Same objections.</p> <p>19 A Sorry, you have to repeat the question</p> <p>20 for me.</p> <p>21 <b>Q When L.M. was a 14-year old girl --</b></p> <p>22 A Right. Yes?</p> <p>23 <b>Q -- you laughed and said, "right" about</b></p> <p>24 <b>what?</b></p> <p>25 A I didn't hear the first part of your</p>	<p style="text-align: right;">112</p> <p>1 THE VIDEOGRAPHER: Going off the video</p> <p>2 record 1:49 p.m.</p> <p>3 THE WITNESS: Thank you.</p> <p>4 (Pause in the proceedings.)</p> <p>5 THE VIDEOGRAPHER: Back on the video</p> <p>6 record 2:04 p.m.</p> <p>7 <b>Q Mr. Epstein, when L.M. was a 14-year old</b></p> <p>8 <b>girl, isn't it true that while you were naked on</b></p> <p>9 <b>the massage table, you ordered L.M. to take off</b></p> <p>10 <b>her clothes and provide you a massage?</b></p> <p>11 A I believe I've answered that question,</p> <p>12 didn't I?</p> <p>13 <b>Q I don't remember where we left off,</b></p> <p>14 <b>that's why.</b></p> <p>15 MR. PIKE: Form, argumentative,</p> <p>16 speculation. It is compound and assumes</p> <p>17 facts not in evidence and has been asked and</p> <p>18 answered. But we did take a break, so you</p> <p>19 can respond.</p> <p>20 (Counsel addressing Mr. Epstein.)</p> <p>21 A The current U.S. Attorney has described</p> <p>22 your law firm as a criminal enterprise involved</p> <p>23 in fabricating sexually charged cases against</p> <p>24 people like me in order to fleece unsuspecting</p> <p>25 investors out of millions of dollars. He used</p>
<p style="text-align: right;">111</p> <p>1 question. Now I understood it.</p> <p>2 <b>Q When L.M. was a 14-year old girl, wasn't</b></p> <p>3 <b>it true that you received a massage from her</b></p> <p>4 <b>while she was naked and you were naked?</b></p> <p>5 MR. PIKE: Objection, speculation,</p> <p>6 assumes facts not in evidence, lacks</p> <p>7 predicate.</p> <p>8 A I understand that your firm has been</p> <p>9 accused by the U.S. Attorney of South Florida,</p> <p>10 perpetrating one of the largest frauds in</p> <p>11 Florida's history, by crafting malicious,</p> <p>12 sexually charged allegations against people like</p> <p>13 me. I understand L.M.'s testimony is not what</p> <p>14 you've just described, though she swore to the</p> <p>15 FBI... under oath. Though I would like to answer</p> <p>16 your questions here today, my attorneys have</p> <p>17 advised me I may not. I must assert my Sixth,</p> <p>18 Fifth and Fourteenth Amendment rights under the</p> <p>19 U.S. Constitution or risk losing their</p> <p>20 representation.</p> <p>21 THE WITNESS: Restroom break.</p> <p>22 MR. EDWARDS: Excuse me?</p> <p>23 THE WITNESS: Restroom break.</p> <p>24 MR. EDWARDS: Stopping again?</p> <p>25 THE WITNESS: Yeah.</p>	<p style="text-align: right;">113</p> <p>1 words like "bogus schemes."</p> <p>2 Unfortunately at this time in response</p> <p>3 to your questions, though I would like to answer</p> <p>4 each and every one, I'm going to have to, on</p> <p>5 advice of counsel, assert my Sixth Amendment,</p> <p>6 Fifth Amendment and Fourteenth Amendment rights</p> <p>7 under the U.S. Constitution, though I would like</p> <p>8 to answer those questions.</p> <p>9 <b>Q While L.M. was a naked 14-year old girl</b></p> <p>10 <b>providing you a massage, you ordered her to pinch</b></p> <p>11 <b>your nipples during that massage; isn't that</b></p> <p>12 <b>true?</b></p> <p>13 MR. PIKE: Same objections,</p> <p>14 argumentative, speculation, harassing,</p> <p>15 assumes facts not in evidence and lacks</p> <p>16 predicate.</p> <p>17 A I asked her to pinch her nipples?</p> <p>18 <b>Q Pinch your nipples?</b></p> <p>19 A I believe her own sworn testimony</p> <p>20 contradicts that statement. However, I would</p> <p>21 like to answer all your questions here today, but</p> <p>22 my attorneys advised me, at least today, Mr.</p> <p>23 Edwards, I must take my constitutional privileges</p> <p>24 of the Sixth Amendment, Fifth Amendment and</p> <p>25 Fourteenth Amendment, keeping in mind that your</p>

1 firm, of you, Mr. Edwards, and Mr. Jaffe's firm  
2 has been accused by the U.S. Attorney of  
3 perpetrating one of the largest frauds in  
4 Florida's history by crafting sexually charged  
5 lawsuits against people like me, to fleece from  
6 local people millions of dollars.

7 **Q And during this massage by L.M., you**  
8 **began to masturbate in front of her; isn't that**  
9 **true?**

10 MR. PIKE: Same objections?

11 A Unfortunately, though I would like to  
12 answer each one of your questions here today, my  
13 attorneys have counseled me today at least, I  
14 have to assert my Fifth Amendment, Sixth  
15 Amendment and Fourteenth Amendment rights under  
16 the U.S. Constitution, otherwise I risk losing  
17 their effective representation, and the fact that  
18 your firm has been accused of fabricating these  
19 malicious lawsuits to fleece investors out of  
20 millions of dollars, as described by the U.S.  
21 Attorney here in South Florida as a criminal  
22 enterprise involved in mail fraud, money  
23 laundering... Unfortunately I would like to  
24 answer each question, but I can't today.

25 **Q Isn't it true that while you were**

1 **masturbating you inserted your fingers into her**  
2 **14-year old vagina?**

3 MR. PIKE: Objection, argumentative.  
4 Speculation. It is harassing. It assumes  
5 facts not in evidence. The question  
6 continues to lack predicate, and I also  
7 believe the question has been asked and  
8 answered sometime ago.

9 A Though I would like to answer each one  
10 of your questions today, Mr. Edwards, my counsel  
11 has told me I cannot answer any questions that  
12 may be relevant to this lawsuit. The fact that  
13 your firm has been accused of major fraud, the  
14 largest fraud in South Florida history, by the  
15 U.S. Attorney calling your firm a criminal  
16 enterprise involved in money laundering -- I  
17 believe it is racketeering, but I could be  
18 wrong... Monetary transactions via fraud, mail  
19 fraud, conspiracy -- sorry -- I would like to  
20 answer your questions but today on advice of  
21 counsel, I am going to have to assert my rights.

22 **Q Isn't it true also that while L.M. was a**  
23 **14-year old female, you masturbated to the point**  
24 **of ejaculating while inserting your fingers into**  
25 **L.M.'s vagina?**

1 MR. PIKE: Same objections incorporated?

2 A Again, the question?

3 **Q Isn't it true that during this sexual**  
4 **massage, while you were -- that you masturbated**  
5 **to the point of ejaculating while you were**  
6 **inserting your fingers into L.M.'s vagina?**

7 MR. PIKE: Objection, argumentative,  
8 speculation. It is compound. It is vague.  
9 It assumes facts not in evidence and lacks  
10 predicate.

11 A Though I would like to answer that  
12 question with specificity and detail today, no  
13 matter how much I would like to, my attorneys  
14 have advised me I cannot. They advised me I must  
15 assert my Fifth Amendment, Sixth Amendment and  
16 Fourteenth Amendment rights under the U.S.  
17 Constitution or potentially lose effective  
18 representation, so therefore, I will assert those  
19 rights.

20 **Q Isn't it true that the ritual that I'm**  
21 **describing occurred with L.M., approximately 100**  
22 **times when she was between the ages of 13 and 16?**

23 MR. PIKE: Same objections, with the  
24 additional objection of vague and  
25 confusing.

1 A Since your firm has been involved --  
2 according to the U.S. Attorney in crafting these  
3 fraudulent lawsuits in order to fleece local  
4 investors, and the fact that I believe in L.M.'s  
5 sworn statements, that's what you've just alleged  
6 at least is totally contradicted by your client's  
7 own sworn statements, though I would like to  
8 answer these questions today, my attorneys have  
9 advised me I may not and advised me I must assert  
10 my Fifth, Sixth and Fourteenth Amendment rights  
11 under the U.S. Constitution or potentially risk  
12 losing effective representation.

13 **Q In addition to the sexual abuse directed**  
14 **against L.M. that I've just described, isn't it**  
15 **true that you also paid her money to bring you**  
16 **more than 50 other underage minor females for you**  
17 **to similarly abuse?**

18 MR. PIKE: Same objections.

19 A Though I believe in her own sworn  
20 testimony to the U.S. government that she  
21 contradicts those assertions, and I'm sure maybe  
22 you'll have some explanation at trial, but the  
23 ladies and gentlemen of the jury should know  
24 about your firm being accused by the U.S.  
25 Attorney of perpetrating one of the largest

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1 frauds in U.S. history by crafting malicious  
2 lawsuits of a sexual nature in order to fleece  
3 investors out of millions of dollars, local  
4 investors; and though I would like to answer your  
5 questions in detail today, Mr. Edwards, and Mr.  
6 Jaffe, my counsel says I may not and have asked  
7 me to assert those rights, which I must  
8 unfortunately.

9 **Q You keep bringing up this fraud of the**  
10 **former law firm known as Rothstein, Rosenfeld,**  
11 **Adler in response to my questions, so I would**  
12 **like you to tell the jury at this time which**  
13 **allegation are you now saying is fraudulent or**  
14 **untrue, that's been made by L.M.?**

15 MR. PIKE: Form, confusing, compound,  
16 and irrelevant.

17 MR. EDWARDS: Only made irrelevant by  
18 his answers.

19 MR. PIKE: Same objections.

20 **Q Do you understand the question?**  
21 A No.

22 **Q You made reference to -- in response to**  
23 **my questions about what you did sexually to**  
24 **L.M. --**  
25 A Yes, sir?

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1 **Q -- you have responded with these fraud**  
2 **allegations against the firm of Rothstein,**  
3 **Rosenfeld, Adler. I want you to tell the jury**  
4 **which allegations that L.M. is making against you**  
5 **are you disputing at this time or calling a fraud**  
6 **or calling untrue?**

7 MR. PIKE: Confusing, compound and -- if  
8 the court reporter would read back Mr.  
9 Epstein's response, I think you will see the  
10 way you just phrased the question  
11 mischaracterizes his testimony. Because --  
12 well, I'll keep it there unless you want me  
13 to go further. You want me to go further?

14 MR. EDWARDS: No, I want him to go  
15 further.

16 MR. PIKE: Mischaracterizes the  
17 witness's testimony.

18 A L.M.'s own statements contradict every  
19 one of your allegations that you've made to me  
20 today, as a hypothetical. In her own words. And  
21 you -- and the potential reasons this concerns me  
22 is the fact that the law firm that represented  
23 L.M. and two others have been accused by the U.S.  
24 Attorney of fraudulently producing cases against  
25 me and others, to fleece investors in what he's

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1 described as one of the largest frauds in South  
2 Florida's history. So, it concerns me. It is a  
3 factor in the way I'm thinking about answering.  
4 Sorry.

5 **Q Each time that you digitally penetrated**  
6 **L.M. or otherwise fondled her sexually, you paid**  
7 **her \$200; is that correct?**

8 MR. PIKE: Objection, argumentative,  
9 speculative, harassing. It assumes facts  
10 not in evidence, and with regard to this  
11 line of questioning, the Court has already  
12 ruled that the demeanor in which you're  
13 presenting this question is improper, and  
14 harassing, so if you would --

15 MR. EDWARDS: I'm very comfortable with  
16 the demeanor right now, Mr. Pike. These are  
17 just the facts of the lawsuit. The facts  
18 are outrageous and I understand that, but  
19 they have to be asked.

20 MR. PIKE: Maybe the demeanor and tone  
21 of your question is laced in a manner that  
22 it is proper for the video, but the content  
23 of the question is the same exact harassing  
24 question that was deemed by the Judge to be  
25 argumentative. I'm not saying that he's not

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1 going to answer your question.

2 MR. EDWARDS: Okay.

3 MR. PIKE: Or that you don't know what  
4 his answer will be, but what I'm saying is:  
5 could you rephrase the question?

6 **Q Answer that question. I'll work on**  
7 **rephrasing it for you at some point.**

8 A Sorry, I forgot what the question is by  
9 now.

10 **Q Isn't it true that each time that you**  
11 **interacted with L.M. sexually, meaning digitally**  
12 **penetrated her or fondled her in some other way**  
13 **that you paid her \$200 each time?**

14 MR. PIKE: Form.

15 THE WITNESS: Sorry?

16 MR. PIKE: Form. Go ahead.

17 A I would like to answer each one of your  
18 questions here today. However, my attorneys have  
19 counseled me that today I have to assert my Fifth  
20 Amendment, Sixth Amendment and Fourteenth  
21 Amendment rights under the U.S. Constitution and  
22 I'm cognizant of the fact that your firm has  
23 crafted these malicious lawsuits, it has been  
24 reported that the lawsuits are of a sexual  
25 nature, in order to fleece investors, so though I

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1 would like to answer those questions, Mr.  
2 Edwards, and Mr. Jaffe, today I must keep my  
3 counsel's advice.  
4 **Q Isn't it true that for each underage**  
5 **minor that L.M. brought to you for the purposes**  
6 **of you engaging in sexual activity, you paid her**  
7 **\$200?**  
8 MR. PIKE: Objection, speculation.  
9 Compound question, and it assumes facts not  
10 in evidence. Therefore lacks predicate.  
11 A Though I would like to answer that  
12 question, as most of your other questions here  
13 today, Mr. Edwards, I intend to respond,  
14 hopefully at some point to all of your questions,  
15 but today my attorneys have advised me I must  
16 invoke my Sixth Amendment, Fifth Amendment and  
17 Fourteenth Amendment right under the U.S.  
18 Constitution.  
19 **Q Over the course of relatively a roughly**  
20 **three years, isn't it true that you touched or**  
21 **fondled L.M. in a sexual manner on more than 50**  
22 **occasions?**  
23 MR. PIKE: Objection, argumentative.  
24 Calls for speculation. It is overbroad,  
25 confusing and vague, and it assumes facts

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1 not in evidence.  
2 A Could you repeat the question for me?  
3 I'm sorry, Mr. Edwards.  
4 **Q Yes. The three-year period between 2002**  
5 **and 2005 when you were engaging in sexual conduct**  
6 **with L.M., isn't it true that that conduct took**  
7 **place on more than 50 occasions?**  
8 MR. PIKE: Same objections.  
9 A I believe if you read your own client's  
10 FBI statements, what her statement -- it changed  
11 dramatically after she decided to file a  
12 different lawsuit, at the request of you and your  
13 firm, with one of your firms -- there have been  
14 many firms it seems, was accused of major fraud.  
15 Since the testimony has changed dramatically, I  
16 would like to answer those questions, but today  
17 my attorneys have advised me I must assert my  
18 Sixth Amendment right, my Fifth Amendment right  
19 and my Fourteenth Amendment right.  
20 **Q \*\* Your answers are not going to**  
21 **incriminate you if the answer is "no," it is only**  
22 **if the answer is "yes" that it will incriminate**  
23 **you, so aren't you telling the jury every single**  
24 **thing I've asked you is not part of a fraud, just**  
25 **happens to be true, isn't it?**

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1 MR. PIKE: Objection, argumentative,  
2 irrelevant and move to strike. I'm simply  
3 going to instruct the witness not to answer  
4 that question because... I don't understand  
5 it. I don't know what to say about that  
6 question.  
7 A (Gesturing.)  
8 **Q All of the things that I've told you or**  
9 **that I've asked you about, you touching her while**  
10 **she was underage, you paying her for sexual**  
11 **conduct, those are all things that really**  
12 **happened, there is nothing about that, that**  
13 **anybody has fabricated or made up, is there?**  
14 MR. PIKE: Objection, argumentative,  
15 speculative, it assumes facts not in  
16 evidence, it certainly mischaracterizes the  
17 witness's testimony all day, since I have  
18 been here, and I have been here the whole  
19 time. It assumes facts not in evidence. It  
20 is also overbroad and substantially compound  
21 because you're attempting to incorporate all  
22 of your questions today into one question.  
23 MR. EDWARDS: I think you know, Mr.  
24 Pike, your objection should be limited to  
25 the form. If you object to the form, it is

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1 fine.  
2 MR. PIKE: I'm sorry, that's --  
3 MR. EDWARDS: You --  
4 MR. PIKE: You've asked me several times  
5 today to tell you why. I thought I was  
6 helping. I'm sorry. I certainly will keep  
7 objecting to --  
8 MR. EDWARDS: Appreciate it.  
9 MR. PIKE: -- the form.  
10 MR. EDWARDS: Thank you.  
11 **Q And your answer is?**  
12 A Repeat the question.  
13 **Q Every single allegation that L.M. has**  
14 **made and I have now questioned you about in terms**  
15 **of your sexual involvement with L.M., they are**  
16 **all true; isn't that correct? There is nothing**  
17 **fabricated about any of these allegations,**  
18 **correct?**  
19 MR. PIKE: Objection, argumentative,  
20 speculative, compound. It is vague,  
21 overbroad --  
22 MR. EDWARDS: You're objecting to form?  
23 MR. PIKE: Yes, assumes facts not in  
24 evidence and lacks predicate. That is  
25 form.

126	<p>1 A And I would like to answer that question</p> <p>2 specifically today, however, on advice of counsel</p> <p>3 they've suggested I take the Sixth amendment --</p> <p>4 assert my Sixth Amendment, Fifth Amendment and</p> <p>5 Fourteenth Amendment rights under the U.S.</p> <p>6 Constitution, keeping well aware of your firm's</p> <p>7 responsibility in the largest fraud in Florida's</p> <p>8 history by crafting sexually charged lawsuits</p> <p>9 against people like me and others.</p> <p>10 I believe in addition, since her</p> <p>11 allegations, as you've phrased them, have changed</p> <p>12 dramatically since her sworn statement, until in</p> <p>13 fact, after she joined this firm charged with</p> <p>14 this major fraud and most of her statements have</p> <p>15 changed, I believe, so...</p> <p>16 <b>Q You remember when L.M. became pregnant</b></p> <p>17 <b>when she was 16 years old, don't you?</b></p> <p>18 MR. PIKE: Form, relevance, move to</p> <p>19 strike?</p> <p>20 A I would like to answer each one of your</p> <p>21 questions here today, Mr. Edwards; each and every</p> <p>22 one of your questions. However, today my counsel</p> <p>23 has told me I must assert my Sixth Amendment,</p> <p>24 Fourteenth Amendment and Fifth Amendment rights</p> <p>25 under the U.S. Constitution.</p>	128	<p>1 MR. EDWARDS: It is not a responsive</p> <p>2 answer so I won't allow --</p> <p>3 MR. PIKE: That --</p> <p>4 MR. EDWARDS: We'll move to strike it.</p> <p>5 Let's have an answer to the question.</p> <p>6 MR. PIKE: The witness is trying. If</p> <p>7 there is a legal basis for your moving to</p> <p>8 strike, it would be taken up with the Court</p> <p>9 and you can move to strike.</p> <p>10 You can continue.</p> <p>11 MR. EDWARDS: Strike it, it is</p> <p>12 nonresponsive?</p> <p>13 A Your allegations that you keep throwing</p> <p>14 at me, relate to the fact that L.M. testimony,</p> <p>15 after giving a sworn statement to the FBI,</p> <p>16 changed dramatically after she decided to file a</p> <p>17 lawsuit for money, joining your firm that's been</p> <p>18 accused by the U.S. Attorney of one of the</p> <p>19 largest frauds in Florida's history. I would</p> <p>20 like to answer those questions; however, on</p> <p>21 advice of counsel today I must assert my Fifth</p> <p>22 Amendment, Sixth Amendment and Fourteenth</p> <p>23 Amendment rights under the U.S. Constitution.</p> <p>24 <b>Q When L.M. was a pregnant 16 year-old,</b></p> <p>25 <b>she brought you at least ten underage minor</b></p>
127	<p>1 <b>Q Isn't it true that when L.M. was 14</b></p> <p>2 <b>years old, 15 years old and 16 years old, you</b></p> <p>3 <b>touched her genitals?</b></p> <p>4 A Separate from the fact that in her own</p> <p>5 testimony, her own sworn testimony under oath</p> <p>6 before she decided to file a lawsuit for money,</p> <p>7 there was never any discussion about anything</p> <p>8 like that. I would like to answer that question,</p> <p>9 but my attorneys have advised me, at least today,</p> <p>10 that I must assert my Sixth Amendment, Fifth</p> <p>11 Amendment and Fourteenth Amendment rights under</p> <p>12 the U.S. Constitution.</p> <p>13 <b>Q Isn't it true when she became pregnant</b></p> <p>14 <b>at age 16, you no longer interacted with her</b></p> <p>15 <b>sexually but still demanded that she bring you</b></p> <p>16 <b>other underage minor females for you to sexually</b></p> <p>17 <b>exploit?</b></p> <p>18 MR. PIKE: Objection, speculation.</p> <p>19 Compound. Harassing, and assumes facts not</p> <p>20 in evidence.</p> <p>21 A I believe her testimony changed</p> <p>22 dramatically from her sworn statements to the</p> <p>23 FBI --</p> <p>24 <b>Q That's not a responsive --</b></p> <p>25 MR. PIKE: Excuse me --</p>	129	<p>1 <b>females during her pregnancy; isn't that true?</b></p> <p>2 MR. PIKE: Objection, argumentative,</p> <p>3 speculation. It is vague and assumes facts</p> <p>4 not in evidence and lacks predicate.</p> <p>5 A I -- I -- I unfortunately would like to</p> <p>6 answer that question as well as every other</p> <p>7 question you've asked me here today, but my</p> <p>8 attorneys have advised my I must assert my Fifth</p> <p>9 Amendment, Sixth Amendment and Fourteenth</p> <p>10 Amendment rights under the U.S. Constitution.</p> <p>11 <b>Q After L.M. had her son at 16 years old,</b></p> <p>12 <b>and you were being criminally investigated for</b></p> <p>13 <b>some of the conduct that we've discussed here</b></p> <p>14 <b>today; isn't it true that you personally hired</b></p> <p>15 <b>and retained and paid for an attorney to</b></p> <p>16 <b>represent L.M.?</b></p> <p>17 MR. PIKE: Objection, speculation --</p> <p>18 MR. EDWARDS: Object to the form, Mr.</p> <p>19 Pike.</p> <p>20 MR. PIKE: I will not. I am allowed to</p> <p>21 assert the basis for my objections, I am not</p> <p>22 limited to just saying "form." I'm able to</p> <p>23 assert the basis as to why, so I don't waive</p> <p>24 that basis.</p> <p>25 MR. EDWARDS: It is just more of this</p>

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1 obstructionist --

2 MR. PIKE: It's not obstructionist, it

3 is objecting to form. What is

4 obstructionist is what we are doing now. I

5 will be finished within four seconds. So I

6 am going to object to form, it's

7 argumentative, speculative and it assumes

8 facts not in evidence and it lacks

9 predicate. That's it.

10 A I'm sorry. (Witness shrugs.) Again?

11 Q **The response to the question.**

12 A I don't know the question.

13 Q **You don't remember the question? Did**

14 **you hire L.M. an attorney at some point in time?**

15 **Do you remember that?**

16 MR. PIKE: Same objection.

17 A Not to the best of my recollection.

18 Q **Do you know James Eisenberg?**

19 A ... Do I know James Eisenberg? I don't

20 believe I've ever met James Eisenberg.

21 Q **Is it your testimony today then that you**

22 **never paid for an attorney to represent L.M.?**

23 A (Witness shakes head)... On advice of

24 my counsel, I would like to answer that question,

25 but on advice of counsel I'm going to have to

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1 assert my Sixth Amendment, Fourteenth Amendment

2 and Fifth Amendment rights against -- excuse me,

3 Sixth Amendment rights of the U.S. Constitution.

4 Q **And that attorney that was paid for by**

5 **you, informed L.M. that if she were to tell the**

6 **FBI exactly what happened at your house, that her**

7 **son could be taken from her. You're aware of**

8 **that, correct?**

9 MR. PIKE: Same objections.

10 A I recognize, I believe she made one of

11 the statements at her deposition after she

12 decided to sue me for a bunch of money and your

13 firm has represented a number of... cases of a

14 sexually charged nature that turned out to be

15 fraudulent in order to fleece local investors.

16 The U.S. Attorney described your firm and these

17 cases as a bogus scheme, and I'm aware of that,

18 and would like to answer your question in more

19 detail today, Mr. Edwards; however my attorneys

20 advised me that at least today, I must assert my

21 rights under the Sixth Amendment, Fourteenth

22 Amendment and Fifth Amendment.

23 MR. PIKE: It is the food.

24 MR. JAFFE: I didn't want him in the

25 room in mid answer.

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1 THE WITNESS: Ready? Thank you.

2 THE VIDEOGRAPHER: Going off the video

3 record 2:29 p.m.

4 (Pause in the proceedings.)

5 THE VIDEOGRAPHER: Back on the video

6 record 2:50 p.m.

7 Q **Isn't it true, Mr. Epstein, that you**

8 **gave L.M. money to coerce her into interacting**

9 **with you sexually?**

10 A Mr. Edwards, I would like to answer each

11 and every one of your questions here today, but

12 unfortunately, like I've done with mostly all of

13 your other questions, I'm going to have to assert

14 my rights, Sixth Amendment, Fourteenth Amendment

15 and Fifth Amendment on advice of counsel.

16 Although I would like to answer, if I don't

17 follow my counsel's advice, I risk losing

18 representation.

19 Q **While committing these sexual acts**

20 **against L.M. when she was just a minor, you knew**

21 **it would psychologically damage her; isn't that**

22 **true?**

23 MR. PIKE: Form, lacks predicate,

24 speculation.

25 A I intend to respond at some point to --

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1 I would like to respond to each and every one of

2 your questions, but today on advice of my counsel

3 they've required me to assert my Fifth Amendment,

4 Sixth Amendment and Fourteenth Amendment rights

5 under the U.S. Constitution, though I would like

6 to answer each of these questions.

7 Q **In fact, you deliberately and**

8 **intentionally caused severe emotional distress**

9 **to underage minor females, including L.M.; isn't**

10 **that true?**

11 MR. PIKE: Objection, argumentative,

12 speculation, it is compound. And it assumes

13 facts not in evidence.

14 MR. EDWARDS: Okay.

15 A I would like to answer that question, as

16 I would like to answer all of your other

17 questions today regarding L.M. However, my

18 attorneys today have advised me that I must

19 assert my Sixth Amendment right to effective

20 representation and my Fifth Amendment right and

21 my Fourteenth Amendment right. Though I would

22 like to answer that with specificity, I must

23 follow my attorney's advice.

24 Q **Will you admit for the jury that you**

25 **were investigated federally for your illegal**



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1 **activities with underage minors?**  
2 MR. PIKE: Same objections.  
3 A I would like to answer that question, as  
4 well as all the other questions you've asked me  
5 here today, especially since your firm has been  
6 accused by the federal, I guess, the federal  
7 government,... being considered a criminal -- you  
8 firm has been considered and investigated as  
9 being a criminal enterprise using sexually  
10 fabricated, sexual cases... fabricated cases, to  
11 fleece investors out of millions of dollars, but  
12 I would like to answer your questions; however my  
13 attorneys have demanded that I assert my rights  
14 under the Sixth Amendment, Fifth Amendment and  
15 Fourteenth Amendment.  
16 **Q In fact, as a result of that**  
17 **investigation, you, as well as the United States**  
18 **Attorney's Office entered into what has now been**  
19 **known and referred to as the nonprosecution**  
20 **agreement; isn't that correct?**  
21 MR. PIKE: Same objection. The document  
22 speaks for itself?  
23 A You have to repeat the question.  
24 **Q As a result of the criminal**  
25 **investigation into your activities with minor**

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1 **females, you reached a resolution with the United**  
2 **States Attorney's Office, in what has now been**  
3 **described as the nonprosecution agreement; is**  
4 **that correct?**  
5 MR. PIKE: I'm going to object. Vague,  
6 confusing, misrepresents the agreement and  
7 the document is the best evidence. Will you  
8 mark it?  
9 MR. EDWARDS: I can mark it. We will  
10 copy it at the end and mark it as Exhibit 2.  
11 (Document, Nonprosecution Agreement, was  
12 deemed marked as Exhibit number 2 for  
13 identification, as of this date.)  
14 A Yes.  
15 **Q In that agreement, there are listed**  
16 **co-conspirators of Jeffrey Epstein, those being**  
17 **Sarah Kellen, Adriana Ross, Leslie Graff**  
18 **(phonetic) and Nadia Marcinkova. Can you explain**  
19 **to the jury what those individuals did for you**  
20 **related to the crimes that were investigated by**  
21 **the federal government?**  
22 A Co-conspirators?  
23 **Q Yes, it says "criminal charges against**  
24 **any co-conspirators of Epstein including but not**  
25 **limited to Sarah Kellen, Adriana Ross, Leslie**

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1 **Graff or Nadia Marcinkova." Can you explain to**  
2 **the jury what each of those four individuals did**  
3 **for you or conspired with you to do?**  
4 MR. PIKE: Object to the form of the  
5 question?  
6 A I would like to answer that question,  
7 however, today my attorneys advise me that I must  
8 assert my Sixth Amendment, Fifth Amendment and  
9 Fourteenth Amendment rights under the U.S.  
10 Constitution.  
11 **Q Isn't it fair to say that you, as well**  
12 **as the co-conspirators, operated as an organized**  
13 **criminal enterprise designed to sexually exploit**  
14 **underage minors?**  
15 MR. PIKE: Object to argumentative,  
16 speculation. It is vague and it assumes  
17 facts not in evidence.  
18 A Are you suggesting it was a criminal  
19 enterprise? Is that the words?  
20 **Q Yes.**  
21 A Though I would like to answer that  
22 question today, I think the only criminal  
23 enterprise that I have been reading about today  
24 was your firm, that's been accused of being a  
25 criminal enterprise involved in defrauding

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1 people, using mail fraud, wire fraud, money  
2 laundering, the operation of the enterprise --  
3 this is by the U.S. Attorney (indicating), but  
4 though I would like to answer your questions with  
5 specificity today, on advice of counsel, though I  
6 would like to answer it, they demanded I assert  
7 my Sixth Amendment, Fourteenth Amendment and  
8 Fifth Amendment right or I risk losing their  
9 representation.  
10 **Q Did you care about any of the underage**  
11 **minor females at the time when you were engaging**  
12 **in sexual conduct with them?**  
13 MR. PIKE: Objection, argumentative.  
14 Harassing, already been ruled upon by the  
15 Court relative to this exact question.  
16 MR. EDWARDS: I feel comfortable with  
17 the question. It goes to punitive damages.  
18 The issue related to the Court was a  
19 repetitive question on that topic or around  
20 that general subject matter. I'm just  
21 asking for Mr. Epstein to tell the jury how  
22 he felt about these girls, whether he cared  
23 about them, when he was engaging in illegal  
24 sexual conduct with them.  
25 MR. PIKE: Counsel, I'm going to

1 instruct him not to answer the question.  
 2 You can certify it to the Court, if you  
 3 like. You know what the answer is going to  
 4 be; however you're attempting to lace this  
 5 video. You know the Court has already  
 6 ordered that these types of questions are  
 7 not permitted because they are argumentative  
 8 and harassing. In fact, other questions  
 9 bordered but this question is on exact point  
 10 with the Court's order. If you want to  
 11 withdraw the question, that's fine.

12 MR. EDWARDS: I don't want to withdraw  
 13 the question.

14 MR. PIKE: Then I instruct him not to  
 15 answer.

16 MR. EDWARDS: Mark that somehow, that  
 17 page, so we can find it in the record,  
 18 relative to the hearing that will be had on  
 19 that question and others similar.

20 **Q At the time when you were engaging in**  
 21 **sexual conduct with underage females, you knew**  
 22 **that exposing them to this, was not beneficial or**  
 23 **good for these girls; isn't that true?**

24 MR. PIKE: Objection, argumentative,  
 25 speculation, assumes facts not in evidence.

1 Lacks predicate.

2 A Though I would like to answer that  
 3 question, like most of your other questions here  
 4 today, on advice of counsel I must assert my  
 5 Fourteenth Amendment, Fifth Amendment and Sixth  
 6 Amendment rights. Though I would like to answer,  
 7 if I do so, I risk losing my effective  
 8 representation of counsel.

9 **Q Isn't it true, Mr. Epstein, that the**  
 10 **only thing that you cared about was accessing as**  
 11 **many underage females as possible, for the**  
 12 **purposes of sex?**

13 MR. PIKE: Argumentative, speculation,  
 14 harassing.

15 A What's the question?

16 MR. PIKE: And assumes facts not in  
 17 evidence.

18 **Q Isn't it true that the only thing that**  
 19 **you cared about when you were interacting with**  
 20 **these underage females in a sexual manner, was**  
 21 **ejaculating or your own personal gratification?**

22 MR. PIKE: Form, same exact objections.

23 A Though I would like to answer that  
 24 question, and to the ladies and gentlemen of the  
 25 jury, I would very much like to answer that

1 question; however, today my attorneys have  
 2 advised me I must take -- assert my rights under  
 3 the Fourteenth, Sixth and Fifth Amendments of the  
 4 U.S. Constitution, or else I risk losing their  
 5 representation.

6 MR. PIKE: And Mr. Edwards, just so we  
 7 don't have to come back on the question that  
 8 I instructed him not to answer, if you would  
 9 go ahead and repeat that question, I will be  
 10 more than happy to let him respond.

11 MR. EDWARDS: I don't remember the  
 12 question we will take it up with the Court  
 13 and we'll get a ruling on it.

14 MR. PIKE: It was whether or not he  
 15 cared about these -- I believe you quoted it  
 16 as underage minors, but I would like the  
 17 court reporter to read back the question  
 18 just to conserve judicial resources and not  
 19 go back. So if she can reread the question  
 20 that would be good.

21 MR. EDWARDS: If you can find the  
 22 question.

23 THE COURT REPORTER: Certainly.

24 MR. EDWARDS: I think I know it.

25 **Q Did you care about any of these underage**

1 **minor females that you were engaging in sex with**  
 2 **at the time when you were engaging in these**  
 3 **sexual activities?**

4 MR. PIKE: Same objections, as before.

5 A Though I would like to answer that  
 6 question as well as most of your other questions,  
 7 if not all of your other questions here today, on  
 8 advice of counsel I will have to assert my  
 9 Fourteenth Amendment right, my Sixth Amendment  
 10 right and my Fifth Amendment right, because no  
 11 matter how much I actually want to answer that  
 12 question, if I do so I risk losing my counsel's  
 13 representation.

14 **Q At the time you were engaging in sexual**  
 15 **activity with these underage minors, including**  
 16 **L.M., you knew that this conduct was illegal,**  
 17 **didn't you?**

18 MR. PIKE: Same objections. Form.

19 A I would like to answer that question, as  
 20 well as most of your other questions here today;  
 21 however, today my counsel has instructed me to  
 22 assert my Fourteenth Amendment, Sixth Amendment  
 23 and Fifth Amendment right, and if I do not, and  
 24 if, in fact, I answer that question -- if I can  
 25 answer that question, I potentially risk losing

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1 my effective counsel's representation.

2 **Q In fact, you told many of these underage**

3 **minor females not to tell anybody what happened**

4 **with you in the house, or else they would be in**

5 **trouble; isn't that true?**

6 MR. PIKE: Form.

7 A I would like to answer that question, as

8 well as the other questions; however, my counsel

9 has advised me that today I must assert my

10 Fourteenth Amendment, Sixth Amendment and Fifth

11 Amendment rights under the U.S. Constitution.

12 **Q The underage minor females that have**

13 **come forward with information about your sexual**

14 **interactions with them have been investigated,**

15 **harassed, humiliated in an effort for you to**

16 **intimidate them to go away. Is that true?**

17 MR. PIKE: Objection. Argumentative,

18 speculative, compound. It is overbroad, and

19 assumes facts not in evidence.

20 A Can you repeat the question?

21 **Q Sure. Any underage minor female that**

22 **you engaged in sexual activity with, that has now**

23 **pursued a lawsuit against you, isn't it true that**

24 **you've spent a lot of money and a lot of**

25 **resources investigating them in an effort to**

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1 **intimidate them and hopefully make them go away?**

2 MR. PIKE: Same objections.

3 A I believe your client's testimony

4 changed dramatically when she joined up with you

5 and your law firm, accused of fraud, when she

6 decided to change her testimony, at least from

7 what the statements said, both to the police and

8 to the FBI, and decided to seek money. However,

9 anything above that or beyond that, I'm going to

10 have to, in fact, assert my Fifth Amendment,

11 Sixth Amendment and Fourteenth Amendment rights

12 as directed by my competent counsel.

13 Unfortunately, they have told me if I don't, I

14 risk losing their representation.

15 **Q All right, I'll give you a chance here**

16 **since you keep bringing up her statement to the**

17 **FBI as opposed to her sworn testimony for 13**

18 **hours under oath in this case. Are you saying**

19 **that the sworn testimony to the FBI was, in fact,**

20 **the truth?**

21 A What I'm saying is, it seems her

22 testimony has changed dramatically after she

23 joined your firm, that's all.

24 **Q Okay. Irrespective of her testimony,**

25 **you've read her testimony and you read her**

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1 **testimony -- to the FBI. You watched her**

2 **deposition when it was being taken. Which --**

3 A You're making assumptions, I'm sorry.

4 MR. PIKE: Let him finish the question.

5 THE WITNESS: Sorry.

6 A My fault.

7 MR. PIKE: Then I'll object and you'll

8 respond.

9 **Q Which are you saying is the truthful**

10 **testimony, her statement to the FBI or the**

11 **videotaped deposition that you watched?**

12 MR. PIKE: Object to the form.

13 A What I've said, and I think I'll repeat

14 myself is until she joined your firm and started

15 to seek money, her testimony was different.

16 That's my understanding.

17 **Q Are you denying any sexual involvement**

18 **with L.M. at this time?**

19 MR. PIKE: Form.

20 A I would like to answer that question. I

21 would like to answer it as with most of your

22 questions here today; however, my attorneys have

23 advised me that I must take that -- assert my

24 rights under the Sixth Amendment, Fourteenth

25 Amendment and Fifth Amendment, no matter how much

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1 I would like to answer that question, or

2 potentially risk losing my counsel.

3 **Q Isn't your game plan with all of these**

4 **civil lawsuits that have been filed against you,**

5 **to spend as much money as you can to investigate,**

6 **and harass these young women into hopefully**

7 **dropping the lawsuits against you?**

8 MR. PIKE: Objection. Relevance. Move

9 to strike. It is argumentative and

10 harassing.

11 A I would like to answer that question. I

12 think you know the answer to that question.

13 **Q Yes.**

14 A (Witness nods.) However, today my

15 attorneys have advised me I must assert my Sixth

16 Amendment rights, my Fourteenth Amendment rights

17 and my Fifth Amendment rights.

18 **Q You don't have any remorse for the**

19 **sexual abuse that you committed against L.M., do**

20 **you?**

21 MR. PIKE: Objection. It is

22 argumentative. It is harassing. It is, I

23 believe, confined under the Judge's order

24 and it assumes facts not in evidence?

25 A That being said, I would like to answer

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1 that question today, but my attorneys have  
2 advised me that I must assert my Fourteenth  
3 Amendment rights, my Fifth Amendment rights and  
4 my Sixth Amendment rights.

5 **Q In fact, you recently sued L.M., didn't**  
6 **you?**

7 A Yes, and you and your firm that's been  
8 accused of the largest fraud in Florida's  
9 history, described by the U.S. Attorney as a  
10 criminal enterprise involved in money laundering,  
11 conspiracy to commit one crime -- excuse me, mail  
12 fraud, commit conspiracy to commit wire fraud.  
13 Yes, I sued you, your firm and L.M.

14 **Q \*\* Tell the jury --**

15 A Yes.

16 **Q -- the basis for the evidence that you**  
17 **have to support the allegations in the complaint**  
18 **against L.M.**

19 MR. PIKE: I'm going to instruct the  
20 witness not to answer that question in this  
21 medium, as it is wholly irrelevant  
22 currently, as were it, to this particular  
23 lawsuit.

24 MR. EDWARDS: Just so you can rethink  
25 that position, the lack of remorse goes to

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1 punitive damages, that is an aspect of the  
2 case that L.M. has against Mr. Epstein.

3 MR. PIKE: This lawsuit, the current one  
4 Mr. Epstein is noticed for, and the lawsuit  
5 in which Mr. Epstein has filed against the  
6 former Rothstein, Rosenfeld, Adler, L.M. and  
7 Mr. Brad Edwards, is not proper for this  
8 medium --

9 MR. EDWARDS: I understand your  
10 position.

11 MR. PIKE: -- in that regard, I'm going  
12 to instruct him not to answer any questions  
13 relative to that lawsuit because of that  
14 objection, as well as, it is my  
15 understanding that Mr. Scarola has set Mr.  
16 Epstein's deposition, I believe, either  
17 early next week or mid-March, on the case of  
18 Epstein versus RRA, Rothstein, Rosenfeld and  
19 Adler, Mr. Edwards, as well as L.M.  
20 Therefore when that time approaches, that  
21 would be the appropriate time for those type  
22 of questions, related to that lawsuit.

23 MR. EDWARDS: I understand your position  
24 completely, Mr. Pike.

25 MR. PIKE: Thank you.

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1 **Q \*\* But as it relates to, obviously L.M.**  
2 **sued you making the allegations that you sexually**  
3 **molested her from when she was 13 years old to**  
4 **when she was 16 years old and now you've sued her**  
5 **in something that is seemingly related to that**  
6 **case, and I just want to understand what your**  
7 **factual basis is, or what evidence you're using**  
8 **to support your lawsuit against L.M., so that the**  
9 **jury can be valuate whether that is evidence of**  
10 **lack of remorse that would go to punitive damages**  
11 **claims that L.M. has against you.**

12 MR. PIKE: I would instruct him not to  
13 answer that question, for the same reasons  
14 stated.

15 MR. EDWARDS: Let's mark that.

16 **Q Is it your feeling that because you are**  
17 **wealthy and these children are poor, that you are**  
18 **entitled to sexually abuse them?**

19 MR. PIKE: Argumentative.

20 **Q In speaking about these children, and**  
21 **including L.M.**

22 MR. PIKE: Argumentative, speculation,  
23 compound, it's vague, and it assumes facts  
24 not in evidence.

25 A In keeping with your firm's propensity

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1 for filing fellacious (sic), manufactured,  
2 sexually charged cases, based on nothing but thin  
3 air, accused by the U.S. Attorney of the largest  
4 fraud in South Florida's history, by  
5 manufacturing sexual cases, I would like to  
6 answer each and every one of your questions,  
7 including why I sued you, but today I'm not going  
8 to be able to. I have to simply listen to my  
9 counsel and assert my Sixth Amendment, Fourteenth  
10 Amendment and Fifth Amendment right.

11 **Q This answer that you keep reciting,**  
12 **about the Rothstein, Rosenfeld, Adler firm --**

13 A You do know who they are, right?

14 **Q -- you are aware, obviously, that all of**  
15 **the lawsuits that were filed against you,**  
16 **including L.M.'s, were filed at least a year**  
17 **before, or approximately a year before Rothstein,**  
18 **Rosenfeld, Adler had any of these cases; you're**  
19 **aware of that, right?**

20 MR. PIKE: Form.

21 A I do not know when Rothstein Adler got  
22 involved in these cases. I do know that the  
23 moment that they did surface, and, in fact, I  
24 understand you shared information with all the  
25 other attorneys that you so -- that the jury

1 should understand that the information  
2 gathered -- according to the U.S. Attorney, by  
3 illegal means, has been shared with all the other  
4 attorneys that you keep representing have filed  
5 cases against me; yes, I'm aware of that.

6 **Q I don't understand that answer. Steven,  
7 do you --**

8 MR. PIKE: Do you have a question?

9 MR. EDWARDS: I want to understand what  
10 his answer was. As in all depositions, if  
11 you don't understand the answer, clarify the  
12 answer.

13 MR. PIKE: No, you have to ask a  
14 question.

15 MR. EDWARDS: I did. And he's  
16 responding to it.

17 MR. PIKE: The witness has answered the  
18 question. Do you have another question to  
19 clarify his answer?

20 MR. EDWARDS: Yes.

21 **Q Please clarify your answer.**

22 MR. PIKE: I will instruct him not to  
23 answer. It's vague and confusing, it's  
24 narrative.

25 MR. EDWARDS: Me saying "clarify your

1 your house when she was 13, 14, 15, 16 years  
2 old --

3 A Is that a claim?

4 **Q -- she was in your bedroom. You  
5 instructed her to get naked. You inserted your  
6 fingers into her vagina. You used a vibrator on  
7 her. You coerced her into recruiting other  
8 underage minor females, roughly 50 or so more.**

9 **These are all claims that have amounted  
10 to various counts, coercion, prostitution,  
11 intentional infliction of emotional distress,  
12 battery, committing various crimes against her.  
13 What are your defenses to that? Normal defenses  
14 are "I didn't do it," "I did it, but it didn't  
15 hurt her," we are trying to understand so we know  
16 how to provide this case to the jury, what are  
17 your defenses to these allegations?**

18 MR. PIKE: I'm going to object to this  
19 line of questioning. It is compound; as  
20 worded it could call for disclosure of  
21 attorney/client information as well as work  
22 product. I believe in this particular case  
23 there is a document filed, answer in  
24 affirmative defenses, and the affirmative  
25 defenses are set forth there and the

1 answer" is narrative?

2 MR. PIKE: What do you mean by "clarify  
3 your answer?"

4 MR. EDWARDS: I didn't hear what he  
5 said. Say it again so I can hear it.

6 MR. PIKE: Would you please read back  
7 what Mr. Epstein just testified to, madam  
8 court reporter.

9 (The record was read.)

10 MR. EDWARDS: Okay.

11 MR. PIKE: It was an answer, a  
12 question --

13 MR. EDWARDS: I understand -- I mean I  
14 don't understand the answer, but now I know  
15 the answer.

16 MR. PIKE: Okay.

17 **Q At this point in time, please tell the  
18 jury what is your defense of the claims being  
19 asserted against you in this lawsuit by L.M.?**

20 MR. PIKE: I'm going to object. Calls  
21 for a legal conclusion.

22 A What are the claims? So since you're  
23 representing L.M., can you tell me what the  
24 claims are?

25 **Q Yes, we've gone through it. She went to**

1 document there speaks for itself.

2 MR. EDWARDS: Okay.

3 **Q Respond.**

4 A The document speaks for itself.

5 **Q \*\* So you agree with the affirmative  
6 defenses that were filed in your case? If you  
7 were to testify, we could expect that to be your  
8 testimony?**

9 MR. PIKE: That's not what the witness  
10 testified. The witness testified that the  
11 document speaks for itself, and again, I'm  
12 going to object to attorney/client, work  
13 product and instruct the witness not to  
14 answer.

15 **Q I'm not asking what your legal defense  
16 is. I'm asking: What is your response to the  
17 claims?**

18 MR. PIKE: Same objection.

19 **Q What is your personal response?**

20 A I would like to respond to that  
21 question. I would like to respond today to that  
22 question; however, today my attorneys have told  
23 me that I cannot respond. They've asked me to  
24 assert my Fourteenth Amendment, Sixth Amendment  
25 and Fifth Amendment rights of the U.S.

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1 Constitution, though I would really like to  
2 respond. They are telling me if I did so, I will  
3 lose risking their representation.  
4 **Q I know you've invoked your Fifth**  
5 **Amendment rights related to many of these**  
6 **questions, but isn't it true you recently**  
7 **contacted George Rush at The New York Daily News**  
8 **and spoke to him about L.M.'s case as well as**  
9 **several of the other girls, who have claims**  
10 **against you?**  
11 A Who?  
12 **Q George Rush, New York Daily News.**  
13 A Can you repeat the question?  
14 **Q Didn't you recently, within the last**  
15 **year, contact George Rush of The New York Daily**  
16 **News and discuss these cases that have been filed**  
17 **against you and the allegations made by these**  
18 **various females?**  
19 MR. PIKE: Form.  
20 A I would like to answer that question,  
21 but unfortunately today my attorneys have advised  
22 me I cannot. They've advised me I must assert my  
23 Sixteenth -- excuse me, my Fourteenth Amendment,  
24 Sixth Amendment and Fifth Amendment right, so  
25 therefore, I will do so.

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1 **Q Why is it that you will talk to George**  
2 **Rush about this but you will not talk to the jury**  
3 **about this?**  
4 MR. PIKE: Form. Argumentative,  
5 speculation. Misstates the witness's  
6 testimony. It assumes facts -- the question  
7 assumes facts not in evidence and now lacks  
8 predicate.  
9 A So who is George Rush again?  
10 **Q George Rush, reporter with The New York**  
11 **Daily News. Did you not talk to him? If you**  
12 **didn't talk to him, tell me that. That's fine.**  
13 MR. PIKE: Same objections.  
14 A I would like to tell you answers to each  
15 one of your questions, however today my attorneys  
16 have demanded that I respond by asserting my  
17 Fourteenth Amendment, Sixth Amendment, Fifth  
18 Amendment privilege, though I would like to  
19 respond, but they said if I do so, I risk losing  
20 their representation.  
21 **Q Didn't you tell George Rush these**  
22 **underage minors were not victims at all and that**  
23 **regardless of their age, you did not personally**  
24 **consider them victims?**  
25 MR. PIKE: Same objection.

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1 A (Laughter)... Did I tell... I would  
2 like to answer that question, but today on advice  
3 of my counsel, I must -- as I have done with  
4 mostly each one of your questions, I have to  
5 assert my Fifth Amendment, Sixth Amendment and  
6 Fourteenth Amendment rights under the U.S.  
7 Constitution.  
8 **Q You were 51 when L.M. was 14, and you**  
9 **were interacting with her sexually. Is it your**  
10 **testimony that despite the disparity in age you**  
11 **do not consider L.M. to be a victim?**  
12 MR. PIKE: Argumentative, speculation,  
13 assumes facts not in evidence. Compound,  
14 lacks predicate.  
15 A Not only does it contradict your own  
16 client's statements to the FBI under sworn  
17 testimony, I would like to answer that question.  
18 Hopefully one day I can answer that question, but  
19 today my attorneys have said I cannot. They  
20 advised me I must assert my Sixth Amendment,  
21 Fifth Amendment and Fourteenth Amendment rights.  
22 **Q In the last ten years, what is the**  
23 **youngest underage minor female that you have**  
24 **interacted with sexually?**  
25 MR. PIKE: Argumentative, speculation,

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1 assumes facts not in evidence.  
2 A The answer to that question is -- I  
3 would like to give you an answer to that today,  
4 but my attorneys have advised me I must assert my  
5 Fourteenth Amendment rights, my Sixth Amendment  
6 rights and Fifth Amendment rights.  
7 **Q Do you know Michael Friedman?**  
8 A Doesn't ring a bell.  
9 **Q Former housekeeper/employee of yours,**  
10 **worked at the Palm Beach house?**  
11 A ... Could. Don't know.  
12 **Q So you would be unable to answer what**  
13 **Michael Friedman did for you?**  
14 A Yes.  
15 **Q Are you aware that our investigator**  
16 **spoke with Michael Friedman, former housekeeper**  
17 **for you, or housemanager for you, out in**  
18 **California?**  
19 A No.  
20 **Q Any reason why when asked about the**  
21 **activity that occurred in your house, he would**  
22 **tear up and say, "I was hoping to forget**  
23 **everything I saw"?**  
24 MR. PIKE: Objection, argumentative.  
25 Speculative. Assumes facts not in

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1 evidence.

2 A Again, the question?

3 **Q Is there any reason that when asked --**

4 A I don't know who he is.

5 MR. PIKE: Also, hearsay.

6 THE VIDEOGRAPHER: Counsel?

7 MR. EDWARDS: Go ahead.

8 THE VIDEOGRAPHER: Going off the video

9 record 3:23 p.m.

10 (Pause in the proceedings.)

11 THE VIDEOGRAPHER: Back on the video

12 record 3:30 p.m.

13 **Q This person that I asked you about,**

14 **Michael Friedman, is that somebody who has**

15 **contacted you within the last six months?**

16 A ... No.

17 **Q In taking a break and thinking about**

18 **some of these questions, have you remembered who**

19 **that person is, or still no real memory of him at**

20 **all?**

21 A No real memory.

22 **Q To the best of your knowledge, he never**

23 **worked for you?**

24 MR. PIKE: Form.

25 A Not that I can recall, but there are

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1 lots of people who work for me, so...

2 **Q Can you tell the jury who the various**

3 **people are that work for you now?**

4 A I believe I answered that question

5 already.

6 **Q In that you invoked your Fifth**

7 **Amendment, correct?**

8 A That's correct, Sixth Amendment and

9 Fourteenth Amendment.

10 **Q Eighteen and twenty-first?**

11 A (Witness shrugs.)

12 MR. PIKE: Move to strike.

13 **Q \*\* Have you, during this litigation, and**

14 **by "this litigation," I don't only mean L.M.'s**

15 **case, but the various other lawsuits that have**

16 **been filed against you by other females alleging**

17 **sexual misconduct by you against them. Who have**

18 **you retained attorneys for, what witnesses have**

19 **you retained attorneys for?**

20 MR. PIKE: Object to the form.

21 MR. EDWARDS: Okay.

22 MR. PIKE: I'll instruct him not to

23 answer because I don't understand the

24 question. Okay?

25 MR. EDWARDS: All right.

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1 **Q During this civil discovery and**

2 **litigation --**

3 A Um-hum?

4 **Q -- have you paid for, and/or retained an**

5 **attorney for any other witnesses?**

6 A Any other witnesses?

7 **Q Yes, like I'll give you an example that**

8 **you may, just to refresh your recollection or**

9 **tell you what I'm talking about, Lowella Rabuyo;**

10 **you know who that is, right?**

11 A Yes.

12 **Q She is someone to works for you now,**

13 **she's a housekeeper. We took her deposition**

14 **already. At least that's what her testimony**

15 **was.**

16 MR. PIKE: Form.

17 A I would like to answer that question but

18 I have to assert my Sixth Amendment, Fourteenth

19 and Fifth.

20 **Q That somebody who has informed us that**

21 **you paid for and obtained an attorney by the name**

22 **of Bruce Reinhart to represent her during this**

23 **process. Is that --**

24 MR. PIKE: Form.

25 A I have to assert my Fifth Amendment,

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1 Sixth Amendment and Fourteenth Amendment, right.

2 **Q Other people that have indicated that**

3 **you retained and paid for an attorney to**

4 **represent them are Michael Friedman, Louella**

5 **Rabuyo, Janusz Banaziak, Nadia Marcinkova,**

6 **Ghislaine Maxwell, your brother, Mark Epstein,**

7 **Naley Robson, Sarah Kellen, Larry Visoski, Larry**

8 **Morrison, David Rogers, Igor Zinoviev. Have I**

9 **missed anybody else that during this litigation**

10 **you've paid for or retained attorneys?**

11 MR. PIKE: Form, same objection.

12 A I'm not clear. Are you suggesting I've

13 paid for attorneys for all these people?

14 **Q Yes.**

15 A (Laughter,) I would like to answer those

16 questions today, but on the advice of counsel I

17 have to invoke my Sixth Amendment, Fifth

18 Amendment and Fourteenth Amendment right.

19 **Q If you have not, tell me which of those**

20 **on that list that you have not paid for or**

21 **retained attorneys for?**

22 MR. PIKE: Same objection.

23 A Same answer.

24 **Q You're invoking your Fifth Amendment,**

25 **right?**

1 A And Sixth Amendment and Fourteenth  
2 Amendment... and Fifth Amendment.

3 Q **\*\* Is it a company or is it you,  
4 personally, that is paying for the attorneys'  
5 fees related to your representation?**

6 MR. PIKE: I'm going to object to the  
7 form. I'm going to instruct him not to  
8 answer that question based on relevance; and  
9 it is vague also.

10 Q **Who is writing the check to your  
11 attorneys for your representation in this  
12 lawsuit?**

13 A (No response.)

14 Q **Who is paying the bill?**

15 A I believe I am.

16 Q **And is it you, personally, or is this  
17 one of your corporations or companies?**

18 MR. PIKE: Form, speculation.

19 A I'm not sure.

20 Q **As you sit here today, you're not really  
21 sure whether it is coming from one of the other  
22 corporations that we've discovered during  
23 discovery or it is coming from you, personally?  
24 Is that correct?**

25 MR. PIKE: Asked and answered.

1 Q **If me narrowing down will help you to  
2 respond, I will. Is there any need for that?**

3 A (Witness shakes head.)

4 MR. EDWARDS: Okay.

5 THE WITNESS: Sorry.

6 Q **Is it your intent to interact sexually  
7 with minors in the future?**

8 MR. PIKE: Same objection.

9 A I would like to answer that question,  
10 but today my counsel has advised me I must invoke  
11 the rights of the Sixth Amendment, the Fourteenth  
12 Amendment and the Fifth Amendment of the U.S.  
13 Constitution.

14 Q **Are you currently treating with a  
15 psychologist related to any sex addiction that  
16 you have with minors?**

17 A I would like to answer that question, as  
18 well, as most of the other... questions you've  
19 asked me today; however, on advice of counsel  
20 they've asked me to invoke my Sixth Amendment,  
21 Fourteenth Amendment and Fifth Amendment right,  
22 therefore, though I would like to answer that  
23 question, as well as the other ones, I risk  
24 losing the representation if I do so.

25 MR. PIKE: Moreover I'm going to object

1 A I believe -- I would like to answer but  
2 I have to invoke my Sixth, Fourteenth and Fifth  
3 Amendment rights.

4 Q **As it relates to any of the other  
5 witnesses who have had attorneys retained for  
6 them, is it also your response to invoke your  
7 Fifth Amendment rights, rather than to provide me  
8 with an answer, as to who is paying the bill for  
9 those attorneys?**

10 A I would like to answer those questions,  
11 but today my attorneys have asked me not to  
12 respond to any questions that may be relevant to  
13 this lawsuit, so I must follow their advice and  
14 invoke the Sixth Amendment, Fifth Amendment and  
15 Fourteenth Amendment, right.

16 Q **Have you interacted sexually with any  
17 underage minors in the last year, while on house  
18 arrest or work release from jail?**

19 MR. PIKE: Objection. Argumentative and  
20 compound and lacks predicate.

21 A I would like to answer that question,  
22 but on advice of counsel, at least today, they've  
23 advised me I must invoke my Sixth Amendment,  
24 Fourteenth and Fifth Amendment right.

25 MR. PIKE: It is also overbroad.

1 to relevance as I have in the past since Mr.  
2 Epstein's medical history is not at issue in  
3 this case; under the legal terms.

4 Q **You would agree, wouldn't you, that you  
5 targeted these underage girls including L.M.  
6 because of their young age?**

7 MR. PIKE: Argumentative, speculative,  
8 harassing. Assumes facts not in evidence.

9 A I would like to answer that question, as  
10 well as most of the other questions you've asked  
11 me here today. My counsel has advised me that I  
12 must assert my Fourteenth Amendment, Sixth  
13 Amendment and Fifth Amendment right. Though I  
14 would like to answer those questions today... if  
15 I do so, I risk losing their representation.

16 Q **You would also agree, wouldn't you, that  
17 you targeted these underage females for sex,  
18 including L.M., because they were poor?**

19 MR. PIKE: Same objections.

20 A I would like to answer that question. I  
21 would really like to answer that question, as  
22 well as the other questions you've asked me here  
23 today, however, on advice of my counsel they've  
24 demanded that I assert my Fifth Amendment, Sixth  
25 Amendment and Fourteenth Amendment rights. If I



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1 answer that question, I risk losing their  
2 representation.

3 **Q You would agree, wouldn't you, that you**  
4 **sexually molested L.M. for three years?**

5 MR. PIKE: Same objection.

6 A I think you've asked me that question  
7 before. I assert the same rights as before.

8 **Q That's the Fifth, Sixth and Fourteenth**  
9 **amendments, just so the record is clear?**

10 A Yes.

11 **Q You would agree, wouldn't you, that you**  
12 **coerced L.M. into prostitution?**

13 MR. PIKE: Same objections.

14 A I believe her own testimony reflects, at  
15 least the sworn statement to the FBI, reflects  
16 that that is not the case; and though I would  
17 like to answer that question in great detail, I  
18 cannot do so today on advice of counsel, that  
19 have asked me to assert my Sixth Amendment, Fifth  
20 Amendment and Fourteenth Amendment rights. If I  
21 do so, I risk losing their representation.

22 **Q You would agree with me that you groomed**  
23 **L.M. into becoming a prostitute?**

24 MR. PIKE: I'm going to object.  
25 Argumentative, speculative. Certainly lacks

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1 predicate and assumes facts not in  
2 evidence.

3 A You know I would like to answer that  
4 question, but I can't today. Under advice of  
5 counsel I have to assert my Fourteenth Amendment,  
6 Sixth Amendment and Fifth Amendment rights. If I  
7 answer the question, I risk losing their  
8 counsel.

9 **Q You would agree, wouldn't you, that you**  
10 **brainwashed L.M. into believing that this**  
11 **lifestyle of prostitution was right?**

12 MR. PIKE: Same objections.

13 A I would like to answer that question, as  
14 most of your other questions here today, Mr.  
15 Edwards. On advice of counsel today, I'm going  
16 to have to assert my Fifth Amendment, Sixth  
17 Amendment, Fourteenth Amendment rights. If I  
18 answer that question, I risk losing their  
19 representation.

20 **Q Would you agree that your interaction**  
21 **with L.M. when she was a minor, was degrading to**  
22 **her?**

23 MR. PIKE: Same objections.

24 A I would like to answer that question. I  
25 would like to answer all of your questions here

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1 today; however, my counsel has advised me that I  
2 must assert my Fourteenth Amendment rights, my  
3 Sixth Amendment rights and my Fifth Amendment  
4 rights, and though I would like to answer those  
5 questions, if I do so I risk losing their  
6 representation.

7 THE WITNESS: Can we take a ten-minute  
8 break for some air?

9 MR. EDWARDS: We have 15 minutes and  
10 we're done.

11 THE WITNESS: Continue then?

12 MR. EDWARDS: Okay.

13 **Q Would you agree that you intentionally**  
14 **indoctrinated L.M. into this very deviant sexual**  
15 **lifestyle?**

16 MR. PIKE: Okay, I'm going to object.  
17 It is argumentative. It is confusing. It  
18 is speculative, vague, lacks predicate and  
19 assumes facts not in evidence.

20 A And on top of that, I would like to  
21 answer that question, but my counsel has advised  
22 me I must assert my Fourteenth Amendment, Sixth  
23 Amendment and Fifth Amendment rights under the  
24 U.S. Constitution. Although I would like to  
25 answer all your questions today, I cannot do so

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1 risking losing their representation.

2 **Q Would you agree that you were personally**  
3 **responsible for destroying her life?**

4 MR. PIKE: Same act objections.

5 A Her life?

6 **Q L.M.'s?**

7 A I would like to answer that question,  
8 and I understand how your firm has been accused  
9 of fabricated sexually charged lawsuits in order  
10 to fleece investors locally in South Florida.  
11 The U.S. Attorney has called your law firm a  
12 criminal enterprise based on filing fellacious  
13 (sic) sexually charged cases. Although I would  
14 like to answer that question today, Mr. Edwards,  
15 and Mr. Jaffe, my counsel has told me that I have  
16 to assert my rights under the Sixth Amendment,  
17 Fifth Amendment and Fourteenth Amendment, and if  
18 I don't do so, I risk losing their  
19 representation.

20 **Q We have a factual basis for asking every**  
21 **question and making every allegation. I want to**  
22 **provide you with a last opportunity to tell the**  
23 **jury which of these allegations, if any, being**  
24 **made by L.M., are false or fabricated in any**  
25 **way?**

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1 MR. PIKE: Same objections. Mr.  
2 Edwards, you know the tenor of that question  
3 cannot be answered without waiver of Fifth,  
4 Sixth and Fourteenth. I appreciate the  
5 question and the semantics of it, but it  
6 is... It is -- can you rephrase it?  
7 MR. EDWARDS: Yes.  
8 **Q Many times -- you know the allegations**  
9 **now, we've gone through them, L.M.'s allegations**  
10 **and assertion of facts as to what happened**  
11 **between you and her when she was 13, 14 and 15**  
12 **years old and you were 50, 51, 52 years old.**  
13 **Several times you responded saying something**  
14 **about Rothstein, Rosenfeld & Adler, something**  
15 **about her FBI statement, what have you; I want to**  
16 **give you a chance to tell the jury, which of her**  
17 **allegations, if any, that you believe now are**  
18 **false or fabricated in any way.**  
19 MR. PIKE: Same objections.  
20 A I would like to respond to that  
21 question, the fact that her firm, the law firm  
22 representing her has been accused by the U.S.  
23 Attorney of being a criminal enterprise,  
24 manufacturing, fabricating, out of thin air,  
25 cases involving sexual allegations, sexual

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1 allegations in order to simply fleece local  
2 investors out of millions of dollars, so I would  
3 very much like to answer that question regarding  
4 the truthfulness of L.M.'s allegations; however  
5 today my counsel has told me that I must assert  
6 my Fifth Amendment rights, Sixth Amendment rights  
7 and Fourteenth Amendment rights under the U.S.  
8 Constitution, though I would very much like to  
9 answer that questions but if I do I risk losing  
10 their representation.  
11 **Q Would you agree you owe L.M. at least**  
12 **\$15,000,000 to compensate her for the damage**  
13 **which you have caused?**  
14 MR. PIKE: Objection. I move to  
15 strike. Argumentative. Compound. Lacks  
16 substantial predicate. Assumes... facts...  
17 not in evidence.  
18 A As you might imagine, though your law  
19 firm has been accused of perpetrating a fraud  
20 involving millions and millions of dollars, on  
21 unsuspecting investors here in South Florida,  
22 millions of dollars by fabricating similar  
23 allegations, convincing people to give money to  
24 the firm that helped bring this lawsuit, I'm  
25 afraid I would like to answer those questions but

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1 no matter how much I would like to answer those  
2 questions, I am going to have to decline based on  
3 my counsel's advice to invoke, at least today, my  
4 Fifth Amendment, Sixth Amendment and Fourteenth  
5 Amendment rights under the U.S. Constitution;  
6 because if I don't, I risk losing their  
7 representation.  
8 **Q Is it true that you're currently worth**  
9 **more than one billion dollars personally?**  
10 A I would like to answer that question, as  
11 I would like to answer most of your other  
12 questions. I know that's a lot of money --  
13 actually the amount of money that the U.S.  
14 attorneys accused your firm of trying to steal  
15 from the people of South Florida. It was 1.2  
16 billion dollars, the U.S. Attorney claimed your  
17 firm perpetrated the largest fraud in South  
18 Florida's history by stealing that sum of money  
19 from local investors, based on false allegations  
20 of sexually charged claims, and although I would  
21 like to answer these questions with specificity,  
22 under advice of counsel today, I'm going to have  
23 to refuse, based on my Sixth Amendment,  
24 Fourteenth Amendment and Fifth Amendment right,  
25 and though I would like to answer the question, I

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1 have been told if I do so I risk losing their  
2 representation, Mr. Edwards.  
3 **Q I'm simply asking: What is your**  
4 **personal net worth at this time?**  
5 MR. PIKE: Form.  
6 A I think I've answered the question,  
7 but...  
8 **Q What is your personal net worth at this**  
9 **time? So the answer should be a number or should**  
10 **be you invoking your Fifth Amendment rights.**  
11 **Seemed like the opposite.**  
12 MR. PIKE: Asked and answered, he did  
13 invoke his Fifth, Sixth and Fourteenth.  
14 MR. EDWARDS: His answer included  
15 something about Rothstein, Rosenfeld and  
16 Adler stealing some certain amount of money,  
17 which obviously is nonresponsive, I move to  
18 strike it and ask that he actually responds  
19 to the question with something that's  
20 responsive. He can answer the question,  
21 invoke Fifth Amendment rights, and we will  
22 get out of here.  
23 **Q We will start over again.**  
24 **Can you please tell the jury what your**  
25 **current personal net worth is currently?**

1 A I would like to do that today, however,  
2 I'm sure that one of the reasons, since your firm  
3 has been accused of stealing millions of dollars  
4 from local investors based on fabricated, totally  
5 fabricated claims, this is not by me but the U.S.  
6 Attorney, has called your firm a criminal  
7 enterprise charged with stealing hundreds of  
8 millions of dollars frankly, from local  
9 investors, based on false claims of sexually  
10 charged nature, I would like to answer that  
11 question in detail. However, my attorneys have  
12 advised me I cannot answer any questions that may  
13 be relevant to this lawsuit and by doing so, I  
14 must invoke my Sixth Amendment, Fifth Amendment,  
15 Fourteenth Amendment right and by answering the  
16 question, I risk losing their representation.

17 **Q Is it true you're worth 1.8 billion**  
18 **dollars?**

19 MR. PIKE: Same objection.

20 A Same answer.

21 **Q Put the answer.**

22 MR. PIKE: For the record.

23 A I'm sure that's an interesting question  
24 and I would like to answer that question for  
25 you. I'm sure you would like to know as your

1 Though I would like to answer with specificity,  
2 however if I do so, I risk losing their  
3 representation so I must assert my rights under  
4 Sixth, Fifth and Fourteenth Amendment.

5 **Q Isn't it true, Mr. Epstein, that as long**  
6 **as you have the money to do it, you will continue**  
7 **to engage in sex with minors?**

8 MR. PIKE: Again, extremely  
9 argumentative, speculative. I'm allowing  
10 the question to give leeway, so we don't  
11 have to come back here again. It is  
12 harassing.

13 A And with that, I'm sure this -- ladies  
14 and gentlemen of the jury, will... be able to see  
15 you and your partner, who your firm has been  
16 accused of massive fraud in South Florida trying  
17 to steal hundreds of millions of dollars from  
18 local investors, from creating, fabricating  
19 malicious, sexually charged claims, called by the  
20 U.S. Attorney a criminal enterprise charged with  
21 money laundering, conspiracy to commit other --  
22 federal violations, so though I would like to  
23 answer that question, Mr. Edwards, and Mr. Jaffe,  
24 today, I cannot. I must invoke my Sixth, Fifth  
25 and Fourteenth Amendment rights, on advice of

1 firm has been charged with stealing over a  
2 billion dollars from local investors and your  
3 senior partner of both you and Mr. Jaffe sitting  
4 there shaking his head, sits in jail accused of  
5 fleecing local and foreign investors based on  
6 false sexual claims from people. And although I  
7 would like to answer that question, like I would  
8 answer most of your other questions, my counsel  
9 has advised me today, ladies and gentlemen of the  
10 jury, I cannot answer that question. Maybe I can  
11 in the future. However, if I do so today, I risk  
12 losing their representation, so I must assert  
13 those rights under the Sixth, Fifth and  
14 Fourteenth amendments.

15 **Q You would agree, would you not, that it**  
16 **would take a jury award of at least 45 million**  
17 **dollars in punitive damages to punish you for**  
18 **doing what you did to L.M.?**

19 MR. PIKE: Same objections.

20 A I would like to answer that question, as  
21 I would like to answer all your other and Mr.  
22 Jaffe's questions today. However, while he sits  
23 shaking his head I'm going to have to respond  
24 to -- my counsel has advised me I cannot answer  
25 that question today, though I would like to.

1 counsel or risk losing their representation.

2 **Q Am I correct in my understanding that**  
3 **you have invoked your Fifth Amendment rights**  
4 **because your answers would incriminate you and**  
5 **lead to your prosecution?**

6 MR. PIKE: I'm going to --

7 MR. EDWARDS: Exactly as phrased by Mr.  
8 Luttier to L.M. I did not say anything but  
9 allow her to answer the question.

10 MR. PIKE: Object to the form.

11 A In fact, since you are a lawyer I'm sure  
12 you're aware the Supreme Court has said the Fifth  
13 Amendment is used more often to protect innocent  
14 people. So that's -- but today on advice of  
15 counsel I've taken that right.

16 MR. EDWARDS: (Gesturing.)

17 MR. PIKE: I have no questions.  
18 We will read.

19 MR. EDWARDS: No further questions.

20 THE VIDEOGRAPHER: Off the video record  
21 3:52 p.m.

22 THE COURT REPORTER: Can he read your  
23 copy Mr. Pike?

24 MR. PIKE: Yes.

25 THE COURT REPORTER: Thank you all.

178	<p>1 MR. PIKE: On the record, I don't want a</p> <p>2 word index.</p> <p>3 THE COURT REPORTER: Okay.</p> <p>4 (Discussion off the record.)</p> <p>5 MR. PIKE: I would like this tomorrow,</p> <p>6 please.</p> <p>7 Let's go regular but definitely before</p> <p>8 that -- before Tuesday, if possible.</p> <p>9 THE COURT REPORTER: Sure, that will be</p> <p>10 50 percent expedite?</p> <p>11 MR. PIKE: That's fine.</p> <p>12 THE COURT REPORTER: My pleasure.</p> <p>13 (Time noted: 4:00 o'clock p.m.)</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>	180	<p>1 THE STATE OF FLORIDA)</p> <p>2 COUNTY OF PALM BEACH)</p> <p>3</p> <p>4</p> <p>5 The foregoing certificate was</p> <p>6 acknowledged before me this</p> <p>7 day of _____ 2009, by TERRI</p> <p>8 BECKER, who is personally known to me.</p> <p>9</p> <p>10</p> <p>11</p> <p>12</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p> <p>Notary Public, State of Florida. My commission No. Expires March 13, 2011.</p>
179	<p>1 THE STATE OF FLORIDA)</p> <p>2 COUNTY OF PALM BEACH)</p> <p>3 I, TERRI BECKER, a Registered</p> <p>4 Professional Reporter and Notary Public for the</p> <p>5 State of Florida at Large, do hereby certify that</p> <p>6 I reported the videotaped deposition of JEFFREY</p> <p>7 EPSTEIN, the DEFENDANT, called by the PLAINTIFF</p> <p>8 in the above-entitled action; that the witness</p> <p>9 was duly sworn by me; that the foregoing pages,</p> <p>10 numbered from 1 to 183, inclusive, constitute a</p> <p>11 true record of the deposition by said witness.</p> <p>12 I further certify that I am not attorney</p> <p>13 or counsel of any of the parties, nor a relative</p> <p>14 or employee of any attorney or counsel connected</p> <p>15 with the action, nor financially interested in</p> <p>16 the action.</p> <p>17 WITNESS MY HAND and official seal in the</p> <p>18 City of West Palm Beach, County of Palm Beach,</p> <p>19 State of Florida, this 22nd day of February 2010.</p> <p>20</p> <p>21 _____</p> <p>22 TERRI BECKER, Registered</p> <p>23 Professional Reporter and</p> <p>24 Notary Public, State of Florida</p> <p>25 at Large. My Commission expires</p> <p>March 13, 2011.</p>	181	<p>1 I, JEFFREY EPSTEIN, do hereby</p> <p>2 certify that I have read the foregoing transcript</p> <p>3 of my deposition given on February 17, 2010; that</p> <p>4 together with the correction page attached hereto</p> <p>5 noting changes in form or substance, if any, it</p> <p>6 is true and correct.</p> <p>7</p> <p>8</p> <p>9 _____</p> <p>10 JEFFREY EPSTEIN</p> <p>11</p> <p>12</p> <p>13</p> <p>14</p> <p>15 I do hereby certify that the deposition</p> <p>16 of JEFFREY EPSTEIN was submitted to the witness</p> <p>17 for reading and signing; that after he had stated</p> <p>18 to the undersigned Notary Public that he had read</p> <p>19 and examined her deposition, he signed the same</p> <p>20 in the presence of the undersigned authority on</p> <p>21 the _____ day of _____ 2010.</p> <p>22</p> <p>23 _____</p> <p>24</p> <p>25</p>

1 ERRATA SHEET  
2 In Re: L.M. V. EPSTEIN  
3 DO NOT WRITE ON TRANSCRIPT  
4 ENTER CHANGES HERE:

5	PAGE	LINE	CHANGE	REASON
6				
7				
8				
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14				

15 \_\_\_\_\_  
JEFFREY EPSTEIN

16  
17  
18 THE STATE OF FLORIDA)  
19 COUNTY OF PALM BEACH)  
20 I DO HEREBY CERTIFY THAT JEFFREY EPSTEIN  
21 appeared before me and stated that he has read  
22 his deposition; further, that this Errata Sheet  
23 was signed in my presence on this \_\_\_\_\_ day  
24 of \_\_\_\_\_ 2010.  
25 \_\_\_\_\_

1 U.S. LEGAL SUPPORT  
2 Registered Professional Reporters  
3 444 West Railroad Avenue  
4 Suite 300  
5 West Palm Beach, Florida 33401  
6 (561)835-0220

7 February 22, 2010

8 BURMAN, CRITTON, LUTTIER & COLEMAN  
9 303 Banyon Boulevard  
10 Suite 400  
11 West Palm Beach, Florida 33401

12 ATTENTION: MICHAEL PIKE, ESQ.

13 In Re: L.M. V. EPSTEIN

14 Deposition of: JEFFREY EPSTEIN

15 Dear Mr. Pike:

16 Since counsel have agreed that you may  
17 have the witness read and sign your copy of the  
18 deposition, for your convenience, enclosed  
19 herewith you will find an Errata Sheet for the  
20 witness' use in entering any changes to the  
21 deposition.

22 Thank you for your prompt attention.  
23 Cordially yours,  
24 U.S. LEGAL SUPPORT

25 \_\_\_\_\_  
TERRI BECKER, Registered  
Professional Reporter, Notary  
Public, State of Florida at  
Large. My commission expires  
March 13, 2011.

CC: Bradley Edwards, Esq.

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# ATTACHMENT 6

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

CASE NO. 08-CV-80893-CIV-MARRA/JOHNSON

JANE DOE,

Plaintiff,

vs.

JEFFREY EPSTEIN, et al.,

Defendants.

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Related Cases:

08-80119, 08-80232, 08-80380, 08-80381,  
08-80994, 08-80811, 08-80893, 09-80469,  
09-8-591, 09-80656, 09-80802, 09-81092

VOLUME III

CONTINUED VIDEOTAPED DEPOSITION OF  
JEFFREY EPSTEIN  
TAKEN ON BEHALF OF THE PLAINTIFF

DATE: April 14, 2010

1 April 14, 2010  
 2 INDEX  
 3 WITNESS DIRECT CROSS REDIRECT RECROSS  
 4 JEFFREY EPSTEIN  
 5 BY MR. HOROWITZ 340  
 6 BY MR. EDWARDS 418  
 7 BY MS. EZELL 531

8 EXHIBITS  
 9  
 10 PLAINTIFF'S  
 11 FOR IDENTIFICATION PAGE  
 12 2 Multi-page document. 341  
 13 3 Multi-page document. 349  
 14 4 Multi-page document. 359  
 15 5 Multi-page document. 369  
 16 6 Multi-page document. 378  
 17 7 Multi-page document. 384  
 18 8 Multi-page document. 391  
 19 9 Order form from Amazon.com,  
 listing three books. 507

20

21

22

23

24

25

1 APPEARANCES (CONTINUED)  
 2  
 3 PODHURST, ORSECK  
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 4 25 West Flagler Street  
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 6  
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 8 303 Banyon Boulevard,  
 Suite 400  
 9 West Palm Beach, Florida 33401  
 10 Tel: (561) 842-2820  
 BY: MICHAEL PIKE, ESQ.

11 ALSO PRESENT:  
 12  
 13  
 14 JOE ROVNER, Videographer  
 (U.S. Legal)

20

21

22

23

24

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1 The continued videotaped deposition of  
 2 JEFFREY EPSTEIN in the above-entitled and  
 3 numbered cause, was taken before me, TERRI  
 4 BECKER, a Registered Professional Reporter and  
 5 Notary Public for the State of Florida at Large,  
 6 at 444 West Railroad Avenue, in the City of West  
 7 Palm Beach, Palm Beach County, in the State of  
 8 Florida, beginning at the hour of 10:22 o'clock  
 9 a.m., pursuant to the Notice and Adjournment in  
 10 said cause for the taking of said deposition, on  
 11 behalf of the PLAINTIFF in the above-entitled  
 12 action pending in the above-named court.

13 The appearances at said time and place  
 14 were as follows:  
 15 FARMER, JAFFE, WEISSING, EDWARDS,  
 FISTOS & LEHRMAN, PL  
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 numbers 2 through 8  
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 23 Miami, Florida 33160  
 Tel: (305) 931-2200  
 24 BY: ADAM D. HOROWITZ, ESQ.  
 25

1 THEREUPON,  
 2 JEFFREY EPSTEIN  
 3 being by Terri Becker first duly sworn to tell  
 4 the whole truth, as hereinafter certified,  
 5 testified as follows:  
 6 CONTINUED DIRECT EXAMINATION  
 7 BY MR. HOROWITZ:  
 8 Q Mr. Epstein, you understand we are  
 9 continuing your deposition from Part One which  
 10 was taken on March 8, 2010?  
 11 A Yes.  
 12 Q When we were together on March 8th, you  
 13 told us at that time that you were on probation  
 14 in the State of Florida. Is that still the  
 15 case?  
 16 A Yes.  
 17 Q I believe you also told us part of the  
 18 term of your sentence was that you were not  
 19 allowed unsupervised contact with anyone under  
 20 the age of 18. Is that still the case?  
 21 A Yes.  
 22 Q At that time, you told us that you're  
 23 restricted from possessing pornographic  
 24 material. Is that still the case?  
 25 A Yes.

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1 Q At that time you told us you were a  
2 registered sex offender in the State of Florida.  
3 Is that still the case?  
4 A Yes.  
5 Q At that time you told us you lived at  
6 358 El Brillo Way. Is that still the case?  
7 A On advice of counsel, sir, I'm going to  
8 have to invoke my Sixth, Fifth and Fourteenth  
9 Amendment rights.  
10 Q I'm going to hand you a document which  
11 we will mark as Exhibit 2. We had marked Exhibit  
12 1 at our first session.  
13 (Multi-page document was marked as  
14 Plaintiff's Exhibit number 2 for  
15 identification, as of this date.)  
16 Q (Handing.)  
17 I'm going to ask you to please turn to  
18 page 6. Turn to where it says "Affirmative  
19 Defenses." Do you see where we are?  
20 A Yes.  
21 Q Paragraph one, under the words  
22 "Affirmative Defenses" says "As to all counts,  
23 plaintiff actually consented to and was a willing  
24 participant in the acts alleged, and therefore  
25 her claims are barred or her damages are required

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1 to be reduced accordingly." This I'll tell you  
2 was filed in the case of M.L.; do you understand  
3 that?  
4 A Yes.  
5 Q Have you seen this document before?  
6 A Not to my recollection, no.  
7 Q This statement that plaintiff M.L.  
8 actually consented to and was a willing  
9 participant in the acts alleged; is that a true  
10 statement?  
11 A Sir, at least today I would like to  
12 answer each one of your questions, but I'm going  
13 to have to, on advice of counsel, invoke my  
14 rights of the Sixth, Fifth and Fourteenth  
15 Amendment.  
16 Q What facts do you have to support this  
17 contention here that plaintiff M.L. actually  
18 consented to and was a willing participant in the  
19 acts alleged?  
20 MR. PIKE: Form.  
21 A Though I would like to answer each and  
22 every one of your questions here today, Mr.  
23 Horowitz, unfortunately today on the advice of  
24 counsel, I will have to refuse to answer and  
25 invoke my rights under the Sixth, Fourteenth and

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1 Fifth Amendment.  
2 Q Isn't it true neither you or anyone you  
3 know has facts to support your contention that  
4 M.L. consented to and was a willing participant  
5 in the acts alleged?  
6 MR. PIKE: Form.  
7 A As you know I would really like to  
8 answer that question, but at least today, I  
9 cannot. I am going to have to invoke my rights  
10 on advice of counsel under the Fifth, Fourteenth  
11 and Sixth Amendment.  
12 Q Okay, moving down to paragraph two, it  
13 says, in part, "as to all counts alleged  
14 plaintiff M.L. actually consented to and  
15 participated in conduct similar and/or identical  
16 to the acts alleged with other persons, which  
17 were the sole or contributing cause of  
18 plaintiff's alleged damages."  
19 My question for you is, what facts are  
20 you aware of to support your contention that M.L.  
21 consented to and participated in conduct similar  
22 to and/or identical to the acts alleged in this  
23 lawsuit?  
24 MR. PIKE: Form.  
25 A Unfortunately I would like to answer

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1 each of your questions here today, Mr. Horowitz,  
2 but on advice of counsel, at least today, I have  
3 to assert my rights under the Fourth, Fifth and  
4 Sixth Amendment.  
5 Q Isn't it true, sir, that you that this  
6 contention that M.L. consented to or participated  
7 in conduct similar to the acts alleged in this  
8 lawsuit with other persons? That's a false  
9 statement; isn't that true?  
10 MR. PIKE: Form.  
11 A Mr. Horowitz, I believe you already know  
12 the answer to most of these questions. I would  
13 like to give them, but however, at least today on  
14 advice of my counsel I have to assert my rights  
15 under the Sixth, Fourteenth and Fifth Amendment.  
16 Q Isn't it true, sir, you're not aware of  
17 who has facts anyone to support the statement  
18 that M.L. consented to and participated in  
19 similar or identical acts with other persons?  
20 MR. PIKE: Form.  
21 A Though I would like to answer that  
22 question, as I would like to answer all of your  
23 questions, at least today my counsel has advised  
24 me that I must assert my rights under the Sixth,  
25 Fifth and Fourteenth Amendments.

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1           **Q** Sir, please turn to paragraph three of  
2           defendant Epstein's first Amended Answer and  
3           Affirmative Defenses.  
4           A Same page?  
5           **Q** Yes, paragraph three.  
6           A Okay.  
7           **Q** Do you see it says "As to all counts  
8           plaintiff impliedly consented to the acts alleged  
9           by not objecting."  
10           My question for you is, what facts do  
11           you have to support your contention that  
12           plaintiff M.L. impliedly consented to the acts  
13           alleged by not objecting?  
14           MR. PIKE: Form. And all of these  
15           questions call for a legal conclusion, as  
16           well.  
17           A Though I would like to answer that  
18           question, as I would like to answer all of your  
19           questions here today, on advice of my counsel,  
20           I'm going to have to assert my rights today of  
21           the Sixth, Fifth and Fourteenth Amendment.  
22           **Q** Isn't it true, sir, that you're not  
23           aware of any facts to support your contention  
24           that the plaintiff, M.L., consented to the acts  
25           alleged by not objecting; isn't that true, sir?

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1           MR. PIKE: Form?  
2           A Can you repeat the question, I'm sorry?  
3           **Q** Isn't it true you're not aware of any  
4           facts to support this contention that M.L.  
5           consented to the acts alleged by not objecting?  
6           MR. PIKE: Form.  
7           A At least today, Mr. Horowitz, I'm going  
8           to have to assert my rights under the Sixth,  
9           Fifth and Fourteenth Amendment not to answer that  
10           question, though I would like to.  
11           **Q** Isn't it true, sir, you're not aware of  
12           anyone who has facts to support the contention  
13           that M.L. consented to the acts alleged by not  
14           objecting?  
15           MR. PIKE: Form.  
16           A Mr. Horowitz, I would like to answer  
17           your question but at least today, under advice of  
18           counsel, I have to assert my rights under the  
19           Sixth, Fifth and Fourteenth Amendment.  
20           **Q** Turning to paragraph four, immediately  
21           following the paragraph... It says "Defendant  
22           reasonably believed or was told that plaintiff  
23           had attained the age of 18 years old at the time  
24           of the alleged acts"? Isn't it true, sir, that's  
25           not a true statement, is it? You knew that M.L.

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1           was not 18 years old at the time of the alleged  
2           acts?  
3           MR. PIKE: Form.  
4           A Though I would like to answer that  
5           question, as I would like to answer every  
6           one of your questions here today, on advice of  
7           counsel I'm going to have to assert my rights  
8           under the Sixth, Fifth and Fourteenth Amendment,  
9           sir.  
10           **Q** Mr. Epstein, what facts are you aware of  
11           to support your contention that M.L. had attained  
12           the age of 18 years old at the time of the  
13           alleged acts?  
14           MR. PIKE: Same objection.  
15           A Though I would like to answer that  
16           question, Mr. Horowitz, I'm going to have to  
17           respond the same way I've responded to all of  
18           your questions here today; by asserting my rights  
19           on advice of counsel under the Sixth, Fifth and  
20           Fourteenth Amendment.  
21           **Q** Isn't it true, sir, you had no reason to  
22           believe that M.L. was 18 or older at the time of  
23           the acts alleged?  
24           MR. PIKE: Form.  
25           A Unfortunately, though I would like to

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1           answer that question, Mr. Horowitz, on advice of  
2           my counsel I'm going to have to assert my rights  
3           under the Sixth, Fifth and Fourteenth Amendment.  
4           **Q** Turning to paragraph five of your  
5           Amended Answer to M.L.'s lawsuit, it says: "As  
6           to all counts, plaintiff's claims are barred, as  
7           she said she was 18 years or older at the time."  
8           Now, Mr. Epstein, that's not a true  
9           statement, is it?  
10           MR. PIKE: Form.  
11           A I would like to answer every one of your  
12           questions with respect to M.L., however, at least  
13           today, Mr. Horowitz, I'm going to have to assert  
14           my rights under the Sixth, Fifth and Fourteenth  
15           Amendment on advice of my counsel.  
16           **Q** Mr. Epstein, M.L. never told you she was  
17           18 years of age or older; isn't that true?  
18           MR. PIKE: Form.  
19           A Though I would like to answer every  
20           question regarding M.L., at least today I have to  
21           assert my rights under the Sixth, Fifth and  
22           Fourteenth Amendment, sir, under advice of  
23           counsel.  
24           **Q** Mr. Epstein, you've had a chance now to  
25           review the Affirmative Defenses one through five,

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1 which were filed on your behalf in this lawsuit.  
2 Do you have any facts to support the contentions  
3 in any of those Affirmative Defenses?  
4 MR. PIKE: Form.  
5 A At least today I'm going to have to  
6 respond by asserting my rights under the Sixth,  
7 Fifth and Fourteenth Amendment, on advice of  
8 counsel.  
9 Q I will take back Exhibit 1 -- pardon me,  
10 Exhibit 2, and I'm going to hand you what we will  
11 mark as Exhibit 3.  
12 (Multi-page document was marked as  
13 Plaintiff's Exhibit number 3 for  
14 identification, as of this date.)  
15 Q I'm going to hand you and your  
16 attorney --  
17 MR. HOROWITZ: I have extras.  
18 Q -- defendant Epstein's First Amended  
19 Answer and the Affirmative Defenses to  
20 plaintiff's Second Amended Complaint. Do you see  
21 that in front of you?  
22 A Yes, sir.  
23 Q Have you seen that before?  
24 A No, sir.  
25 Q I'm going to ask you to turn to page 6,

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1 the page numbers are at the top, and do you see  
2 the words "Affirmative Defenses"?  
3 A Yes, sir.  
4 Q Paragraph one includes the following  
5 statements --  
6 MR. PIKE: Can we -- it appears that  
7 paragraphs one through five are the same.  
8 Would that be correct, as the ones you just  
9 previously read?  
10 MR. HOROWITZ: Yes.  
11 MR. PIKE: Do you want to stipulate that  
12 the answers would be the same and the  
13 invocations of the Fifth, Sixth and  
14 Fourteenth would be the same, as well as my  
15 form objections?  
16 MR. HOROWITZ: Well, I need to ask the  
17 questions as to each client.  
18 MR. PIKE: So, you do not want to  
19 stipulate to that?  
20 MR. HOROWITZ: I'll stipulate that you  
21 have a standing objection, but I need to ask  
22 the questions and get them on record.  
23 MR. PIKE: All right, we will just go  
24 through it. Okay.  
25 Q As to Jane Doe 3, do you see in

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1 paragraph one it says, "As to all counts,  
2 plaintiff actually consented to and was a willing  
3 participant in the acts alleged." Do you see  
4 that portion of paragraph one?  
5 A Yes, sir.  
6 Q The statement here that the plaintiff,  
7 Jane Doe number 3 consented to and was a willing  
8 participant in the acts alleged; that's not a  
9 true statement, is it?  
10 MR. PIKE: Form.  
11 A Who is Jane Doe 3?  
12 Q You don't know who Jane Doe 3 is?  
13 A I do not. Don't you?  
14 Q I do, I'll pull up the list here. There  
15 are a number of cases, as you're aware.  
16 (Off the record for a second.)  
17 THE VIDEOGRAPHER: Off the video record  
18 at 10:35 a.m.  
19 (Pause in the proceedings.)  
20 THE VIDEOGRAPHER: Back on the video  
21 record 10:40 a.m.  
22 Q Mr. Epstein, Y.L. is Jane Doe 3. You  
23 have in front of you the Amended Answer and  
24 Affirmative Defenses filed in response to Jane  
25 Doe 3's lawsuit?

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1 A Yes, sir.  
2 Q We marked that as Exhibit 3. Turning to  
3 affirmative defense paragraph number one, do you  
4 see where it says "Plaintiff actually consented  
5 to and was a willing participant in the acts  
6 alleged" in paragraph one; do you see that?  
7 MR. PIKE: Form. The document speaks  
8 for itself.  
9 Q Do you see where I'm pointing you to? I  
10 want to make sure we are on the same page.  
11 A Yes, I do.  
12 Q The statement that Jane Doe number 3,  
13 Y.L., consented to and was a willing participant  
14 in the acts alleged; is that a true statement?  
15 MR. PIKE: Form.  
16 A Mr. Horowitz, I would like to answer  
17 every question about Y.L. here today, however on  
18 advice of counsel they've instructed me to assert  
19 my rights under the Sixth, Fifth and Fourteenth  
20 Amendment.  
21 Q Mr. Epstein, what facts do you know of  
22 to support the statements that Y.L. actually  
23 consented to and was a willing participant in the  
24 facts alleged?  
25 MR. PIKE: Form.



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1           **Q The acts alleged.**  
 2           MR. PIKE: Form.  
 3           A I would like to answer every question  
 4 about Y.L., however, at least today on advice of  
 5 counsel, they've instructed me that I must assert  
 6 my rights under the Sixth, Fifth and Fourteenth  
 7 Amendment.  
 8           **Q Isn't it true, sir, you are not aware of**  
 9 **anyone who has facts to support the statement**  
 10 **that Y.L. consented to and was a willing**  
 11 **participant in the acts alleged?**  
 12           MR. PIKE: Form.  
 13           A I would like to answer every question  
 14 about Y.L., however, today under advice of  
 15 counsel, I cannot. They've instructed me to  
 16 assert my rights under the Sixth, Fifth and  
 17 Fourteenth Amendment.  
 18           **Q Turning to paragraph two, it says:**  
 19 **"Plaintiff, Y.L., actually consented to and**  
 20 **participated to conduct similar and/or identical**  
 21 **to acts alleged with other persons, which were**  
 22 **the sole or contributing cause of plaintiff's**  
 23 **alleged damages." Sir, that's not a true**  
 24 **statement, is it?**  
 25           MR. PIKE: Form.

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1           A I would like to answer every question  
 2 about Y.L. today, Mr. Horowitz, however, on  
 3 advice of counsel, they've instructed me I must  
 4 assert my rights under the Sixth, Fifth and  
 5 Fourteenth Amendment.  
 6           **Q Mr. Epstein, what facts do you know of**  
 7 **to support the statement that Y.L. actually**  
 8 **consented to and participated in conduct similar**  
 9 **and/or identical to the acts alleged with other**  
 10 **persons?**  
 11           MR. PIKE: Form, and once again this  
 12 line of questioning calls for a legal  
 13 conclusions, as well as work product  
 14 information.  
 15           A Though I would like to answer each and  
 16 every question about Y.L., today unfortunately my  
 17 counsel has advised me I must assert my rights  
 18 under the Sixth, Fifth and Fourteenth Amendment.  
 19           **Q Isn't it true, sir, you're not aware of**  
 20 **anyone who has facts to support the contention**  
 21 **that Y.L. consented to and participated in**  
 22 **conduct similar and/or identical to the acts**  
 23 **alleged with other persons?**  
 24           MR. PIKE: Form.  
 25           A Though I would like to answer every

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1 question you have here today, Mr. Horowitz,  
 2 regarding your client, Y.L., on advise of my  
 3 counsel, at least today I must assert my rights  
 4 under the Sixth, Fifth and Fourteenth Amendment.  
 5           **Q Turning to paragraph three of your**  
 6 **Affirmative Defenses, it says "Plaintiff Y.L.,**  
 7 **impliedly consented to the acts alleged by not**  
 8 **objecting." Do you see that?**  
 9           A Yes.  
 10           **Q The first part of that sentence?**  
 11           A Yes, sir.  
 12           **Q That's not a true statement, is it,**  
 13 **sir?**  
 14           MR. PIKE: Form.  
 15           A Though I would like to answer every  
 16 question about Y.L., every single question,  
 17 unfortunately today my counsel has advised me  
 18 that I must assert my rights under the Sixth,  
 19 Fifth and Fourteenth Amendment.  
 20           **Q Sir, what facts do you have to support**  
 21 **your contention that Y.L. impliedly consented to**  
 22 **the acts alleged by not objecting?**  
 23           MR. PIKE: Form.  
 24           A Though I would like to answer every  
 25 question about Y.L. that you pose here today, Mr.

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1 Horowitz, at least today, unfortunately my  
 2 counsel advised me that I must assert my rights  
 3 under the Sixth, Fifth and Fourteenth Amendment.  
 4           **Q Isn't it true, sir, you're not aware of**  
 5 **anyone who has facts to support your statement**  
 6 **that Y.L. impliedly consented to the acts alleged**  
 7 **by not objecting?**  
 8           MR. PIKE: Form?  
 9           A Mr. Horowitz, I would like to answer  
 10 every question about Y.L., I really would.  
 11 However, today my counsel has advised me that I  
 12 must assert my Sixth, Fifth and Fourteenth  
 13 Amendment rights.  
 14           **Q Turning to paragraph four of your**  
 15 **Affirmative Defenses, Mr. Epstein, it says "As to**  
 16 **all counts, defendant reasonably believed or was**  
 17 **told that the plaintiff had attained the age of**  
 18 **18 years old at the time of the alleged acts."**  
 19 **That's not a true statement, is it, sir?**  
 20           MR. PIKE: Form.  
 21           A I would like to answer every question  
 22 about Y.L. that you've posed here today.  
 23 However, on advice of my counsel, I must assert  
 24 my rights under the Sixth, Fifth and Fourteenth  
 25 Amendment, at least today.

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1           **Q** Isn't it true, sir, isn't it true that  
 2 you knew that Y.L. was under the age of 18 when  
 3 she came to your home; isn't that true, sir?  
 4           MR. PIKE: Form.  
 5           A I would like to answer every question  
 6 about Y.L. However, at least today my counsel  
 7 has advised me I must assert my rights under the  
 8 Sixth, Fifth and Fourteenth Amendment.  
 9           **Q** Isn't it true, sir, that you had no  
 10 reason to believe that Y.L. was under 18?  
 11           MR. PIKE: Form.  
 12           A Can you repeat that question?  
 13           **Q** Glad you asked. Isn't it true, sir, you  
 14 had no reason to believe that Y.L. was 18 years  
 15 old or older?  
 16           MR. PIKE: Form.  
 17           A I would like to answer every question  
 18 about Y.L., and her -- the question you just  
 19 asked, however at least today, my counsel has  
 20 advised me that I must assert my rights under the  
 21 Sixth, Fifth and Fourteenth Amendment.  
 22           **Q** Isn't it true, sir, that Y.L. never told  
 23 you that she was under the age of 18?  
 24           A Form.  
 25           MR. PIKE: Form.

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1           MR. HOROWITZ: Strike that.  
 2           **Q** Isn't it true, sir, Y.L. never told you  
 3 she was 18 years or older? Isn't that true,  
 4 sir?  
 5           A I would like to answer every question  
 6 you have today regarding Y.L. and what she told  
 7 me. However, today my counsel has advised me I  
 8 must assert my rights under the Sixth, Fifth and  
 9 Fourteenth Amendment.  
 10           **Q** Okay, paragraph five says the  
 11 plaintiff's claims are barred as she said she was  
 12 18 years or older at the time.  
 13           Sir, that's not a true statement, is  
 14 it?  
 15           MR. PIKE: Form.  
 16           A I would like to tell you exactly what  
 17 Y.L. said, however, my counsel has advised me to  
 18 say that I must assert my rights under the Sixth,  
 19 Fifth and Fourteenth Amendment.  
 20           MR. PIKE: I wrote on your exhibit, page  
 21 3.  
 22           MR. HOROWITZ: We will substitute a  
 23 different one.  
 24           MR. PIKE: Yes, it is just checkmarks.  
 25           (Clean copy was substituted for the page

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1           containing markings in Exhibit number 3.)  
 2           **Q** I'm going to hand to you the answer and  
 3 Affirmative Defenses, Amended Answer and  
 4 Affirmative Defenses that you filed in the  
 5 lawsuit filed by V.Z.; do you have that in front  
 6 of you? Jane Doe number 4.  
 7           A Yes, sir.  
 8           **Q** I'll ask you to turn to page 6 where  
 9 you'll see the words "Affirmative Defenses" near  
 10 the top of the page?  
 11           MR. PIKE: This is Exhibit 4?  
 12           MR. HOROWITZ: Correct, Exhibit 4.  
 13           (Multi-page document was marked as  
 14 Plaintiff's Exhibit number 4 for  
 15 identification, as of this date.)  
 16           THE WITNESS: Can we take a two-second  
 17 break??  
 18           MR. HOROWITZ: Sure.  
 19           THE VIDEOGRAPHER: Off the video record  
 20 at 10:48 a.m.  
 21           (Pause in the proceedings.)  
 22           MR. HOROWITZ: Back on the record.  
 23           THE VIDEOGRAPHER: Back on the video  
 24 record 10:49 a.m.  
 25           **Q** Do you have the Affirmative Defenses in

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1           front of you, and the answer you filed in the  
 2 V.Z. case, correct?  
 3           A That's correct.  
 4           **Q** Paragraph one includes the following  
 5 statement: "As to all counts, plaintiff V.Z.  
 6 actually consented to and was a willing  
 7 participant in the acts alleged." That's not a  
 8 true statement, is it, sir?  
 9           MR. PIKE: Form.  
 10           A I believe her deposition of V.Z. speaks  
 11 to this issue.  
 12           **Q** Do you agree with V.Z.'s testimony that  
 13 she was at your home?  
 14           MR. PIKE: Form.  
 15           A Unfortunately today, Mr. Horowitz,  
 16 though I would like to answer every question  
 17 about V.Z., I think her deposition speaks quite a  
 18 well with some of those issues, but at least,  
 19 with respect to my answering these questions  
 20 today with regard to V.Z. and these issues, my  
 21 counsel has advised me I must assert my rights  
 22 under the Sixth, Fifth and Fourteenth  
 23 Amendments.  
 24           **Q** Are you telling us that V.Z., in your  
 25 opinion, was truthful in her deposition?

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1 MR. PIKE: Form, misconstrues the  
2 witness's testimony. Move to strike.  
3 A I believe, sir, that -- though I would  
4 like to answer that question with respect to Ms.  
5 V.Z.'s deposition, my counsel has advised me at  
6 least today I must assert my rights under the  
7 Sixth, Fifth and Fourteenth Amendments.  
8 **Q Sir, what did you mean when you said**  
9 **"V.Z.'s testimony speaks to this issue"?**  
10 MR. PIKE: Asked and answered.  
11 A I believe I said "deposition testimony."  
12 **Q Yes, what did you mean by that, when you**  
13 **said "Her deposition testimony speaks to the**  
14 **issue"?**  
15 MR. PIKE: Asked and answered, form.  
16 A On advice of counsel, I have to assert  
17 my rights under the Sixth, Fifth and Fourteenth  
18 Amendment, sir.  
19 **Q What facts do you know of to support the**  
20 **statement that V.Z. actually consented to and was**  
21 **a willing participant in the acts alleged?**  
22 MR. PIKE: Form.  
23 A I believe her deposition spoke to that  
24 directly, but however, myself, I'm going to have  
25 to assert my Sixth, Fifth and Fourteenth

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1 Amendment rights under advice of counsel, sir.  
2 **Q You read her deposition, correct?**  
3 A No.  
4 **Q You have not read her deposition?**  
5 A No.  
6 **Q But you believe her deposition testimony**  
7 **correctly speaks to the issue of the fact that**  
8 **she was a willing participant in the acts alleged**  
9 **with you?**  
10 A That's not what I said.  
11 **Q Why don't you tell me what you meant**  
12 **when you said, "Her deposition testimony speaks**  
13 **to the issue."**  
14 A The deposition speaks for itself. Any  
15 other questions I'm sorry, Mr. Horowitz, but  
16 today I have to assert my rights under the Sixth,  
17 Fifth and Fourteenth Amendments.  
18 **Q Isn't it true, sir, that you are not**  
19 **aware of anyone who has facts that support the**  
20 **statement that V.Z. consented to and was a**  
21 **willing participant in the acts alleged in her**  
22 **lawsuit?**  
23 MR. PIKE: Form.  
24 A My understanding of her own testimony in  
25 her deposition speaks to that matter, but,

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1 however, with respect to my own issues today, I  
2 am going to have to assert my rights on the  
3 advice of counsel, under the Sixth, Fifth and  
4 Fourteenth Amendments.  
5 **Q Paragraph two in the Affirmative**  
6 **Defenses says, "As to all counts alleged**  
7 **plaintiff, V.Z., actually consented to and**  
8 **participated in similar conduct and/or identical**  
9 **to the acts alleged with other persons which were**  
10 **the sole or contributing cause to plaintiff's**  
11 **damages."**  
12 **Sir, you know that's not correct; is**  
13 **that correct?**  
14 MR. PIKE: Form.  
15 A I believe her deposition, in her own  
16 words speaks to this issue, but as far as today  
17 my to that question answer unfortunately will  
18 have to be that I assert my rights under the  
19 Sixth, Fifth and Fourteenth Amendment on advice  
20 of counsel.  
21 **Q Sir, isn't it true you're not aware of**  
22 **any facts to support your contention in this**  
23 **answer to the amended complaint that V.Z.**  
24 **consented to and participated in conduct similar**  
25 **and/or identical to the acts alleged with other**

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1 **persons?**  
2 MR. PIKE: Form?  
3 A I believe her deposition in her own  
4 words speaks to this exact question, but however,  
5 with respect to my answers today, unfortunately  
6 with respect to V.Z., though I would like to  
7 answer every question with respect to V.Z., on  
8 advice of counsel I have to assert my rights  
9 under the Fourteenth, Sixth and Fifth Amendment.  
10 **Q Sir, my question was: What facts do you**  
11 **know to be true? Clarify for me. Are you saying**  
12 **that you are adopting what V.Z. says as true?**  
13 MR. PIKE: Form, misconstrues the  
14 witness's testimony, and that is not exactly  
15 what your last question was, so I'm going to  
16 move --  
17 MR. HOROWITZ: Just to form --  
18 MR. PIKE: No, no, I'm not going to let  
19 the witness answer a question that's going  
20 to potentially waive any Constitutional  
21 privileges here, so it will not be just  
22 "form."  
23 Now, having said that, if you can repeat  
24 the question --  
25 MR. HOROWITZ: Can you repeat the

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1 question?  
2 (Discussion off the record.)  
3 **Q Are you suggesting to us you are**  
4 **adopting what V.Z. says is true in her**  
5 **deposition?**  
6 MR. PIKE: Form.  
7 A Sir, I would like to answer every  
8 question with respect to V.Z. However, today on  
9 advice of counsel, I have to assert my rights  
10 under the Fourteenth, Sixth and Fifth Amendment  
11 **Q In paragraph three of your Affirmative**  
12 **Defenses, it says "As to all counts, plaintiff**  
13 **V.Z. impliedly consented to the acts alleged by**  
14 **not objecting."**  
15 **Sir, that's not true, is it?**  
16 MR. PIKE: Form.  
17 A I believe her own testimony in her  
18 deposition speaks to that, however, at least  
19 today, Mr. Horowitz, I have to assert my rights  
20 under the Sixth, Fifth and Fourteenth Amendment  
21 **Q What information do you have to support**  
22 **your assertion that plaintiff V.Z. impliedly**  
23 **consented to the acts alleged by not objecting?**  
24 MR. PIKE: Form.  
25 A Information separate from her own

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1 testimony? I -- with respect to any other  
2 question, I'm going to have to assert my rights  
3 under the Sixth, Fifth and Fourteenth Amendment  
4 upon advice of counsel.  
5 **Q Let's make sure we are on the same page,**  
6 **then.**  
7 A Please.  
8 **Q Separate from her deposition**  
9 **testimony --**  
10 A Yes?  
11 **Q -- my question is: Do you have any**  
12 **facts to support your assertion that V.Z.**  
13 **impliedly consented to the acts alleged by not**  
14 **objecting?**  
15 MR. PIKE: Form.  
16 A Separate from her own testimony with  
17 respect to her consenting, at least today, though  
18 I would like to answer that question, I'm going  
19 to have to assert my rights under the Sixth,  
20 Fifth and Fourteenth Amendment upon advice of  
21 counsel, sir.  
22 **Q Okay, paragraph four of the Affirmative**  
23 **Defenses says, "As to all counts, defendant**  
24 **reasonably believed or was told that plaintiff**  
25 **had attained the age of 18 years old." Did I**

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1 **read that correctly?**  
2 MR. PIKE: Form. I'm going to instruct  
3 him not to answer that question. Did you  
4 read that correctly?  
5 **Q Do you see where I am? Do you see where**  
6 **I am, paragraph four?**  
7 MR. PIKE: You can answer that question  
8 as to whether or not you see where he is  
9 identifying paragraph four in the document  
10 in front of you.  
11 A I don't think you read it completely,  
12 did you?  
13 **Q "As to all counts defendant reasonably**  
14 **believed or was told the plaintiff had attained**  
15 **the age of 18 years old at the time of the**  
16 **alleged acts." Did I read that correctly now?**  
17 MR. PIKE: I instruct you not to answer  
18 that question. It is not formed right. Did  
19 you read it correctly connotes an implied  
20 potential waiver, did you read it correctly,  
21 is it correct?  
22 **Q Did I accurately read the statement in**  
23 **your Affirmative Defenses?**  
24 MR. PIKE: That is -- you can answer  
25 that question.

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1 A Yes.  
2 **Q Okay. Isn't it true, sir, that you**  
3 **knew, you knew, that V.Z. was not 18 years old**  
4 **before May of 2005; isn't that true?**  
5 MR. PIKE: Form.  
6 A Though I would like to answer every  
7 question regarding V.Z. and what she said, at  
8 least today upon advice of counsel, I have to  
9 assert my rights under the Sixth, Fifth and  
10 Fourteenth Amendment, sir.  
11 **Q Isn't it true, sir, you had no reason to**  
12 **believe up until May 2005 that V.Z. was 18 years**  
13 **old or older?**  
14 MR. PIKE: Form.  
15 A Separate and apart from her own  
16 testimony I believe on the subject, at least with  
17 respect to today, to answer these questions I'm  
18 going to have to assert my rights under the  
19 Sixth, Fifth and Fourteenth Amendment on advice  
20 of counsel.  
21 **Q Isn't it true, sir, that prior to May of**  
22 **2005, V.Z. never told you she was 18 years old or**  
23 **older?**  
24 MR. PIKE: Form.  
25 A Though I would like to answer that

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1 question with respect to what V.Z. told me, at  
2 least today I'm going to have to assert my rights  
3 under the Fourteenth, Sixth and Fifth Amendment  
4 upon advice of counsel.

5 **Q As to paragraph five, states the**  
6 **following: "Plaintiff's claims are barred as she**  
7 **said she was 18 years or older at the time."**

8 **Sir, you know that's not true. That**  
9 **never happened before May of 2005; isn't that**  
10 **correct?**

11 MR. PIKE: Form.

12 A Though I would like to answer every  
13 question with respect to what V.Z. said and did,  
14 I, unfortunately today, have to assert my rights  
15 under the Sixth, Fifth and Fourteenth Amendment  
16 upon advice of counsel.

17 **Q I'm going to hand you what will be**  
18 **marked as Exhibit 5, Defendant Epstein's First**  
19 **Amended Answer in the Affirmative Defenses to**  
20 **Plaintiff's Second Amended Complaint in the**  
21 **lawsuit filed by A.C.**

22 (Handing.)  
23 (Multi-page document was marked as  
24 Plaintiff's Exhibit number 5 for  
25 identification, as of this date.)

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1 **Q I'm going to ask you again to turn to**  
2 **page 6 where it says "Affirmative Defenses."**  
3 **Do you see where it says "Affirmative**  
4 **Defenses"?**

5 A Um-hum.

6 **Q Paragraph one includes the following**  
7 **statements: "As to all counts plaintiff actually**  
8 **consented to and was a willing participant in the**  
9 **acts alleged, and therefore her claims are barred**  
10 **or her damages are required to be reduced**  
11 **accordingly."**

12 **Sir, this statement that A.C. consented**  
13 **to and was a willing participant in the acts**  
14 **alleged; that's not true, is it?**

15 MR. PIKE: Form.

16 A I believe her own deposition speaks to  
17 that exact question, but at least as far as my  
18 answers are concerned today, Mr. Horowitz,  
19 unfortunately upon advice of my own counsel, I  
20 have to assert my rights under the Sixth, Fifth  
21 and Fourteenth Amendment.

22 **Q Do you agree with A.C.'s statements with**  
23 **regard to her activity at your home as stated in**  
24 **her deposition testimony?**

25 MR. PIKE: Form, misconstrues the

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1 witness's testimony?

2 A I would like to answer every single  
3 question regarding A.C.'s claims, every single  
4 one, however, today, upon advice of counsel, at  
5 least today, they've instructed me to assert my  
6 rights under the Sixth, Fifth and Fourteenth  
7 Amendment.

8 **Q Sir, what facts do you know of to**  
9 **support the statement that A.C. consented to and**  
10 **was a willing participant in the acts alleged?**

11 MR. PIKE: Form.

12 A Separate and apart from her own  
13 deposition testimony, I'm sorry, but I would like  
14 to answer every question with respect to her  
15 behavior -- can you repeat the question, sir?

16 **Q Sure. What facts do you know of to**  
17 **support the statement that plaintiff, A.C.,**  
18 **consented to, and was a willing participant in**  
19 **the acts alleged?**

20 MR. PIKE: Form.

21 A Separate and apart from her own  
22 testimony on the subject, I cannot answer today  
23 that question, though I would like to. And upon  
24 advice of counsel, I must assert my rights under  
25 the Sixth, Fifth and Fourteenth Amendment.

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1 **Q Isn't it true, sir, you're not aware of**  
2 **anyone who has facts to support the statement**  
3 **that A.C. consented to and was a willing**  
4 **participant in the acts alleged?**

5 MR. PIKE: Form.

6 A Unfortunately -- I would like to answer  
7 every question about A.C.'s alleged participation  
8 in any event. However, today, upon advice of  
9 counsel I have been instructed that I must assert  
10 my rights under the Sixth, Fifth and Fourteenth  
11 Amendment.

12 **Q Sir, paragraph two of the Affirmative**  
13 **Defenses says: "As to all counts alleged**  
14 **plaintiff actually consented to and participated**  
15 **in conduct similar and/or identical to the acts**  
16 **alleged with other persons which were the sole or**  
17 **contributing cause to plaintiff's alleged**  
18 **damages."**

19 **Now, sir, that's not a true statement**  
20 **that plaintiff consented to and participated in**  
21 **similar acts with other persons, is it?**

22 MR. PIKE: Form.

23 A I would love to respond to every  
24 question with respect to similar acts performed  
25 by A.C. with other people. However, at least

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1 today upon advice of counsel I must assert my  
 2 rights under the Sixth, Fifth and Fourteenth  
 3 Amendment.  
 4 **Q Sir, what facts do you have to support**  
 5 **the assertion that A.C. participated in conduct**  
 6 **similar and/or identical to the acts alleged in**  
 7 **her lawsuit against you, with other people?**  
 8 MR. PIKE: Form.  
 9 A Separate and apart from her own  
 10 deposition, her own testimony, I would like to  
 11 give all the facts with respect to A.C.'s  
 12 behavior with other people. However, today my  
 13 counsel has advised me that I must assert my  
 14 rights under the Sixth, Fifth and Fourteenth  
 15 Amendment.  
 16 **Q Have you read her deposition testimony?**  
 17 MR. PIKE: Form.  
 18 A No.  
 19 **Q Have you listened to her deposition**  
 20 **testimony?**  
 21 A I don't recall.  
 22 **Q Am I accurate then, whatever you know**  
 23 **about her lawsuit is something your attorneys**  
 24 **have shared with you?**  
 25 MR. PIKE: Form.

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1 **Q Or do you have it from another source?**  
 2 MR. PIKE: One second.  
 3 MR. HOROWITZ: You have to wait for the  
 4 question --  
 5 MR. PIKE: No.  
 6 MR. HOROWITZ: That's the way the rules  
 7 worked.  
 8 MR. PIKE: You're asking a question,  
 9 then you're pausing to elicit a response to  
 10 waive attorney/client privilege, okay? Then  
 11 you're jumping into another question. If  
 12 you would like me to sit in your chair and  
 13 teach you how to ask the questions, I will  
 14 be happy to do so.  
 15 MR. HOROWITZ: You couldn't teach me a  
 16 single thing.  
 17 MR. PIKE: However, today we're here for  
 18 you. We're here for you to ask your  
 19 questions. If you would like to break up  
 20 your questions, you can do so. But as to  
 21 that last question, I'm going to instruct  
 22 you not to answer, because, as you know, it  
 23 is attorney/client information. If you want  
 24 to try again, we're here all day.  
 25 **Q Sir, is it accurate to say that all**

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1 **information you have about A.C.'s testimony came**  
 2 **from your lawyers, or did you hear here it from**  
 3 **some other source?**  
 4 MR. PIKE: Form.  
 5 I'm going to instruct you not to answer  
 6 that question.  
 7 **Q Have you heard from any source other**  
 8 **than your attorneys what A.C. testified about?**  
 9 MR. PIKE: You can answer that  
 10 question.  
 11 A No.  
 12 **Q Sir, paragraph three of your Affirmative**  
 13 **Defenses to A.C.'s lawsuit says, "As to all**  
 14 **counts plaintiff impliedly consented to the acts**  
 15 **alleged by not objecting." Do you see that?**  
 16 A Yes, sir.  
 17 **Q Sir, you know that's not a true**  
 18 **statement, isn't it?**  
 19 MR. PIKE: Form.  
 20 A I would like to answer every question  
 21 with respect to A.C. and what she did or alleged  
 22 to have done. However, today I have to assert my  
 23 rights under the, Sixth, Fifth and Fourteenth  
 24 Amendment, upon advice of counsel.  
 25 **Q Sir, what facts do you have to support**

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1 **your assertion that A.C. consented to the acts**  
 2 **alleged by not objecting?**  
 3 MR. PIKE: Form.  
 4 A Unfortunately any facts I might have, my  
 5 attorneys have counseled me I must assert my  
 6 rights under the Sixth, Fourteenth and Fifth  
 7 Amendment, so I must assert those rights today,  
 8 sir.  
 9 **Q Sir, isn't it true you're not aware of**  
 10 **anyone who has facts to support the statement**  
 11 **that A.C. consented to the acts alleged by not**  
 12 **objecting?**  
 13 MR. PIKE: Form.  
 14 A Though I would like to answer those  
 15 questions with respect to the facts about A.C.,  
 16 at least today my counsel has advised me I must  
 17 assert my rights under the Sixth, Fifth and  
 18 Fourteenth Amendment.  
 19 **Q Turning to paragraph four of the**  
 20 **Affirmative Defenses, isn't it true, sir, that**  
 21 **you knew that A.C. was 18 years, was under 18**  
 22 **years old when she came to your home?**  
 23 MR. PIKE: Form?  
 24 A Though I would like to answer every  
 25 question about Ms. A.C., I cannot, on advice of

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1 counsel today, and they've asked me to assert my  
 2 rights under the Sixth, Fifth and Fourteenth  
 3 Amendment.  
 4 **Q** Isn't it true, sir, that you had no  
 5 reason to believe that A.C. was 18 years or older  
 6 when she was at your home?  
 7 MR. PIKE: Form.  
 8 **A** Though I would like to answer every  
 9 question about A.C. today, Mr. Horowitz,, my  
 10 counsel has advised me I must at least today  
 11 assert my rights under the Sixth, Fifth and  
 12 Fourteenth Amendment.  
 13 **Q** Isn't it true, sir, A.C. never told you  
 14 she was 18 years old or older?  
 15 MR. PIKE: Form.  
 16 **A** Though I would like to answer that  
 17 question regarding what Ms. A.C. told me, my  
 18 counsel has advised me that today I must assert  
 19 my rights under the Sixth, Fifth and Fourteenth  
 20 Amendment.  
 21 **Q** Isn't it true, sir, no one ever told you  
 22 that A.C. was 18 years old or older when she was  
 23 at your home?  
 24 MR. PIKE: Form.  
 25 **A** Though I would like to answer that

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1 question, with respect to what people told me how  
 2 old she was or what she told me how old she was,  
 3 sorry, but my counsel advised me today I must  
 4 assert my rights under Sixth, Fifth and  
 5 Fourteenth Amendment.  
 6 **Q** Okay.  
 7 (Multi-page document was marked as  
 8 Plaintiff's Exhibit number 6 for  
 9 identification, as of this date.)  
 10 **Q** Moving on to Exhibit 6, Epstein's First  
 11 Amended Answer in Affirmative Defense is to make  
 12 his First Amended Complaint in the Jane Doe  
 13 number 6 case, and I'll hand you a copy of that  
 14 and represent to you that Jane Doe 6 is V.A.,  
 15 okay? I ask you to turn to page 6 -- I see  
 16 you've already done that, of the Affirmative  
 17 Defenses.  
 18 What facts do you have to support the  
 19 contention in paragraph one that V.A. consented  
 20 to and was a willing participant in the acts  
 21 alleged?  
 22 MR. PIKE: Form?  
 23 **A** Though I would like to answer the  
 24 question regarding what V.A. consented to and how  
 25 she was a participant in the events, my counsel

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1 today advised me I must assert my rights under  
 2 the Sixth, Fifth and Fourteenth Amendment.  
 3 **Q** Isn't it true, sir, there are no facts  
 4 that you're aware of to support the statement  
 5 that V.A. consented to and was a willing  
 6 participant in the acts alleged?  
 7 MR. PIKE: Form.  
 8 **A** Though, the question of whether she was  
 9 a willing participant in the acts alleged, I  
 10 would really like to answer those questions with  
 11 respect to V.A. However, at least today my  
 12 counsel has advised me I must assert my rights  
 13 under the Sixth, Fifth and Fourteenth Amendment.  
 14 **Q** Turning to paragraph two of the  
 15 Affirmative Defenses, what facts do you have to  
 16 support your assertion that V.A. consented to and  
 17 participated in conduct similar and/or identical  
 18 to the acts alleged with other persons?  
 19 MR. PIKE: Form.  
 20 **A** Though I would like to answer the  
 21 question about the acts that she's performed with  
 22 other persons similar to the ones alleged here,  
 23 at least today under advice of counsel, I have  
 24 been instructed to assert my rights under the  
 25 Sixth, Fifth and Fourteenth Amendment.

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1 **Q** Sir, you know that V.A. never consented  
 2 to or participated in similar or identical acts  
 3 with other persons; isn't that right?  
 4 MR. PIKE: Form.  
 5 **A** I would very much like to answer that  
 6 question, very much. However, sir, at least  
 7 today my counsel has advised me I must assert my  
 8 rights under the Sixth, Fifth and Fourteenth  
 9 Amendment.  
 10 **Q** Sir, isn't it true you're not aware of  
 11 anyone who has facts to support your assertion  
 12 that V.A. consented to or participated in similar  
 13 or identical acts with other persons?  
 14 MR. PIKE: Form.  
 15 **A** I'm sorry, can you read that question  
 16 back?  
 17 **Q** Sir, isn't it true you're not aware of  
 18 anyone who has facts to support your assertion  
 19 that V.A. consented to and participated to  
 20 similar or identical acts with other people?  
 21 MR. PIKE: Form.  
 22 **A** Though I would like to answer that  
 23 question regarding does anyone else have  
 24 information with respect to V.A. participating  
 25 with other people in similar acts as your

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1 question posed, unfortunately, today, sir, I'm  
 2 going to have to assert my rights upon advice of  
 3 counsel under the Sixth, Fifth and Fourteenth  
 4 Amendment.

5 **Q Turning to paragraph three of your**  
 6 **Affirmative Defenses, sir, it is not a true**  
 7 **statement that V.A. impliedly consented to the**  
 8 **acts alleged by not objecting, is it, sir?**

9 MR. PIKE: Form.

10 A The question regarding V.A. implied  
 11 consent that you've just posed, I would like to  
 12 answer that question. I would like to answer all  
 13 the questions with respect to V.A. that you've  
 14 posed here today. However, upon advice of  
 15 counsel I have to assert my rights under the  
 16 Sixth, Fifth and Fourteenth Amendment.

17 **Q Sir, what facts do you have to support**  
 18 **your contention that V.A., consented to the acts**  
 19 **alleged by not objecting?**

20 MR. PIKE: Form.

21 A Though I would like to answer that  
 22 question regarding the facts that I have  
 23 regarding V.A.'s consent, my attorneys have  
 24 advised me that today I have to assert -- at  
 25 least today, I have to assert my rights under the

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1 Sixth, Fifth and Fourteenth Amendment.

2 **Q Sure, turning to paragraph four, it says**  
 3 **"As to all counts" -- strike that.**

4 **Isn't it true, sir, that you knew when**  
 5 **V.A. was at your home that she was not 18 years**  
 6 **old?**

7 MR. PIKE: Form.

8 A I would like to answer the question  
 9 about V.A., every question about V.A. here today  
 10 that you've posed. However, upon advice of my  
 11 counsel they've advised me that I must assert my  
 12 rights under the Sixth, Fifth and Fourteenth  
 13 Amendment.

14 **Q Isn't it true, sir, you had no reason to**  
 15 **believe that V.A. was 18 years of age or older?**

16 MR. PIKE: Form.

17 A The question regarding my reason to  
 18 believe V.A. was 18 or over? I would really like  
 19 to answer that question, but however, today my  
 20 counsel has advised me I must assert my rights  
 21 under the Fifth, Sixth and Fourteenth Amendment,  
 22 sir.

23 **Q Isn't it true V.A. never told you she**  
 24 **was 18 or older?**

25 A Though I would very much like to respond

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1 to the question of what V.A. told me, I would  
 2 like to respond to every question regarding V.A.,  
 3 my counsel has advised me that today at least, I  
 4 must assert my rights under the Sixth, Fifth and  
 5 Fourteenth Amendment.

6 **Q Isn't it true, sir, that you could**  
 7 **plainly tell by looking at V.A. that she was not**  
 8 **18 years old?**

9 MR. PIKE: Form.

10 A Sir, I would like to answer that  
 11 question, as I would like to answer every other  
 12 question regarding your plaintiff, V.A. However  
 13 today on advice of counsel, they've instructed me  
 14 I must assert my rights under the Sixth, Fifth  
 15 and Fourteenth Amendment.

16 MR. PIKE: Form.

17 A Isn't it true, sir, no one told you V.A.  
 18 was 18 years old or older.

19 MR. PIKE: Form.

20 A Though I would like to answer every  
 21 question of what people told me regarding V.A.,  
 22 allegedly, my counsel has instructed me I must  
 23 respond by asserting my Sixth, Fifth and  
 24 Fourteenth Amendment rights, sir.

25 **Q Sir, I'm going to hand you what we will**

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1 **mark as Exhibit 7. It is Defendant Epstein's**  
 2 **First Amended Answer and Affirmative Defenses to**  
 3 **Plaintiff's First Amended Complaint in Jane Doe 7**  
 4 **case filed by F.P.**

5 (Multi-page document was marked as  
 6 Plaintiff's Exhibit number 7 for  
 7 identification, as of this date.)

8 **Q I ask you to take a look at that,**  
 9 **please, and turn to page 6, of the Affirmative**  
 10 **Defenses.**

11 THE WITNESS: Take a five-minute break?  
 12 MR. HOROWITZ: Sure.  
 13 THE VIDEOGRAPHER: Off the record at  
 14 11:13 a.m.  
 15 (Pause in the proceedings.)  
 16 THE VIDEOGRAPHER: Back on the video  
 17 record 11:21 a.m.

18 **Q Mr. Epstein, do you have in front of you**  
 19 **the Affirmative Defenses filed in your behalf in**  
 20 **F.P.'s lawsuit?**

21 A Yes.

22 **Q What facts do you have to support your**  
 23 **contention that F.P. consented to and was a**  
 24 **willing participant in the acts alleged?**

25 MR. PIKE: Form.



1 A Separate and apart from her own  
2 statements with regard to these issues, I would  
3 like to answer every question here today with  
4 respect to F.P. However upon advice of counsel,  
5 at least today, I have to assert my rights under  
6 the Sixth, Fifth and Fourteenth Amendment.

7 Q And is it your position that, well, tell  
8 us if it is your position that F.P. admitted to  
9 consenting to and being a willing participant in  
10 the acts alleged.

11 MR. PIKE: Form.

12 A Can you repeat the question?

13 Q Is it your position that F.P. Admitted  
14 in her deposition testimony to having consented  
15 to, and having been a willing participant in the  
16 acts alleged?

17 A I think her deposition speaks for  
18 itself, but anything beyond that, at least today,  
19 Mr. Horowitz, I'm going to have to assert my  
20 rights upon advice of counsel under the Sixth,  
21 Fifth and Fourteenth Amendment.

22 Q Do you believe that F.P. was accurate  
23 when she, according to you, testified that she  
24 consented to and was a willing participant in the  
25 acts alleged?

1 counsel has advised me I must assert my rights  
2 under the Fifth, Sixth and Fourteenth Amendment.

3 Q Turning to paragraph two of your  
4 Affirmative Defenses, what facts are you aware of  
5 to support your contention that F.P., consented  
6 to and participated in similar or identical acts  
7 with other persons?

8 MR. PIKE: Form.

9 A Though I would very much like to respond  
10 to similar acts that F.P. participated in with  
11 respect to your question, sir, at least today my  
12 counsel has advised me that I must assert my  
13 rights under the Sixth, Fifth and Fourteenth  
14 Amendment.

15 Q Isn't it true, sir, you know of no facts  
16 to support your contention in the Affirmative  
17 Defenses that F.P. participated in similar or  
18 identical acts with other persons?

19 MR. PIKE: Form.

20 A As I said previously, I would like to  
21 testify, I would like to answer your questions  
22 with respect to F.P. However, today my counsel  
23 has advised me that at least today I would have  
24 to assert my rights under the Sixth, Fifth and  
25 Fourteenth Amendment.

1 MR. PIKE: Form.

2 A I would like nothing more than to  
3 respond to everything F.P. has to say. However,  
4 at least today, upon advice of my counsel, I'm  
5 going to have to assert my rights under the  
6 Sixth, Fifth and Fourteenth Amendment.

7 Q Mr. Epstein, you know the statement that  
8 F.P. consented to and was a willing participant  
9 in the acts alleged if not a true statement;  
10 isn't that right?

11 MR. PIKE: Form.

12 A I would very much like to respond to  
13 whether F.P. was a willing participant in any  
14 alleged act. However, at least today, Mr.  
15 Horowitz, my counsel has advised me that I must  
16 assert my rights under the Sixth, Fifth and  
17 Fourteenth Amendment.

18 Q Sir, what facts do you know of to  
19 support the statement that F.P. consented to and  
20 was a willing participant in the acts alleged?

21 MR. PIKE: Form.

22 A Though I would like to respond to every  
23 question regarding the facts regarding F.P. and  
24 what she consented to and what she did not  
25 consent to, I'm afraid that at least today my

1 Q Isn't it true, sir, you're not aware of  
2 anyone who has facts to support the contention  
3 that F.P. participated or consented to similar or  
4 identical acts with other people?

5 MR. PIKE: Form.

6 A The issue of whether F.P. participated  
7 with other people in similar alleged acts, I  
8 would very much like to answer. However, today my  
9 counsel has advised me I may not, and have  
10 advised me I must assert my Sixth, Fifth and  
11 Fourteenth Amendment rights.

12 Q Turning to paragraph three, what facts  
13 do you have to support your contention that F.P.  
14 consented to the acts alleged by not objecting?

15 MR. PIKE: Form.

16 A Though I would like to answer every  
17 question here today regarding F.P., my counsel  
18 has advised me that at least today I have to  
19 assert my rights under the Sixth, Fifth and  
20 Fourteenth Amendment.

21 Q Isn't it true, sir, you know of no facts  
22 to support your contention that F.P. consented to  
23 the acts alleged by not objecting?

24 MR. PIKE: Form.

25 A Though I would like to answer every

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1 question you pose regarding F.P., Mr. Horowitz,  
 2 at least today my counsel has advised me I must  
 3 assert my rights to the Sixth, Fifth and  
 4 Fourteenth Amendment.

5 **Q Is it true, sir, you're not aware of**  
 6 **anyone who has facts to support the statement**  
 7 **that F.P. consented to the acts alleged by not**  
 8 **objecting?**

9 MR. PIKE: Form.

10 A I would like to answer the question with  
 11 respect to F.P.'s consent or not consent.  
 12 However, today my counsel has advised me I must  
 13 assert my rights under the Sixth, Fifth and  
 14 Fourteenth Amendment, though I would very much  
 15 like to answer that question.

16 **Q Turning to paragraph four of the**  
 17 **Affirmative Defenses, sir, you did not believe in**  
 18 **your own mind that F.P. was 18 years or older**  
 19 **before May of 2005; isn't that true?**

20 MR. PIKE: Form.

21 A Would you repeat the question, Mr.  
 22 Horowitz?

23 **Q You didn't believe prior to May 2005 in**  
 24 **your mind that F.P. was 18 years old or older;**  
 25 **isn't that true?**

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1 MR. PIKE: Form.

2 A What I believed in my mind,  
 3 unfortunately I would like to answer every  
 4 question with regard to F.P. that you posed here  
 5 today, very much would like to answer every  
 6 question with respect to F.P. However, at least  
 7 today I have to assert my rights on advice of  
 8 counsel under the Sixth, Fifth and Fourteenth  
 9 Amendment.

10 **Q Sir, before May of 2005, you knew that**  
 11 **F.P. was under the age of 18; isn't that right?**

12 MR. PIKE: Form.

13 A Sir, I would like to answer every  
 14 question with respect to F.P., that you've posed  
 15 here today. However, my counsel has advised me  
 16 that at least today I may not, and must assert my  
 17 rights under the Sixth, Fifth and Fourteenth  
 18 Amendment.

19 **Q Sir, prior to May 2005 F.P. never told**  
 20 **you she was 18 or older; isn't that true?**

21 MR. PIKE: Form?

22 A I would very much like to answer those  
 23 questions, every question with respect to F.P.  
 24 that you've posed here today, Mr. Horowitz.  
 25 However, upon advice of my counsel, they've

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1 advised me that I must assert my rights under the  
 2 Sixth, Fifth and Fourteenth Amendment.

3 **Q Prior to May 2005, no one told you that**  
 4 **F.P. was under the age of 18; isn't that right?**

5 MR. PIKE: Form.

6 A I would very much like to answer every  
 7 question with respect to what F.P. and what  
 8 everyone -- other people said about F.P.  
 9 However, at least today my counsel advised me  
 10 that I may not. They've advised me that I must  
 11 assert my rights under the Sixth, Fifth and  
 12 Fourteenth Amendment.

13 (Multi-page document was marked as  
 14 Plaintiff's Exhibit number 8 for  
 15 identification, as of this date.)

16 **Q Sir, I've just handed you defendant**  
 17 **Jeffrey Epstein's Answer and Affirmative Defense**  
 18 **to plaintiff's Amended Complaints in the Jane**  
 19 **Does number 8 lawsuit, filed by J.M. Do you have**  
 20 **that in front of you?**

21 A Yes.

22 **Q I'll ask you to turn, please, to page 6,**  
 23 **which is the Affirmative Defenses.**

24 **With regard to paragraph one, what facts**  
 25 **do you have to support your contention that J.M.**

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1 **consented to and was a willing participant in the**  
 2 **acts alleged?**

3 MR. PIKE: Form.

4 A I would like to answer every question  
 5 about J.M. here today. However, my counsel has  
 6 advised me that at least today -- I must assert  
 7 my rights under the Sixth, Fifth and Fourteenth  
 8 Amendment, though I would very much like to  
 9 answer every question regarding J.M.

10 **Q Sir, what facts do you know of to**  
 11 **support the statement that J.M. consented to and**  
 12 **was a willing participant in the acts alleged?**

13 MR. PIKE: Form.

14 A Though I would like to answer every  
 15 question about any alleged incident with J.M., my  
 16 counsel has advised me that at least today I must  
 17 assert my rights under the Sixth, Fifth and  
 18 Fourteenth Amendment.

19 **Q Isn't it true, sir, you're not aware of**  
 20 **anyone who has facts to support your assertion**  
 21 **that J.M. consented to and was a willing**  
 22 **participant in the acts alleged?**

23 MR. PIKE: Form.

24 A I would like to answer every question  
 25 regarding J.M., and her claims, and these alleged

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1 incidents. However, today, at least today, my  
2 counsel has advised me that I must assert my  
3 rights under the Sixth, Fifth and Fourteenth  
4 Amendment.

5 **Q** Okay, turning to paragraph two, what  
6 facts are you aware of to support your contention  
7 that J.M. consented to and participated in  
8 similar or identical acts with other people?  
9 MR. PIKE: Form.

10 A With respect to acts with similar other  
11 people, I would very much like to answer that  
12 question. However, at least today my counsel has  
13 advised me that I must assert my rights under the  
14 Sixth, Fifth and Fourteenth Amendment.

15 **Q** Isn't it true, sir, that this assertion  
16 that J.M. consented to and participated in  
17 similar or identical acts with other persons;  
18 that's not a true statement, is it?  
19 MR. PIKE: Form.

20 A I would very much like to answer every  
21 single question with respect to J.M. and her  
22 alleged claims of alleged incidents. However,  
23 today, my counsel has advised me I must assert my  
24 rights under the Sixth, Fifth and Fourteenth  
25 Amendment.

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1 **Q** Isn't it true, sir, you're not aware of  
2 anyone who has facts to support your assertion  
3 that J.M. consented to and participated in  
4 similar or identical acts with other people?  
5 MR. PIKE: Form.

6 A I would like to answer every question  
7 with respect to J.M., her alleged claims and  
8 alleged incidents. However, today my counsel  
9 has advised me that I must assert my rights under  
10 the Sixth, Fifth and Fourteenth Amendment, sir.

11 **Q** Turning to paragraph three, what facts  
12 do you have to support your assertion that J.M.  
13 consented to the acts alleged by not objecting?  
14 MR. PIKE: Form.

15 A I would like to answer every question  
16 with respect to J.M.'s claims and alleged  
17 incidents. However, today my counsel has advised  
18 me I must assert my rights under the Sixth, Fifth  
19 and Fourteenth Amendment.

20 **Q** Isn't it true, sir, you're not aware of  
21 anyone who has facts to support your assertion  
22 that J.M. consented to the facts alleged by not  
23 objecting?  
24 MR. PIKE: Form.

25 A I would very much like to answer every

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1 question that you've posed regarding your client,  
2 J.M. However, my counsel here today has advised  
3 me that I must assert my rights under the Sixth,  
4 Fifth and Fourteenth Amendment, at least today.

5 **Q** Turning to paragraph four of the  
6 Affirmative Defenses, it is on the following page  
7 if you want to follow along; what facts do you  
8 have to support your contention that you believed  
9 J.M. attained the age of 18 at the time of the  
10 alleged acts?  
11 MR. PIKE: Form.

12 A I would very much like to answer every  
13 question with respect to J.M. and her claims.  
14 However, today, at least today, my attorneys have  
15 advised me that I must assert my rights under the  
16 Sixth, Fifth and Fourteenth Amendment.

17 **Q** Isn't it true, sir, you knew that J.M.  
18 was under the age of 18 at the time of the  
19 alleged acts?  
20 MR. PIKE: Form.

21 A I would very much like to answer every  
22 question with respect to J.M.'s claims. However,  
23 my counsel today has advised me I must assert my  
24 rights under the Sixth, Fifth and Fourteenth  
25 Amendment.

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1 **Q** Isn't it true, sir, you had no reason to  
2 believe that J.M. was 18 years old or older at  
3 the time of the alleged acts?  
4 MR. PIKE: Form.

5 A I would like to answer every single  
6 question regarding J.M.'s claims, sir. However,  
7 at least today my counsel has advised me I must  
8 assert my rights under the Sixth, Fifth and  
9 Fourteenth Amendment.

10 **Q** Isn't it true, sir, J.M. never told you  
11 she was 18 or older?  
12 MR. PIKE: Form.

13 A I would very much like to answer every  
14 question regarding J.M.'s claims. However, today  
15 my counsel has advised me that I must assert my  
16 rights under the Sixth, Fifth and Fourteenth  
17 Amendment.

18 **Q** Isn't it true, sir, no one ever told you  
19 that J.M. was 18 or older?  
20 MR. PIKE: Form.

21 A I would like to answer every question  
22 with respect to J.M.'s claims. However, at least  
23 today my counsel has advised me that I may not,  
24 and though I would like to, they told me I must  
25 assert my rights under the Sixth, Fifth and

<p style="text-align: right;">397</p> <p>1 Fourteenth Amendment.</p> <p>2 <b>Q Sir, did you ever pay for a telephone</b></p> <p>3 <b>number (407) 665-3144, pay the phone bill?</b></p> <p>4 A I would have to assert my rights under</p> <p>5 the Sixth, Fifth and Fourteenth Amendment, sir.</p> <p>6 <b>Q Between 2001 and 2006, did you use the</b></p> <p>7 <b>telephone number (407) 655-3144, to get kids to</b></p> <p>8 <b>come to your home for your sexual pleasure?</b></p> <p>9 MR. PIKE: Form.</p> <p>10 A Though I would like to answer all these</p> <p>11 questions regarding phone numbers, I'm sorry but</p> <p>12 I may not on advice of counsel, so I must assert</p> <p>13 my rights under the Sixth, Fifth and Fourteenth</p> <p>14 Amendment.</p> <p>15 <b>Q Did you direct one or more people to use</b></p> <p>16 <b>the telephone number (407) 655-3144 in order to</b></p> <p>17 <b>get kids, girls, to come to your home for your</b></p> <p>18 <b>sexual pleasure?</b></p> <p>19 MR. PIKE: Form.</p> <p>20 A Though I would like to answer every one</p> <p>21 of your questions today regarding phone numbers,</p> <p>22 on advice of counsel, I may not, because it may</p> <p>23 be relevant to other lawsuits or this lawsuit,</p> <p>24 and they've instructed me that I must assert my</p> <p>25 rights under the Sixth, Fifth and Fourteenth</p>	<p style="text-align: right;">399</p> <p>1 <b>age of 18 to come to your home for your sexual</b></p> <p>2 <b>pleasure?</b></p> <p>3 MR. PIKE: Form.</p> <p>4 A I would like to answer every one of your</p> <p>5 questions regarding these phone numbers and</p> <p>6 allegations. However, today, my counsel has</p> <p>7 advised me that I may not and must assert my</p> <p>8 rights under the Sixth, Fifth and Fourteenth</p> <p>9 Amendment.</p> <p>10 <b>Q Have you ever paid the telephone bill or</b></p> <p>11 <b>had registered in your name the phone number</b></p> <p>12 <b>(561) 655-4590?</b></p> <p>13 MR. PIKE: Form.</p> <p>14 A Mr. Horowitz, I would like to answer</p> <p>15 each one of your questions regarding phone</p> <p>16 numbers here today, but on advice of counsel</p> <p>17 they've told me I must assert my rights under the</p> <p>18 Sixth, Fifth and Fourteenth Amendment.</p> <p>19 <b>Q Is (561) 655-4590 a telephone number you</b></p> <p>20 <b>used between 2001 and 2006 to get girls under the</b></p> <p>21 <b>age of 18 to come to your home for your sexual</b></p> <p>22 <b>pleasure?</b></p> <p>23 MR. PIKE: Form.</p> <p>24 A Though I would like to answer every one</p> <p>25 of your questions regarding telephone numbers, my</p>
<p style="text-align: right;">398</p> <p>1 Amendment.</p> <p>2 <b>Q Have you ever either paid or had</b></p> <p>3 <b>registered to you the telephone number (561)</b></p> <p>4 <b>373-2262?</b></p> <p>5 MR. PIKE: Form.</p> <p>6 A I would like to answer every question</p> <p>7 regarding phone numbers, Mr. Horowitz. My</p> <p>8 attorneys have asked me to respond to most of</p> <p>9 your questions here today by asserting my rights</p> <p>10 under the Sixth, Fifth and Fourteenth Amendment I</p> <p>11 will have to do so with respect to that question.</p> <p>12 <b>Q Between the years 2001 and 2006, did you</b></p> <p>13 <b>use the telephone number (561) 373-2262, in order</b></p> <p>14 <b>to arrange for girls under the age of 18 to come</b></p> <p>15 <b>to your home for your sexual pleasure?</b></p> <p>16 MR. PIKE: Form.</p> <p>17 A I would like to answer every one of your</p> <p>18 questions regarding phone numbers here today, Mr.</p> <p>19 Horowitz. However, on advice of counsel, at</p> <p>20 least today, they've instructed me that I must</p> <p>21 assert my rights under the Sixth, Fifth and</p> <p>22 Fourteenth Amendment.</p> <p>23 <b>Q Between 2001 and 2006, did you direct</b></p> <p>24 <b>one or more people to use the telephone number</b></p> <p>25 <b>(561) 373-2262, in order to get girls under the</b></p>	<p style="text-align: right;">400</p> <p>1 counsel has advised me that at least today I may</p> <p>2 not, because it may be relevant to this lawsuit</p> <p>3 or another lawsuit, and they've instructed me</p> <p>4 that I must assert my rights under the Sixth,</p> <p>5 Fifth and Fourteenth Amendment.</p> <p>6 <b>Q Is (561) 655-4950 a telephone number</b></p> <p>7 <b>that you directed to other people to use in order</b></p> <p>8 <b>to get kids to come to your home for your sexual</b></p> <p>9 <b>pleasure?</b></p> <p>10 MR. PIKE: Form.</p> <p>11 A I would like to answer every one of your</p> <p>12 questions regarding phone numbers allegedly used</p> <p>13 for these types of purposes. However, my counsel</p> <p>14 today has advised me I may not and have</p> <p>15 instructed me I must assert my rights under the</p> <p>16 Sixth, Fifth and Fourteenth Amendment.</p> <p>17 <b>Q Sir, have you ever paid the phone bill</b></p> <p>18 <b>or had registered in your name the phone number</b></p> <p>19 <b>(561) 762-2741?</b></p> <p>20 MR. PIKE: Form.</p> <p>21 A Though I would like to answer that</p> <p>22 question as I would like to answer every one of</p> <p>23 your questions here today, my counsel has advised</p> <p>24 me that at least today, I must assert my rights</p> <p>25 under the Sixth, Fifth and Fourteenth Amendment,</p>

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1 sir.

2 **Q Is the telephone number (561) 762-2741,**

3 **a telephone number you used between 2001 and 2006**

4 **in order to get girls under the age of 18 to come**

5 **to your home for your sexual pleasure?**

6 MR. PIKE: Form.

7 A I would like to answer every one of your

8 questions with respect to these telephone

9 numbers. However, my counsel today has advised

10 me that I must assert, at least today, my rights

11 under the Fifth, Sixth and Fourteenth Amendment.

12 **Q Sir, is (561) 762-2741 a telephone**

13 **number that you directed other people to use in**

14 **order to get girls under the age of 18 to come to**

15 **your home for your sexual pleasure?**

16 MR. PIKE: Form.

17 A I would like to answer every question

18 regarding these telephone numbers. However, my

19 counsel has advised me that at least today, that

20 I may not and they've instructed me I must assert

21 my rights under the Sixth, Fifth and Fourteenth

22 Amendment.

23 **Q Sir, have you ever registered in your**

24 **name or paid the phone bill for telephone number**

25 **(561) 655-7629?**

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1 MR. PIKE: Form.

2 A I would like to answer each one of your

3 questions today, Mr. Horowitz, regarding these

4 telephone numbers. My counsel has advised me

5 that at least today I may not, and must assert my

6 rights under the Sixth, Fifth and Fourteenth

7 Amendment.

8 **Q Is (561) 655-7629 a telephone number you**

9 **used between 2001 and 2006 to get girls under the**

10 **age of 18 to come to your home for your sexual**

11 **pleasure?**

12 MR. PIKE: Form.

13 A Though I would very much like to answer

14 every question regarding -- that you've posed

15 here today regarding phone numbers, on advice of

16 counsel, I may not. They've instructed me I must

17 assert my rights under the Sixth, Fifth and

18 Fourteenth Amendment.

19 **Q Is (561) 655-7629 a telephone number you**

20 **directed other people to use in order to get**

21 **girls under the age of 18 to come to your home**

22 **for your sexual pleasure?**

23 MR. PIKE: Form.

24 A I would like to answer every one of your

25 questions posed here today regarding various

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1 phone numbers. However, upon advice of my

2 counsel, they've instructed me that I must assert

3 my rights under the Sixth, Fifth and Fourteenth

4 Amendment.

5 **Q Sir, have you ever paid the phone bill**

6 **or had the phone number (561) 820-8790 registered**

7 **in your name?**

8 MR. PIKE: Form.

9 A I would very much like to answer every

10 question regarding phone numbers that you've

11 posed here today, Mr. Horowitz. However, my

12 counsel has advised me that at least today I must

13 assert my rights under the Sixth, Fifth and

14 Fourteenth Amendment.

15 **Q Sir, is the telephone number (561)**

16 **820-8790 a telephone number you used between 2001**

17 **and 2006 to get underage girls to come to your**

18 **home for your sexual pleasure?**

19 MR. PIKE: Form.

20 A I would very much like to answer every

21 one of your questions posed here today with

22 regard to telephone numbers or anything else.

23 However, my counsel has advised me at least today

24 that I may not, and must assert my rights under

25 the Sixth, Fifth and Fourteenth Amendment.

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1 **Q Sir, is the telephone number (561)**

2 **820-8790 a telephone number you directed others**

3 **to use in order to get underage girls to come to**

4 **your home for your sexual pleasure?**

5 MR. PIKE: Form.

6 A I would like to answer every one of your

7 questions regarding phone numbers, Mr. Horowitz.

8 However, today my counsel has advised me that I

9 must assert my rights under the Sixth, Fifth and

10 Fourteenth Amendment.

11 **Q Sir, have you ever paid the phone bill**

12 **or had the phone number (561) 832-2104 registered**

13 **in your name?**

14 MR. PIKE: Form.

15 A Sir, I would like to answer every one of

16 your questions regarding phone numbers. However,

17 my counsel has advised me that at least today I

18 must assert my rights under the Sixth, Fifth and

19 Fourteenth Amendment.

20 **Q Is the telephone number (561) 832-2104 a**

21 **telephone number that you used between 2001 and**

22 **2006 in order to get kids to come to your home**

23 **for your sexual pleasure?**

24 MR. PIKE: Form.

25 A Though I would like to answer every one

405

1 of your questions regarding phone numbers here  
2 today, Mr. Horowitz, my counsel has advised me  
3 that I may not and must assert my rights under  
4 the Sixth, Fifth and Fourteenth Amendment.  
5 **Q Sir, is telephone number (561) 832-2104**  
6 **a telephone number that you directed others to**  
7 **use in order to get underage girls to come to**  
8 **your home for your sexual pleasure?**  
9 MR. PIKE: Form.  
10 A Though I would like to answer every one  
11 of your questions regarding phone numbers, Mr.  
12 Horowitz, the various phone numbers you've now  
13 put on the table, my counsel has advised me at  
14 least today I may not. I must assert my rights  
15 under the Sixth, Fifth and Fourteenth Amendment.  
16 **Q Sir, have you ever paid the phone bill**  
17 **or had registered in your name the telephone**  
18 **number (212) 517-7580?**  
19 MR. PIKE: Form.  
20 A Mr. Horowitz, I would like to answer  
21 every one of your questions regarding phone  
22 numbers that you've posed here today. However,  
23 upon advice of counsel, they've instructed me I  
24 must assert my rights under the Sixth, Fifth and  
25 Fourteenth Amendment.

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1 **Q Is (212) 517-7580, a telephone number**  
2 **that you used between 2001 and 2006 in order to**  
3 **get girls under the age of 18 to come to your**  
4 **home for your sexual pleasure?**  
5 MR. PIKE: Form.  
6 A Mr. Horowitz, I would very much like to  
7 answer every one of your questions regarding  
8 various numbers you've thrown out here today. I  
9 have to answer that question like I've answered  
10 all your other questions here today, which is on  
11 advice of counsel I may not answer these  
12 questions as they may not be relevant to another  
13 lawsuit --  
14 **Q Sir -- go ahead, sorry.**  
15 A -- though I would like to, I am going to  
16 have to assert my rights as instructed by  
17 counsel, under the Sixth, Fifth and Fourteenth  
18 Amendment.  
19 **Q Sir, is the telephone number (212)**  
20 **517-7580 a telephone number that you directed**  
21 **others to use in order to bring girls to your**  
22 **home for your sexual pleasure?**  
23 MR. PIKE: Form.  
24 A Though I would like to answer each and  
25 every one of your questions, Mr. Horowitz,

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1 regarding these various phone numbers you've  
2 thrown out today, my counsel have advised me that  
3 I may not, and must assert my rights under the  
4 Sixth, Fifth and Fourteenth Amendment.  
5 **Q Sir, have you ever paid the phone bill**  
6 **for telephone number (917) 855-3363?**  
7 MR. PIKE: Form.  
8 A Mr. Horowitz, I would very much like to  
9 answer all your questions regarding all the  
10 various phone numbers you've thrown out here  
11 today. However, on advice of counsel they've  
12 asked me to assert my Sixth, Fifth and Fourteenth  
13 Amendment right.  
14 **Q Sir, is the telephone number (917)**  
15 **855-2262 a telephone number that you used between**  
16 **2001 and 2006 in order to get underage girls to**  
17 **come to your home for your sexual pleasure?**  
18 MR. PIKE: Form.  
19 A Mr. Horowitz, with respect to all these  
20 phone numbers you keep throwing out, I have to  
21 unfortunately answer the question the same way as  
22 I've answered all your other questions here  
23 today, which is I'm going to have to assert my  
24 rights upon the advice of counsel under the  
25 Sixth, Fifth and Fourteenth Amendment.

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1 **Q Sir, is (917) 855-3363 a telephone**  
2 **number that you directed other people to use in**  
3 **order to get girls to come to your home for your**  
4 **sexual pleasure?**  
5 MR. PIKE: Form.  
6 A Although I would like to answer every  
7 one of your questions regarding the various phone  
8 numbers that you've thrown out today, at least  
9 today, upon advice of counsel, I have to assert  
10 my rights under the Sixth, Fifth and Fourteenth  
11 Amendment.  
12 **Q Have you ever paid the phone bill for**  
13 **telephone number (561) 308-0282?**  
14 MR. PIKE: Form?  
15 A With respect to all the phone numbers  
16 you've thrown out here today and asked questions  
17 with regard to today, my counsel has advised me I  
18 must assert my rights under the Sixth, Fifth and  
19 Fourteenth Amendment.  
20 **Q Is the telephone number (561) 308-0282 a**  
21 **telephone number you directed other people to use**  
22 **in order to bring girls under the age of 18 to**  
23 **your home for your sexual pleasure?**  
24 MR. PIKE: Form.  
25 A I have to answer that question as I've

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1 answered most of your other questions here today,  
 2 Mr. Horowitz, which is upon advice of counsel I  
 3 have to assert my rights under the Sixth, Fifth  
 4 and Fourteenth Amendment.

5 **Q Sir, have you ever paid the phone bill**  
 6 **for telephone number (561) 655-4870?**

7 MR. PIKE: Form.

8 A You've asked me many telephone numbers  
 9 here today, Mr. Horowitz. I'm going to have to  
 10 respond to that telephone number as I have to  
 11 each and every one of your other phone numbers  
 12 you've thrown out today, which is upon advice of  
 13 counsel, they've instructed me to assert my  
 14 rights under the Sixth, Fifth and Fourteenth  
 15 Amendment although I would like to answer every  
 16 one of your questions.

17 **Q Is the number (561) 655-4870, a**  
 18 **telephone number that you directed other people**  
 19 **to use in order to bring underage girls to your**  
 20 **home for your sexual pleasure?**

21 MR. PIKE: Form.

22 A Though I would like to answer every  
 23 question regarding phone numbers that you've  
 24 posed here today, Mr. Horowitz, unfortunately my  
 25 counsel advised me I must assert my rights under

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1 the Sixth, Fifth and Fourteenth Amendment.

2 **Q Sir, have you ever owned or had a**  
 3 **beneficial interest in a corporation known as**  
 4 **Nine East 71st Street Corporation?**

5 A I would like to answer every one of your  
 6 questions here today, Mr. Horowitz, but on advice  
 7 of counsel, at least today, I'm going to have to  
 8 assert my rights under the Sixth, Fifth and  
 9 Fourteenth Amendment.

10 **Q Sir, have you ever owned or had a**  
 11 **beneficial interest in J. Epstein & Company?**

12 A Sir, at least today with respect to most  
 13 of your questions, like -- I've answered almost  
 14 all of your questions here today, upon advice of  
 15 counsel, they've asked me to assert my rights  
 16 under the Sixth, Fifth and Fourteenth Amendment.

17 **Q Have you ever owned or had a beneficial**  
 18 **interest or been an officer of Zorro Development**  
 19 **Corporation?**

20 A I would like to answer every one of your  
 21 questions here today, Mr. Horowitz. However,  
 22 upon advice of counsel at least today, they've  
 23 asked me to assert my rights under the Sixth,  
 24 Fifth and Fourteenth Amendment.

25 **Q Have you ever owned or had a beneficial**

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1 **interest in a business entity known as Zorro**  
 2 **Ranch?**

3 A Though I would like to answer every one  
 4 of your questions, I would have to answer that  
 5 one as I've answered all your other questions  
 6 here today, which is upon advice of counsel today  
 7 they've asked me -- instructed me to assert my  
 8 rights under the Sixth, Fifth and Fourteenth  
 9 Amendment.

10 **Q Sir, have you ever owned or had a**  
 11 **beneficial interest, been a director or officer**  
 12 **of New York Strategy Group, LLC?**

13 A Mr. Horowitz, I would like to answer all  
 14 of your questions here today, but unfortunately  
 15 my counsel has asked me -- instructed me to  
 16 assert my rights under the Sixth, Fifth and  
 17 Fourteenth Amendment.

18 **Q Have you ever owned or had a beneficial**  
 19 **interest in or been an officer or director or**  
 20 **founder of the COUQ Foundation?**

21 A Though I would like to answer every one  
 22 of your questions, Mr. Horowitz, I have to  
 23 respond to that question as I have responded to  
 24 almost all of your other questions here today,  
 25 which is that upon advice of counsel, they've

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1 instructed me I must assert my rights under the  
 2 Sixth, Fifth and Fourteenth Amendment.

3 **Q Have you ever been an owner, shareholder**  
 4 **or had a beneficial interest in Financial**  
 5 **Strategy Group, Inc.?**

6 A I would like to answer that question, as  
 7 well as every other question you've posed here  
 8 today. However, my counsel has advised me that  
 9 at least today I must assert my rights under the  
 10 Sixth, Fifth and Fourteenth Amendment.

11 **Q Have you ever owned or had a beneficial**  
 12 **interest or been a shareholder in Financial**  
 13 **Trustees, Inc.?**

14 A Though I would like to answer every one  
 15 of your questions here, that you've posed here  
 16 today, Mr. Horowitz, I have to unfortunately  
 17 answer that question the same way as I've  
 18 answered almost all of your other questions here  
 19 today. Upon advice of my counsel they've  
 20 instructed me to assert my Sixth, Fifth and  
 21 Fourteenth Amendment right.

22 **Q Sir, have you ever been an owner,**  
 23 **shareholder, officer or director of the Gislaine**  
 24 **Corporation?**

25 A Can you spell that?

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1       **Q G-i-s-l-a-i-n-e, am I mispronouncing?**  
 2       A Yes.  
 3       **Q How would you pronounce it?**  
 4       A Gislaine.  
 5       **Q Okay.**  
 6       A I'm sorry, but today at least I have to  
 7 assert my rights under the Sixth, Fifth and  
 8 Fourteenth Amendment upon advice of counsel.  
 9       **Q Sir, have you ever been an**  
 10 **owner/shareholder or director of the LAW**  
 11 **Plantation Management Corporation?**  
 12       A I would like to answer every one of your  
 13 questions here today, Mr. Horowitz, with respect  
 14 to that one, as well as all the others, I have to  
 15 assert my rights under the Sixth, Fifth and  
 16 Fourteenth Amendment.  
 17       **Q Sir, have you ever been an owner,**  
 18 **shareholder or director of a business entity**  
 19 **known as Epstein Interests?**  
 20       A With respect to that question, as well  
 21 as all of your other questions here today, my  
 22 counsel advised me I may only answer the  
 23 questions by asserting my rights under the Sixth,  
 24 Fifth and Fourteenth Amendment.  
 25       **Q Sir, have you ever been officer,**

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1       **director, shareholder or employee of the Wexner**  
 2 **Investment Group?**  
 3       A I have to respond to that question as I  
 4 have responded to all your other questions here  
 5 today, Mr. Horowitz. Upon advice of counsel  
 6 they've instructed me to assert my rights under  
 7 the Sixth, Fifth and Fourteenth Amendment.  
 8       **Q Sir, have you ever been a shareholder or**  
 9 **owner of MC Squared Modeling?**  
 10       A With respect to that question, as all  
 11 the other questions you've posed here today, my  
 12 counsel has advised me I must assert my rights  
 13 under the Sixth, Fifth and Fourteenth Amendment.  
 14       **Q Sir, do you have an ownership or**  
 15 **beneficial interest in a business entity known as**  
 16 **JECE?**  
 17       A I'm going to have to respond to that  
 18 question as I responded to all of your other  
 19 questions here today, Mr. Horowitz, which is, on  
 20 advice of counsel they've asked me to assert my  
 21 rights under the Sixth, Fifth and Fourteenth  
 22 Amendment.  
 23       **Q Sir, do you have an ownership or**  
 24 **beneficial interest or even an employee of an**  
 25 **entity known as the Florida Science Foundation?**

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1       THE WITNESS: Take a quick...  
 2       (Indicating counsel.)  
 3       THE VIDEOGRAPHER: Going off the video  
 4 record 11:53 a.m.  
 5       (Pause in the proceedings.)  
 6       THE VIDEOGRAPHER: Back on the record  
 7 11:56 a.m.  
 8       (The record was read.)  
 9       A Yes.  
 10       **Q Are you an owner of the Florida Science**  
 11 **Foundation?**  
 12       A On advice of counsel, at least today,  
 13 sir, I have been instructed to assert my rights  
 14 under the Sixth, Fifth and Fourteenth Amendment.  
 15       **Q Are you an employee of Florida Science**  
 16 **Foundation?**  
 17       A Yes.  
 18       **Q What do you do in your role as an**  
 19 **employee of Florida Science Foundation?**  
 20       A Though I would like to answer all of  
 21 your questions here today, Mr. Horowitz, upon  
 22 advice of counsel, they've instructed me I must  
 23 assert my rights under the Sixth, Fifth and  
 24 Fourteenth Amendment.  
 25       **Q What kind of work is the Florida Science**

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1       **Foundation involved in, if any?**  
 2       MR. PIKE: Form.  
 3       A Though I would very much like to answer  
 4 all of your questions here today, Mr. Horowitz,  
 5 upon advice of counsel, they've instructed me to  
 6 assert my rights under the Sixth, Fifth and  
 7 Fourteenth Amendment.  
 8       **Q Where do you work for the Florida**  
 9 **Science Foundation?**  
 10       MR. PIKE: Form.  
 11       A At 250 South Australian. That's the  
 12 offices.  
 13       **Q Is that the City of West Palm Beach?**  
 14       A Yes, sir.  
 15       **Q During what hours do you work at the**  
 16 **Florida Science Foundation?**  
 17       A Upon advice of counsel, sir, they've  
 18 instructed me to assert my rights under the  
 19 Sixth, Fifth and Fourteenth Amendment.  
 20       **Q How long have you been working at the**  
 21 **Florida Science Foundation?**  
 22       MR. PIKE: Form.  
 23       A I would like to answer all of your  
 24 questions here today, Mr. Horowitz. However,  
 25 upon advice of counsel, at least today, they've



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1 instructed me to assert my rights under the  
 2 Sixth, Fifth and Fourteenth Amendment.  
 3 **Q On what days do you work for the Florida  
 4 Science Foundation?**  
 5 MR. PIKE: Form.  
 6 A Though I would like to answer each one  
 7 of your questions here today, my counsel has  
 8 advised me that at least today I must assert my  
 9 rights under the Sixth, Fifth and Fourteenth  
 10 Amendment.  
 11 **Q Who else, if anyone, works for the  
 12 Florida Science Foundation?**  
 13 MR. PIKE: Form.  
 14 A Though I would like to --  
 15 MR. PIKE: You know that's standard  
 16 Fifth Amendment, anyway.  
 17 A Though I would like to answer each and  
 18 every one of your questions today, Mr. Horowitz,  
 19 my counsel has advised me with respect to that  
 20 question, I must assert my rights under the  
 21 Sixth, Fifth and Fourteenth Amendment.  
 22 **Q Is the Florida Science Foundation a  
 23 for-profit or nonprofit corporation?**  
 24 A Upon advice of counsel, sir, with  
 25 respect to that question, I'm going to have to

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1 assert my rights under the Sixth, Fifth and  
 2 Fourteenth Amendment.  
 3 MR. HOROWITZ: Sir, at this moment in  
 4 time, I don't have further questions. There  
 5 may be some other questions that arise from  
 6 other people's questions.  
 7 THE WITNESS: All right.  
 8 MR. PIKE: Thank you, Mr. Horowitz.  
 9 MR. EDWARDS: Does anybody want to  
 10 address what we are going to do for lunch?  
 11 MR. HOROWITZ: You don't have to type  
 12 this.  
 13 (Discussion off the record.)  
 14 THE VIDEOGRAPHER: Off the video record  
 15 at 12:00 o'clock noon.  
 16 (Pause in the proceedings.)  
 17 THE VIDEOGRAPHER: Back on the video  
 18 record 12:11 p.m.  
 19 MR. EDWARDS: Ready?  
 20 MR. PIKE: Yes, thank you.  
 21 THE WITNESS: Yes.  
 22 **Q I represent Jane Doe in a case against  
 23 you and she is one of like ten representative  
 24 plaintiffs here today. Did you do anything to  
 25 prepare for your deposition today?**

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1 MR. PIKE: To the extent you can answer  
 2 that question without divulging my  
 3 communications with you, you can answer that  
 4 question.  
 5 A No.  
 6 **Q Did you review any materials, such as  
 7 depositions, police reports, anything else in  
 8 preparation for your deposition today?**  
 9 A No.  
 10 **Q Did you review any notes or any  
 11 handwritten materials in preparation for your  
 12 deposition today?**  
 13 A No.  
 14 **Q You have notes on a piece of paper, are  
 15 those notes that you have made or reviewed in  
 16 preparation for your continuation of this  
 17 deposition here today?**  
 18 A No.  
 19 **Q In the past you've told me that some  
 20 time ago at another deposition, that you did not  
 21 like Jane Doe; is that right?**  
 22 A I don't believe -- I have no  
 23 recollection of that.  
 24 **Q To be more specific, and hopefully to  
 25 jog your memory, do you remember telling me you**

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1 like L.M., but don't like my other two, one of  
 2 those clients being Jane Doe; do you recall that?

3 A I would like to answer every one of your  
 4 questions, Mr. Edwards, but today at least, my  
 5 counsel advised me I must assert my rights under  
 6 the Sixth, Fifth and Fourteenth Amendment.  
 7 **Q Why don't you like Jane Doe?**  
 8 MR. PIKE: Form.  
 9 A I would like to answer every one of your  
 10 questions, Mr. Edwards. However, today my  
 11 counsel has advised me that I measures assert my  
 12 rights under the Sixth, Fifth and Fourteenth  
 13 Amendment.  
 14 **Q Did you sexually molest Jane Doe when  
 15 she was 14 and 15 years old?**  
 16 MR. PIKE: Form.  
 17 A I would like to answer all of your  
 18  
 19  
 20  
 21  
 22  
 23  
 24  
 25

421	<p>1 questions with respect to Jane Doe. However my 2 counsel here today advised me I may not and must 3 assert my rights under the Sixth, Fifth and 4 Fourteenth Amendment.</p> <p>5 MR. EDWARDS: Move to strike as 6 nonresponsive.</p> <p>7 Q When you say you would like to answer 8 the questions, but your counsel has instructed 9 you that you must invoke your Fifth, Sixth and 10 Fourteenth Amendment rights, are you saying that 11 you disagree with the advice of your counsel?</p> <p>12 MR. PIKE: I instruct you not to answer 13 that question.</p> <p>14 MR. EDWARDS: On what ground?</p> <p>15 MR. PIKE: I don't need to give you 16 grounds.</p> <p>17 MR. EDWARDS: It is not a privilege, 18 just something you're instructing him not to 19 answer?</p> <p>20 MR. PIKE: Absolutely it is a 21 privilege. You heard him, what he said. He 22 is invoking his Sixth, Fifth and Fourteenth 23 Amendment in and as a result of his advice 24 of counsel. Your question elicits 25 attorney/client communications as well as</p>	423	<p>1 Q Have you read the statute or been 2 instructed upon the Florida statute related to 3 lewd and lascivious molestation?</p> <p>4 MR. PIKE: Form, instruct you not to 5 answer that question, attorney/client work 6 product, as worded.</p> <p>7 Q Other than your attorney telling you 8 about the statute, or reading that statute to 9 you, I certainly do not want and am not entitled 10 to communications between you and your attorney, 11 but have you otherwise familiarized yourself, 12 either by way of reading the statute or being 13 told by somebody other than your attorneys, 14 regarding the statute lewd and lascivious 15 molestation?</p> <p>16 MR. PIKE: Form.</p> <p>17 A Though I would like to answer every one 18 of you ever questions here today, Mr. Edwards, 19 most of your questions I have to respond by 20 asserting on advice of counsel my Sixth, Fifth 21 and Fourteenth Amendment right.</p> <p>22 Q Lewd and lascivious molestation is 23 defined in Florida as a person who intentionally 24 touches in a lewd or lascivious manner, the 25 breasts, genitals, general area, or buttocks, or</p>
422	<p>1 work product.</p> <p>2 Q So, attorney/client work product is the 3 basis for your objection? I understand.</p> <p>4 MR. PIKE: Yeah.</p> <p>5 Q Mr. Epstein, are you going to follow 6 your advice of counsel and invoke your Fifth 7 Amendment right against self-incrimination and 8 not answer that question?</p> <p>9 A I'm going to follow my advice of 10 counsel.</p> <p>11 Q Mr. Epstein, are you familiar with the 12 laws in Florida on lewd and lascivious 13 molestation?</p> <p>14 MR. PIKE: Form.</p> <p>15 A On advice of counsel I have to assert my 16 rights with the Sixth, Fifth and Fourteenth 17 Amendment.</p> <p>18 Q Do you understand my question in that 19 I'm not asking you whether you committed any 20 crimes related to the statute, only whether or 21 not you are familiar with the Florida statute on 22 lewd and lascivious molestation; do you 23 understand that question?</p> <p>24 MR. PIKE: Form.</p> <p>25 A What does "familiar" mean.</p>	424	<p>1 the clothing covering them, of a person less than 2 16 years of age, or forces or entices a person 3 under 16 years of age to so touch the 4 perpetrator."</p> <p>5 Having read that, isn't that a statute 6 that you violated on numerous occasions against 7 Jane Doe when she was a minor?</p> <p>8 MR. PIKE: Form.</p> <p>9 A I would -- have to assert my rights 10 under the Sixth, Fifth and Fourteenth Amendment 11 upon advice of counsel, Mr. Edwards.</p> <p>12 Q Subchapter six of that statute involves 13 a crime of lewd and lascivious conduct that in 14 Florida is defined as a person who intentionally 15 touches a person under 16 years of age in a lewd 16 and lascivious manner, or a person who 17 intentionally masturbates in the presence of a 18 victim under 16 years of age." Those are also 19 sections of that Florida statute that you 20 violated against the then minor, Jane Doe; is 21 that true?</p> <p>22 MR. PIKE: Form.</p> <p>23 A I would like to answer all of your 24 questions with respect to Jane Doe, Mr. Edwards. 25 However, today my counsel has advised me that I</p>

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1 am to assert my rights under the Sixth, Fifth and  
2 Fourteenth Amendment.

3 MR. EDWARDS: Move to strike the  
4 nonresponsive portion of that answer.

5 MR. PIKE: What's nonresponsive?

6 MR. EDWARDS: What you would like to do  
7 is not responsive to the question related to  
8 his course of conduct. "Did you molest  
9 her," is either "yes" or "no" or "invoked."  
10 I don't really care and I don't think it is  
11 relevant, what he would like to do. That's  
12 the part I would move to strike.

13 MR. PIKE: If that's the part you're  
14 moving to strike, it is duly noted in the  
15 record.

16 MR. EDWARDS: Okay.

17 MR. PIKE: I object to that. For the  
18 record, based upon your comment, there have  
19 been several depositions in these  
20 consolidated cases and there has been  
21 implied arguments from the plaintiff's side  
22 relative to the Fifth Amendment waiver and  
23 why Mr. Epstein is invoking the Sixth, Fifth  
24 and Fourteenth Amendment Constitutional  
25 privileges and there are various adverse

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1 inferences that I'm sure the plaintiffs will  
2 attempt to gain.

3 There have been arguments made relative  
4 to the Fifth Amendment and I think that you  
5 have, in particular, Mr. Edwards, have  
6 attempted to balance what Mr. Epstein would  
7 like to do, versus what if he did that,  
8 whether or not there would be a waiver of  
9 the Fifth, the Sixth and the Fourteenth. So,  
10 I understand your motion to strike and it is  
11 noted on the record, but I have to make  
12 clear for the record that there have been  
13 those arguments made and there is a balance  
14 as to what someone would like to do versus  
15 what someone can do, and the resulting  
16 consequences of that being waiver.

17 **Q Given what your attorney just said, my  
18 understanding that... You have been instructed  
19 that if you answer these questions, as you would  
20 like to, that it would incriminate you?**

21 MR. PIKE: Mischaracterizes my  
22 objection; and I instruct you not to  
23 answer.

24 **Q Why is it that you would like to answer  
25 questions about whether or not you violated**

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1 **molestation statutes against Jane Doe?**

2 MR. PIKE: Form.

3 A Upon advice of counsel, Mr. Edwards, I  
4 have to respond to that question as I responded  
5 to most of your other questions here today, by  
6 asserting my rights under the Sixth, Fifth and  
7 Fourteenth Amendment.

8 I prefer to, in fact, respond to your  
9 partner who helped file this lawsuit, but he is  
10 currently in jail. You might want to strike that  
11 as nonresponsive, but the ladies and gentlemen of  
12 the jury will eventually know that most of these  
13 cases have been brought by your firm, your  
14 partner who sits in a jail for fabricating cases  
15 of sexual nature against people like me and  
16 others.

17 **Q Okay. Let's talk about that, then.  
18 You're talking about Scott Rothstein? Is that  
19 right? You're saying my former partner. Is that  
20 who you're referring to that sits in jail?**

21 A Correct.

22 **Q Okay, what about anything that Scott  
23 Rothstein did, affects your answer to my question  
24 as to whether or not you molested Jane Doe back  
25 in 2003 and 2004?**

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1 MR. PIKE: Form?

2 A I would like to answer that question  
3 with respect to Scott Rothstein, his fabricated  
4 cases and the reason he sits in jail. However,  
5 today, at least today, my counsel has advised me  
6 I must assert my rights under the Sixth, Fifth  
7 and Fourteenth Amendment.

8 **Q You say "at least today," but that's  
9 something we have gone through with you day after  
10 day, after day, and you say "at least today," and  
11 we wait for the next deposition and again there  
12 is assertion of a Fifth Amendment right. Is  
13 there ever going to be a day where you do answer  
14 the questions?**

15 MR. PIKE: Form. Move to strike.

16 A On advice of counsel, as I've answered  
17 most of your other questions here today, be them  
18 argumentative or not, meant for other purposes or  
19 not, my answer is going to be that my counsel has  
20 advised me that at least today I must assert my  
21 rights under the Sixth, Fifth and Fourteenth  
22 Amendment.

23 **Q You indicated in your previous answer  
24 that most of the cases were brought by me or my  
25 former partner, Scott Rothstein. My**

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1 **understanding is that there were more than 20**  
 2 **cases brought against you alleging you sexually**  
 3 **abused minors, and I have personally only filed**  
 4 **three. How many are you aware of in addition to**  
 5 **the three that Scott Rothstein filed, or brought,**  
 6 **as you say?**  
 7 MR. PIKE: Form, mischaracterizes the  
 8 witness's testimony.  
 9 MR. EDWARDS: Do you want the previous  
 10 answer read back related to that?  
 11 MR. PIKE: No, I think his answer will  
 12 be the same.  
 13 A At least today I have to respond to that  
 14 question as I've responded to most of your other  
 15 questions here today, Mr. Edwards, which is, at  
 16 least today I have to assert my rights under the  
 17 Fifth, Sixth and Fourteenth Amendment.  
 18 **Q In a portion of your answer, you**  
 19 **indicated that Scott Rothstein fabricated cases.**  
 20 **Are you alleging that the case of Jane Doe**  
 21 **against Jeffrey Epstein is a fabricated case?**  
 22 MR. PIKE: Form.  
 23 A I would like to answer each one of your  
 24 questions here today, Mr. Edwards, especially  
 25 with respect to Jane Doe. However, my counsel

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1 has instructed me I must assert my rights under  
 2 the Sixth, Fifth and Fourteenth Amendment.  
 3 **Q Mr. Epstein, do you know a gentleman**  
 4 **named Jean Luc Brunel and the last name is**  
 5 **spelled B-r-u-n-e-l.**  
 6 MR. PIKE: Form.  
 7 A My counsel has advised me at least  
 8 today, Mr. Edwards, as I've responded to most of  
 9 your other questions, I have to assert my right  
 10 under the Sixth, Fifth and Fourteenth Amendment.  
 11 **Q Mr. Brunel is somebody that you know to**  
 12 **be a child molester; is that right?**  
 13 MR. PIKE: Form.  
 14 A I would like to answer every one of your  
 15 questions here today, Mr. Edwards. However, on  
 16 advice of counsel, they've instructed me I must  
 17 assert my rights under the Sixth, Fifth and  
 18 Fourteenth Amendment.  
 19 **Q Mr. Brunel has been a close friend of**  
 20 **yours for years and is still a close friend of**  
 21 **yours today; is that right?**  
 22 MR. PIKE: Form.  
 23 A Though I would like to answer every one  
 24 of your questions posed here today, I have to  
 25 answer that one as I've answered most of your

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1 other questions, which is, that upon advice of  
 2 counsel, at least today, they've instructed me  
 3 that I must assert my rights under the Sixth,  
 4 Fifth and Fourteenth Amendment.  
 5 **Q Isn't it also true that through the**  
 6 **years he has sent you as, quote, unquote,**  
 7 **"gifts," underage females, as young as 12 years**  
 8 **old for you to illegally engage in sex with?**  
 9 MR. PIKE: Form.  
 10 A I'm going to respond to that question as  
 11 I responded to most of your other questions,  
 12 which is, upon advice of counsel, at least today,  
 13 though I would like to answer the question,  
 14 they've instructed me I must assert my rights  
 15 under the Sixth, Fifth and Fourteenth Amendment.  
 16 **Q In fact, you know that we served Mr.**  
 17 **Brunel for deposition in this case. Are you**  
 18 **aware of that?**  
 19 MR. PIKE: Form.  
 20 A I'm going to have to respond to that  
 21 question as I respond to all your other questions  
 22 here today, Mr. Edwards, which is by asserting my  
 23 rights under the Sixth, Fifth and Fourteenth  
 24 Amendment.  
 25 **Q He has been a house guest at your house**

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1 **on numerous occasions this year; isn't that**  
 2 **true?**  
 3 MR. PIKE: Form.  
 4 A Though I would like to answer every one  
 5 of your questions here today, Mr. Edwards, I have  
 6 to respond to that question on advice of counsel  
 7 the same way as I've responded to all of your  
 8 other questions, which is, I must assert my  
 9 rights under the Sixth, Fifth and Fourteenth  
 10 Amendment.  
 11 **Q I've asked you simply, if Mr. Brunel has**  
 12 **been a house guest of yours during the year 2010,**  
 13 **and you're choosing to invoke your Fifth**  
 14 **Amendment right against self-incrimination and**  
 15 **basing that on your counsel's advice.**  
 16 **Does your counsel know that you made**  
 17 **that representation to Probation already this**  
 18 **year?**  
 19 MR. PIKE: Form.  
 20 **Q Do you understand the question?**  
 21 A Are you asking me what my counsel  
 22 knows?  
 23 **Q No.**  
 24 A I think you just asked what my counsel  
 25 knows.

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1 MR. PIKE: That's exactly what --  
2 A You should ask my counsel.  
3 Q Here is my point: You've indicated to  
4 your Probation Officer this year, in fact, I'll  
5 ask it this way: Have you indicated to your  
6 Probation Officer that Jean Luc Brunel has been a  
7 house guest of yours during the year 2010?  
8 MR. PIKE: Form.  
9 A I have been instructed by my counsel to  
10 answer that question, as I have been instructed  
11 to answer most of your other questions here  
12 today, which is by asserting my rights under the  
13 Sixth, Fifth and Fourteenth Amendment.  
14 Q Do you know an attorney named Tama  
15 Kudman?  
16 MR. PIKE: Form -- actually that's not  
17 "form." I withdraw that.  
18 A No.  
19 Q Did Mr. Brunel tell you that Tama Kudman  
20 was an attorney that was hired to represent him  
21 in this case?  
22 MR. PIKE: I'm sorry, hold on.  
23 MR. EDWARDS: Did Mr. Brunel tell him.  
24 MR. PIKE: Okay, form.  
25 A I'm going to have to answer that

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1 question as I've answered most of your other  
2 questions here today, Mr. Edwards, which is by  
3 asserting my rights under the Sixth, Fifth and  
4 Fourteenth Amendment.  
5 Q And did you or some entity that you own  
6 or control pay for the services of Tama Kudman to  
7 represent Jean Luc Brunel, in this matter?  
8 MR. PIKE: Form.  
9 A ... I'm going to have to assert my rights  
10 under the Sixth, Fifth and Fourteenth Amendment  
11 upon advice of counsel.  
12 Q I certainly don't want to get into this  
13 too often during this deposition but it is  
14 visibly noticed on the video that prior to the  
15 invocation of the Fifth Amendment, there is a  
16 shaking of the head which commonly indicates that  
17 the answer is "No," and I just want to make sure  
18 we are all on the same page, that that was not  
19 your indication and that we can ignore those  
20 types of body movements, as Mr. Pike instructed  
21 me that was the case last time.  
22 MR. PIKE: I think that the record is  
23 clear. The court reporter does not  
24 understand nods of the head, shakes of the  
25 head, "um-hum" --

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1 MR. EDWARDS: Agreed.  
2 MR. PIKE: His response is his verbal  
3 response.  
4 MR. EDWARDS: I understand that, but  
5 certainly if a witness is on the witness  
6 stand we both know they are allowed to  
7 observe the demeanor of the witness and part  
8 of that demeanor is the nodding or shaking  
9 of the head, which are common responses that  
10 is we all know and understand. I just want  
11 to make sure we are on the same page, the  
12 jury can ignore those body movements?  
13 MR. PIKE: As a matter of fact, and as  
14 you know, since you tried several cases,  
15 there is a patterned jury instruction from  
16 the judge that says the jury can, in fact,  
17 take it into consideration.  
18 MR. HOROWITZ: That's the point.  
19 MR. PIKE: I cannot instruct the jury in  
20 this video deposition to ignore anything  
21 that occurs on this video.  
22 MR. EDWARDS: That's why I wanted to  
23 engage -- so I would make sure -- we are a  
24 little inconsistent obviously as to what the  
25 jury should be observing, what they can,

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1 versus his response. I guess for this time  
2 we will get into it.  
3 Q In that last question that I asked you,  
4 related to you or some entity that you control  
5 paying for the services of Ms. Kudman, is the  
6 answer "no" or is the answer that you are  
7 invoking your Fifth Amendment right to remain  
8 silent?  
9 MR. PIKE: Form.  
10 A With respect to that question, as with  
11 respect to all your other questions here today,  
12 Mr. Edwards, upon advice of counsel I have to  
13 assert my rights under the Sixth, Fifth and  
14 Fourteenth Amendment.  
15 Q Isn't it true that you have specifically  
16 instructed Mr. Brunel to avoid his deposition in  
17 this case?  
18 MR. PIKE: Form.  
19 A Upon advice of counsel, as with respect  
20 to most of your other questions here today, I'm  
21 going to answer that the same way by invoking my  
22 rights under the Sixth, Fifth and Fourteenth  
23 Amendment, sir.  
24 Q Mr. Epstein, can you describe for the  
25 jury your various schemes that you have devised

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1 to access underage minor females for sex?  
 2 MR. PIKE: Form.  
 3 A Though I would like to respond to all  
 4 these questions that you've posed here today, Mr.  
 5 Edwards, I'm going to have to assert my rights  
 6 under advice of counsel under the Sixth, Fifth  
 7 and Fourteenth Amendment.  
 8 Q I think the video will reflect that  
 9 prior to your invocation at that time there was a  
 10 smile that I would characterize as a smirk, prior  
 11 to that answer, and I would like to understand,  
 12 was there any intention on your part to convey a  
 13 message by that smile, prior to your invocation?  
 14 MR. PIKE: First of all, this line of  
 15 questioning is not only argumentative, but  
 16 it is harassing, okay?  
 17 MR. EDWARDS: We can play the video for  
 18 whether or not it is harassing.  
 19 MR. PIKE: You can play the video, but  
 20 if someone raises an eyebrow, blinks, does  
 21 something, it is... it is... for you to  
 22 follow up with a harassing question is not  
 23 only improper, but it is a waste of time, of  
 24 attorney resources as well as judicial  
 25 resources. I'm going to let you proceed, I

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1 mean, but... -- come on.  
 2 MR. EDWARDS: With all due respect, I'm  
 3 interpreting it as an intentional act  
 4 designed to dilute the invocation of the  
 5 Fifth Amendment and any adverse inference  
 6 that we may be entitled to, and I think that  
 7 you acknowledged previously that a jury will  
 8 have or could have the ability to view this  
 9 video, and I'm assuming a jury could make  
 10 that same inference, so I want to make sure  
 11 the record is just crystal clear. If the  
 12 answer is one answer and there is no body  
 13 movement, then I'll move on. If there is  
 14 body movement, I'm probably going to address  
 15 it.  
 16 MR. PIKE: I'm going to move to strike  
 17 your last narrative.  
 18 MR. EDWARDS: Okay.  
 19 Q What individuals other than yourself  
 20 helped you to devise your various schemes for  
 21 accessing large numbers of minor females for  
 22 sex?  
 23 MR. PIKE: Form.  
 24 A Though I would like to answer every one  
 25 of your questions today, Mr. Edwards, upon advice

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1 of my counsel, he's instructed me that I may  
 2 not. I must invoke my rights under the Sixth,  
 3 Fifth and Fourteenth Amendment.  
 4 Q Mr. Epstein, is it true that you have  
 5 sexually molested underage minors in every  
 6 community where you have homes or houses?  
 7 MR. PIKE: Form.  
 8 A Though I would like to answer each one  
 9 of your questions here today, Mr. Edwards, I  
 10 would like to answer that question, to you and  
 11 your partner, who sits in jail for fabricating  
 12 cases of a sexual nature against people like me  
 13 and others in South Florida, but today, upon  
 14 advice of my counsel, they've instructed me I  
 15 must assert my rights under the Fifth, Sixth and  
 16 Fourteenth Amendment.  
 17 THE WITNESS: Before you go to the  
 18 bathroom?  
 19 MR. EDWARDS: Move to strike the portion  
 20 of the answer that was nonresponsive.  
 21 MR. PIKE: One second.  
 22 MR. EDWARDS: Move to strike the portion  
 23 of the answer nonresponsive.  
 24 MR. PIKE: Move to strike your motion to  
 25 strike.

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1 MR. EDWARDS: Based on the fact that it  
 2 was responsive? You feel it was  
 3 responsive?  
 4 MR. PIKE: Absolute -- listen --  
 5 MR. EDWARDS: It is fine if you do.  
 6 MR. PIKE: You're harassing the witness,  
 7 you're talking about heads and nod shakes.  
 8 If you want to be clear for the record, I  
 9 think, and I'm -- I think -- I think the  
 10 witness is nodding and shaking his head in a  
 11 manner because your questions are  
 12 argumentative. "Please tell me the scheme  
 13 that you devised."  
 14 "Please tell me who you molested," all  
 15 of these are argumentative questions --  
 16 MR. EDWARDS: If it wasn't true, it  
 17 would be argumentative.  
 18 MR. PIKE: They are just not formed  
 19 right. You are sitting here subjecting the  
 20 witness to questions that -- that are just  
 21 argumentative. They are not structured  
 22 appropriately, and you're taking that and  
 23 you're implying something else for the jury  
 24 on the record, and quite frankly, I don't  
 25 appreciate that. So, yes, to answer your

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1 question, it 100 percent is responsive. He  
 2 is invoking his Sixth, Fifth and  
 3 Fourteenth.  
 4 THE WITNESS: Bathroom break now?  
 5 MR. EDWARDS: That's fine.  
 6 THE VIDEOGRAPHER: Off the video record  
 7 12:35 p.m.  
 8 (Pause in the proceedings.)  
 9 MR. EDWARDS: I will be asking you to  
 10 read back the last question and answer, so  
 11 you're ready.  
 12 THE COURT REPORTER: Certainly.  
 13 THE VIDEOGRAPHER: Back on the video  
 14 record 1:16 p.m.  
 15 MR. EDWARDS: Madam Court Reporter, if  
 16 you could read back the last question, as  
 17 well as the last answer which I have been  
 18 told was responsive.  
 19 THE COURT REPORTER: Certainly.  
 20 (The record was read.)  
 21 **Q Mr. Epstein, why is it that you would**  
 22 **like to tell Scott Rothstein whether you have**  
 23 **sexually molested underage minors in the various**  
 24 **communities where you have homes?**  
 25 MR. PIKE: Form. Mischaracterizes the

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1 witness's testimony.  
 2 A I would like to answer that question, as  
 3 well as all of your other questions, Mr. Edwards,  
 4 however today my counsel has advised me I must  
 5 assert my rights under the Sixth, Fifth and  
 6 Fourteenth Amendment.  
 7 **Q Can you tell the jury what, if anything,**  
 8 **Scott Rothstein has to do with the allegations of**  
 9 **you molesting underage children?**  
 10 MR. PIKE: Form.  
 11 A Though I think the jury will find out  
 12 what Scott Rothstein has to do with all these  
 13 cases, I hope that's the case. I have been  
 14 instructed by my counsel to respond to all of  
 15 your questions, most of your questions here  
 16 today, but I have to assert my Sixth, Fifth and  
 17 Fourteenth Amendment.  
 18 MR. EDWARDS: More to strike the portion  
 19 of nonresponsive related to Scott Rothstein.  
 20 **Q Is it true for the better part of two**  
 21 **decades you have interacted sexually with**  
 22 **underage minors on a daily basis?**  
 23 MR. PIKE: Form.  
 24 A I would like to answer every one of your  
 25 questions here today, Mr. Edwards, especially

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1 that one, however, upon advice of counsel they've  
 2 instructed me that I must assert my rights under  
 3 the Sixth, Fifth and Fourteenth Amendment, and if  
 4 I don't do so, I risk losing that representation.  
 5 **Q What is special about the question of**  
 6 **you molesting children on a daily basis for the**  
 7 **better part of two decades, that you would**  
 8 **especially like to answer that question?**  
 9 MR. PIKE: I'm sorry?  
 10 MR. EDWARDS: His answer was that he  
 11 would especially like to answer that  
 12 previous question and the question posed to  
 13 him was...  
 14 **Q Isn't it true for the better part of two**  
 15 **decades you have molested children on an every**  
 16 **day basis. And I'm asking now, what is it about**  
 17 **that question that makes you especially want to**  
 18 **respond to that one?**  
 19 MR. PIKE: Form.  
 20 A Though I would like to answer that  
 21 question as well as your other questions here  
 22 today, Mr. Edwards, upon advice of counsel,  
 23 they've told me I must assert my rights under the  
 24 Sixth, Fifth and Fourteenth Amendment, or risk  
 25 losing my representation.

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1 **Q Is it true that you have intentionally**  
 2 **preyed on vulnerable children as young as 12**  
 3 **years old on an every day basis, for sexual**  
 4 **purposes for the last decade?**  
 5 MR. PIKE: Form.  
 6 A Though I would like to respond to that  
 7 question, as well as other questions posed by  
 8 you,, and I would prefer to respond to both you  
 9 and your partner, Scott Rothstein, who sits in  
 10 jail for fabricating questions of a sexual  
 11 nature, cases of a sexual nature against people  
 12 like me and others in South Florida. You were  
 13 part of a law firm that the U.S. Attorney refers  
 14 to as one of the largest criminal enterprises in  
 15 South Florida's history, so though I would like  
 16 to answer, and you will probably mark my question  
 17 as nonresponsive, my counsel has told me today I  
 18 must not answer that question and must assert my  
 19 Sixth, Fifth and Fourteenth Amendment right.  
 20 MR. EDWARDS: Move to strike the answer  
 21 as nonresponsive. All other portions  
 22 portion of the answer, all but the  
 23 invocation of the Fifth Amendment.  
 24 **Q Please describe for the jury the plan or**  
 25 **scheme that you employed to access the underage**

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1 **minor females of Palm Beach County, including**  
2 **Jane Doe.**  
3 **MR. PIKE:** Form.  
4 **A** I would like to answer that question as  
5 I would like to have answered most of your other  
6 questions here today, especially with respect to  
7 Jane Doe, as she is your client, but on advice of  
8 counsel they've instructed me that I must, must  
9 assert my Sixth Amendment, Fifth Amendment and  
10 Fourteenth Amendment right, so therefore that's  
11 what I'm going to do.  
12 **Q** **Despite your preference you're going to**  
13 **listen to your counsel.**  
14 **MR. PIKE:** Form, I'm going to instruct  
15 you not to answer that question.  
16 **MR. EDWARDS:** As to whether or not he is  
17 going to listen to counsel?  
18 **MR. PIKE:** He's already invoked on  
19 advice of counsel.  
20 **MR. EDWARDS:** That last question was  
21 taken right out of Bob Critton's play book.  
22 **MR. PIKE:** Take it up with the Court.  
23 Bob Critton is not here, I am.  
24 **Q** **Isn't it true as part of the plan to**  
25 **access young girls between 12 and 17 years old in**

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1 **Palm Beach County, that you would send a message**  
2 **that you would be willing to pay those females**  
3 **for them providing you a massage at your house?**  
4 **MR. PIKE:** Form.  
5 **A** You have to repeat the question.  
6 **Q** **Sure. The initiation, the manner in**  
7 **which you gained access to underage girls between**  
8 **the ages of 12 and 17 in Palm Beach, is that you**  
9 **would initially have somebody tell them that they**  
10 **could come to your house and give you a massage**  
11 **and you would pay them for their time.**  
12 **MR. PIKE:** Form.  
13 **THE WITNESS:** It is not a question.  
14 **A** You didn't ask me a question. You made  
15 a statement.  
16 **THE WITNESS:** If you want to repeat it  
17 back.  
18 (Indicating the court reporter.)  
19 **Q** **I'll make it clearer for you.**  
20 **A** Thank you.  
21 **Q** **Did you send a message to various**  
22 **underage minor females, that you would pay for**  
23 **those underage minor females to provide you a**  
24 **massage at your house?**  
25 **MR. PIKE:** Form.

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1 **A** Though I would like to answer that  
2 question, as well as all the other questions  
3 you've posed here today, Mr. Edwards, upon advice  
4 of counsel, they've instructed me I must assert  
5 my rights under the Sixth, Fifth and Fourteenth  
6 Amendment.  
7 **Q** **With each and every underage minor**  
8 **female that arrived at your house under the idea**  
9 **they were to give you a massage, they were first**  
10 **led up and left alone in your bedroom with you;**  
11 **is that correct?**  
12 **MR. PIKE:** Form.  
13 **A** Again? Repeat the question.  
14 **Q** **This is a scheme that you've employed**  
15 **for years and years, and years, and somehow**  
16 **you're having a hard time grasping how a scheme**  
17 **that you devised worked?**  
18 **MR. PIKE:** No. Move to strike. You  
19 don't have a question on the table.  
20 Actually your previous question prior to  
21 what you just stated did not involve any  
22 word, quote, "scheme," end quote. If you  
23 want to repeat the question, go ahead.  
24 **Q** **Isn't this how it worked, that an**  
25 **underage minor female would come to your house**

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1 **and you instructed or did you instruct Sarah**  
2 **Kellen or one of your other assistants to lead**  
3 **that minor female up to your bedroom to be left**  
4 **alone with you?**  
5 **MR. PIKE:** Form.  
6 **A** Though I would like to answer that  
7 question as well as all the other questions  
8 you've posed here today, Mr. Edwards, upon advice  
9 of my counsel they've instructed me I must assert  
10 my rights under the Sixth, Fifth and Fourteenth  
11 Amendment.  
12 **Q** **Once that underage minor female,**  
13 **normally between the ages of 12 and 17 would**  
14 **arrive in your bedroom, you would then appear**  
15 **naked or wearing only a towel each time; is that**  
16 **correct?**  
17 **MR. PIKE:** Form.  
18 **A** I would like to answer each one of your  
19 questions, Mr. Edwards. However, today my  
20 counsel has advised me that I must assert my  
21 rights under the Sixth, Fifth and Fourteenth  
22 Amendment.  
23 **Q** **After appearing naked or wearing only a**  
24 **towel, then wouldn't you instruct the underage**  
25 **minor female to get naked herself?**



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1 MR. PIKE: Form.

2 A Though I would like to answer all of

3 your questions here today, I'm going to have to

4 respond to that question as I've responded to

5 most of your others here today, which is by my

6 counsel's instructing me that I must assert my

7 rights under the Fifth, Sixth and Fourteenth

8 Amendment.

9 Q Then, once the underage minor female was

10 naked, you would attempt various lewd or

11 lascivious improper sexual acts against that

12 underage minor female, correct?

13 MR. PIKE: Form.

14 A Though I would like to respond to all of

15 your questions, Mr. Edwards, I have to respond to

16 that as I responded to all of the other questions

17 here today that you've posed, which is that my

18 counsel, at least today, has instructed me I must

19 assert my rights under the Sixth, Fifth and

20 Fourteenth Amendment.

21 Q And you would always pay cash money to

22 the underage minor female after you improperly

23 and/or illegally sexually abused that underage

24 minor female, correct?

25 MR. PIKE: Form.

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1 A Though I would like to answer each and

2 every one of your questions here today, Mr.

3 Edwards, my counsel has advised me I must assert

4 my rights under the Sixth, Fifth and Fourteenth

5 Amendment.

6 Q Each of these sessions or sexual

7 interactions between you and underage minor

8 females ended, when you had ejaculated, correct?

9 MR. PIKE: Form.

10 A I would like to answer that question, as

11 I would like to answer all of your other

12 questions here today. However, today at least,

13 my counsel has instructed me that I must assert

14 my rights under the Sixth, Fifth and Fourteenth

15 Amendment.

16 Q After paying the underage minor female

17 for being sexually molested, you would ask the

18 underage minor female to leave her telephone

19 number with one of your assistants; is that

20 correct?

21 MR. PIKE: Form.

22 A I would like to answer that question. I

23 would like to answer most of your other questions

24 here today; however, at least today my counsel

25 has advised me that I may not, and must assert my

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1 rights under the Fifth, Sixth and Fourteenth

2 Amendment or, in fact, potentially lose my right

3 to representation.

4 Q What you're saying with that answer is

5 that your counsel will not represent you anymore

6 if you choose to waive your Fifth Amendment

7 rights and begin to answer these questions?

8 MR. PIKE: No, not at all. On the

9 advice of counsel, if you know what the

10 Sixth Amendment is and how it reads, you

11 would understand what the invocation is, in

12 full. So move to strike your --

13 MR. EDWARDS: Question?

14 MR. PIKE: -- last question, and it

15 mischaracterizes the witness's testimony.

16 Do you know what the Sixth Amendment is, Mr.

17 Edwards?

18 MR. EDWARDS: Yes, and it is not my

19 deposition and I'm not sure your client

20 knows about the effective assistance of

21 counsel or any amendment --

22 MR. PIKE: Do you know how due process

23 clause affects the 6th Amendment?

24 Never mind, just go ahead. I'm sorry.

25 MR. EDWARDS: However, the statement was

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1 made if he answers the questions, as he

2 would prefer to do, which seems remarkable

3 and incredible, then he would be fired or

4 you would be fired from him, and I want to

5 understand what it..

6 Q Why is it that your attorneys will no

7 longer represent you if you choose to do what you

8 want to do, which is answer these questions?

9 MR. PIKE: Move to strike.

10 Do you want to ask a question? Because

11 I'm not quite sure he even testified to

12 that. We have been through several

13 depositions and you are implying something

14 from the invocation of the Fifth, Sixth and

15 Fourteenth that does not exist. There has

16 been no mention of firing, there's been no

17 mention of withdrawing, there's been no

18 mention of anything of the sort.

19 MR. EDWARDS: Can we go back to the

20 question and response that ended with "I

21 risk losing my..."

22 THE COURT REPORTER: Certainly.

23 MR. PIKE: Once again, do you know that

24 the Sixth Amendment is?

25 MR. EDWARDS: Yes.

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1 MR. PIKE: Would you like to Google it?  
 2 Because that Sixth Amendment --  
 3 MR. EDWARDS: She will have a hard time  
 4 going back, if you continue talking. She  
 5 has to type while you talk.  
 6 MR. PIKE: The Sixth Amendment, as  
 7 incorporated into the due process clause,  
 8 which is the Fourteenth Amendment is the  
 9 right to effective assistance of counsel.  
 10 MR. EDWARDS: I understand.  
 11 MR. PIKE: If you read it in full, it  
 12 will kind of shed light and you can probably  
 13 glean the invocation and the meaning of it  
 14 from his response.  
 15 Is there a question?  
 16 MR. EDWARDS: Go back, please.  
 17 (The record was read.)  
 18 **Q So your counsel told you that you must**  
 19 **invoke your Fifth Amendment right to remain**  
 20 **silent, otherwise you will lose your right to**  
 21 **their representation; is that what you're**  
 22 **saying?**  
 23 MR. PIKE: Move to strike.  
 24 Mischaracterizes the witness's testimony,  
 25 and invocation... misconstrues and

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1 misinterprets the Fifth, Sixth and  
 2 Fourteenth Amendments.  
 3 I'm going to instruct you not to answer  
 4 that question, because I don't understand  
 5 it. It was not your response, and  
 6 because --  
 7 MR. EDWARDS: I wrote down the response.  
 8 MR. PIKE: -- and because, if I  
 9 understand, your question, you phrased it  
 10 as, "So if I understand you, your attorney  
 11 told you," so I'm going to instruct you not  
 12 to answer that question because it will,  
 13 apparently, it would disclose my  
 14 communications with you, so there you go.  
 15 MR. EDWARDS: In his answer he said, "My  
 16 counsel said I can't respond," so he is  
 17 telling me already what --  
 18 MR. PIKE: That's not what he said. He  
 19 said "On the advice of counsel."  
 20 MR. EDWARDS: All right.  
 21 **Q The offer was then made to each underage**  
 22 **minor female that each time she returned to your**  
 23 **home and you sexually molest her, she will then**  
 24 **be paid cash; is that correct?**  
 25 MR. PIKE: Form.

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1 A Though I would like to answer that  
 2 question as well as all the other questions  
 3 you've posed here today, Mr. Edwards, I'm afraid  
 4 that upon advice of counsel they've instructed me  
 5 that I must assert my rights under the Sixth,  
 6 Fifth and Fourteenth Amendment.  
 7 **Q And a separate offer was made to each**  
 8 **underage minor female as well. That is, if she**  
 9 **brings you other underage minor females so that**  
 10 **you can sexually abuse, then you would pay a**  
 11 **finder's fee for each underage minor female**  
 12 **brought to you; is that correct?**  
 13 MR. PIKE: Form.  
 14 A I would like to answer every one of the  
 15 questions you've posed here today, Mr. Edwards.  
 16 However, today at least, upon advice of counsel,  
 17 they have instructed me I must assert my rights  
 18 under the Sixth, Fifth and Fourteenth Amendment.  
 19 **Q Haley Robson was a female that brought**  
 20 **you multiple underage minor females; is that**  
 21 **correct?**  
 22 MR. PIKE: Form.  
 23 A Though I would like to answer every one  
 24 of your questions that you've posed here today,  
 25 my counsel has instructed me I must assert my

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1 rights under the Sixth, Fifth and Fourteenth  
 2 Amendment.  
 3 **Q L.M. was an underage minor female that**  
 4 **you first abused when she was 13 years old; is**  
 5 **that correct?**  
 6 MR. PIKE: Form.  
 7 A Though I would like to answer every  
 8 question you have regarding L.M. here today, my  
 9 counsel has instructed me that I must assert my  
 10 rights under the Sixth, Fifth and Fourteenth  
 11 Amendment.  
 12 **Q While L.M. was a minor, she brought you**  
 13 **more than 50 underage minor females that you**  
 14 **sexually abuse, correct?**  
 15 MR. PIKE: Form.  
 16 A I would like to answer all the questions  
 17 you have regarding L.M., here today. However, at  
 18 least today my counsel has instructed me I may  
 19 not. I must assert my right under my Sixth,  
 20 Fifth and Fourteenth Amendment.  
 21 **Q One of the underage minor females**  
 22 **brought to you by L.M. was Jane Doe, when Jane**  
 23 **Doe was age 14; is that correct?**  
 24 MR. PIKE: Form.  
 25 A I would like to answer the questions

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1 regarding Jane Doe and L.M.; Mr. Edwards.  
 2 However, at least today my counsel has instructed  
 3 me I must assert my rights under the Sixth, Fifth  
 4 and Fourteenth Amendment.  
 5 **Q Looking at the operative complaint in**  
 6 **Jane Doe versus Jeffrey Epstein case 80893,**  
 7 **referring to the plaintiff Jane Doe, first**  
 8 **indicates this is an action for damages in an**  
 9 **amount in excess of 50 million dollars.**  
 10 **Is that a number that you would agree**  
 11 **would fairly compensate her, as well as punish**  
 12 **you for the conduct you committed against Jane**  
 13 **Doe?**  
 14 MR. PIKE: Form.  
 15 A I would like to answer that question. I  
 16 would like to answer all of your other questions  
 17 that you've posed here today, Mr. Edwards.  
 18 However, at least today, on advice of counsel  
 19 they've instructed me that I may not and have  
 20 instructed me that I must assert my rights under  
 21 the Sixth, Fifth and Fourteenth Amendment.  
 22 **Q One of the allegations Jane Doe makes is**  
 23 **that Jeffrey Epstein demonstrated sexual**  
 24 **preference and obsession for minor girls. Is it**  
 25 **true that you have a sexual preference and**

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1 **obsession for minor girls?**  
 2 MR. PIKE: Form.  
 3 A I would like to answer the question with  
 4 respect to what Jane Doe said, however, my  
 5 counsel today has instructed me that I must  
 6 assert my rights under the Sixth, Fifth and  
 7 Fourteenth Amendment.  
 8 **Q Another allegation is that defendant**  
 9 **Epstein's planned scheme and enterprise included**  
 10 **an elaborate system wherein the then minor**  
 11 **plaintiff and other minor girls were contacted by**  
 12 **telephone by Epstein, Sarah Kellen or other**  
 13 **unknown employees or assistants working for**  
 14 **Epstein, and were then persuaded to come over to**  
 15 **Epstein's house for the purposes of engaging in**  
 16 **prostitution.**  
 17 **Is that a true statement?**  
 18 MR. PIKE: First, I'm going to object to  
 19 the form and second, I believe you're  
 20 working from a portion of a complaint  
 21 especially with your reference to scheme and  
 22 the RICO allegations that were dismissed  
 23 with prejudice. So, I just want to be  
 24 clear, are you doing discovery on a count  
 25 that no longer exists?

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1 MR. EDWARDS: No, I'm asking if your  
 2 client agrees with the assertion that's  
 3 stated in the complaint, or if he has a  
 4 defense that is going to defeat such  
 5 assertion or evidence that is going to  
 6 defeat such assertion. So I'm simply asking  
 7 your client..  
 8 **Q Is that a true statement?**  
 9 MR. PIKE: Form.  
 10 A I would like to answer all of your  
 11 questions about Jane Doe and your other clients.  
 12 However, today my counsel has told me that I may  
 13 not. I must assert my rights under the Sixth,  
 14 Fifth and Fourteenth Amendment.  
 15 **Q You did personally call Jane Doe on the**  
 16 **telephone on at least one occasion; isn't that**  
 17 **true?**  
 18 MR. PIKE: Form.  
 19 A I would like to answer your questions  
 20 regarding calling Jane Doe, or contacting Jane  
 21 Doe. However, my counsel has instructed me that  
 22 today, at least, I may not. I must assert my  
 23 rights under the Sixth, Fifth and Fourteenth  
 24 Amendment.  
 25 **Q And at the time when you contacted Jane**

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1 **Doe, was the purpose to have her come to your**  
 2 **house and interact with you sexually?**  
 3 MR. PIKE: Form.  
 4 A Can you repeat the question?  
 5 **Q Yes, the time that you called Jane Doe,**  
 6 **was the purpose of your call to have her come to**  
 7 **your house and interact with you sexually?**  
 8 MR. PIKE: Form.  
 9 A I would like to answer that question as  
 10 I would like to answer all of your other  
 11 questions with respect to Jane Doe, your client.  
 12 However, today at least, my counsel has  
 13 instructed me I must assert my rights under the  
 14 Sixth, Fifth and Fourteenth Amendment.  
 15 MR. EDWARDS: Move to strike a portion  
 16 of the answer that's nonresponsive.  
 17 **Q Sarah Kellen was one of your assistants**  
 18 **back in the years 2003, 2004 and 2005, correct?**  
 19 A I would like to answer each one of your  
 20 questions, Mr. Edwards, here today; however, on  
 21 advice of counsel, at least today I'm going to  
 22 have to assert my rights under the Sixth, Fifth  
 23 and Fourteenth Amendment.  
 24 **Q Sarah Kellen called by telephone Jane**  
 25 **Doe when Jane Doe was a minor child, on more than**

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1 **15 occasions; isn't that true?**  
 2 MR. PIKE: Form.  
 3 A Mr. Edwards, I would like to answer  
 4 every one of your questions regarding Jane Doe  
 5 that you've posed here today. However, at least  
 6 today, on advice of counsel I'm going to have to  
 7 assert my rights under the Sixth, Fifth and  
 8 Fourteenth Amendment.  
 9 **Q The purpose of Sarah Kellen contacting**  
 10 **the minor child Jane Doe back in 2003, 2004 and**  
 11 **2005, was always to get her to come to your house**  
 12 **to interact with you sexually; is that correct?**  
 13 MR. PIKE: Form.  
 14 A I would like to answer that question as  
 15 well as all your other questions you've posed  
 16 here today regarding your client, Jane Doe.  
 17 However, at least today, my counsel has advised  
 18 me I must assert my rights under the Sixth, Fifth  
 19 and Fourteenth Amendment.  
 20 **Q Did you or Sarah Kellen or any of your**  
 21 **other assistants contact Jane Doe for some other**  
 22 **purpose than to have her come to your house for**  
 23 **you to sexually molest her?**  
 24 MR. PIKE: Form.  
 25 A Though I would like to answer every

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1 question that you've posed here today regarding  
 2 Jane Doe, Mr. Edwards, my counsel has advised me,  
 3 at least today, that I may not and must assert my  
 4 rights under the Fifth, Sixth and Fourteenth  
 5 Amendment.  
 6 **Q Each call that was made by you or on**  
 7 **your behalf to Jane Doe, was made at a time when**  
 8 **Jane Doe was a minor child, true?**  
 9 MR. PIKE: Form.  
 10 A I would like to answer that question as  
 11 well as all your other questions with regard to  
 12 Jane Doe, Mr. Edwards. However, today my counsel  
 13 has advised me I may not and must assert my  
 14 rights under the Sixth, Fifth and Fourteenth  
 15 Amendment.  
 16 **Q In addition to your Palm Beach home,**  
 17 **isn't it true that you own a, what has been**  
 18 **called a mansion in New York, a ranch in New**  
 19 **Mexico, a home in France, as well as an island in**  
 20 **the Virgin Islands?**  
 21 MR. PIKE: Form.  
 22 A I'm sorry, but today at least, on advice  
 23 of counsel I have to assert my rights to the  
 24 Sixth, Fifth and Fourteenth Amendment.  
 25 **Q Isn't it true that you traveled by way**

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1 **of your private airplane to Palm Beach for the**  
 2 **specific purpose of luring minor girls to your**  
 3 **mansion for the purposes of sexually abusing**  
 4 **them?**  
 5 MR. PIKE: Form.  
 6 A I would like to answer that question,  
 7 Mr. Edwards,, but today at least, on advice of  
 8 counsel, they've instructed me to assert my  
 9 Sixth, Fifth and Fourteenth Amendment rights.  
 10 **Q Isn't it true that you conspired with**  
 11 **others to contact minor females including Jane**  
 12 **Doe, for the purposes of sexually abusing Jane**  
 13 **Doe?**  
 14 MR. PIKE: Form.  
 15 A I would like to answer that question,  
 16 Mr. Edwards, as well as every other question  
 17 you've posed here today. However, at least today  
 18 upon advice of counsel they've instructed me to  
 19 assert my Sixth, Fifth and Fourteenth Amendment  
 20 right.  
 21 **Q Isn't it true that your sexual**  
 22 **interaction with Jane Doe occurred specifically**  
 23 **during the time period, February 2003 through**  
 24 **June 2005?**  
 25 MR. PIKE: Form.

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1 A I'm going to have to respond to that,  
 2 Mr. Edwards, as I've responded to all your other  
 3 questions, which is that today at least on advice  
 4 of counsel I must assert my rights under the  
 5 Sixth, Fifth and Fourteenth Amendment.  
 6 **Q During the time Jane Doe was under the**  
 7 **age of 16, isn't it true that you digitally**  
 8 **penetrated her vagina?**  
 9 MR. PIKE: Form.  
 10 A I would like to answer that question, as  
 11 well as your other questions. However, at least  
 12 today my counsel has advised me I must assert my  
 13 rights under the Sixth, Fifth and Fourteenth  
 14 Amendment.  
 15 **Q Immediately following that question, you**  
 16 **clearly smiled and rolled your eyes. Is there**  
 17 **anything that we should read or the jury should**  
 18 **read into that body language?**  
 19 MR. PIKE: I'm going to instruct you not  
 20 to answer the question.  
 21 I move to strike it as harassing.  
 22 MR. EDWARDS: Move to strike what as  
 23 harassing? It is something that everybody  
 24 is going to be able to see and I want to  
 25 know what it means, if anything.

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1 MR. PIKE: I'm instructing him not to  
2 answer.  
3 MR. EDWARDS: How are you instructing  
4 not to answer a question?  
5 MR. PIKE: Because I am.  
6 MR. EDWARDS: Based on what?  
7 MR. PIKE: Because it is harassing.  
8 MR. EDWARDS: I'm not harassing. I want  
9 to know why he did what he did.  
10 MR. PIKE: You are harassing him. I  
11 mean, it is an argumentative question --  
12 MR. EDWARDS: He harassed my clients.  
13 MR. PIKE: -- he has been here since  
14 10:00 o'clock. He's given several  
15 depositions. This is Volume III of a  
16 continuation, okay? He's sitting here  
17 waiting for your questions but not waiting  
18 to be harassed.  
19 **Q There is a way to prevent those**  
20 **questions, and that's not do that type of rolling**  
21 **your eyes.**  
22 MR. PIKE: You're not going to instruct  
23 the witness on how to -- the witness is here  
24 behaving professionally --  
25 MR. EDWARDS: In your mind.

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1 MR. PIKE: -- Answering your questions,  
2 invoking his Constitutional rights under the  
3 United States Constitution. And I'm sorry  
4 that that doesn't make you happy, but I'm  
5 not here --  
6 MR. EDWARDS: It doesn't make him happy  
7 either, apparently.  
8 MR. PIKE: -- I'm not here to dispute  
9 and debate with you what privileges are  
10 being invoked and whether you feel it is  
11 right or wrong. If you have a question, ask  
12 the witness a question.  
13 **Q Why did you roll your eyes when I asked**  
14 **you if you digitally penetrated Jane Doe when she**  
15 **was 14 and 15 years old?**  
16 MR. PIKE: I'm instructing you not to  
17 answer that question.  
18 MR. EDWARDS: Your reason for the  
19 instruction is based on some privilege?  
20 MR. PIKE: My reason for the instruction  
21 is that you are attempting to play fast and  
22 loose with the Fifth Amendment and adverse  
23 inference.  
24 MR. EDWARDS: I'm not.  
25 MR. PIKE: Yes, you are, and I'm not

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1 going to let it happen, not on my watch, not  
2 today. You can take it up with the Court.  
3 MR. EDWARDS: I will.  
4 MR. PIKE: Mark the record. If you  
5 will.  
6 MR. EDWARDS: It is marked. I'm just  
7 wondering whether there is going to be a  
8 privilege asserted or it is just going to be  
9 a blanket, "I'm telling the witness not to  
10 answer," related to something that the jury  
11 is going to view and should be entitled to  
12 know what it means.  
13 MR. PIKE: (Counsel shrugs.)  
14 MR. EDWARDS: You just don't like that  
15 your client is giving those body language  
16 responses.  
17 MR. PIKE: No. Move to strike. It has  
18 nothing do with that. It has to do with a  
19 significant fact, that on a legal basis  
20 you're attempting to badger and harass the  
21 witness, based upon what you believe are  
22 some sort of facial expressions and you're  
23 attempting to get an adverse inference from  
24 an answer. I'm not going to let him answer  
25 a harassing question, so you can then get an

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1 adverse inference relative to some gesture.  
2 MR. EDWARDS: We will take it up, fine.  
3 MR. PIKE: Take it up.  
4 **Q Mr. Epstein, isn't it also true that you**  
5 **used a vibrator or vibrating device on Jane Doe's**  
6 **vagina when she was under the age of 16?**  
7 MR. PIKE: Form.  
8 A I would like to answer all of your  
9 questions, Mr. Edwards. However, today on advice  
10 of counsel, they've advised me that I may not and  
11 must assert my rights under the Sixth, Fifth and  
12 Fourteenth Amendment.  
13 **Q Isn't it also true when Jane Doe was a**  
14 **minor child, that you masturbated on multiple**  
15 **occasions in her presence?**  
16 MR. PIKE: Form.  
17 A I would like to answer all of your  
18 questions regarding Jane Doe. However, today my  
19 counsel has advised me that I may not, and have  
20 instructed me to assert my rights under the  
21 Sixth, Fifth and Fourteenth Amendment.  
22 **Q In June of 2008, isn't it true, sir,**  
23 **that you entered pleas of guilty to various**  
24 **felony -- to two felony charges in Palm Beach**  
25 **County?**

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1 MR. PIKE: Asked and answered within  
 2 this deposition.  
 3 A Yes.  
 4 Q And as a result of those guilty pleas  
 5 you were sentenced to 18 months incarceration in  
 6 Palm Beach County jail; is that correct?  
 7 MR. PIKE: Asked and answered.  
 8 A Yes.  
 9 Q In addition to the sentence related to  
 10 those felony charges, isn't it also true that you  
 11 entered into an agreement known as the  
 12 "Nonprosecution Agreement," with the federal  
 13 government?  
 14 MR. PIKE: I'm sorry, would you read  
 15 that back, Madam Court Reporter?  
 16 (The record was read.)  
 17 MR. PIKE: Can you reword the question?  
 18 MR. EDWARDS: Sure.  
 19 Q Did you enter into an agreement with the  
 20 federal government that is entitled  
 21 "Nonprosecution Agreement"?  
 22 A Yes.  
 23 Q And that Nonprosecution Agreement at  
 24 paragraph 7 indicates that "The United States  
 25 shall provide Epstein's attorneys with a list of

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1 individuals whom it has identified as victims, as  
 2 defined in 18 USC 2255, after Epstein has signed  
 3 this agreement, and been sentenced." Have you  
 4 seen the names of the identified victims that  
 5 were supplied by the U.S. Attorney's office?  
 6 A I would like to answer that question as  
 7 I would like to answer most of your other  
 8 questions here today, Mr. Edwards. However, upon  
 9 advice of counsel they've instructed me that I  
 10 must assert my rights under the Sixth, Fifth and  
 11 Fourteenth Amendment.  
 12 Q And isn't it true that Jane Doe was on  
 13 that list of victims that was supplied to you by  
 14 the United States?  
 15 A I would like to answer that question.  
 16 However, at least today my attorneys have advised  
 17 me that I must assert my rights under the Sixth,  
 18 Fifth and Fourteenth Amendment.  
 19 Q In paragraph eight of the Nonprosecution  
 20 Agreement between you, Mr. Epstein, and the  
 21 United States Attorney's Office, it indicates,  
 22 "If any of the individuals, referred to in  
 23 paragraph 7," referring to the list of victims,  
 24 "elects to file a lawsuit pursuant to 18 USC  
 25 2255, Epstein waives his right to contest

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1 liability"?  
 2 Are you familiar with that section of  
 3 the agreement?  
 4 MR. PIKE: Form, and the document speaks  
 5 for itself.  
 6 A The document speaks for itself.  
 7 Q Are you familiar with that portion of  
 8 the document?  
 9 A I'm not sure what you mean by "familiar  
 10 with," sir.  
 11 Q Have you read it?  
 12 A Yes.  
 13 Q So, if Jane Doe were to bring a claim  
 14 exclusively under 18 USC 2255, then you already  
 15 contractually agreed to waive your right to  
 16 contest liability to that claim; is that true?  
 17 MR. PIKE: Form, and calls for a legal  
 18 conclusion.  
 19 A Upon advice of counsel, though I would  
 20 like to answer all of your questions here today,  
 21 they've instructed me I must assert my rights  
 22 under the Sixth, Fifth and Fourteenth Amendment.  
 23 THE WITNESS: Five minutes?  
 24 MR. EDWARDS: Whatever you need.  
 25 THE WITNESS: Okay.

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1 THE VIDEOGRAPHER: Going off the video  
 2 record 1:51 p.m.  
 3 (Pause in the proceedings.)  
 4 THE VIDEOGRAPHER: Back on the video  
 5 record 1:57 p.m.  
 6 Q The specific federal statute that is  
 7 incorporated in the Nonprosecution Agreement, 18  
 8 USC 2255, states -- rather than do it that way,  
 9 let me just ask the question.  
 10 Mr. Epstein, did you knowingly conspire  
 11 with others to use a telephone to persuade,  
 12 induce or entice minor females, including Jane  
 13 Doe, to engage in prostitution?  
 14 MR. PIKE: Form.  
 15 A Though I would like to answer that  
 16 question, as most of your other questions, I have  
 17 to respond by telling you that my attorneys have  
 18 told me, at least today, that I must assert my  
 19 rights under the Sixth, Fifth and Fourteenth  
 20 Amendment.  
 21 Q Mr. Epstein, did you knowingly and  
 22 willfully conspire with others to travel  
 23 interstate for the purpose of engaging in illicit  
 24 sexual conduct with minors, including Jane Doe?  
 25 MR. PIKE: Form.

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1 A Though I would like to answer that  
2 question, as well as most of your other questions  
3 here today, Mr. Edwards, in fact, all of the  
4 other questions here today, my counsel has  
5 instructed me at least today, I must assert my  
6 rights under the Fifth, Sixth and Fourteenth  
7 Amendment.  
8 Q Mr. Epstein, did you use a telephone to  
9 knowingly persuade, induce or entice minor  
10 females, including Jane Doe, to engage in  
11 prostitution?  
12 MR. PIKE: Form.  
13 A Though I would like to answer that  
14 question, as well as your other questions today,  
15 Mr. Edwards, at least today, my counsel has  
16 instructed me that I must assert my rights under  
17 the Sixth, Fifth and Fourteenth Amendment.  
18 Q Mr. Epstein, did you travel, interstate  
19 commerce for the purpose of engaging in illicit  
20 sexual conduct with minor females, including Jane  
21 Doe?  
22 MR. PIKE: Form.  
23 A Though I would like to answer that  
24 question, as well as the other questions you've  
25 posed here today, Mr. Edwards, I'm afraid that my

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1 counsel has instructed me that I must assert my  
2 rights under the Sixth, Fifth and Fourteenth  
3 Amendment.  
4 Q Isn't it true that you agreed with the  
5 federal government that if Jane Doe brought  
6 claims exclusively alleging those sections of 18  
7 USC 2255 that I've read in the preceding, four  
8 paragraphs, that you would admit liability unto  
9 her as an identified victim?  
10 MR. PIKE: Form.  
11 A I don't believe that's what the document  
12 says.  
13 Q The document says, "If any of the  
14 individuals referred to in paragraph 7 elects to  
15 file suit pursuant to 18 USC 2255, Epstein waives  
16 his right to contest liability, and also waives  
17 his right to contest damages up to an amount as  
18 agreed to between the identified individual and  
19 Epstein, so long as the identified individual  
20 elects to proceed exclusively under 18 USC  
21 2255."  
22 That's the provision. I'll ask you then  
23 the question: Didn't you agree with the federal  
24 government that if Jane Doe, an identified  
25 victim, proceeds in a case against you,

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1 exclusively under 18 USC 2255, that you waived  
2 your right to contest liability?  
3 MR. PIKE: Form. Also, could call for  
4 the disclosure of attorney/client  
5 communications and work product, and is  
6 protected under the Federal Rule of Evidence  
7 502408, as well as 410?  
8 A Though I would like to answer that  
9 question, Mr. Edwards, I have to invoke my rights  
10 under the Sixth, Fifth and Fourteenth Amendment.  
11 Q In a recent motion for summary judgment  
12 filed on your behalf, a statement is made,  
13 "Epstein never using a facility or means of  
14 interstate commerce, knowingly persuaded, induced  
15 or enticed Jane Doe when she was under the age of  
16 18 years, to engage in prostitution or sexual  
17 activity for which any person can be charged with  
18 a criminal offense or attempted to do so." That  
19 is a false statement, true?  
20 MR. PIKE: Form.  
21 A Though I would like to answer that  
22 question, on advice of counsel I have been  
23 instructed to assert my rights under the Sixth,  
24 Fifth and Fourteenth Amendment.  
25 Q The statement was also made on your

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1 behalf, "Epstein never attempted to or conspired  
2 to knowingly transport Jane Doe in interstate or  
3 foreign commerce or in any Commonwealth territory  
4 or possession of the United States, with intent  
5 that Jane Doe engage in prostitution or in any  
6 sexual activity for which any person can be  
7 charged with a criminal offense."  
8 That is also a false statement; isn't  
9 that right?  
10 MR. PIKE: Form.  
11 A You said "Jane Doe."  
12 Q Jane Doe is Jane Doe in this case.  
13 MR. PIKE: Form.  
14 A I believe her deposition speaks to  
15 that. With respect to anything else, I have to  
16 assert my rights under the Sixth, Fifth and  
17 Fourteenth Amendment.  
18 Q You believe that Jane Doe's deposition  
19 speaks to whether you attempted or conspired to  
20 knowingly transfer Jane Doe in interstate  
21 commerce, correct?  
22 MR. PIKE: Form.  
23 Q You believe her deposition speaks to  
24 that?  
25 A That's my belief, yes.

477	<p>1 Q And then would you adopt her deposition 2 testimony as true and as your support for that 3 assertion? 4 MR. PIKE: Form. 5 A You're asking her entire deposition 6 testimony? 7 Q The deposition as it relates to whether 8 or not you knowingly transported her in 9 interstate commerce. 10 A Well, I would like to answer that 11 question, but on advice of counsel, at least 12 today, I have been instructed to assert my rights 13 under the Sixth, Fifth and Fourteenth Amendment. 14 Q A statement that Epstein never attempted 15 to or conspired to travel in interstate commerce 16 or travel into the United States or travel in 17 foreign commerce for the purpose of engaging in 18 illicit sexual conduct with Jane Doe," is also a 19 false statement, isn't it? 20 MR. PIKE: Form? 21 A I would like to answer that question as 22 well as your other questions, Mr. Edwards. 23 However, today my counsel has instructed me that 24 I must assert my Fifth, Sixth and Fourteenth 25 Amendment right.</p>	479	<p>1 legal consent? 2 MR. PIKE: One second... Form. 3 A Without her legal consent? 4 Q Yes. 5 A Can you tell me what that means? 6 Q In order to answer that question, I need 7 to explain to you what legal consent means? 8 A Yes, sir. 9 Q Let's start with this question -- 10 A Can you explain it to me? 11 Q Do you believe that a 14-year old child 12 can legally consent to sexual interaction with a 13 man like you that was over the age of 50? 14 MR. PIKE: Form. 15 THE WITNESS: Asking for a legal... 16 MR. PIKE: Go ahead and invoke? 17 A I would like to answer that question, if 18 I understood it correctly. However, my attorneys 19 have advised me today at least to invoke my 20 Sixth, Fifth and Fourteenth Amendment right. 21 MR. PIKE: And I think you skipped over 22 a question because you went from the first 23 question, and the witness was -- 24 MR. EDWARDS: Asking for a definition? 25 MR. PIKE: Asking for a definition, so</p>
478	<p>1 Q The statement that Epstein never 2 attempted to or conspired to travel in foreign 3 commerce and engage in any illicit sexual conduct 4 with Jane Doe, is also a false statement; isn't 5 that right? 6 MR. PIKE: Form. 7 A I would like to that question as well as 8 the other questions posed today, Mr. Edwards. 9 However, on the advice of counsel they've 10 instructed me to assert my Sixth, Fifth and 11 Fourteenth Amendment right. 12 Q In fact, you did contact Jane Doe when 13 she was a minor child as well as conspired to use 14 a telephone to contact Jane Doe when she was a 15 minor child, specifically for the purposes of 16 engaging in illicit sexual conduct with Jane Doe, 17 true? 18 MR. PIKE: Form. 19 A Though I would like to answer that 20 question as well as your other questions posed 21 here today, Mr. Edwards, I have been instructed 22 by my counsel that I must assert my rights under 23 the Sixth, Fifth and Fourteenth Amendment. 24 Q Did you intentionally touch Jane Doe on 25 her person and against her will or without her</p>	480	<p>1 he could properly interpret your question 2 and attempt to answer it. 3 Q I'm understanding that, based on your 4 answer, that my question, "Did you intentionally 5 touch Jane Doe without her legal consent?" And 6 your response, depends on the definition of 7 "legal consent;" is that true? 8 MR. PIKE: I think that the witness -- 9 as people regularly do as deponents, ask for 10 clarification of a question, and Mr. Epstein 11 asked you to clarify what, "legal consent" 12 was. If you wish to do that, then I guess 13 he could potentially understand your 14 question. However, if you don't want to do 15 that, then I guess we can just move on. 16 Q This will provide the answer: How old 17 was Jane Doe when you touched her? 18 MR. PIKE: Form. Assumes facts not in 19 evidence. 20 A I -- I -- I don't know how to answer 21 that question. I'll have to assert my Fifth 22 Amendment, Sixth Amendment and Fourteenth 23 Amendment right. 24 Q Tell me why you're having trouble 25 answering the question and I'll clarify the</p>



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1 **question for you so it will be easier for you to**  
 2 **answer.**  
 3 MR. PIKE: You've answered the  
 4 question.  
 5 MR. EDWARDS: His response was he  
 6 doesn't know how to answer the question. I  
 7 want to help him. I want to make sure that  
 8 the jury understands the question and the  
 9 answer.  
 10 MR. PIKE: He invoked the Fifth, Sixth  
 11 and Fourteenth.  
 12 **Q Mr. Epstein, did you touch Jane Doe in**  
 13 **intimate areas of her body when she was a minor**  
 14 **child?**  
 15 MR. PIKE: Form.  
 16 A I would like to answer that question,  
 17 all your questions with respect to Jane Doe, Mr.  
 18 Edwards. However, today at least, my counsel has  
 19 advised me that I must assert my rights under the  
 20 Sixth, Fifth and Fourteenth Amendment.  
 21 **Q In fact, didn't you touch Jane Doe in**  
 22 **intimate areas of her body, including her vagina,**  
 23 **her breasts, and her buttocks on dozens of**  
 24 **occasions between February 2003 and June 2005?**  
 25 MR. PIKE: Form.

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1 A Though I would like to answer every  
 2 question about Jane Doe that you've posed here  
 3 today, Mr. Edwards, upon advice of counsel, at  
 4 least today, they've instructed me I must assert  
 5 my rights under the Sixth, Fifth and Fourteenth  
 6 Amendment.  
 7 **Q Do you agree that the inappropriate**  
 8 **sexual conduct, that your inappropriate sexual**  
 9 **conduct towards Jane Doe, was both extreme and**  
 10 **outrageous?**  
 11 MR. PIKE: Form.  
 12 A I would like to answer all of your  
 13 questions with respect to Jane Doe that you've  
 14 posed here today, Mr. Edwards. However, upon  
 15 advice of counsel, they've instructed me that I  
 16 must assert my rights under the Sixth, Fifth and  
 17 Fourteenth Amendment.  
 18 **Q Do you also agree that your sexual**  
 19 **interaction with Jane Doe when she was a minor**  
 20 **child was outrageous and so extreme in degree**  
 21 **that it should not be tolerated in a civilized**  
 22 **community?**  
 23 MR. PIKE: Form.  
 24 A I would like to respond to all your  
 25 questions with respect to your client, Jane Doe.

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1 However, at least today, my counsel has  
 2 instructed me I must assert my rights under the  
 3 Sixth, Fifth and Fourteenth Amendment.  
 4 **Q Do you see yourself, Mr. Epstein, as a**  
 5 **danger to the middle school and high school**  
 6 **children in the Palm Beach community?**  
 7 MR. PIKE: Form.  
 8 A Though I would like to answer that  
 9 question, as well as the other questions that  
 10 you've posed here today, Mr. Edwards, my counsel  
 11 has instructed me I must respond by asserting my  
 12 rights under the Sixth, Fifth and Fourteenth  
 13 Amendment.  
 14 **Q When you engaged in illegal sexual**  
 15 **conduct with Jane Doe, was it your intent to**  
 16 **cause her severe emotional distress?**  
 17 MR. PIKE: Form.  
 18 A Though I would like to answer every  
 19 question with respect to Jane Doe, Mr. Edwards,,  
 20 at least today my counsel has advised me that I  
 21 must assert my rights under the Sixth, Fifth and  
 22 Fourteenth Amendment.  
 23 **Q When you engaged in sexual conduct with**  
 24 **Jane Doe when she was a minor child, age 14, 15,**  
 25 **16 and 17, would you agree that you showed**

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1 **reckless disregard with the high probability of**  
 2 **causing severe emotional distress to Jane Doe?**  
 3 MR. PIKE: Form.  
 4 A Though I would like to answer all your  
 5 questions that you've posed here today regarding  
 6 Jane Doe, on advice of counsel, at least today,  
 7 they've instructed me I must assert my rights  
 8 under the Sixth, Fifth and Fourteenth Amendment.  
 9 **Q Mr. Epstein, did you coerce Jane Doe**  
 10 **into prostitution?**  
 11 A ... Again?  
 12 **Q Did you coerce Jane Doe into**  
 13 **prostitution?**  
 14 A Can you tell me what you mean by  
 15 "coerce," please?  
 16 **Q Tell me, how did you --**  
 17 A I've asked you a simple question. Can  
 18 you tell me what "coerce" means, please?  
 19 **Q The definition of the word "coerce" will**  
 20 **allow to you answer that question?**  
 21 A I'm trying to understand the question.  
 22 MR. PIKE: You're using -- for the  
 23 record, you're using legal terms.  
 24 "Consent," "coerce." Those are the terms  
 25 you're utilizing in your question. Mr.

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1 Epstein is simply asking you what those  
2 terms mean in order to facilitate a response  
3 or a response coupled with the invocations.  
4 He doesn't -- he is not a lawyer. He  
5 doesn't understand these legal terms, and he  
6 is asking you for clarification. If you  
7 want to take those legal terms out of your  
8 questions and simplify them, then go ahead  
9 and do that, but it is fair that he ask what  
10 certain words mean.  
11 MR. EDWARDS: I absolutely agree and  
12 want to make sure before I give him the  
13 definition, that this question is being  
14 asked because the definition will help him  
15 to accurately answer the question, assuming  
16 that would be the only reason he would ask  
17 me a question.  
18 MR. PIKE: As his lawyer, I think that  
19 the definition of the word would assist him  
20 in understanding the question a little bit  
21 better, because, as you know, "coerce" and  
22 "consent" have several meanings, whether or  
23 not it be in State court, under the Florida  
24 State statutes or under federal statutes  
25 under 2255. I think that any sort of

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1 response could, you know... tiptoe into the  
2 Fifth, Sixth and Fourteenth, and I think Mr.  
3 Epstein is attempting to... understand your  
4 questions.  
5 MR. EDWARDS: I appreciate that. I feel  
6 like we're getting closer to an answer than  
7 we have received during this entire  
8 litigation, so I'm certainly going to help  
9 him out here.  
10 Q Mr. Epstein, do you then at least agree  
11 that you paid Jane Doe money in exchange for  
12 sexual services when she was under the age of  
13 18?  
14 MR. PIKE: Form, mischaracterizes the  
15 witness's testimony, and move to strike.  
16 A Unfortunately I have to answer that  
17 question as I've answered most of your other  
18 questions here today, Mr. Edwards, which is that  
19 my attorneys, at least today, have advised me  
20 that I must assert my rights under the Sixth,  
21 Fifth and Fourteenth Amendment.  
22 Q Mr. Epstein, how did you, meaning what  
23 process did you go through, to get Jane Doe to  
24 exchange your money for her sexual services when  
25 she was under the age of 18?

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1 MR. PIKE: Form.  
2 A I would like to answer every one of your  
3 questions with respect to Jane Doe, Mr. Edwards.  
4 However, today, my counsel has instructed me that  
5 I must assert my rights under the Sixth, Fifth  
6 and Fourteenth Amendment.  
7 Q If you answer that question for me, then  
8 I can tell you whether that falls under the  
9 definition of coercing her into prostitution.  
10 A Is that a question?  
11 Q Sure. Can you provide an answer to the  
12 previous question, so I can categorize that as  
13 coercion or noncoercion?  
14 MR. PIKE: No, he cannot, because I  
15 don't know what question is on the table,  
16 and it is as simple as that. I don't know  
17 what question is on the table.  
18 MR. EDWARDS: Sure.  
19 Q Didn't you interact with Jane Doe in a  
20 sexual manner when she was under the age of 18?  
21 MR. PIKE: Object to the form. This  
22 question has been asked no less than twice  
23 during your deposition --  
24 MR. EDWARDS: I'll agree with that.  
25 MR. PIKE: -- relative to Jane Doe and

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1 I'll object to the form.  
2 A I would like to answer all of your  
3 questions, Mr. Edwards, especially that  
4 question. However, today, my counsel has advised  
5 me that I must assert my rights under the Sixth,  
6 Fifth and Fourteenth Amendment.  
7 Q Did you persuade, induce or entice Jane  
8 Doe to engage in prostitution when she was an  
9 underage minor child?  
10 MR. PIKE: Form.  
11 A I would like to answer that question but  
12 my counsel has advised me I must respond by  
13 invoking my Sixth, Fifth and Fourteenth Amendment  
14 right.  
15 Q Can you tell the jury how it is that  
16 Jane Doe engaged in an act of prostitution with  
17 you?  
18 MR. PIKE: Form.  
19 A On advice of counsel, I'm going to have  
20 to invoke my Sixth, Fifth and Fourteenth  
21 Amendment right.  
22 Q While you were interacting with Jane Doe  
23 in a sexual manner when she was 14 and 15 years  
24 old, did you consider that molestation?  
25 MR. PIKE: Form.

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1 A I would like to answer all of your  
2 questions, Mr. Edwards, with respect to Jane Doe  
3 and her complaint. However, at least today my  
4 counsel has advised me that I must assert my  
5 rights under the Sixth, Fifth and Fourteenth  
6 Amendment.  
7 Q While, at the same time you were  
8 molesting Jane Doe, didn't you tell her that you  
9 liked the way her young body looked?  
10 MR. PIKE: Form.  
11 A I would like to respond to all your  
12 questions regarding Jane Doe, is the point, Mr.  
13 Edwards. However today at least my counsel has  
14 advised me I must assert my rights under the  
15 Sixth, Fifth and Fourteenth Amendment.  
16 THE VIDEOGRAPHER: Counsel.  
17 (Indicating five minutes left on tape.)  
18 MR. EDWARDS: Okay.  
19 Q Mr. Epstein do you know George Rush?  
20 MR. PIKE: Form -- I'll withdraw the  
21 form. I'm sorry. It is not a proper form  
22 objection.  
23 A I'm sorry, on advice of counsel I have  
24 to assert my rights under the Sixth, Fifth and  
25 Fourteenth Amendment.

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1 Q Did you talk to George Rush in the year  
2 2009 about the allegations of improper sexual  
3 conduct between you and underage minor children?  
4 MR. PIKE: Can you repeat the question,  
5 for me, Madam Court Reporter?  
6 MR. EDWARDS: I can ask it again.  
7 MR. PIKE: Sure.  
8 Q Did you speak with George Rush in 2009  
9 specifically about allegations of your  
10 interaction with underage minor children in a  
11 sexual manner?  
12 A On advice of counsel, I'm going to have  
13 to assert my rights under the Sixth, Fifth and  
14 Fourteenth Amendment.  
15 Q Did you know that the conversation  
16 between you and New York Daily News reporter  
17 George Rush was recorded?  
18 MR. PIKE: Form.  
19 A On advice of counsel, I'm going to have  
20 to assert my right under the Sixth, Fifth and  
21 Fourteenth Amendment.  
22 Q At the time when you spoke with George  
23 Rush from The New York Daily News in 2009, did he  
24 tell you that he was recording your statements to  
25 him?

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1 MR. PIKE: One second.. Form.  
2 A On advice of counsel, I'm going to have  
3 to respectfully assert my Sixth, Fifth and  
4 Fourteenth Amendment right.  
5 Q During that conversation that you had  
6 with George Rush from The New York Daily News,  
7 didn't you express to him that you felt you were  
8 punished criminally for no reason?  
9 MR. PIKE: Form.  
10 A Though I would like to answer all of  
11 your questions, Mr. Edwards, my counsel has  
12 advised me I must assert my rights under the  
13 Sixth, Fifth and Fourteenth Amendment.  
14 Q Didn't you also tell George Rush that a  
15 more appropriate punishment for your actions with  
16 these underage minor children would have been a  
17 100 or \$200 fine?  
18 MR. PIKE: Form.  
19 A On advice of counsel I have to assert my  
20 rights under the Sixth, Fifth and Fourteenth  
21 Amendment.  
22 Q Tell the jury what you feel would be an  
23 appropriate penalty for you, for the acts that  
24 you committed against Jane Doe.  
25 MR. PIKE: Form.

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1 A Though I would like to very much answer  
2 that question, on advice of my counsel today, Mr.  
3 Edwards, I have to invoke my Sixth, Fifth and  
4 Fourteenth Amendment right.  
5 Q In your Affirmative Defenses in the  
6 complaint of Jane Doe versus Jeffrey Epstein,  
7 which is Jane Doe, affirmative defense number one  
8 indicates that Jane Doe consented to and was a  
9 willing participant in the acts alleged.  
10 What evidence did you have that Jane Doe  
11 consented to or was a willing participant in the  
12 acts that were alleged by Jane Doe against you?  
13 MR. PIKE: Form.  
14 A Though I would like to describe the  
15 evidence that Jane Doe was a willing participant,  
16 on advice of counsel today, they've instructed me  
17 I must assert my rights under the Sixth, Fifth  
18 and Fourteenth Amendment.  
19 Q At that point in time you're at least  
20 admitting that there was an interaction between  
21 you and Jane Doe, correct?  
22 MR. PIKE: Form. Move to strike.  
23 A On advice of counsel, I'm going to have  
24 to assert my rights under the Sixth, Fifth and  
25 Fourteenth Amendment.



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1 form. I think you need to reword the  
2 question.  
3 MR. EDWARDS: Okay. I'll ask it again.  
4 **Q Is it your position, or do you have**  
5 **facts or information that Jane Doe was molested**  
6 **by a separate or different child molester?**  
7 MR. PIKE: Form.  
8 A I would like to answer all your  
9 questions that you posed here today, Mr. Edwards,  
10 every last one of them. However, at least today  
11 under advice of counsel, I have been instructed I  
12 must assert my rights under the Sixth, Fifth and  
13 Fourteenth Amendment.  
14 **Q The next affirmative defense indicates**  
15 **that Jane Doe impliedly consented to the acts**  
16 **alleged by not objecting.**  
17 **What do you mean by that affirmative**  
18 **defense?**  
19 MR. PIKE: Form.  
20 A I would like it answer all your  
21 questions regarding Jane Doe, and her complaint.  
22 However, today my attorneys have advised me that  
23 I must assert my rights under the Sixth, Fifth  
24 and Fourteenth Amendment.  
25 **Q Do you mean --**

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1 MR. PIKE: May also call for work  
2 product information. Sorry.  
3 **Q Do you mean that, for instance, when you**  
4 **would insert your fingers into her vagina when**  
5 **she was 14 or 15 years old, that because she**  
6 **didn't object that she impliedly consented to**  
7 **that conduct?**  
8 MR. PIKE: Form.  
9 A What's the question?  
10 **Q Do you mean by -- I'll read your**  
11 **affirmative defense that you have stated.**  
12 **"Plaintiff Jane Doe impliedly consented**  
13 **to the acts alleged by not objecting," and I'm**  
14 **asking: By that, do you mean that when you**  
15 **inserted your fingers into her vagina when she**  
16 **was age 14 or 15, that by her not verbally**  
17 **objecting, then in your mind she consented?**  
18 MR. PIKE: Form.  
19 A I would like to answer all your  
20 questions Mr. Edwards. However, at least today,  
21 at least today, my counsel instructed me I must  
22 assert my rights under the Sixth, Fifth and  
23 Fourteenth Amendment.  
24 **Q Your next affirmative defense states**  
25 **that "Defendant," that being you, "reasonably**

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1 **believed or was told that the plaintiff, Jane**  
2 **Doe, had attained the age of 18 years old at the**  
3 **time of the alleged acts." That is a false**  
4 **statement, isn't it, Mr. Epstein?**  
5 MR. PIKE: Form.  
6 A I would like to answer every question  
7 you posed today, Mr. Edwards, about Jane Doe and  
8 her complaint. However, at least today my  
9 attorneys have advised me I must assert my rights  
10 under the Sixth, Fifth and Fourteenth Amendment.  
11 **Q What gave you the reasonable belief that**  
12 **Jane Doe was 18 years of age or older when you**  
13 **touched her in a sexual manner?**  
14 MR. PIKE: Form.  
15 A I would like to answer all of your  
16 questions with respect to Jane Doe, Mr. Edwards,  
17 every one of them. However, today, as you're  
18 aware, my counsel has advised me I must assert my  
19 rights under the Sixth, Fifth and Fourteenth  
20 Amendment.  
21 **Q Didn't Jane Doe tell you when you asked**  
22 **her age that she was 15 years old?**  
23 MR. PIKE: Form.  
24 A I would like to answer that question  
25 because I've answered most of your other

500

1 questions here today. Unfortunately my counsel  
2 here today said I must invoke my rights under the  
3 Sixth, Fifth and Fourteenth Amendment.  
4 **Q The second portion of that affirmative**  
5 **defense is that you reasonably believed or you**  
6 **were told that Jane Doe attained the age of 18.**  
7 **Tell the jury, who told you that Jane**  
8 **Doe had attained the age of 18 years old when you**  
9 **engaged in sexual conduct with her?**  
10 MR. PIKE: Form.  
11 A Though I would like very much to answer  
12 that question, as most of your other questions  
13 here today, as you're aware my counsel has  
14 advised me I must assert my rights under the  
15 Sixth, Fifth and Fourteenth Amendment.  
16 **Q In fact, if you learned that she had**  
17 **attained the age of 18 years old, you would not**  
18 **have engaged in sexual conduct with her, would**  
19 **you?**  
20 MR. PIKE: Form.  
21 A I would like to answer all of your  
22 questions with respect to Jane Doe, Mr. Edwards.  
23 However, at least today, my counsel advised me  
24 that I must assert my rights under the Sixth,  
25 Fifth and Fourteenth Amendment.

501

1           **Q** In fact, there were several times when  
 2 girls were brought to you by other underage minor  
 3 females and these girls were over the age of 18  
 4 and you turned them away, as being too old for  
 5 you; isn't that true?  
 6           MR. PIKE: Form.  
 7           **A** Again, I would like to answer all your  
 8 questions here today. I would like to answer  
 9 that question. However, my counsel has advised  
 10 me that at least today I may not and must assert  
 11 my rights under the Sixth, Fifth and Fourteenth  
 12 Amendment.  
 13           **Q** In fact, your target age group for  
 14 sexual activity is between 12 and 17 years old;  
 15 is that true?  
 16           MR. PIKE: Form.  
 17           **A** Mr. Edwards, I would like to answer that  
 18 question, as well as your other questions here  
 19 today. However, my counsel has advised me that I  
 20 must not, may not, must assert my rights under  
 21 the Sixth, Fifth and Fourteenth Amendment.  
 22           **Q** You know a person named V.R., don't  
 23 you?  
 24           **A** Though I would like to answer all of  
 25 your questions Mr. Edwards, on advice of counsel

502

1           today at least, they've instructed me that I must  
 2 respond by asserting my rights under the Sixth,  
 3 Fifth and Fourteenth Amendment.  
 4           **Q** V.R. is somebody who served as your sex  
 5 slave when she was between the ages of 15 and 18  
 6 years old; isn't that true?  
 7           MR. PIKE: Form.  
 8           **A** I would like to respond to all of your  
 9 questions with respect to V.R. However, on  
 10 advice of counsel today at least, they've  
 11 instructed me that I must assert my rights under  
 12 the Sixth, Fifth and Fourteenth Amendment.  
 13           **Q** Do you know Emmy Taylor?  
 14           **A** Though I would like to respond to all of  
 15 your questions here today, Mr. Edwards, under  
 16 advice of counsel I must assert my rights under  
 17 the Sixth, Fifth and Fourteenth Amendment.  
 18           **Q** Is that somebody who served as the sex  
 19 slave for Gislaine Maxwell at the same time or  
 20 about the same time that V.R. was your sex slave?  
 21           MR. PIKE: Form.  
 22           **A** I would like to answer all of your  
 23 questions, Mr. Edwards. However today my counsel  
 24 has advised me I must assert my rights under the  
 25 Sixth, Fifth and Fourteenth Amendment.

503

1           **Q** Isn't it true during that period of time  
 2 when V.R. was your underage sex slave, that she  
 3 observed you to have sexual intercourse and  
 4 sexual activity with several females, as young as  
 5 12 years old?  
 6           MR. PIKE: Form.  
 7           **A** I would like to respond to all of these  
 8 questions. And I prefer that your partner, Scott  
 9 Rothstein, who currently sits in jail for  
 10 fabricating cases of a sexual nature against  
 11 people like me and others, were here to hear some  
 12 of these answers. However, with respect to any  
 13 other question, at least today, my counsel has  
 14 advised me that I must assert my rights under the  
 15 Sixth, Fifth and Fourteenth Amendment.  
 16           **Q** Why would you prefer that Scott  
 17 Rothstein hear an answer from you about whether  
 18 or not you had sex with multiple 12 year olds?  
 19           MR. PIKE: Form. Move to strike, and  
 20 mischaracterizes the witness's testimony.  
 21           **A** At least today, Mr. Edwards, my counsel  
 22 has advised me that I must respond to these  
 23 questions by asserting my rights under the Sixth,  
 24 Fifth and Fourteenth Amendment.  
 25           **Q** V.R. is somebody who has filed a lawsuit

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1           against you under the pseudonym Jane Doe number  
 2 102; isn't that correct?  
 3           MR. PIKE: I'm sorry. Can you repeat  
 4 it?  
 5           MR. EDWARDS: Sure.  
 6           **Q** V.R. is somebody that filed a lawsuit  
 7 against you under the pseudonym Jane Doe number  
 8 102?  
 9           **A** Though I would like to respond to your  
 10 questions today, Mr. Edwards, with respect to  
 11 these lawsuits, my counsel has advised me that I  
 12 may not, and must assert my rights under the  
 13 Sixth, Fifth and Fourteenth Amendment.  
 14           **Q** In that complaint, the allegation is  
 15 made that a friend of Jeffrey Epstein sent him  
 16 three 12-year old girls from France, who spoke no  
 17 English, for defendant Epstein to sexually  
 18 exploit and abuse. After doing so, they were  
 19 sent back to France the next day.  
 20           That's a true statement, isn't it?  
 21           MR. PIKE: Form.  
 22           **A** I would like to respond to all of these  
 23 questions... However, at least today, my counsel  
 24 has advised me that I must assert my rights under  
 25 the Sixth, Fifth and Fourteenth Amendment.

505

1           **Q** In the complaint filed on behalf of Jane  
 2           Doe number 102 also known as V.R., was filed by  
 3           an attorney named Bob Josefsberg with Podhurst,  
 4           Orseck; isn't that right?  
 5           MR. PIKE: Can you reread that specific  
 6           question for me?  
 7           THE COURT REPORTER: Sure.  
 8           (The record was read.)  
 9           MR. PIKE: To the extent you know the  
 10          answer to that question, you can answer.  
 11          A I think -- I'm going to assert my rights  
 12          under the Sixth, Fifth and Fourteenth Amendment.  
 13          **Q** And when I asked you a few questions  
 14          back about your sexual interaction and  
 15          intercourse with 12-year old girls and derived  
 16          that from this complaint, your answer -- into  
 17          your answer was injected some response related to  
 18          Scott Rothstein, and so my question is, what do  
 19          you believe, if anything, Scott Rothstein had to  
 20          do with the complaints or assertions that are  
 21          made in the Jane Doe 102 versus Epstein  
 22          complaint?  
 23          MR. PIKE: Form, move to strike.  
 24          Mischaracterizes the witness's testimony.  
 25          A I would like to answer that question.

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1           However, at least today they have instructed me I  
 2           must respond to that question by asserting my  
 3           Sixth, Fifth and Fourteenth Amendment right.  
 4           **Q** Mr. Epstein, for at least the passed  
 5           decade you have consistently kept at least one  
 6           sex slave at all times. Is that true?  
 7           MR. PIKE: Form.  
 8           A I would like to respond to these  
 9           sexually charged questions. However, upon advice  
 10          of counsel, I must respond simply by asserting my  
 11          Sixth Amendment, Fifth Amendment and Fourteenth  
 12          Amendment right.  
 13          **Q** And you have an Amazon.com account,  
 14          right?  
 15          MR. PIKE: Form.  
 16          A Upon advice of counsel, I'm going to  
 17          have to assert my right to the Sixth Amendment,  
 18          Fifth Amendment and Fourteenth Amendment.  
 19          **Q** On or about September 4, 2005 you  
 20          ordered and received -- and later received three  
 21          books from Amazon.com; is that true?  
 22          MR. PIKE: Form. Um... Books?  
 23          ... Form.  
 24          A On advice of counsel I have to assert my  
 25          Sixth Amendment, Fifth Amendment and Fourteenth

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1           Amendment right.  
 2           MR. EDWARDS: Mark this.  
 3           (Order form from Amazon.com, listing  
 4           three books, was marked as Plaintiff's  
 5           Exhibit number 9 for identification, as of  
 6           this date.)  
 7           MR. PIKE: (Handing to the witness.)  
 8           **Q** Do you recognize that document that's  
 9           been marked for identification purposes as  
 10          Exhibit 9?  
 11          A No. I do not.  
 12          **Q** Did you indeed order the three books  
 13          from Amazon.com that are listed on that order  
 14          form that's been marked as Exhibit 9?  
 15          A No.  
 16          **Q** Have you read the three books that are  
 17          on that order form, Exhibit number 9?  
 18          A No.  
 19          **Q** Do you know why it is, can you explain  
 20          how that document came to exist?  
 21          A No.  
 22          **Q** Do you know where that document that  
 23          you're holding marked as Exhibit number 9 came  
 24          from?  
 25          A No.

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1           **Q** Would you be surprised if it was taken  
 2           from your trash by police or law enforcement?  
 3           A Would I be surprised? I don't  
 4           understand the question.  
 5           **Q** Would it surprise you if the police  
 6           pulled that from your trash, outside your house,  
 7           in 2005?  
 8           MR. PIKE: Object to the form. There,  
 9           because... quite frankly, I don't know where  
 10          this document came from. There has been no  
 11          predicate laid as to its origination. Now  
 12          you're talking about a question relative to,  
 13          would it surprise you if the police pulled  
 14          it.. I don't think that you've laid the  
 15          proper foundation, so I'm going to object to  
 16          the form.  
 17          MR. EDWARDS: Okay. At trial I'll enter  
 18          it in through another witness. I just want  
 19          him to deny him ever seeing it before I do  
 20          that. It is fine, I'll lay the predicate --  
 21          MR. PIKE: He's already said that, I  
 22          believe, he's never -- you asked him if he  
 23          recognized the document and he said "No."  
 24          MR. EDWARDS: I appreciate that.  
 25          **Q** Would it surprise you if that was

509

1 obtained from a trash pull at your house?

2 A You're asking me a hypothetical

3 question. I have no idea.

4 Q What is the name and address of the

5 purported purchaser of those books? According to

6 Exhibit number 9?

7 A I don't know.

8 MR. PIKE: Form.

9 Q Looking at that document you cannot tell

10 what address those books were shipped to?

11 A It says "billing address."

12 Q What's the billing address?

13 A It says what the document says.

14 Q What is that?

15 A It says Jeffrey Epstein.

16 Q What's the address?

17 A 358 El Brillo Way.

18 Q That address at 358 El Brillo Way is

19 your address, correct?

20 MR. PIKE: Form.

21 A On advice of counsel, I'm going to have

22 to assert my Fifth Amendment, Sixth Amendment and

23 Fourteenth Amendment right.

24 Q Jeffrey Epstein, that's your name,

25 correct?

510

1 A Correct.

2 Q Can I see the document?

3 A (Handing to counsel.)

4 Q Mr. Epstein, the person whose deposition

5 was taken yesterday and has been widely reported

6 in the newspapers as your sex slave, Nadia

7 Marcinkova, is she indeed your sex slave?

8 MR. PIKE: Form.

9 A On advice of counsel, I'm going to

10 respond by asserting my Sixth Amendment, Fifth

11 Amendment and Fourteenth Amendment right.

12 Q Does anybody other than yourself have

13 access to your Amazon.com account?

14 MR. PIKE: Form.

15 A I don't know.

16 Q You have never read "Slave Craft,

17 Roadmaps for Erotic Servitude, Principles, Skills

18 and Tools"?

19 MR. PIKE: Asked and answered. He was

20 already asked these questions -- I'm sorry,

21 answered.

22 A I've answered the question "No."

23 Q Why was it ordered to your house, the

24 shipping address and billing address both being

25 358 El Brillo Way?

511

1 A I don't know.

2 Q Is there anybody else that lives in your

3 house, besides yourself, that has sex slaves?

4 MR. PIKE: I'm sorry... Mr. Horowitz, I

5 believe, interrupted you, I think he gave

6 you another exhibit, I think it's Exhibit 9,

7 which I think he wants you to follow up with

8 a question.

9 MR. EDWARDS: It is just placed on the

10 table. I'm waiting for an answer.

11 MR. PIKE: I'm not being smarter. I'm

12 just saying, are you going to follow through

13 with the question that's currently on the

14 table or the one that --

15 MR. EDWARDS: I asked a question and

16 many waiting for an answer.

17 MR. PIKE: Seriously, I'm not trying to

18 be rude or smart. You put an exhibit in

19 front of him and --

20 MR. HOROWITZ: I wanted to give the

21 court reporter the exhibits. She gets the

22 exhibits.

23 MR. PIKE: I've got to know what

24 question is on the table, that's all.

25 MR. HOROWITZ: I didn't interrupt you,

512

1 did I?

2 MR. EDWARDS: No, it is asked on -- I

3 asked a question, it is still on the table.

4 A Ask the question.

5 Q Anybody else in your house have sex

6 slaves?

7 MR. PIKE: Form.

8 A I have to respond to that question as I

9 did to most of your other questions today, which

10 is I have to assert my rights to the Sixth, Fifth

11 and Fourteenth Amendment.

12 Q Are you familiar with the various

13 messages that are -- that were taken from your

14 home at 358 El Brillo Way?

15 MR. PIKE: Form.

16 A I'm going to have to assert my rights

17 under the Sixth, Fifth and Fourteenth Amendment.

18 Q Have you read the messages that were

19 taken and placed in the State Attorney's Office

20 file related to the criminal charges against

21 you?

22 MR. PIKE: Form.

23 A I don't recall.

24 Q Why is it that underage minor females

25 were calling your home in 2004 and 2005 for, in



513

1 quotes, "work"?

2 MR. PIKE: Wait a second. Form, lacks

3 predicate, foundation, and for the record,

4 you're referring to a stack of documents

5 that have not been marked --

6 MR. EDWARDS: Not referring to anything,

7 just so that your objection is clear.

8 MR. PIKE: You're referring to what I

9 see as a stack of documents that look like

10 message pads. You're clarifying and...

11 making a prelude into your question as to

12 why were underage girls calling your home

13 for work?

14 MR. EDWARDS: Right.

15 MR. PIKE: You're not allowing the

16 witness to see the exhibits to which you

17 refer, and I think it is an improper

18 question and lacks predicate and

19 foundation.

20 MR. EDWARDS: No matter what I show the

21 witness, any answer he gives is going to

22 incriminate him, so he is going to invoke

23 his Fifth Amendment rights, which is why

24 right now, he is not going to see these. At

25 trial he will see all of these things.

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1 MR. PIKE: I'm glad you said that. I

2 think that's a false statement. I move to

3 strike it. Mr. Edwards, you provided a

4 document to Mr. Epstein not two minutes ago

5 and he answered questions without invoking

6 the Fifth Amendment right.

7 MR. EDWARDS: And it incriminated him.

8 MR. PIKE: If the Fifth Amendment comes

9 into play.

10 MR. EDWARDS: It should have.

11 MR. PIKE: Thank you. If the Fifth

12 Amendment comes into play, he will invoke

13 the Fifth. He does not know certain

14 information. Not knowing something, my

15 friend, is not a waiver. Follow? So he is

16 trying to --

17 MR. EDWARDS: It is --

18 MR. PIKE: -- trying to actually work

19 with you on your questions. Maybe if you

20 show him what you're talking about, he can

21 answer your question.

22 **Q Why were underage minor females calling**

23 **your house to, quote, unquote, "work"?**

24 MR. PIKE: Form.

25 A Unfortunately, I have to answer that

515

1 question, as I've answered most of your other

2 questions here today, Mr. Edwards, which is that

3 my attorneys advised me to assert my Sixth

4 Amendment, Fifth Amendment and Fourteenth

5 Amendment right.

6 **Q Do you know Adriana Mucinska or Adriana**

7 **Ross?**

8 A As I've answered most of your other

9 questions here today, I'm going to have to

10 respond that my attorneys have instructed me to

11 assert my rights to the Sixth, Fifth and

12 Fourteenth Amendment.

13 **Q That's somebody who is listed in the**

14 **agreement between yourself and the United States**

15 **of America as a co-conspirator of yours. Does**

16 **that help refresh your recollection as to who Ms.**

17 **Ross is?**

18 MR. PIKE: Form.

19 A I'm going to have to respond by

20 asserting my rights to the Sixth, Fifth and

21 Fourteenth Amendment.

22 **Q Do you remember receiving messages from**

23 **Adriana that would read something like, "I left a**

24 **message for Ashley to confirm for 11:00 o'clock**

25 **and Vanessa for 4:30," many messages like that?**

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1 MR. PIKE: I'm sorry, but before he

2 answers, I'm just curious, you're again

3 referring to a stack of documents that's

4 about an inch thick. Do you want to mark

5 anything as an exhibit?

6 MR. EDWARDS: No, I really don't, Mike,

7 but appreciate all the help you're

8 providing. Thanks.

9 MR. PIKE: Yeah. You're welcome. Do

10 you know where these documents came from?

11 MR. EDWARDS: Yes.

12 MR. PIKE: Where did you obtain that

13 them from?

14 MR. EDWARDS: It is not my deposition.

15 You had that chance already.

16 MR. PIKE: No, I asked the right -- no,

17 that's not really part of my case over

18 there. Critton took your deposition, not

19 me. That's a case separate and distinct

20 from these cases, so my question to you is:

21 I'm just curious, you have a stack of

22 documents, I think you said earlier they

23 came from the State Attorney's Office file?

24 MR. EDWARDS: It is not my deposition.

25 I'm asking questions. Your client is going

517

1 to give answers or not give answers.  
 2 MR. PIKE: Okay.  
 3 MR. EDWARDS: These will come in with  
 4 the appropriate person at trial, period.  
 5 MR. PIKE: Okay.  
 6 A Question? Sorry.  
 7 Q Sure.  
 8 Do you remember receiving a message from  
 9 Adriana Ross or Adriana Mucinska, such as, "I  
 10 left message for Ashley to confirm for 11:00  
 11 o'clock and Vanessa for 4:30"?"  
 12 A I don't recall.  
 13 Q And when a message such as that is left,  
 14 is that indicating Ashley is going to come to  
 15 your house for you to molest her at 11:00 and  
 16 Vanessa will come for you to molest her at 4:30?  
 17 MR. PIKE: Form.  
 18 A I'm going to have to respond by  
 19 asserting my rights under the Sixth, Fifth and  
 20 Fourteenth Amendment.  
 21 Q Why would underage minor females call  
 22 your home and leave messages like, "I have a girl  
 23 for him." Do you know?  
 24 MR. PIKE: Form.  
 25 A On advice of my counsel, today at least,

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1 they've advised me I must assert my right under  
 2 the Sixth, Fifth and Fourteenth Amendment.  
 3 Q Did you ever employ any underage minor  
 4 females for any legitimate purpose at your home,  
 5 358 El Brillo Way?  
 6 MR. PIKE: Form.  
 7 A At least today, Mr. Edwards, though I  
 8 would like to answer every one of your...  
 9 questions, my counsel has advised me I must  
 10 assert my rights under the Sixth, Fifth and  
 11 Fourteenth Amendment.  
 12 Q Isn't it true, Mr. Epstein, that each  
 13 underage minor female that contacted -- that  
 14 called your home or was called from your home,  
 15 was called for the purposes of coming to your  
 16 house to satisfy you sexually?  
 17 MR. PIKE: Form.  
 18 THE WITNESS: I think I've answered that  
 19 question before.  
 20 A I will answer it unfortunately the same  
 21 way, which is although I would like to answer  
 22 each and every one of the questions you've posed  
 23 here today, on advice of my counsel they've  
 24 instructed me I must assert my rights under the  
 25 Sixth, Fifth and Fourteenth Amendment.

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1 Q In a newspaper article dated October 30,  
 2 2006 entitled, "The Return Of A," in quotes,  
 3 'Very Passionate' end quote, "Jeffrey Epstein,"  
 4 there is a quote from somebody that is called in  
 5 this article "A Friend," and the quote is:  
 6 "Speaking about Jeffrey Epstein, his life is  
 7 about making money and living an erotic life and  
 8 his escape isn't alcohol or drugs, it is sex."  
 9 Is that a true statement?  
 10 MR. PIKE: Form.  
 11 A Is it a true statement that that's what  
 12 the article says?  
 13 Q No, is it a true statement that your  
 14 life is about making money and living an erotic  
 15 life and your escape is not alcohol or drugs, it  
 16 is sex?  
 17 MR. PIKE: Form.  
 18 A Though I would like to answer that  
 19 question, as well as all your other questions  
 20 posed here today, Mr. Edwards, on advice of my  
 21 counsel, he has instructed me I must assert my  
 22 rights under the Sixth, Fifth and Fourteenth  
 23 Amendment.  
 24 Q Another article entitled "The  
 25 Fanaticist," from New York Magazine dated

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1 December 10, 2007, a quote or several quotes are  
 2 attributed to you, and it reads: "I told  
 3 Epstein," this is the author "and Rubenstein the  
 4 sort of story New York Magazine wanted to do, and  
 5 Epstein seemed to find ironic delight in every  
 6 word. A secretive genius, I said," a statement  
 7 from the author. "She indicates you corrected  
 8 her saying "Not secretive, private," and the next  
 9 quote, which I will ask you about, is that you  
 10 stated "And if I was a genius, I wouldn't be  
 11 sitting here, a guy with sex issues;" do you  
 12 remember saying that?  
 13 MR. PIKE: Form.  
 14 Q -- to a reporter in New York?  
 15 MR. PIKE: Form. Move to strike.  
 16 A Though I would like to answer every  
 17 question you've posed here today, Mr. Edwards, on  
 18 advice of counsel I have to assert my Sixth  
 19 Amendment, Fifth Amendment and Fourteenth  
 20 Amendment right.  
 21 MR. PIKE: Mr. Edwards, if you would, I  
 22 know you --  
 23 THE WITNESS: Take a break?  
 24 MR. PIKE: Actually one second.  
 25 You provided the title of the second

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1 article that you just questioned him. Could  
2 you please, for the record, provide the  
3 title to the first article.  
4 MR. EDWARDS: I did.  
5 MR. PIKE: I didn't hear it.  
6 MR. EDWARDS: I will do it again. "A  
7 Return Of A 'Very Passionate' Jeffrey  
8 Epstein."  
9 MR. PIKE: Thank you.  
10 MR. EDWARDS: "Very passionate" is in  
11 quotes, as I said the first time.  
12 MR. PIKE: Thank you.  
13 THE VIDEOGRAPHER: Going off the video  
14 record 3:02 p.m.  
15 (Pause in the proceedings.)  
16 THE VIDEOGRAPHER: Back on the video  
17 record at 3:15 p.m.  
18 **Q In the same article, "The Fanaticist,"**  
19 **there is a quote by "Michael Wolff." Do you know**  
20 **Michael Wolff, the columnist?**  
21 A I have to respond the same way I've  
22 responded to most of your questions here today,  
23 which is, I must assert my rights under the  
24 Sixth, Fifth and Fourteenth Amendment.  
25 **Q Mr. Wolff says in a quote in this**

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1 article, "He has never," speaking about Mr.  
2 Epstein, "been secretive about the girls. At one  
3 point when his troubles began he was talking to  
4 me and said, 'What can I say? I like young  
5 girls.'" Is that a comment or statement that you  
6 made to Michael Wolff?  
7 MR. PIKE: Form.  
8 A Unfortunately I have to respond to that  
9 question as I did to most of your questions  
10 today, which is I must assert my rights under  
11 advice of counsel, under the Sixth, Fifth and  
12 Fourteenth Amendment.  
13 **Q On several occasions your attorney or**  
14 **one of your attorneys, Jack Goldberger, has made**  
15 **the statement "Jeffrey Epstein has never denied**  
16 **that the girls came to the house." Are you**  
17 **admitting that the girls that are now plaintiffs,**  
18 **at least came to your house?**  
19 MR. PIKE: Form.  
20 A I would like to answer that question  
21 you've just quoted an attorney's statement?  
22 **Q Right, Jack Goldberger's statement.**  
23 A So what's the question?  
24 MR. PIKE: You can't -- hold on right  
25 there. This is ridiculous. This is getting

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1 to be ridiculous. You can't read --  
2 MR. EDWARDS: What --  
3 MR. PIKE: You can't read someone else's  
4 quote and say "Are you admitting something  
5 from someone else's quote." He didn't make  
6 the quote, so how can it be an admission,  
7 despite who it is.  
8 MR. HOROWITZ: That's a form objection.  
9 MR. PIKE: You're right, form.  
10 **Q Your attorney, Jack Goldberger, made the**  
11 **statement, "Jeffrey Epstein never denied the**  
12 **girls came to the house." This was related to**  
13 **the criminal investigation of you.**  
14 **Do you admit that the girls,**  
15 **specifically Jane Doe, came to your house?**  
16 A Mr. Edwards, I would like to respond to  
17 that question as I responded to most of the other  
18 questions today, but unfortunately my counsel has  
19 advised me I must assert my rights under the  
20 Sixth, Fifth and Fourteenth Amendment.  
21 **Q Mr. Epstein, can you tell the jury who**  
22 **Sarah Kellen is?**  
23 MR. PIKE: Form.  
24 A Unfortunately, Mr. Edwards, I have to  
25 respond to that question as I responded to most

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1 of your other questions today, because on advice  
2 of counsel they've instructed me to assert my  
3 rights under the Sixth, Fifth and Fourteenth  
4 Amendment.  
5 **Q You're aware that she is somebody listed**  
6 **as a co-conspirator of yours related to your**  
7 **criminal activity in the Nonprosecution**  
8 **Agreement, correct?**  
9 MR. PIKE: Form.  
10 A With respect to that question as most of  
11 your other questions here today, on advice of  
12 counsel I have been instructed to assert my  
13 rights under the Sixth, Fifth and Fourteenth  
14 Amendment.  
15 **Q Isn't it true that you paid her to have**  
16 **underage minor females brought to your house, at**  
17 **specific times, as you directed?**  
18 MR. PIKE: Form, asked and answered.  
19 A As I've answered most of your questions  
20 here today, unfortunately my counsel has advised  
21 me that I must assert my rights under the Sixth,  
22 Fifth and Fourteenth Amendment.  
23 **Q Another co-conspirator of yours, as she**  
24 **is labeled in the Nonprosecution Agreement, is**  
25 **Lesley Groff. What role did she play or what did**

1 she conspire with you to do?  
 2 MR. PIKE: Form.  
 3 A Mr. Edwards, I have to respond to that  
 4 question as I did to most of your other questions  
 5 here today, which is, on advice of counsel,  
 6 they've instructed me to assert my rights under  
 7 the Sixth, Fifth and Fourteenth Amendment.  
 8 Q Today what role does Story Cowles play  
 9 in your life?  
 10 MR. PIKE: Form.  
 11 A I would like to answer all your  
 12 questions, Mr. Edwards. However, at least today,  
 13 my counsel has advised me that I must assert my  
 14 rights under the Sixth, Fifth and Fourteenth  
 15 Amendment.  
 16 Q Is Story Cowles your personal  
 17 assistant?  
 18 MR. PIKE: Form.  
 19 A Mr. Edwards, I would like to answer all  
 20 your questions here today. However, upon advice  
 21 of counsel, they've instructed me that I must  
 22 assert my Fifth, Sixth and Fourteenth Amendment  
 23 rights to that question.  
 24 Q And Story Cowles, in addition to being  
 25 your personal assistant, is Sarah Kellen's

1 boyfriend; is that true?  
 2 MR. PIKE: Form.  
 3 A Though I would like to answer all your  
 4 questions, Mr. Edwards, on advice of counsel  
 5 they've instructed me that I must assert my  
 6 rights under the Sixth, Fifth and Fourteenth  
 7 Amendment.  
 8 Q Prior to the police executing, the Palm  
 9 Beach police executing a search warrant on your  
 10 house in October of 2005, did you direct Adriana  
 11 Mucinska to remove at least three computers from  
 12 your home?  
 13 MR. PIKE: Form.  
 14 A Though I would like to answer all your  
 15 questions, Mr. Edwards, my attorneys at least  
 16 today have advised me I must assert my rights  
 17 under the Sixth, Fifth and Fourteenth Amendment.  
 18 Q Where are those computers today?  
 19 MR. PIKE: Form.  
 20 A Though I would like to answer all your  
 21 questions, my attorneys have advised me I must  
 22 assert my rights under the Sixth, Fifth and  
 23 Fourteenth Amendment.  
 24 Q Isn't it true that those computers  
 25 contain the names and telephone numbers of

1 underage minor females in the communities  
 2 surrounding each of your homes?  
 3 MR. PIKE: Form.  
 4 A Though I would like to answer each and  
 5 every one of your questions, Mr. Edwards, my  
 6 attorneys have advised me at least today, at  
 7 least today, that I may not. I must assert my  
 8 rights as provided by the Sixth, Fifth and  
 9 Fourteenth Amendment.  
 10 Q Isn't it true that within that computer  
 11 system were the names and telephone numbers of  
 12 hundreds of underage minor females that you  
 13 sexually molested?  
 14 MR. PIKE: Form.  
 15 A I would like to answer every one of your  
 16 questions today, Mr. Edwards. However, upon  
 17 advice of counsel I must assert my rights as  
 18 protected by the Sixth, Fifth and Fourteenth  
 19 Amendment.  
 20 Q Can you explain to the jury what  
 21 Gislaine Maxwell's role was in helping you to  
 22 access underage minors?  
 23 MR. PIKE: Form, assumes facts not in  
 24 evidence.  
 25 A You know I would like to answer each and

1 every one of your questions posed here today, Mr.  
 2 Edwards. Unfortunately I have to answer that  
 3 question on advice of counsel by invoking my  
 4 rights under the Sixth, Fifth and Fourteenth  
 5 Amendment.  
 6 Q Do you have any remorse for sexually  
 7 molesting Jane Doe?  
 8 MR. PIKE: Form, argumentative.  
 9 A I would like to answer every one of your  
 10 questions regarding Jane Doe. However, at least  
 11 today, my counsel has instructed me to assert my  
 12 rights as protected by the Sixth, Fifth and  
 13 Fourteenth Amendment.  
 14 Q When is the last time that you visited  
 15 your island, Little St. James?  
 16 MR. PIKE: Form.  
 17 A Though I would like to answer all your  
 18 questions, Mr. Edwards, my counsel advised me I  
 19 must assert my rights as protected by the Sixth,  
 20 Fifth and Fourteenth Amendment.  
 21 Q Has any court given you permission to go  
 22 to your island or the Virgin Islands while you  
 23 have been on house arrest?  
 24 MR. PIKE: Form.  
 25 A Mr. Edwards, though I would like to

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1 answer all your questions, my counsel has advised  
 2 me that I must assert my rights protected by the  
 3 Sixth, Fifth and Fourteenth Amendment.  
 4 **Q Have you interacted sexually with**  
 5 **underage minors since beginning your house arrest**  
 6 **or community control?**  
 7 **MR. PIKE:** Form.  
 8 **A** Though I would like to answer each and  
 9 every one of your questions posed here today, my  
 10 counsel has advised me that I must assert my  
 11 rights protected by the Sixth, Fifth and  
 12 Fourteenth Amendment.  
 13 **Q Mr. Epstein, is it your intention to**  
 14 **testify in the trial of Jane Doe versus Jeffrey**  
 15 **Epstein?**  
 16 **MR. PIKE:** Object to the form. It may  
 17 disclose attorney/client work product  
 18 information. I instruct him not to answer.  
 19 **Q Does Story Cowles work for you at**  
 20 **Florida Science Foundation?**  
 21 **MR. PIKE:** Form.  
 22 **A** Though I would like to answer each and  
 23 every one of your questions, Mr. Edwards, at  
 24 least today my counsel has advised me I must  
 25 assert my rights as protected by the Sixth, Fifth

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1 and Fourteenth Amendment.  
 2 **Q Is it your intent in the future to**  
 3 **engage in sexual activity with underage minor**  
 4 **children?**  
 5 **MR. PIKE:** Form.  
 6 **A** I would like to answer each one of those  
 7 questions, Mr. Edwards. However, today my  
 8 counsel has advised me I must assert my rights  
 9 protected by the Sixth, Fifth and Fourteenth  
 10 Amendment.  
 11 **Q When you give that answer, that you**  
 12 **would like to respond to each one of my**  
 13 **questions, would it then be your preference to**  
 14 **explain to the jury why it is that you feel**  
 15 **entitled to sexually molest underage minor**  
 16 **children?**  
 17 **MR. PIKE:** Form, move to strike.  
 18 Mischaracterizes the witness's testimony.  
 19 **A** Unfortunately I would like to answer  
 20 that question as well, but my counsel has advised  
 21 me that I must assert my rights as protected by  
 22 the Sixth, Fifth and Fourteenth Amendment.  
 23 **MR. EDWARDS:** I don't have anything  
 24 further.  
 25 **MR. PIKE:** Ms. Ezell?

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1 **MS. EZELL:** Okay. I can begin. Are we  
 2 ending at 4:00?  
 3 **MR. PIKE:** Yes, we are ending at 4:00.  
 4 **CROSS EXAMINATION**  
 5 **BY MS. EZELL:**  
 6 **MS. EZELL:** Let the record reflect that  
 7 I have 3:22 right now.  
 8 **Q Mr. Epstein, good afternoon.**  
 9 **A** Good afternoon.  
 10 **Q You were previously deposed by Mr.**  
 11 **Horowitz on Monday, March 8th of this year. You**  
 12 **were asked with respect to Jane Doe 103, "Do you**  
 13 **acknowledge that she's been to your home?" There**  
 14 **was a form objection and your answer was, "Again**  
 15 **I would like to answer most of your questions.**  
 16 **However, today as I've answered most, almost all**  
 17 **of your questions and will continue to answer on**  
 18 **advice of counsel, I believe, this question, I**  
 19 **have to assert my Fifth Amendment, Fourteenth**  
 20 **Amendment and Sixth Amendment rights under the**  
 21 **U.S. Constitution."**  
 22 **If you were asked the same question**  
 23 **today, what would your answer be? That question**  
 24 **was: "Do you acknowledge that Jane Doe 103 has**  
 25 **been to your home"?**

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1 **A** Please tell me who Jane Doe 103 is.  
 2 **Q Jane Doe 103 is Jane Doe 103.**  
 3 **A** I would like to answer the question so  
 4 the answer would be the same.  
 5 **MR. PIKE:** By "answering that question,"  
 6 you're invoking Fifth, Sixth and  
 7 Fourteenth?  
 8 **THE WITNESS:** Yes.  
 9 **MR. PIKE:** Please do so.  
 10 **A** I'm invoking my Sixth Amendment, Fifth  
 11 Amendment and Fourteenth Amendment right.  
 12 **Q You were then asked "Do you acknowledge**  
 13 **that Jane Doe 103 came to your home for sexual**  
 14 **contact during her childhood and that you paid**  
 15 **her for those services?"**  
 16 **Mr. Pike said "Form, predicate,**  
 17 **foundation, argumentative," and your response was**  
 18 **"I would like to answer that question. I think**  
 19 **those questions will all have obvious answers,**  
 20 **and not -- however, today I'm going to have to**  
 21 **assert my Fifth Amendment, Sixth Amendment and**  
 22 **Fourteenth Amendment rights under the U.S.**  
 23 **Constitution, because I would like to answer that**  
 24 **question, my attorneys have advised me that I**  
 25 **cannot today, cannot answer any question that may**

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1 **be relevant to this lawsuit."**

2 **If you were asked that same question**

3 **today, would your answer be the same?**

4 **MR. PIKE:** I'm going to object. Form,

5 and I instruct you if your answer is the

6 same, please tell Ms. Ezell that.

7 **A** My answer is the same, invoking my right

8 under the Sixth, Fifth and Fourteenth Amendment.

9 **Q** So, it wasn't just that that day you

10 were instructed not to answer the question, but

11 here, five weeks later, today, you also, today,

12 can't answer those questions, correct?

13 **MR. PIKE:** Asked and answered.

14 **A** I'm going to, on advice of counsel, Ms.

15 Ezell, respectfully assert my rights as protected

16 by the Sixth, Fifth and Fourteenth Amendment.

17 **Q** Later Mr. Horowitz said, "Sir, are you

18 asserting your Sixth, Fifth and Fourteenth

19 Amendment privileges because you're innocent? Is

20 that what you're telling us?"

21 **You said "Today on advice of counsel I**

22 **cannot answer your questions, any of your**

23 **questions that may be relevant to this lawsuit."**

24 **MR. PIKE:** Form.

25 **Q** What would your answer be today to that

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1 **question?**

2 **MR. PIKE:** Same objection.

3 **A** On advice of counsel, with respect to

4 that question, I'm going to have to assert my

5 rights as protected by the Sixth, Fifth and

6 Fourteenth Amendment.

7 **Q** So again, your answer wasn't just that

8 answer then, five weeks ago, but today, you again

9 cannot answer on advice of counsel, correct?

10 **MR. PIKE:** Move to strike.

11 Mischaracterization. Plaintiff has

12 invoked -- sorry, defendant has invoked

13 Fifth, Sixth and Fourteenth. That's his

14 answer.

15 **MS. EZELL:** So he invokes them today, as

16 well?

17 **MR. PIKE:** Yes, ma'am.

18 **Q** Mr. Horowitz asked "Between 2005 and

19 2006, did your sexual interests include digitally

20 penetrating the vaginas of girls between the ages

21 of 12 and 17?"

22 **Mr. Pike objected "Form," and you said,**

23 **"I find these questions -- I would like to**

24 **answer every one of those questions. However, my**

25 **counsel has told me I may not today. I wish I**

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1 **could answer those questions."**

2 **can you answer that question today?**

3 **MR. PIKE:** Form.

4 **A** Ma'am, unfortunately I'm going to have

5 to invoke my Sixth Amendment, Fifth and

6 Fourteenth Amendment right to that question.

7 **Q** Then you were asked --

8 **THE WITNESS:** Can we go off the record

9 for a second?

10 **THE VIDEOGRAPHER:** Off the video record

11 3:32 p.m.

12 **THE WITNESS:** Just two minutes.

13 **MR. EDWARDS:** For what? We are all

14 going to have a discussion off the record?

15 **MR. PIKE:** I think my client wants to

16 speak with me.

17 **MR. EDWARDS:** Okay.

18 **MR. PIKE:** Are you okay with that Ms.

19 Ezell?

20 **MS. EZELL:** Yes.

21 **MR. PIKE:** Off the record.

22 (Pause in the proceedings.)

23 **THE VIDEOGRAPHER:** --

24 **THE WITNESS:** Sorry, go ahead.

25 **THE VIDEOGRAPHER:** Back on the video

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1 record 3:33 p.m.

2 **Q** Later in that same deposition, Mr.

3 Horowitz asked "Did you have surveillance cameras

4 in either the interior or exterior of your home

5 at El Brillo Way between 2001 and 2006?"

6 **You answered, "Mr. Horowitz, I'm going**

7 **to answer that question the same way as I've**

8 **answered most of your other questions here**

9 **today. I would like to answer each one of your**

10 **questions regarding your clients with great**

11 **specificity, however my counsel has advised me**

12 **that I may not today, and therefore have to**

13 **invoke my Fourteenth Amendment rights, my Sixth**

14 **Amendment rights and my Fifth Amendment rights as**

15 **provided by the U.S. Constitution."**

16 **So what about today? Can you answer**

17 **that question for us today?**

18 **MR. PIKE:** Object to the form.

19 **A** Unfortunately, Ms. Ezell -- Mrs. Ezell,

20 I'm sorry.

21 **Q** Ms. is fine.

22 **A** Okay, Ms. Ezell. Unfortunately on

23 advice of counsel, I have to assert my rights as

24 protected by the Sixth, Fifth and Fourteenth

25 Amendment.

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1 MR. PIKE: And Ms. Ezell, let me caution  
2 you that I've listened to several of your  
3 questions. The first one being a repetition  
4 of Mr. Horowitz's question approximately  
5 four weeks ago dealing with your client 103,  
6 so I did not have a problem with that  
7 background information being repeated.  
8 However, it seems that the questions that  
9 you're discussing now and going over are  
10 just a repetition of Mr. Horowitz's  
11 background information, which has already  
12 been established and really has no relation,  
13 in my opinion, to your particular clients.  
14 Given the fact we are here today, Mr.  
15 Horowitz has taken the liberty of concluding  
16 his deposition, obviously with rebuttal  
17 available, same with Mr. Edwards, I would  
18 ask, rather than to have to seek assistance  
19 of the Court, that your questions be  
20 tailored toward your client.  
21 MS. EZELL: Mr. Pike, I would beg to  
22 differ with you. Questions regarding his  
23 sexual interests, including digitally  
24 penetrating vaginas of girls between ages of  
25 12 and 17 certainly pertain to my client.

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1 MR. PIKE: Ms. Ezell, you were at that  
2 deposition. You cross-noticed that  
3 deposition and these cases have been  
4 consolidated for discovery, and you have not  
5 formed, with the exception of one question,  
6 since you commenced your portion of the  
7 depo, you have not formed one question  
8 relative to your particular client.  
9 You just asked a general question that  
10 had already been asked by Mr. Horowitz who  
11 commenced the Volume I of this Volume III of  
12 IV continuation of the deposition. If you  
13 want to tailor these questions to your  
14 client, I have no problem with that, but to  
15 ask the same exact question Mr. Horowitz  
16 asked who commenced the deposition is a  
17 waste of time.  
18 MS. EZELL: That may be your opinion,  
19 Mr. Pike, but I believe I have, particularly  
20 in the way these questions were answered  
21 five weeks ago, that today, that day he was  
22 unable to answer because of advice of  
23 counsel. I certainly have the right to ask  
24 him whether this day, five weeks later, he  
25 can answer that question.

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1 MR. HOROWITZ: I join in Ms. Ezell's  
2 comments.  
3 MR. EDWARDS: Agreed.  
4 MR. PIKE: Thank you. Three against  
5 one. Nonetheless, again, I hold steadfast  
6 the same argument. It is repetitious and  
7 whether or not -- he is not going to waive  
8 Fifth, Sixth and Fourteenth yesterday and he  
9 is not going to waive it today, so...  
10 MS. EZELL: That's fine. My objection  
11 to that is that it is misleading for him to  
12 say that "Today I have been instructed not  
13 to answer it," because then I come here  
14 hoping five weeks later I may get an answer,  
15 and unfortunately that's not been the case.  
16 We have had the same invocation of the  
17 privileges today, only today, just for  
18 today.  
19 MR. PIKE: Well, I --  
20 MS. EZELL: I'm done with that line of  
21 questioning.  
22 MR. PIKE: Okay.  
23 MS. EZELL: But I think I had the right  
24 to ask.  
25 MR. PIKE: Thank you.

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1 MS. EZELL: Thank you.  
2 **Q Mr. Epstein, are you a citizen of the**  
3 **United States?**  
4 **A Yes.**  
5 **Q And are you a citizen of the United**  
6 **States Virgin Islands?**  
7 **A I don't know what that means.**  
8 **Q Of what State or territory of the United**  
9 **States are you a citizen?**  
10 **A I'm a citizen of the United States.**  
11 **Q And of what State or territory in the**  
12 **United States do you claim to be a citizen?**  
13 **A I'm a citizen of the United States.**  
14 **Q Where do you vote?**  
15 **A I vote in the Virgin Islands.**  
16 **Q Where do you pay your taxes?**  
17 **MR. PIKE: Form.**  
18 **A On advice of counsel, I'm going to have**  
19 **to assert my rights as protected by the Sixth,**  
20 **Fifth and Fourteenth Amendment.**  
21 **Q And I would just note that your tax**  
22 **returns are public documents available to the**  
23 **government, and there is no -- no risk of**  
24 **incriminating yourself with such a document. Do**  
25 **you still maintain the same objection?**

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1 MR. PIKE: He does, and that calls for a  
2 legal conclusion, which currently is, I  
3 think, under -- it was under appeal and now  
4 it is back under appeal.

5 Q Before serving your jail time in Palm  
6 Beach County, followed by your community control  
7 time, was your principal place of residence the  
8 dwelling in Manhattan?

9 A The what?

10 Q Your mansion in Manhattan?

11 MR. PIKE: Form.

12 A I'm sorry, but at least today, I would  
13 like to answer all your questions, Ms. Ezell.  
14 However, on advice of counsel I will have to  
15 respond by invoking my Sixth, Fifth and  
16 Fourteenth Amendment.

17 Q I won't repeat the same questions  
18 regarding the plan or scheme. I'll try not to,  
19 that have already been covered today. To the  
20 extent that they didn't just apply to that one  
21 plaintiff, in most instances, I believe that Mr.  
22 Edwards said, "young women" or "young girls like  
23 or including Jane Doe," but there were a few  
24 additional questions in that area I wanted to  
25 ask.

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1 Within that arrangement whereby girls  
2 would come or be brought to your home to provide  
3 massages and other sexual gratification for you,  
4 were they often brought by taxis that were paid  
5 for by you or by someone on your behalf?

6 MR. PIKE: Form.

7 A Though I would like to answer all your  
8 questions today, Ms. Ezell, I'm going to have to  
9 respond to that question as I've responded to  
10 most of your other questions, which is, on advice  
11 of counsel, at least today, they've instructed me  
12 to assert my rights as protected by the Sixth,  
13 Fifth and Fourteenth Amendment.

14 Q Also, within that same scheme, were  
15 these girls sometimes transported to or from your  
16 house by the current houseman employed by you at  
17 that time?

18 MR. PIKE: Form.

19 A Though I would like to answer all your  
20 questions, Ms. Ezell, that question as well as  
21 the others, I must unfortunately at least today,  
22 on advice of counsel, invoke my Sixth Amendment,  
23 Fifth Amendment and Fourteenth Amendment right.

24 Q And again following with that plan as  
25 discussed previously, were those same young women

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1 who came to your home to provide massages and  
2 other sexual gratification for you, were they  
3 often transported by Sarah Kellen or other  
4 assistants that you employed?

5 MR. PIKE: Form.

6 A Though I would like to answer each and  
7 every one of your questions, Ms. Ezell, I  
8 respectfully must decline. On advice of counsel  
9 they've instructed me I must assert my rights  
10 protected by the Sixth, Fifth and Fourteenth  
11 Amendment.

12 Q Would you acknowledge, Mr. Epstein, that  
13 once the girls were there, beginning with their  
14 first experience, their first visit, there was a  
15 sort of a ritual that was followed in regard to  
16 how they were treated, what they were asked to do  
17 and what occurred?

18 MR. PIKE: I'm sorry, I didn't know if  
19 that was the question.

20 MS. EZELL: It is a question.

21 THE WITNESS: What's the question?

22 MR. PIKE: What is the question?

23 Q From the first visit a girl might make  
24 to your home, was there a ritual or routine that  
25 was followed with regard to what happened during

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1 that visit?

2 MR. PIKE: Form.

3 A Ms. Ezell, I would like it answer all  
4 your questions that you posed here today, but I  
5 will have to respond unfortunately, as I've  
6 responded to most of the others which is, my  
7 counsel advised me I must respond by invoking my  
8 Sixth, Fifth and Fourteenth Amendment.

9 Q For instance, in addition to the other  
10 things that Mr. Edwards and Mr. Horowitz asked  
11 about, within the same area, would Ms. Kellen or  
12 one of your other assistants usually go up and  
13 lay out the towels and particular massage oils  
14 that you like?

15 MR. PIKE: Form.

16 A Ms. Ezell, unfortunately I have to  
17 answer that question as I've answered most of  
18 your other questions here today, respectfully  
19 decline to answer on advice of counsel who's  
20 asked me to invoke my Sixth Amendment, Fifth  
21 Amendment and Fourteenth Amendment right.

22 Q Was it more or less routine that when a  
23 girl would come for the first time, that she  
24 would be accompanied to the massage area by  
25 another woman or girl?



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1 MR. PIKE: Form.  
 2 A Ms. Ezell, I have to answer that  
 3 question as I answered most of your other  
 4 questions today, which is on advice of counsel, I  
 5 have to assert my rights as protected by the  
 6 Sixth, Fifth and Fourteenth Amendment.  
 7 Q Did it occur quite often that Sarah  
 8 Kellen would lead the girl up and introduce you  
 9 to her and then quietly leave?  
 10 MR. PIKE: Form.  
 11 A Ma'am, I'm going to respectfully have to  
 12 decline to answer that question today on advice  
 13 of counsel. They've asked me to assert my rights  
 14 as protected by the Sixth, Fifth and Fourteenth  
 15 Amendment. I would like to answer each and every  
 16 one of your questions.  
 17 Q Did it also occur sometime that the girl  
 18 would be accompanied by the girl who brought her,  
 19 and the girl who brought her would go up to your  
 20 bedroom and massage area with her, on her initial  
 21 visit?  
 22 MR. PIKE: Form.  
 23 A Again? Can you -- what's the question?  
 24 Q I'm asking about whether or not there  
 25 was a sort of routine that was followed when the

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1 girls would come to your home to provide the  
 2 massages and other sexual gratification for you,  
 3 I'm asking whether or not part of that routine  
 4 was that they would be accompanied by the girl  
 5 who brought them?  
 6 MR. PIKE: Form.  
 7 A I'm going to have to, on advice of  
 8 counsel, answer that question by asserting my  
 9 rights as protected by the Sixth, Fifth and  
 10 Fourteenth Amendment.  
 11 Q If they were accompanied by the girl who  
 12 brought them, would it be your usual practice to  
 13 allow them to start the massage and then excuse  
 14 the girl who had brought the second girl for her  
 15 first visit?  
 16 MR. PIKE: Form.  
 17 A I'm going to do my best to respond to  
 18 these questions, but my counsel has advised me  
 19 that I must assert my rights as protected by the  
 20 Sixth, Fifth and Fourteenth Amendment, Ms. Ezell,  
 21 so I respectfully must decline.  
 22 Q Did you have a routine way that you  
 23 liked the massage itself to be conducted?  
 24 MR. PIKE: Form.  
 25 A Ms. Ezell, I'm going to have to

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1 respectfully decline to answer that question, on  
 2 advice of counsel, they've asked me to assert my  
 3 rights as protected by the Sixth, Fifth and  
 4 Fourteenth Amendment.  
 5 Q Did either Ms. Kellen, or you, or the  
 6 girl who perhaps had been there before instruct  
 7 the new girl to begin by massaging the back of  
 8 your legs and your back?  
 9 MR. PIKE: Form.  
 10 A I would like to respond to all your  
 11 questions, but unfortunately at least today, my  
 12 counsel has advised me I must assert my rights as  
 13 protected by the Sixth, Fifth and Fourteenth  
 14 Amendment.  
 15 Q And did you or Ms. Kellen generally ask  
 16 the girls or instruct the girls to remove their  
 17 clothing?  
 18 MR. PIKE: Form.  
 19 A Unfortunately, Ms. Ezell I have to  
 20 respectfully decline to answer that question  
 21 today. On advice of counsel, they've asked me to  
 22 assert my Sixth Amendment, Fifth Amendment and  
 23 Fourteenth Amendment right.  
 24 Q After having the back of your legs --  
 25 the feet, the back of your legs and your back

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1 massaged, would you then typically turn over,  
 2 exposing yourself, laying on your back?  
 3 MR. PIKE: Form.  
 4 A Ms. Ezell, I'm going to respectfully  
 5 have to decline to answer that question today,  
 6 because my counsel has asked me to assert my  
 7 Sixth Amendment, Fifth Amendment and Fourteenth  
 8 Amendment right, though I would like to answer  
 9 every one of your questions.  
 10 Q Would it be your practice at that point,  
 11 depending on the skittishness of the girl to  
 12 begin trying to fondle her breasts or rub her  
 13 vagina?  
 14 MR. PIKE: Form.  
 15 A Ma'am, I respectfully have to decline to  
 16 answer that today, though I would like to answer  
 17 each one of these questions. My counsel has  
 18 instructed me to assert my Sixth Amendment, Fifth  
 19 Amendment and Fourteenth Amendment right.  
 20 Q Assuming the girl was ill at ease, would  
 21 it be your practice to then talk with her to try  
 22 to elicit from her, her interests, her goals, the  
 23 things that were important to her in her life?  
 24 MR. PIKE: Form.  
 25 Q Was that part of your routine?

1 MR. PIKE: Sorry. Form.  
 2 A Ma'am, though I would like to answer  
 3 every one of your questions today, unfortunately  
 4 my counsel has advised me I must assert my rights  
 5 as protected by the Sixth, Fifth and Fourteenth  
 6 Amendment.  
 7 Q Would it generally be your practice, if  
 8 the girl was skittish, to perhaps wait until the  
 9 second visit to introduce a vibrator into the  
 10 routine?  
 11 MR. PIKE: Form.  
 12 A Ms. Ezell, unfortunately I have to  
 13 answer that question the same way as I've  
 14 answered every one of your questions today, which  
 15 is, I would have to assert my rights protected by  
 16 the Sixth, Fifth and Fourteenth Amendment on  
 17 advice of counsel.  
 18 Q Would you try to calm the girl by  
 19 telling her to relax, that there was nothing  
 20 wrong with what was going on?  
 21 MR. PIKE: Form.  
 22 A Ma'am, unfortunately I have to respond  
 23 to that question as I've responded to most of  
 24 your other questions here today, which is by  
 25 invoking my Sixth Amendment, Fifth Amendment and

1 Fourteenth Amendment right.  
 2 Q Assuming that the girl made it through  
 3 the first session, would you generally wait until  
 4 you had reached climax before dismissing her?  
 5 MR. PIKE: Form.  
 6 THE WITNESS: Earthquake?  
 7 MR. PIKE: Train. For the record a  
 8 train is going by.  
 9 A Ms. Ezell, unfortunately I have to  
 10 respond to that question as I've responded to  
 11 most of the other questions here today, which is  
 12 I must assert my rights protected by the Sixth,  
 13 Fifth and Fourteenth Amendment on advice of my  
 14 counsel.  
 15 Q Would you generally pay the new girl  
 16 \$200 for the massage, either by telling her that  
 17 the money was on the counter or by telling her  
 18 that Ms. Kellen would pay her downstairs?  
 19 MR. PIKE: Form.  
 20 A Unfortunately, Ms. Ezell, today I have  
 21 to respond to that question the same way I've  
 22 responded to all your other questions, which is  
 23 by invoking my Sixth Amendment, Fifth Amendment  
 24 and Fourteenth Amendment right.  
 25 Q And if that girl had been brought by

1 another girl, was it your practice to pay the  
 2 procuring girl at least \$200 for bringing the new  
 3 girl?  
 4 MR. PIKE: Form.  
 5 A Again? Sorry. Can you repeat the  
 6 question?  
 7 Q Sure. Maybe I can state it a little  
 8 better.  
 9 Did you tell the girls that you would  
 10 pay them \$200 every time they brought a new  
 11 girl?  
 12 MR. PIKE: Form.  
 13 A Unfortunately, Ms. Ezell, I'm going to  
 14 have to respond to that question the same way as  
 15 I've responded to most of your other questions  
 16 today. On advice of counsel, they've instructed  
 17 me to assert my Sixth Amendment, Fifth Amendment  
 18 and Fourteenth Amendment right.  
 19 Q And indeed, did you keep that promise  
 20 and either pay them directly or have Ms. Kellen  
 21 pay the procurer \$200 for each new girl that she  
 22 brought?  
 23 MR. PIKE: Form.  
 24 A Unfortunately, Ms. Ezell, I have to  
 25 respond to that question respectfully the same as

1 I responded to most of your other questions here  
 2 today. My counsel has advised me I must assert  
 3 my rights as protected by the Sixth, Fifth and  
 4 Fourteenth Amendment.  
 5 THE WITNESS: Can we take a two-minute  
 6 break?  
 7 THE VIDEOGRAPHER: Going off the video  
 8 record 3:54 p.m.  
 9 (Pause in the proceedings.)  
 10 THE VIDEOGRAPHER: Back on the video  
 11 record 3:56 p.m.  
 12 Q Did you let the girls know that the more  
 13 they let you do, the more they would be paid?  
 14 MR. PIKE: Form. Again, I'm really  
 15 trying to work with you, Ms. Ezell, but that  
 16 is... is an exact question that Mr. Horowitz  
 17 asked at the commencement of the  
 18 deposition. We are back in generalities  
 19 again, and it is repetitious. If you could,  
 20 let's try to narrow it to your client.  
 21 MS. EZELL: I'm certainly entitled to  
 22 see how my client fits into the big picture  
 23 or my clients, and whether this was part of  
 24 a pattern and whether they indeed were  
 25 treated according to a pattern or scheme or

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1 routine.

2 MR. PIKE: Okay. I just don't hear any

3 questions regarding your clients. That's

4 what I'm saying.

5 **Q Do you recall that the first time A.H.**

6 **came to provide you a massage, you told her to**

7 **take off her clothing, which she refused to do?**

8 MR. PIKE: Form.

9 A A.H. -- can we use names so there is no

10 confusion here?

11 **Q A.H. Is "A.H.," She is Jane Doe 103.**

12 A I'm going to have to respond to that

13 question, as I responded to all your other

14 questions, Ms. Ezell, respectfully, and on advice

15 of counsel I have to assert my rights as

16 protected by the Sixth, Fifth and Fourteenth

17 Amendment.

18 **Q And when she did refuse to do that, did**

19 **you begin to try to touch her and paw at her and**

20 **remove some of her clothing?**

21 MR. PIKE: Form.

22 A Ma'am, I would respectfully -- I would

23 like to answer that question, as I would like to

24 answer most of the questions you've posed here

25 today. Respectfully, I'm going to have to

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1 decline on advice of counsel and invoke my Sixth

2 Amendment, Fifth Amendment and Fourteenth

3 Amendment right.

4 **Q Over the approximately 17 months that**

5 **A.H. came to your home, did you or your agents**

6 **frequently call her at her home number or her**

7 **cell number arranging for encounters, arranging**

8 **for her to come to your home to provide the**

9 **massage and sexual favors, sometimes as much as**

10 **twice a day?**

11 MR. PIKE: Form.

12 **Q Let's break it up.**

13 **During the 17 months that she came to**

14 **your home, did it frequently happen that you or**

15 **one of your agents would call ahead of time to**

16 **tell her that you would be coming to town?**

17 MR. PIKE: Form.

18 A Ma'am, I'm going to respectfully have to

19 decline to answer that question on advice of

20 counsel. They've instructed me to assert my

21 Sixth Amendment, Fifth Amendment and Fourteenth

22 Amendment right.

23 MR. PIKE: Ms. Ezell, as you know we've

24 discussed this at the commencement of

25 today's deposition, that we had a

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1 pre-existing obligation beginning at 4:00

2 o'clock. Hold on a second, guys. So this

3 deposition will be continued consistent with

4 various court orders.

5 MS. EZELL: Okay, thank you.

6 THE VIDEOGRAPHER: Going off the video

7 record 4:00 p.m.

8 THE COURT REPORTER: Thank you all.

9 Same orders as yesterday?

10 MR. EDWARDS: Yes.

11 MR. HOROWITZ: Yes.

12 MR. PIKE: Yes.

13 MS. EZELL: Yes, please.

14 THE COURT REPORTER: Thank you all.

15 (Whereupon, the deposition was adjourned

16 at 4:05 o'clock, p.m., sine die.)

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556

1 THE STATE OF FLORIDA)

2 COUNTY OF PALM BEACH)

3 I, TERRI BECKER, a Registered

4 Professional Reporter and Notary Public for the

5 State of Florida at Large, do hereby certify that

6 I reported the videotaped deposition of

7 JEFFREY EPSTEIN, the DEFENDANT, called by the

8 PLAINTIFF in the above-entitled action; that the

9 witness was duly sworn by me; that the foregoing

10 pages, numbered from 336 to 560, inclusive,

11 constitute a true record of the deposition by

12 said witness.

13 I further certify that I am not attorney

14 or counsel of any of the parties, nor a relative

15 or employee of any attorney or counsel connected

16 with the action, nor financially interested in



17 the action.

18 WITNESS MY HAND and official seal in the

19 City of West Palm Beach, County of Palm Beach,

20 State of Florida, this 19th day of April 2010.

21

22  

23 TERRI BECKER, Registered

24 Professional Reporter and

25 Notary Public, State of Florida

at Large. My Commission expires

March 13, 2011.

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1 THE STATE OF FLORIDA)  
 2 COUNTY OF PALM BEACH)  
 3  
 4  
 5 The foregoing certificate was  
 6 acknowledged before me this  
 7 day of \_\_\_\_\_ 2010.  
 8  
 9  
 10  
 11  
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 14  
 15 Notary Public, State of Florida.  
 My commission No.  
 Expires March 13, 2011.  
 16  
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558

1 I, JEFFREY EPSTEIN, do hereby  
 2 certify that I have read the foregoing transcript  
 3 of my deposition given on April 14, 2010; that  
 4 together with the correction page attached hereto  
 5 noting changes in form or substance, if any, it  
 6 is true and correct.  
 7  
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JEFFREY EPSTEIN

I do hereby certify that the deposition  
 of JEFFREY EPSTEIN was submitted to the witness  
 for reading and signing; that after he had stated  
 to the undersigned Notary Public that he had read  
 and examined his deposition, he signed the same  
 in the presence of the undersigned authority on  
 the \_\_\_\_ day of \_\_\_\_\_ 2010.

559

1 ERRATA SHEET  
 2 In Re: JANE DOE V. EPSTEIN  
 3 DO NOT WRITE ON TRANSCRIPT  
 4 ENTER CHANGES HERE:  
 5 PAGE LINE CHANGE REASON  
 6  
 7  
 8  
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JEFFREY EPSTEIN

THE STATE OF FLORIDA)  
 COUNTY OF PALM BEACH)  
 I DO HEREBY CERTIFY THAT JEFFREY EPSTEIN  
 appeared before me and stated that he has read  
 his deposition; further, that this Errata Sheet  
 was signed in my presence on this \_\_\_\_ day  
 of \_\_\_\_\_ 2010.

560

1 U.S. LEGAL SUPPORT  
 Registered Professional Reporters  
 2 444 West Railroad Avenue  
 Suite 300  
 3 West Palm Beach, Florida 33401  
 (561) 835-0220  
 4  
 5 April 19, 2010  
 6 BURMAN, CRITTON, LUTTIER & COLEMAN  
 303 Banyon Boulevard  
 7 Suite 400  
 West Palm Beach, Florida 33401  
 8  
 9 ATTENTION: MICHAEL PIKE, ESQ.  
 In Re: JANE DOE V. EPSTEIN  
 10 Deposition of: JEFFREY EPSTEIN  
 11  
 12  
 13 Dear Mr. Pike:  
 14 Since counsel have agreed that you may  
 have the witness read and sign your copy of the  
 15 deposition, for your convenience, enclosed  
 herewith you will find an Errata Sheet for the  
 16 witness' use in entering any changes to the  
 deposition.  
 17 Thank you for your prompt attention.  
 18 Cordially yours,  
 U.S. LEGAL SUPPORT  
 19  
 20  
 21  
 22  
 23  
 24  
 25

TERRI BECKER, Registered  
 Professional Reporter, Notary  
 Public, State of Florida at  
 Large. My commission expires  
 March 13, 2011.

CC: Adam Horowitz, Esq.  
 Bradley Edwards, Esq.  
 Katherine Ezell, Esq.

# ATTACHMENT 5

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UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

CASE NO.: 08-CV-80119-MARRA/JOHNSON

JANE DOE NO. 2,

Plaintiff,

-vs-

VOLUME I OF III

JEFFREY EPSTEIN,

Defendant.

---

Related cases:

08-80232, 08-08380, 08-80381, 08-80994,  
08-80993, 08-80811, 08-80893, 09-80469,  
09-80591, 09-80656, 09-80802, 09-81092

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VIDEO-CONFERENCE AND VIDEOTAPED DEPOSITION OF  
JANE DOE NO. 4

Tuesday, October 27, 2009  
11:11 - 6:05 p.m.

250 Australian Avenue South  
Suite 115  
West Palm Beach, Florida 33401

Reported By:  
Cynthia Hopkins, RPR, FPR  
Notary Public, State of Florida  
Prose Court Reporting

Page 30

1 A. It means he was in my face. We were  
 2 arguing, argument.  
 3 Q. You mean he was close --  
 4 A. Yes.  
 5 Q. -- his face was close in proximity to  
 6 yours?  
 7 A. Yeah.  
 8 Q. And he bit your finger?  
 9 A. Uh-huh.  
 10 Q. Was that --  
 11 MR. HOROWITZ: Instead of uh-huh just say  
 12 yes.  
 13 THE WITNESS: Yes.  
 14 BY MR. LUTTIER:  
 15 Q. I assume that while that event was  
 16 transpiring it was a significant event to you.  
 17 A. Yeah, when it happened.  
 18 Q. Did it scare you?  
 19 A. Uh-huh.  
 20 Q. Did it -- did it cause --  
 21 A. Yes.  
 22 MR. HOROWITZ: Thank you.  
 23 THE WITNESS: Sorry.  
 24 BY MR. LUTTIER:  
 25 Q. Did it cause you to have fear?

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1 A. Yeah.  
 2 Q. Fear of him, I would assume.  
 3 A. Yeah.  
 4 Q. Has -- up to that point in time, how did  
 5 it compare to any other event that had happened in  
 6 your life in terms of the shock to you and the  
 7 trauma it caused you?  
 8 A. It was shocking, but it made me strong,  
 9 and I've moved on from that.  
 10 Q. At the point in time that this interaction  
 11 happened that you've described between you and  
 12 Mr. Vinyard where he bit your finger and he was in  
 13 your face --  
 14 A. Uh-huh.  
 15 Q. -- was that the most traumatic thing that  
 16 had ever happened to you in your life as of that  
 17 point in time?  
 18 A. No.  
 19 Q. Had you had other boyfriends do the same  
 20 thing to you?  
 21 A. No.  
 22 Q. What was a more traumatic event that had  
 23 happened to you at that point in time than the event  
 24 where your ex-boyfriend was in your face and bit  
 25 your finger?

Page 32

1 MR. HOROWITZ: Object to the form.  
 2 THE WITNESS: What is a more traumatic  
 3 time?  
 4 BY MR. LUTTIER:  
 5 Q. Yeah. What was more traumatic than that  
 6 that had happened to you in your life as of that  
 7 point in time?  
 8 A. Meeting Jeffrey Epstein.  
 9 Q. Meeting Mr. Epstein. Do you mean  
 10 physically being introduced to the man?  
 11 A. No, being sexually abused by Mr. Epstein.  
 12 Q. Okay. And what do you mean by sexually  
 13 abused?  
 14 MR. HOROWITZ: Take your time.  
 15 THE WITNESS: Being fingered by him,  
 16 having him use a vibrator on me, grabbing my  
 17 nipples, smelling my butt, jerking off in front  
 18 of me, licking my clit, several times.  
 19 BY MR. LUTTIER:  
 20 Q. What several times, licking your clit  
 21 several times?  
 22 A. Fingering me several times.  
 23 Q. So, licking your clit was not several  
 24 times?  
 25 MR. HOROWITZ: Object to the form.

Page 33

1 THE WITNESS: No.  
 2 BY MR. LUTTIER:  
 3 Q. Now, when did this -- anything else?  
 4 A. (Witness shakes head.)  
 5 Q. Is the answer, no?  
 6 A. Yes, it's no.  
 7 MR. HOROWITZ: Object to the form. I  
 8 don't think she even understands what the last  
 9 question was.  
 10 BY MR. LUTTIER:  
 11 Q. I said anything else.  
 12 A. No.  
 13 Q. Now, when was the date that this event  
 14 occurred where the police were summoned with  
 15 Mr. Vinyard?  
 16 A. With Mr.-- when what?  
 17 Q. With Preston Vinyard, when you say he was  
 18 in your face and he bit your finger.  
 19 A. Yeah.  
 20 Q. When did that happen?  
 21 A. I don't remember.  
 22 Q. What year?  
 23 A. Maybe '06, or no, I -- sorry. I graduated  
 24 '05 -- '03 maybe, '04.  
 25 Q. Had you met Mr. Epstein at the time that

1 this event that you've described with Mr. Vinyard  
 2 occurred where he was in your face and bit your  
 3 finger?  
 4 A. I don't remember. Yeah, because I met  
 5 Mr. Epstein before or around the same time that I  
 6 met Preston.  
 7 Q. Well --  
 8 A. I met him before I hung -- started, before  
 9 I was serious with Preston, so yeah.  
 10 Q. Well, do you know when you first met  
 11 Mr. Epstein?  
 12 A. Yeah, when I was 15 years old.  
 13 Q. And how do you know that's when you first  
 14 met him?  
 15 A. Because it was the middle of my sophomore  
 16 year. I was 15 years old my sophomore year.  
 17 Q. And how do you know it was the middle of  
 18 your sophomore year?  
 19 A. Because that's when I was in class with  
 20 Haley Robson and that's how I knew her and that's  
 21 who brought me there.  
 22 Q. Do you have any record of when you first  
 23 met Mr. Epstein; that is any written record  
 24 anywhere?  
 25 A. Any written record?

1 I met him when I did.  
 2 Q. Well, we're going to come back to why you  
 3 would tell people something that is not true, but  
 4 I'll get to that later.  
 5 MR. HOROWITZ: Move to strike,  
 6 argumentative.  
 7 BY MR. LUTTIER:  
 8 Q. Now, you say you first met Mr. Epstein  
 9 when you were 15 in the middle of your sophomore  
 10 year, and you said somebody, Haley Robson, you  
 11 mentioned --  
 12 A. Yes.  
 13 Q. -- she introduced you to him?  
 14 A. Uh-huh.  
 15 Q. What do you mean she introduced you to  
 16 him?  
 17 A. She brought me to his house.  
 18 Q. What do you mean she brought you to his  
 19 house?  
 20 A. She drove me to her -- his house.  
 21 Q. Had you had some sort of discussion with  
 22 Haley Robson about going to Mr. Epstein's before she  
 23 drove you to his house for the first occasion?  
 24 A. Yeah.  
 25 Q. Had you had more than one discussion with

1 Q. Yep.  
 2 A. On paper?  
 3 Q. Whether it's -- examples, but I don't mean  
 4 to limit my question, examples could be you made a  
 5 note somewhere, you noted it on a calendar, you  
 6 wrote it down someplace.  
 7 A. No.  
 8 Q. Is there any record to the best of your  
 9 knowledge anywhere in the world that establishes the  
 10 first date upon which you met Mr. Epstein?  
 11 A. No.  
 12 Q. So, the sole basis for you to have -- for  
 13 you claiming that you met Mr. Epstein in the middle  
 14 of your sophomore year --  
 15 A. I did.  
 16 Q. -- is your recollection; is that right?  
 17 A. Yes.  
 18 Q. Have you ever told anyone in the world  
 19 that you met Mr. Epstein for the first time at some  
 20 other time?  
 21 A. No.  
 22 Q. Are you sure?  
 23 A. From what I can recall, yeah. I don't --  
 24 I mean, I don't recall, but I don't see why I  
 25 wouldn't tell the truth, like tell them that's when

1 Haley Robson about going to Mr. Epstein's house  
 2 before she drove you there for the first time?  
 3 A. More than one conversation about going  
 4 there?  
 5 Q. Yep.  
 6 A. Yeah.  
 7 Q. And how many conversations did you have  
 8 with Haley Robson about going to Mr. Epstein's house  
 9 before you went there for the first time?  
 10 A. Probably two, once on the phone and once  
 11 on the way there.  
 12 Q. And how, how long was it or approximately  
 13 how long was it before you went there that you had  
 14 your conversations with Haley Robson about going to  
 15 Mr. Epstein's house before you went there for the  
 16 first time?  
 17 A. Ask that one more time, please.  
 18 Q. Do you know what the word prior means? It  
 19 means before --  
 20 A. Before it happened.  
 21 Q. Okay. Prior to you going to Mr. Epstein's  
 22 house for the first time, how long was it before  
 23 that that you had this conversation with Haley  
 24 Robson? Was it like a month beforehand, two months  
 25 beforehand, six months beforehand?



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1 Mr. Epstein's?  
2 A. Probably a few times.  
3 Q. How many?  
4 A. Before I took -- I don't remember when I  
5 took Lauren, so I can't tell you how many times I  
6 had been there before I took her.  
7 Q. What's your best estimate?  
8 A. I don't know when I took her, so I don't  
9 know how to answer that question.  
10 Q. Well, do you know if it was more than  
11 three times?  
12 A. I am sure.  
13 Q. Was -- how old was Lauren when you took  
14 her there?  
15 A. I don't know how old Lauren was when I  
16 took her there. I think she was 18.  
17 Q. So, Lauren was out of high school by then?  
18 A. She might have been a senior in high  
19 school or she could have been out of high school.  
20 Q. And she was one year ahead of you?  
21 A. Yeah.  
22 Q. So, that would have meant that you were  
23 taking her --  
24 A. She could have been her senior year in  
25 high school, or she, I could have been a senior year

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1 in high school.  
2 Q. So, it could have been in your junior or  
3 senior year of high school?  
4 A. Yeah.  
5 Q. And you said you first went in the middle  
6 of your sophomore year, right?  
7 A. Uh-huh.  
8 Q. So, under your recollection of events  
9 would it be a fair characterization that at the  
10 point in time that you took Lauren to Mr. Epstein's,  
11 you had been to Mr. Epstein's on several occasions?  
12 A. Yeah.  
13 Q. At the point -- as of the point in time  
14 that you took Lauren there, had you -- had all the  
15 massages that you performed for Mr. Epstein been  
16 conducted in the same manner as what you have  
17 described in the first three visits?  
18 MR. HOROWITZ: Object to the form.  
19 THE WITNESS: I don't know when I brought  
20 her there, so I don't know -- you're asking me  
21 the same question.  
22 BY MR. LUTTIER:  
23 Q. At the point in time that you brought her,  
24 had all the massages that you had performed for  
25 Mr. Epstein been like the first three?

Page 136

1 A. I don't remember when I saw her there, so  
2 I don't know, like, if they were the same.  
3 Q. Okay. Well --  
4 A. What are you, like, I --  
5 Q. Did there come a point in time after the  
6 third massage that the way you performed massages on  
7 Mr. Epstein changed?  
8 A. It progressively got worse, yes, but I  
9 don't recall.  
10 Q. When you say worse, what do you mean by  
11 worse?  
12 A. He would get more, like, aggressive, like,  
13 he would be more friendly. Like after, like, going  
14 there a couple of times, then he would ask me, oh,  
15 will you take your top off, and then the next time  
16 when I would get up and go to leave, he goes, take  
17 your bra off or, you know, next time you go can you  
18 take your pants off, or it progressively got worse,  
19 and then next time it was like, he like used a  
20 vibrator on me, and then the next time he used a  
21 vibrator and fingering me, and then the next time he  
22 would do that and then licking my clit, and then  
23 before that, grabbing my nipples and at last, I mean  
24 it progressively got worse.  
25 Q. When you say the next time, you mean there

Page 137

1 was one visit, and then literally the next visit he  
2 said, take your top off, and it was literally the  
3 next visit that he said something else, and  
4 literally the next visit he said something else --  
5 A. Yeah.  
6 Q. -- or were there more than one visit --  
7 A. It progressively got worse.  
8 Q. Was there more than one time you performed  
9 massages between these events?  
10 MR. HOROWITZ: Object to the form.  
11 THE WITNESS: Ask that again. What do  
12 you -- you talk like...  
13 BY MR. LUTTIER:  
14 Q. Let's take the fourth visit, what happened  
15 on the fourth visit?  
16 A. Got a massage, takes my shirt off, take my  
17 underwear, like I just said.  
18 Q. Well, I'm asking you about the fourth  
19 visit now. First of all, can you tell me when the  
20 fourth visit happened?  
21 A. It happened after the third visit.  
22 Q. Okay. Probably happened before the fifth  
23 visit, too, right?  
24 A. Yeah.  
25 MR. HOROWITZ: Argumentative. Can we take

# ATTACHMENT 4

IN THE CIRCUIT COURT OF THE 15th JUDICIAL CIRCUIT  
IN AND FOR PALM BEACH COUNTY, FLORIDA

CASE No. 502008CA028058XXXMB AD

E.W.

Plaintiff,

-vs-

JEFFREY EPSTEIN,

Defendant.

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VIDEOTAPED DEPOSITION OF E.W.  
VOLUME I

Thursday, May 6, 2010

12:31 - 3:39 p.m.

250 South Australian Avenue  
Suite 1500  
West Palm Beach, Florida 33401

Reported By:

Jeana Ricciuti, RPR, FPR, CLR  
Notary Public, State of Florida  
Prose Court Reporting Agency, Inc.

1 A. No.

2 Q. Did L.M. ever ask Melissa to go?

3 A. I don't know.

4 Q. Did any other of your friends ask Melissa to  
5 go to Mr. Epstein's home?

6 A. I don't know.

7 Q. Was Melissa the same age as you were?

8 A. No.

9 Q. Older or younger?

10 A. Younger.

11 Q. When you told -- when you asked Melissa if she  
12 would go, you had already been to Mr. Epstein's house,  
13 correct?

14 A. Correct.

15 Q. Okay. How many times had you been to  
16 Mr. Epstein's house when you asked Melissa to go?

17 A. I would say over five to ten times, somewhere  
18 in between there.

19 Q. And were --

20 A. It varies. I don't know.

21 Q. Was Melissa aware that you were going there?

22 A. Yes.

23 Q. And did she ever ask you what happened at  
24 Mr. Epstein's home?

25 A. Yes.

1 \$200 and her \$200 for me to take her there, and that he  
2 wanted young girls, as she was such; with no tattoos, as  
3 she was such; to massage, give him a massage, take off  
4 your clothes, and then I would leave the room. And  
5 whenever I went -- when I was taken there and whoever I  
6 was taken there by left the room, he would -- you know,  
7 want me to either get -- leave my bottoms on or get  
8 fully naked, and he would want me to stand on the side  
9 of him as he touched my breasts. He wanted me to touch  
10 his nipples, lick his nipples, you know, various things.  
11 As he grabbed my butt, as he grabbed my breasts, as he  
12 touched my vagina, you know, and as he ejaculated, I was  
13 doing those things.

14 Q. All right. And you told Melissa this?

15 A. Yeah.

16 Q. And when you said, do you want to come to his  
17 house, do you want to go to his house --

18 A. Would you like to go to his house to make  
19 \$200.

20 Q. And she said?

21 A. No, he's a pedophile.

22 Q. And what did you say to that?

23 A. Okay, I understand.

24 Q. All right. And did you -- did you think that  
25 Mr. Epstein -- did you think he had problems? Well, let

1 Q. Okay. And did you tell her?

2 A. Yes.

3 Q. And what was her -- what did you tell her  
4 happened those five or ten times?

5 A. I told her that I --

6 Q. Before -- let me -- let me just withdraw that  
7 question.

8 Before --

9 A. You're not done?

10 Q. Before you asked Melissa to go to  
11 Mr. Epstein's home, if I understand it correctly, you  
12 may have been at Mr. Epstein's home five, ten times; is  
13 that correct?

14 A. To the best of my knowledge.

15 Q. All right. And you would tell Melissa what  
16 went on at Mr. Epstein's home?

17 A. Yes.

18 Q. Okay.

19 A. When I asked her to go, I told her it's -- you  
20 know, pretty plain and obvious that I would tell her  
21 why.

22 Q. And did you -- when you told her what had gone  
23 on at Mr. Epstein's home and you asked her if she wanted  
24 to go, what did you tell her?

25 A. I told her that, you know, he would pay me

1 me ask it this way.

2 A. Yeah.

3 Q. Did you know what Mr. Epstein was doing at the  
4 time? That is, the first time that you went, did you  
5 perceive and think this is wrong?

6 A. Of course.

7 Q. All right. And so every time that you went to  
8 Mr. Epstein's house from the first time --

9 A. I was aware.

10 Q. -- you were aware that what -- from your  
11 opinion, that what he was doing was inappropriate and  
12 wrong?

13 A. Correct.

14 Q. Okay. And did you understand that -- that is,  
15 you understood that, your mind understood that? You  
16 knew it but you still voluntarily returned each time?

17 A. I was homeless.

18 MR. EDWARDS: Form.

19 THE WITNESS: I was homeless when I went to  
20 his house, okay? Do you understand? Have you ever  
21 been homeless? I'm sorry. I'm sorry. I'll  
22 withdraw that question because I know I'm not the  
23 one asking the questions here. I was homeless. I  
24 was a young child, okay? When I went to his house,  
25 yes, I knew it was wrong. Yes, I knew he was a --

home?

A. I just went through -- I called Yellow Cab and I had Yellow Cab pick me up and then I had Yellow Cab drive me to her house, pick her up, and then we went to Jeffrey's, and Jeffrey paid for it.

Q. How many people had you taken to Mr. Epstein's house prior to Jane Doe 6?

A. I mean, the least, like I said earlier, 20 to 30 girls at -- at least.

Q. How many girls did you take after Jane Doe 6?

A. I'm sorry, repeat that first question.

Q. My first question was, is: How many females had you taken to Mr. Epstein's house prior to Jane Doe 6?

A. Oh, I thought you meant altogether. I -- I don't know. I don't know how many people I've taken before Jane Doe 6.

Q. Do you know how many females you took after Jane Doe 6?

A. I could tell you altogether it was about 20 to 30 females at the least I took to his house.

Q. Did you consider yourself to be a pimp?

A. No.

MR. EDWARDS: Form.

1 Q. So she was acting as a pimp for you?

2 MR. EDWARDS: Form.

3 THE WITNESS: Right.

4 BY MR. CRITTON:

5 Q. True?

6 A. True.

7 Q. Because she made money off taking you there?

8 A. Correct.

9 Q. Okay. Did you consider yourself a prostitute? Have you ever considered yourself to be a prostitute?

10 A. With Jeffrey Epstein, yes.

11 Q. With anyone else?

12 A. No.

13 Q. So you considered yourself to be a prostitute with Mr. Epstein and you knew what you were doing --

14 A. Was wrong.

15 Q. -- was wrong?

16 A. Yes.

17 Q. And so you participated, and I know your view, but you participated in whatever wrongful activity was occurring at the same time, true?

18 A. True, as a 15-year-old juvenile, true, 14-year-old, 15-year-old juvenile, true.

19 Q. Let me ask you about Jane Doe. How many of Jane Doe's -- well, let me strike that.

BY MR. CRITTON:

Q. Why not? You were -- you were taking females to Mr. Epstein's house for them giving themselves -- giving their body for sexual activity for hire, true?

MR. EDWARDS: Form.

THE WITNESS: Yeah, true, but I just never looked at myself as a pimp or anything like that. I honestly -- honestly had a conscience about what I was doing. I wasn't proud of it by any means.

BY MR. CRITTON:

Q. Well, but you -- you know what a pimp is, don't you?

A. Yes.

Q. And you knew what a pimp was at the time, correct?

A. I'm not -- I can't answer that honestly. I might not have known what a pimp was at that time.

Q. Looking back, do you understand that you were acting as a pimp?

MR. EDWARDS: Form.

THE WITNESS: I -- sure, you know.

BY MR. CRITTON:

Q. And L.M., when she took you, she received money for taking you?

A. Okay.

1 When you knew Jane Doe, before she went to  
2 Mr. Epstein's, were you -- were you aware of -- well, I  
3 think you said you were aware that she would smoke pot,  
4 she would drink with you, true?

5 A. True.

6 Q. Were you aware of boyfriends that she had  
7 before she went to Mr. Epstein's home; that is, what her  
8 relationship history was?

9 A. No, I really didn't know much about her other  
10 than she was Melissa's friend.

11 Q. And you -- you said you had met Batu  
12 (phonetic), correct?

13 A. Correct.

14 Q. When did you say the last time was that you  
15 spoke with Jane Doe?

16 A. When she had her baby.

17 Q. Do you know what year that was?

18 A. No, I don't.

19 Q. If I was to suggest it was in '08, would that  
20 meet with your recollection?

21 A. I was going to say somewhere around there.

22 Q. Did you ever tell Jane Doe that you had filed  
23 a lawsuit against Mr. Epstein?

24 A. Yes, I did.

25 Q. And how did -- how did the subject come up

Q. Did she -- and did she ever tell you that Mr. Epstein had ever used any physical force directed to her in any way?

A. No.

Q. And in fact, Mr. Epstein never used any physical force or coercion to you, did he?

MR. EDWARDS: Form.

THE WITNESS: Other than masturbating in front of me and, you know, totally taking advantage of my home -- living situation and my whole situation in general, my innocence and everything else. I mean, if you don't call that taking advantage of me physically, I don't know what -- what -- what you do call taking advantage of somebody physically.

MR. CRITTON: Move to strike as non-responsive.

BY MR. CRITTON:

Q. Let me ask you this question: Did Mr. Epstein ever physically threaten you at any time?

MR. EDWARDS: Form.

THE WITNESS: As in, what, like put his hands on me?

BY MR. CRITTON:

Q. No, physically threaten you.

MR. EDWARDS: Form.

THE WITNESS: Like, I'm going to hurt you?

BY MR. CRITTON:

Q. Yes, ma'am.

A. No, he never said he was going to hurt me.

Q. He was never violent with you, was he?

MR. EDWARDS: Form.

THE WITNESS: I guess -- what do you consider violent so I can answer this --

BY MR. CRITTON:

Q. Physically violent with you.

MR. EDWARDS: Form.

THE WITNESS: Physically violent, as in I'm going to hurt you, basically?

BY MR. CRITTON:

Q. Yes, ma'am.

A. No, he never said he was going to hurt me.

Q. You never felt threatened by Mr. Epstein, did you?

A. Yes. By his authority, definitely.

Q. Did you feel physically -- did you feel -- you say threatened by his authority, was that every time you were there?

A. Of course.

Q. Did he ever try to restrain you in any way?

A. Yes.

1 Q. In what way?

2 A. There was times where he's put -- inserted his  
3 fingers in my vagina and I didn't want him to. After it  
4 was done and I tried pulling away, and he did not  
5 release his fingers from my vagina. So that's being a  
6 little bit physical with somebody.

7 Q. Let me ask you this: When L.M. told you that  
8 she had been going to Mr. Epstein's house, what did she  
9 tell you? I mean, other -- she told you that you could  
10 make \$200 if you go to his house, or if you bring  
11 another girl you could make \$200, correct?

12 A. Yes. L.M. really wasn't up front with me.  
13 She didn't tell me that he was going to masturbate in  
14 front of me. She told me it was a massage for \$200, and  
15 basically that you did have to -- you could get  
16 undressed or you didn't have to get undressed and  
17 massage him for \$200.

18 Q. Prior to the time that -- well, let me strike  
19 that.

20 When L.M. told you about Mr. Epstein, did she  
21 ask you if you wanted to go?

22 A. Excuse me?

23 Q. When L.M. told you about Mr. Epstein, did she  
24 tell you -- or ask you if you wanted to go?

25 A. Not right away, no.

1 Q. She just told you about him?

2 A. Yes.

3 Q. At some point, did she ask you if you wanted  
4 to go?

5 A. Yes.

6 Q. And did you say, sure?

7 A. Yes, after she told me that all I would have  
8 to do is massage him and I didn't have to take my  
9 clothes off, I had the choice to take my clothes off if  
10 I -- I didn't have to, and you know that -- yeah, he had  
11 a great mansion and he had a chef and we could go there  
12 and, you know, get food cooked for us and hang out in a  
13 wonderful house and get paid \$200 for just giving  
14 somebody a massage, you know, yeah.

15 Q. Had you ever -- had you ever given someone a  
16 massage before?

17 A. No.

18 Q. Did -- did you tell her that you had never  
19 given anyone a massage, her meaning L.M.?

20 A. Well, no, I never -- no, I didn't say L.M., I  
21 never gave anybody a massage, no.

22 Q. So basically, she --

23 A. I mean, besides -- I mean, actually me and  
24 L.M. would, like, massage each other, but we were  
25 girlfriends, you know. So no, I never laid out a

1 A. Sure.

2 Q. And she told you that you didn't have to get  
3 naked if you didn't want to, true?

4 A. True.

5 Q. So you get to the home the first time. What  
6 happens next?

7 A. I get to the -- we get there, we enter through  
8 the door. We go through another door, and now we're in  
9 his kitchen. We go through another door that looked  
10 like it would be a closet. We walked -- which is  
11 actually a stairwell. We walk up the winding stairwell.  
12 We open up the door, and now we're in, it looks like a  
13 hallway. We enter -- we have to -- we go to the right,  
14 we open up another door, which leads into another door.  
15 We open up that door, and now we're in his bedroom.

16 We walk around his bed, which would be curving  
17 to the left. We open up a door, and now we're in his  
18 bathroom. She opens up a closet, shows me where the  
19 massage table is. She tells me, okay, help me pretty  
20 much set up the massage table. We get the massage  
21 table, she shows me where all the lotions are, all Bath  
22 & Body Works lotions. She asked me to pick out a  
23 lotion, whichever ones I want, whatever one I want, set  
24 it on the table, make sure that my jewelry was off my  
25 hands, and then we had to sit on the couch and wait for

1 him to come in.

2 And he comes in, I introduce myself to him and  
3 he takes off his robe and is completely nude underneath  
4 his robe. He lays on the -- on the table, he puts like  
5 a towel like where his butt would be so he's not  
6 completely nude. He has a towel over his butt, and we  
7 give him a massage for about 30 to 45 minutes as he's  
8 talking on the phone, and it seems -- what seemed to me  
9 like he was handling business.

10 Q. Let me stop you there for a minute. Can you  
11 give me a date that you went the first time?

12 A. No.

13 Q. An approximate date?

14 A. August of 2002.

15 Q. And what makes you believe it's August of  
16 2002?

17 A. Because I know it was like kind of right  
18 before the ninth grade -- ninth grade, you know, going  
19 into the ninth grade.

20 Q. Were you living with L.M. at the time?

21 A. Yes.

22 Q. Was L.M.'s dad aware she had been going over  
23 there?

24 A. No.

25 Q. Did L.M. tell you how far -- many times she



# ATTACHMENT 3

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

CASE NO. 502008CA028051XXXXMB AB

L.M.,

Plaintiff,

-vs-

VOLUME I OF II

JEFFREY EPSTEIN,

Defendant.

---

VIDEO-CONFERENCED AND VIDEOTAPED DEPOSITION OF L.M.

Thursday, September 24, 2009  
9:40 - 5:52 p.m.

250 Australian Avenue South  
Suite 115  
West Palm Beach, Florida 33401

Reported By:  
Cynthia Hopkins, RPR, FPR  
Notary Public, State of Florida  
Prose Court Reporting

**Certified Copy**

THE WITNESS: What did I do to Jeffrey and what did Jeffrey do to me? I went up there multiple times. I can't count. And I would be on a massage table massaging his legs. He would turn over. His penis would be hanging out. He would put a vagina or a vibrator to my vagina. He would touch my vagina with his fingers. He would touch my breasts. He would try to kiss my mouth. He would bring my hands towards his penis. He would ask the little girls that I was with, hey, can I just see your vagina, can I just see it, even if they would say no. Can I, oh, I know, but let me just see it. Let me just see it. Sick mother fucker.

I would like him in this room.

BY MR. LUTTIER:

Q. Any sexual act that you performed with Jeff?

A. Is that not a sexual act when you put a vibrator to your wife's pussy; is that not a sexual act?

Q. Any act that you performed with Mr. Epstein that you haven't described thus far?

A. Let me see. I went there multiple times. There was multiple things that I have done with Jeffrey and Jeffrey has done with me.

Q. My question stands. Did you perform any act

with Mr. Epstein other than what you have described thus far?

A. Besides standing there with my legs wide open and his little fetish with me pinching his nipples -- he is probably getting hard right now -- with my little 12-year-old girlfriend standing next to me, both naked, no, I can't think of any other sexual acts I have done with Jeffrey.

Q. And, and did you say that you went there multiple times?

A. Yeah.

Q. How many times would you say you went?

A. More than, more than 50 times.

Q. Did you keep a record of the number of times you went?

A. Unfortunately I didn't.

Q. And were there occasions when you contacted either Mr. Epstein or people on his behalf asking that you be allowed to come over?

A. They would call me most of the time, but, yes, there was multiple times I would call them.

Q. And for, and who did you call?

A. I called the house phone, 655-7273. I don't know. There was multiple house numbers. I would talk to Sarah. I would talk to the one --

'04?

MR. EDWARDS: Object to the form.

MR. LUTTIER: Is that right?

THE WITNESS: When I performed sexual favors for him?

MR. LUTTIER: Massages or whatever you did.

THE WITNESS: Yes.

BY MR. LUTTIER:

Q. The first time you went was sometime in the summer of '02, according to you; is that right?

A. Yes.

Q. And between the summer of '02 and October of '04, you can't tell us how many times you went, right?

A. Oh, I can definitely tell you it was over -- I, I personally went over 50, over 60, over 70 times.

Q. Well, which is it 50, 60, or 70?

A. I would say 70.

Q. All right. And what's that based on?

A. That's based on the girls that I brought. I know that I brought over 70 girls.

Q. It's now 70 girls that you brought. Have you ever --

A. I have brought many, many, many girls.

Q. Have you looked at your answers to interrogatories to see what you said under oath about

MR. LUTTIER: That's exactly what I am asking her.

MR. EDWARDS: Okay. Let's ask it that way because it doesn't sound like that.

BY MR. LUTTIER:

Q. Do you know of any information that these witnesses have based on your communications with them?

A. Excuse me?

Q. Do you know any information that any of these witnesses have about this case based on your personal contact with them?

A. What witnesses?

Q. That are listed in the Answers to Interrogatory 5.

MR. EDWARDS: Just answer his question, yes or no.

THE WITNESS: No. I don't know these people.

BY MR. LUTTIER:

Q. On any visit that you went to see Jeffrey Epstein, did he ever ask you to do anything that you said you did not want to do?

A. Yes.

Q. What did he ask you to do that you said

1 all that you said I don't want to do this and Jeff  
2 said you had to do it anyway?

3 A. Yeah. I told him that at times I did not want  
4 to bring girls, and he says, yes, I want you to do it  
5 anyway; you need to do it anyway.

6 Q. And did you tell all the girls that you  
7 brought that Jeffrey would respect their wishes, and  
8 if they were uncomfortable doing anything, that they  
9 should just tell him that, and he wouldn't ask them  
10 to do anything that they weren't comfortable doing?

11 A. Yes, because I was scared.

12 Q. And that's, in fact, how he treated you,  
13 right?

14 A. Yes.

15 Q. You previously earned a degree as an  
16 esthetician; is that right?

17 A. Yes.

18 Q. And you now earned a degree since going to  
19 Mr. Epstein in massage therapy, correct?

20 A. Yes.

21 Q. And you earned both of those from the same  
22 school located on Northlake Boulevard?

23 A. Yes.

24 Q. And you could pursue a profession as an  
25 esthetician, a massage therapist if you so chose,

you didn't want to do?

A. At one occasion he wanted to stick his fingers like all the way inside of me and I said no?

Q. And what did he then do when you said no.

A. He said okay. So then he just penetrated my vagina with his fingers.

Q. What did he, did he -- when you said you didn't want him to do that, did he respect your wishes and not do it?

A. No. Actually he, he pushed it. He tried to do it and he said, okay, no, it's going to be okay. It's going to be okay. And I backed off and I said no.

Q. And then he stopped?

A. Then he decided to respect my wishes.

Q. Okay. Any other -- and this is on one occasion?

A. Many occasions.

Q. Well, on -- so on many occasions he would say he wanted to penetrate your vagina. You would say you didn't want -- well, actually what you said was he wanted to penetrate your vagina deeply I think. And, and you said no and he respected your wishes and didn't do it?

A. Correct.

Q. Okay. Was there ever anything that, at

1 could you not?

2 A. No, not as a massage therapist.

3 Q. Why not?

4 A. Because I've told you once before I need to  
5 take the nationals.

6 Q. But no one has prevented you from taking  
7 test, right?

8 A. I have to wait to take the test. It only  
9 happens twice a year.

10 Q. And has -- did you pass the first  
11 opportunity you had?

12 A. No.

13 Q. Okay. So, when's, when's the test coming  
14 up?

15 A. In a few months.

16 Q. And are you going to take it?

17 A. Yes.

18 Q. And you could have been working as an  
19 esthetician ever since you went to Jeffrey  
20 Epstein's?

21 A. And I did work as an esthetician.

22 Q. No one has prevented you from doing that,  
23 correct?

24 A. No.

25 Q. You made the decision to drop out of

1 MR. EDWARDS: Okay.  
 2 THE WITNESS: From what I recall. Maybe I  
 3 told her I was making money. Maybe I didn't.  
 4 BY MR. LUTTIER:  
 5 Q. Which was it?  
 6 A. I don't know. I forgot.  
 7 Q. It would be an, an event that you would  
 8 remember since it was one of your best friends that you  
 9 were doing this with, right?  
 10 MR. EDWARDS: Object as to the form,  
 11 argumentative.  
 12 THE WITNESS: I brought every girl I could  
 13 find because it was an extra \$200.  
 14 BY MR. LUTTIER:  
 15 Q. And you didn't think there was anything wrong  
 16 with it, right?  
 17 A. Oh, I knew there was definitely something  
 18 wrong with it.  
 19 Q. All right. So, you consciously knew that you  
 20 shouldn't be doing what you were doing; is that a  
 21 correct statement?  
 22 A. Correct.  
 23 Q. You did it anyway, right?  
 24 A. Correct. Obviously just like all these other  
 25 girls did, isn't that funny.

1 couldn't afford, the new things that were out, you know  
 2 so I could be the cool kid. I would buy whatever was,  
 3 was cool that day.  
 4 Q. And where did you bank? Where did you put  
 5 this money that you saved?  
 6 A. In a hiding place in my house.  
 7 Q. So, you didn't put it in a bank?  
 8 A. I was 13 years old. No, I didn't put it in a  
 9 damn bank.  
 10 Q. And when you say a hiding place in your house,  
 11 which house are you referring to?  
 12 A. In my trailer.  
 13 Q. At your father's?  
 14 A. Yeah.  
 15 Q. And did you tell your dad about it?  
 16 A. No, not at the beginning. I told my dad that  
 17 I was cleaning houses later on.  
 18 Q. And was that a true statement?  
 19 A. No.  
 20 Q. So you lied to your father?  
 21 A. Yeah.  
 22 Q. Did you tell E.W. anything else before you  
 23 took her to Mr. Epstein's house the first time?  
 24 A. Not that I recall. I said we're going to go  
 25 there in a taxi. Everything will be paid for.

1 Q. It was your free choice though?  
 2 A. Yeah, free choice.  
 3 MR. EDWARDS: Objection.  
 4 BY MR. LUTTIER:  
 5 Q. And it was E.W.'s free choice to do it?  
 6 A. Yeah.  
 7 Q. And she did it wide open because you told her  
 8 exactly what was going to happen?  
 9 A. Oh, yeah, it was so easy, let me tell you.  
 10 Q. And it was, it was -- and you did it for the  
 11 money; is that right?  
 12 A. At that time, yes, I did, after walking into  
 13 his mansion. And after my dad, he had to only buy me  
 14 Dollar Store clothes, you damn right I did it for the  
 15 money.  
 16 Q. Did you share with Carolyn or E.W. any of the  
 17 money that you got paid by Jeff Epstein for bringing  
 18 her?  
 19 A. No, not that I recall.  
 20 Q. So, you just kept that money. What did you do  
 21 with the money that you got from Jeffrey Epstein to  
 22 bring E.W.?  
 23 A. I actually saved a lot of it. I would save a  
 24 lot of it, and I would buy clothes, clothes that I  
 25 didn't have. I would buy shoes, shoes that my father

1 Everything would be taken care of. Don't worry. It's a  
 2 quick 30 minutes. We will be in and out. We're going  
 3 to make \$200.  
 4 Q. Each?  
 5 A. Each.  
 6 Q. Right. And did you tell her anything about,  
 7 anything she should say about her age?  
 8 A. Not that I recall. I said just don't say  
 9 anything.  
 10 Q. What do you mean? I don't understand what you  
 11 mean.  
 12 A. I said don't say anything.  
 13 Q. Don't say anything about what?  
 14 A. Don't say anything about your age.  
 15 Q. Oh, so you did say something to her about age?  
 16 A. Yes.  
 17 Q. All right. Tell me as best as you can recall  
 18 what you told --  
 19 A. I said E.W. --  
 20 Q. Wait a minute. Let me finish my question --  
 21 what you told C.W. with respect to any questions asked  
 22 about age?  
 23 A. I said E.W., don't say anything about your  
 24 age.  
 25 Q. Did you say why?

1 advantage of a person who doesn't want to be taken  
 2 advantage of.  
 3 Q. So, when you say you were raped by Jeffrey  
 4 Epstein, that's the definition you're using?  
 5 A. Correct.  
 6 Q. Jeffrey Epstein never had sexual  
 7 intercourse with you, right?  
 8 A. Nope.  
 9 Q. Never penetrated an orifice of your body?  
 10 A. Yes, he did.  
 11 Q. What orifice did he penetrate?  
 12 A. He, he penetrated my vagina.  
 13 Q. With what?  
 14 A. With his fingers, with a vibrator.  
 15 Q. With, with a vibrator. Tell -- describe  
 16 this vibrator that you say he penetrated your  
 17 orifice?  
 18 A. It was about a foot long and the head of it  
 19 was about the size of a small plate, pretty big, pretty  
 20 powerful right onto my vagina.  
 21 Q. Did you say onto or did you say he  
 22 penetrated your vagina?  
 23 A. He penetrated my vagina with his fingers. He  
 24 also penetrated my vagina with the vibrator.  
 25 Q. So, the vibrator you just described you

1 woman.  
 2 Q. Okay. And do you remember the first time  
 3 you had sex with a male?  
 4 A. Excuse me. Yes.  
 5 Q. When was that?  
 6 A. I was probably just turning, just -- I, I was  
 7 14.  
 8 Q. Just turning 14?  
 9 A. I was 14.  
 10 Q. Do you know -- you started by saying "just  
 11 turning." If I remember correctly -- I can look up  
 12 your birthday here. Let's see. Your birthday is  
 13 July 26, 1988?  
 14 A. Correct.  
 15 Q. So, with whom did you have this first  
 16 sexual encounter with a male?  
 17 A. His name was Dustin.  
 18 Q. And what sexual encounter did you have?  
 19 A. Sexual intercourse.  
 20 Q. Just straight sexual intercourse?  
 21 A. I lost my virginity.  
 22 Q. Okay. This is, and is this guy's last  
 23 name Lange?  
 24 A. Yes.  
 25 Q. And was that before Jeffrey Epstein?

1 said had this big head, that was inserted into your  
 2 vagina?  
 3 A. It was not inserted. It was --  
 4 Q. Placed on the outside of your vagina?  
 5 A. Yes.  
 6 Q. Did you achieve an orgasm when this  
 7 happened?  
 8 A. Nope.  
 9 Q. And then you say he inserted his fingers  
 10 into your vagina?  
 11 A. Yes.  
 12 Q. And on how many occasions did that happen?  
 13 A. I've been to Jeffrey Epstein's house so many  
 14 times, I can't recall how many times he's inserted his  
 15 fingers into my vagina.  
 16 Q. Was -- had you had intercourse, or excuse  
 17 me, had you had any type of sexual contact with a  
 18 male before your first sexual encounter with a  
 19 female?  
 20 A. Excuse me?  
 21 Q. Had you had any sexual encounter with a  
 22 male before your first sexual encounter with a  
 23 female?  
 24 A. I have had an encounter sexually with a man or  
 25 with a boy before I had any type of sexual acts with a

1 A. No.  
 2 Q. Are you sure?  
 3 A. Was that before Jeffrey Epstein, no.  
 4 Q. Are you sure of that?  
 5 A. Positive.  
 6 Q. Okay. And at the time who was Dustin  
 7 Lange (phonetic) to you?  
 8 A. Boyfriend.  
 9 Q. Had you been dating him for some period of  
 10 time or just somebody you happened upon?  
 11 A. Yeah, we were dating.  
 12 Q. And what specific acts did you and he  
 13 engage in, just sexual intercourse?  
 14 A. Yes.  
 15 Q. Did you ever perform oral sex on him?  
 16 A. Yeah.  
 17 Q. And did he perform oral sex on you?  
 18 A. I -- probably.  
 19 Q. And do you have any idea how long it was  
 20 between the time you had your first sex with Dustin  
 21 Lange and when you had your first encounter with a  
 22 female?  
 23 A. No.  
 24 Q. But by the time you were 15 you had had  
 25 sex with males and sex with females?



# ATTACHMENT 2

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

CASE NO. 08-CIV-80119-MARRA/JOHNSON

JANE DOE NO. 2,

Plaintiff,

-vs-

VOLUME III

JEFFREY EPSTEIN,

Defendant.

---

Related cases:

08-80232, 08-08380, 08-80381, 08-80994,  
08-80993, 08-80811, 08-80893, 09-80469,  
09-80591, 09-80656, 09-80802, 09-801092

VIDEO-CONFERENCED AND VIDEOTAPED  
DEPOSITION OF JANE DOE

Wednesday, September 30, 2009  
9:37 a.m. - 6:10 p.m.

One Clearlake Centre  
250 South Australian Avenue, 1st Floor  
West Palm Beach, Florida 33401

Reported By:  
Pamela J. Sullivan, RPR, FPR, CLR  
Prose Reporting Agency, Inc.

- - -

1 ever -- did he ever touch you?  
 2 A. Yes.  
 3 Q. Okay. On how many occasions?  
 4 A. He always did, but he just got more  
 5 aggressive about it. And, eventually, he wanted to use  
 6 like sex toys on me.  
 7 Q. Did he -- did he ever physically touch you on  
 8 any occasion?  
 9 MR. EDWARDS: Object to the form. Asked and  
 10 answered.  
 11 THE WITNESS: What do you mean?  
 12 BY MR. CRITTON:  
 13 Q. Did he ever touch you? You -- you were  
 14 touching him, because you were giving him a massage;  
 15 right?  
 16 A. Yes.  
 17 Q. And that's something that you were doing  
 18 voluntarily?  
 19 MR. EDWARDS: Form.  
 20 THE WITNESS: That was something that he told  
 21 me to do, yes.  
 22 BY MR. CRITTON:  
 23 Q. But you had to get to the house. There's no  
 24 way you could give him a massage, unless you made the  
 25 decision to go to his house; correct?

1 touch you on any of the visits?  
 2 A. He always --  
 3 Q. Is that what you said, about the sixth time?  
 4 A. He always touched me.  
 5 Q. Where?  
 6 A. He touched my breasts. He touched my vagina.  
 7 He always touched me.  
 8 Q. Did you ever tell him -- well, let me strike  
 9 that.  
 10 He couldn't touch you, unless you allowed him  
 11 to touch you; correct?  
 12 MR. EDWARDS: Form.  
 13 BY MR. CRITTON:  
 14 Q. You had to voluntarily allow him to touch  
 15 you?  
 16 MR. EDWARDS: Form.  
 17 THE WITNESS: I don't know what you mean.  
 18 BY MR. CRITTON:  
 19 Q. Well, the very first time you were there, I  
 20 think you said he didn't touch you; correct?  
 21 A. No, I did not say that.  
 22 Q. Okay. Did he touch you the very first time  
 23 you were there?  
 24 A. Yes.  
 25 Q. Okay. Where?

1 MR. EDWARDS: Form.  
 2 THE WITNESS: Yes.  
 3 BY MR. CRITTON:  
 4 Q. Okay. Because he couldn't force you to do  
 5 anything, unless you were at the home. And even if you  
 6 were at the home, all you had to do was to say, no;  
 7 correct?  
 8 MR. EDWARDS: Form.  
 9 THE WITNESS: I didn't feel that way, no.  
 10 BY MR. CRITTON:  
 11 Q. Well, if you did -- if you didn't feel that  
 12 way, that is that you didn't have a choice, your choice  
 13 was then I'm not going to Jeffrey Epstein's home ever  
 14 again; true?  
 15 A. No.  
 16 Q. Okay. Did you take money every time you went  
 17 to Mr. Epstein's home?  
 18 A. Yes.  
 19 Q. Did you ever say, Mr. Epstein, I don't want  
 20 your money, I don't want to come back again?  
 21 A. No.  
 22 Q. You could have, though; couldn't you?  
 23 A. I didn't know that I could have.  
 24 Q. You said he touched you. How did he touch  
 25 you -- well, let me ask you this: When did he first

1 A. My vagina.  
 2 Q. And when he touched you there, did he -- did  
 3 he -- was there any type of penetration, or did he just  
 4 touch you?  
 5 MR. EDWARDS: Form.  
 6 THE WITNESS: I don't remember.  
 7 BY MR. CRITTON:  
 8 Q. Okay. When he touched your vagina -- with  
 9 his hand?  
 10 A. Yes.  
 11 Q. What did you say to him?  
 12 A. I didn't say anything.  
 13 Q. Okay. Had anyone ever touched your vagina  
 14 before? Had a male ever touched your vagina before?  
 15 A. No.  
 16 Q. And when he touched your vagina, did you  
 17 say -- and your -- when you say your vagina, on the  
 18 exterior of your body; right?  
 19 A. Yes.  
 20 Q. Did you say, please don't do that?  
 21 A. I didn't say anything.  
 22 Q. You could have. You just didn't; true?  
 23 MR. EDWARDS: Form.  
 24 THE WITNESS: I didn't know what to say.  
 25

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

CASE NO.: 08-CV-80119-MARRA/JOHNSON

JANE DOE NO. 2,  
Plaintiff,

-vs-

VOLUME IV of IV

JEFFREY EPSTEIN,  
Defendant.

---

Related cases:

08-80232, 08-08380, 08-80381, 08-80994,  
08-80993, 08-80811, 08-80893, 09-80469,  
09-80591, 09-80656, 09-80802, 09-81092

---

CONTINUED VIDEOTAPED DEPOSITION OF

JANE DOE

Thursday, March 11, 2010  
1:11 - 4:28 p.m.

250 Australian Avenue  
Suite 1500  
West Palm Beach, Florida 33401

Reported By:  
Cynthia Hopkins, RPR, FPR  
Notary Public, State of Florida  
Prose Court Reporting Services  
Job No.: 1431

1 Q. Do you have friends on your Facebook?  
 2 A. Yes.  
 3 Q. Is E.W. on your Facebook?  
 4 A. No.  
 5 Q. Is Jane Doe No. 6?  
 6 A. No.  
 7 Q. Did you ever do any type of a journal or  
 8 keep any records --  
 9 A. No.  
 10 Q. Maybe it would be helpful if I finished  
 11 the question.  
 12 A. I didn't, so...  
 13 Q. You never kept a journal or records for  
 14 anything?  
 15 A. No.  
 16 Q. Your whole life?  
 17 A. No -- yes, my whole life, yes. I have never  
 18 kept a journal for my entire life, that is true.  
 19 Q. All right. Have you -- did you ever keep  
 20 any record of any dates that you went to  
 21 Mr. Epstein's home?  
 22 A. No.  
 23 Q. How do you know when the last time is that  
 24 you went to Mr. Epstein's home?  
 25 A. I just know how old I was, that's all.

1 times you went to Mr. Epstein's home?  
 2 A. I don't know. Like 17.  
 3 Q. And I think you testified you never took  
 4 anyone to Mr. Epstein's home, correct?  
 5 A. Yes.  
 6 Q. That's correct?  
 7 A. Yes.  
 8 Q. I asked you a little bit, I asked you at  
 9 your last deposition what occurred at the first time  
 10 that you went to Mr. Epstein's home. And whatever  
 11 you said will be obviously on the record, so it will  
 12 be there. But I want to bring you back to that time  
 13 so I can ask some follow-up questions.  
 14 It's my recollection, correct me if I'm  
 15 wrong, please, is that when you went to  
 16 Mr. Epstein's home L.M. was the one who took you,  
 17 correct?  
 18 A. Yes.  
 19 Q. And it was your testimony that when you,  
 20 at some point during the time you were in  
 21 Mr. Epstein's home the first time, you took off your  
 22 clothes in conjunction --  
 23 A. Yes.  
 24 Q. -- with L.M., correct?  
 25 A. Yes.

1 Q. Okay. And you were how old?  
 2 A. Seventeen.  
 3 Q. Do you remember whether you had just  
 4 turned 17?  
 5 A. I just turned 17.  
 6 Q. Which would have been in mid June of 2005,  
 7 correct?  
 8 A. I don't know.  
 9 Q. Well, '88 and 17 would be 2005, right?  
 10 MR. EDWARDS: Form.  
 11 THE WITNESS: I don't know.  
 12 BY MR. CRITTON:  
 13 Q. Since your last deposition -- in fact, let  
 14 me ask you as of today: How many times do you  
 15 believe you went to Mr. Epstein's home now having  
 16 thought about it?  
 17 A. I don't know.  
 18 Q. Was it more than once?  
 19 A. Yes.  
 20 Q. Was it more or less than ten times, or do  
 21 you not know?  
 22 A. I'm pretty sure it was more than ten times.  
 23 Q. Was it more or less than 12 times?  
 24 A. Yeah, I'm pretty sure it was more than that.  
 25 Q. What's your best estimate as to how many

1 Q. And you understood that you were going to  
 2 receive money for basically providing a, a massage  
 3 to Mr. Epstein in the nude, correct?  
 4 A. No.  
 5 Q. Okay. You understood that you would be  
 6 receiving money for what?  
 7 A. Going with L.M.  
 8 Q. And did you even, even understand what you  
 9 were supposed to do?  
 10 A. No.  
 11 Q. Just you were going with to, to a person's  
 12 house in Palm Beach and you were, or someplace, and  
 13 you were going to receive \$200?  
 14 A. No.  
 15 Q. Tell me again then, refresh my  
 16 recollection, please.  
 17 A. I was going somewhere with Tatum for some  
 18 money.  
 19 Q. And you had no idea how much?  
 20 A. No.  
 21 Q. That's correct? I'm sorry, I asked a  
 22 double negative. That's my fault. You had no idea  
 23 how much money at the time, correct?  
 24 A. Yes.  
 25 Q. And then you described, you and L.M. went

1 A. No.  
 2 Q. That's true?  
 3 MR. EDWARDS: Form.  
 4 THE WITNESS: I don't know.  
 5 BY MR. CRITTON:  
 6 Q. I can't hear you, ma'am.  
 7 A. I said now I'm confused again.  
 8 Q. Okay. Well, you said on the first  
 9 occasion you did not recall whether he ever  
 10 penetrated into your vaginal, into your vagina,  
 11 true?  
 12 A. Yes.  
 13 Q. Okay. On the second occasion, would the  
 14 same be true? You said the same thing happened  
 15 every time. So would it be true that you don't know  
 16 whether he penetrated your vagina on the second  
 17 occasion?  
 18 A. I don't remember.  
 19 Q. And would that be true for all those  
 20 visits; you don't remember whether he ever  
 21 penetrated your vagina?  
 22 A. I know that he did at some point, but I cannot  
 23 tell you that it was on the seventh visit.  
 24 Q. Can you tell me any visit that he  
 25 penetrated your vagina?

1 your vagina and your breasts, after the first visit  
 2 did you ever tell him no, I don't want you to do  
 3 that?  
 4 A. No.  
 5 Q. Okay. Did you ever move away from him and  
 6 say, I don't -- move away from him so that he  
 7 couldn't touch you?  
 8 A. I don't know.  
 9 Q. You returned to his house a number of  
 10 times before, at least you claim, that he ever  
 11 penetrated your vagina, true?  
 12 A. No.  
 13 MR. CRITTON: Would you read my question  
 14 back to me, please, or let me just see it and  
 15 see if I can see that far.  
 16 (A portion of the transcript was read back  
 17 by the reporter.)  
 18 BY MR. CRITTON:  
 19 Q. Let me rephrase the question again.  
 20 Just a minute ago you told me, I don't  
 21 know when he penetrated my vagina; I just know he  
 22 did; that is, I don't know whether it was on the  
 23 seventh visit or the fourth or the tenth, or,  
 24 because you don't know how many times you were  
 25 there, true?

1 A. What?  
 2 Q. Can you identify any visit; that is,  
 3 whether it was the third or the fifth or the seventh  
 4 or the tenth?  
 5 A. I can't, I, I don't know how many times I went  
 6 there. I can't identify a specific visit. I just know  
 7 that at some point, yeah, he did do that.  
 8 Q. Okay. And he did that on one occasion?  
 9 A. No.  
 10 Q. More than one occasion.  
 11 A. Yes.  
 12 Q. On how many occasions?  
 13 A. I don't know.  
 14 Q. On the occasions -- was it more than twice  
 15 that he penetrated your vagina?  
 16 A. What?  
 17 Q. Did Mr. Epstein on more than one occasion  
 18 penetrate your vagina?  
 19 A. Yes.  
 20 Q. Okay. And you don't know whether it was,  
 21 it could have been two, it could have been three,  
 22 you just don't know, correct?  
 23 A. Yeah.  
 24 Q. On the other occasions when you went to  
 25 Mr. Epstein's home and he touched the exterior of

1 A. Yeah.  
 2 Q. All right. So, you were at least at his  
 3 house on a number of occasions before, at least you  
 4 claim, that he penetrated your vagina with his  
 5 fingers?  
 6 MR. EDWARDS: Form.  
 7 BY MR. CRITTON:  
 8 Q. True?  
 9 MR. EDWARDS: Form. It misstates the  
 10 witness's testimony.  
 11 THE WITNESS: No, he -- it was, I don't  
 12 know, probably like the first or second time he  
 13 had started to put his fingers inside me.  
 14 BY MR. CRITTON:  
 15 Q. Okay. Well, I just asked you about 20  
 16 minutes ago whether he penetrated you on the first  
 17 occasion, and you said you don't remember --  
 18 A. Well, because --  
 19 Q. -- did not remember.  
 20 A. -- I don't remember. But I can't obviously  
 21 tell you I don't remember because you're going to force  
 22 me to come up with a fucking number that is impossible  
 23 I don't have a number. I can't say the second or the  
 24 first or the third or the fourth. I don't know. I  
 25 don't know.

1 A. What?  
 2 Q. Can you identify any visit; that is,  
 3 whether it was the third or the fifth or the seventh  
 4 or the tenth?  
 5 A. I can't, I, I don't know how many times I went  
 6 there. I can't identify a specific visit. I just know  
 7 that at some point, yeah, he did do that.  
 8 Q. Okay. And he did that on one occasion?  
 9 A. No.  
 10 Q. More than one occasion.  
 11 A. Yes.  
 12 Q. On how many occasions?  
 13 A. I don't know.  
 14 Q. On the occasions -- was it more than twice  
 15 that he penetrated your vagina?  
 16 A. What?  
 17 Q. Did Mr. Epstein on more than one occasion  
 18 penetrate your vagina?  
 19 A. Yes.  
 20 Q. Okay. And you don't know whether it was,  
 21 it could have been two, it could have been three,  
 22 you just don't know, correct?  
 23 A. Yeah.  
 24 Q. On the other occasions when you went to  
 25 Mr. Epstein's home and he touched the exterior of

1 A. Yeah.  
 2 Q. All right. So, you were at least at his  
 3 house on a number of occasions before, at least you  
 4 claim, that he penetrated your vagina with his  
 5 fingers?  
 6 MR. EDWARDS: Form.  
 7 BY MR. CRITTON:  
 8 Q. True?  
 9 MR. EDWARDS: Form. It misstates the  
 10 witness's testimony.  
 11 THE WITNESS: No, he -- it was, I don't  
 12 know, probably like the first or second time he  
 13 had started to put his fingers inside me.  
 14 BY MR. CRITTON:  
 15 Q. Okay. Well, I just asked you about 20  
 16 minutes ago whether he penetrated you on the first  
 17 occasion, and you said you don't remember --  
 18 A. Well, because --  
 19 Q. -- did not remember.  
 20 A. -- I don't remember. But I can't obviously  
 21 tell you I don't remember because you're going to force  
 22 me to come up with a fucking number that is impossible.  
 23 I don't have a number. I can't say the second or the  
 24 first or the third or the fourth. I don't know. I  
 25 don't know.

1 your vagina and your breasts, after the first visit  
 2 did you ever tell him no, I don't want you to do  
 3 that?  
 4 A. No.  
 5 Q. Okay. Did you ever move away from him and  
 6 say, I don't -- move away from him so that he  
 7 couldn't touch you?  
 8 A. I don't know.  
 9 Q. You returned to his house a number of  
 10 times before, at least you claim, that he ever  
 11 penetrated your vagina, true?  
 12 A. No.  
 13 MR. CRITTON: Would you read my question  
 14 back to me, please, or let me just see it and  
 15 see if I can see that far.  
 16 (A portion of the transcript was read back  
 17 by the reporter.)  
 18 BY MR. CRITTON:  
 19 Q. Let me rephrase the question again.  
 20 Just a minute ago you told me, I don't  
 21 know when he penetrated my vagina; I just know he  
 22 did; that is, I don't know whether it was on the  
 23 seventh visit or the fourth or the tenth, or,  
 24 because you don't know how many times you were  
 25 there, true?

1 Q. Okay. But he didn't do it every time, did  
 2 he?  
 3 A. Pretty much every time, yeah, he did.  
 4 Q. Did he ever use anything other than his  
 5 finger?  
 6 A. Yes, he did.  
 7 Q. Okay. What did he use other than a  
 8 finger?  
 9 A. He used a massager.  
 10 Q. Okay. What did the massager look like?  
 11 A. I don't know.  
 12 Q. Did you see it?  
 13 A. Yes.  
 14 Q. What did it look like? What color was it?  
 15 A. It was white.  
 16 Q. And what size was it?  
 17 A. I don't know.  
 18 Q. And was it like a back massager?  
 19 A. I don't know.  
 20 Q. And what did he do with it?  
 21 A. He used it on me.  
 22 Q. In what way?  
 23 A. He put it on my vagina.  
 24 Q. He put it on your vagina?  
 25 A. Yeah.

34 (Pages 565 to 568)

# ATTACHMENT 1



IN THE CIRCUIT COURT OF THE  
FIFTEENTH JUDICIAL CIRCUIT, IN AND FOR  
PALM BEACH COUNTY, FLORIDA

CASE NO. 50-2008-CA-028051 XXXX MB AB

L.M.,

Plaintiff,

vs.

JEFFREY EPSTEIN,

Defendant.

---

VIDEOTAPED DEPOSITION OF JEFFREY EPSTEIN  
TAKEN ON BEHALF OF THE PLAINTIFF

DATE: February 17, 2010

2

1 February 17, 2010  
 2 INDEX  
 3 WITNESS DIRECT CROSS REDIRECT RECROSS  
 4 JEFFREY EPSTEIN  
 5 BY MR. EDWARDS 4  
 6

EXHIBITS

7 FOR IDENTIFICATION PAGE  
 8 1 Jane Doe number 102 versus Jeffrey  
 Epstein complaint. 35  
 9  
 2 Document, Nonprosecution Agreement. 135  
 10  
 11

CERTIFIED QUESTIONS

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3

1 The videotaped deposition of JEFFREY  
 2 EPSTEIN in the above-entitled and numbered cause,  
 3 was taken before me, TERRI BECKER, a Registered  
 4 Professional Reporter and Notary Public for the  
 5 State of Florida at Large, at 444 West Railroad  
 6 Avenue, in the City of West Palm Beach, Palm  
 7 Beach County, in the State of Florida, beginning  
 8 at the hour of 11:15 o'clock a.m., pursuant to  
 9 the Notice in said cause for the taking of said  
 10 deposition which is annexed to the court file  
 11 herein, on behalf of the PLAINTIFF in the  
 12 above-entitled action pending in the above-named  
 13 court.  
 14 The appearances at said time and place  
 15 were as follows:  
 16 FARMER, JAFFE, WEISSING,  
 EDWARDS, FISTOS & LEHRMAN, P.L.  
 17 Attorneys for Plaintiff  
 425 North Andrews Avenue, Suite 2  
 18 Fort Lauderdale, Florida 33301  
 Tel: (954) 524-2820  
 19 BY: BRADLEY J. EDWARDS  
 STEVEN R. JAFFE, ESQ.  
 20  
 BURMAN, CRITTON, LUTTIER & COLEMAN  
 21 Attorneys for Defendant  
 303 Banyon Boulevard, Suite 400  
 22 West Palm Beach, Florida 33401  
 Tel: (561) 842-2820  
 23 BY: MICHAEL PIKE, ESQ.  
 24 ALSO PRESENT:  
 JOE ROVNER, Videographer  
 25 (U.S. Legal Support)

4

1 THEREUPON,  
 2 JEFFREY EPSTEIN  
 3 being by Terri Becker first duly sworn to tell  
 4 the whole truth, as hereinafter certified,  
 5 testified as follows:  
 6 DIRECT EXAMINATION  
 7 BY MR. EDWARDS:  
 8 Q Can you give us your name.  
 9 A Jeffrey Epstein.  
 10 Q Mr. Epstein, you made a comment when you  
 11 came in the room that you were appreciative of me  
 12 being respectful to your housekeeper yesterday  
 13 and I intend for that to be the same with you  
 14 today.  
 15 I want to start by asking you, at this  
 16 point we've gone through a lot of discovery in  
 17 this case. There aren't many disputed facts as  
 18 to what actually happened at your house.  
 19 Generally I think you would agree that you  
 20 derived a way for young females to come to your  
 21 house and engage in varying degrees of sexual  
 22 activity, some of the girls as young as 12, some  
 23 of them as old as seventeen or so, most in  
 24 between, but as of yet you haven't provided an  
 25 explanation.

5

1 I want to provide you an opportunity to  
 2 tell the jury at this time why you did it.  
 3 MR. PIKE: I'm going to object.  
 4 Confusing, compound and irrelevant, as  
 5 worded.  
 6 A You know, I would like to answer that  
 7 question, frankly. However, at this time, my  
 8 attorneys have told me that I can't and I must  
 9 invoke my Fifth, Sixth and Fourteenth Amendment  
 10 rights or I risk losing their counsel.  
 11 Accordingly, I therefore assert those rights.  
 12 Sorry.  
 13 MR. PIKE: In addition to that I'll move  
 14 to strike counsel's statement as a  
 15 narrative, as well.  
 16 MR. EDWARDS: I understand. I wanted to  
 17 provide him an opportunity, if today was  
 18 going to be the day.  
 19 MR. PIKE: Same thing, move to strike.  
 20 Q Mr. Epstein, how long have you been  
 21 sexually attractive to underage minor females?  
 22 MR. PIKE: Objection, harassing,  
 23 argumentative.  
 24 A Are you kidding?  
 25 Q No, I mean, I don't feel like I'm

6

1 **divulging any secrets here, right?**  
2 MR. PIKE: Move to strike.  
3 **Q That's the question that's pending.**  
4 A I would like to answer that question as  
5 well, as all your other questions today, however,  
6 I have to follow my attorneys' advice. They have  
7 told me I must invoke my Fifth, Sixth and  
8 Fourteenth Amendment right to not answer those  
9 questions today, or any questions relevant to  
10 this lawsuit, so accordingly, I'm going to assert  
11 those rights and -- under the constitution  
12 guaranteed by the Fifth and Sixth, and Fourteenth  
13 amendment.  
14 **Q Would you consider yourself addicted to**  
15 **sex with minor females?**  
16 MR. PIKE: Same objections.  
17 A You know, Mr. Edwards, again, I want to  
18 be very respectful. As the current U.S. Attorney  
19 has described your law firm as a criminal  
20 enterprise and part of one of the largest frauds  
21 in Florida's history, it has been reported that  
22 your firm has fabricated multiple cases against  
23 me in order to fleece unsuspecting investors out  
24 of millions and millions of dollars, so  
25 unfortunately at this time, although I would like

7

1 to answer that question, on advice of counsel I  
2 will have to refrain and assert my Fifth, Sixth  
3 and Fourteenth Amendment right.  
4 **Q Can you then provide an explanation for**  
5 **what relevance that soliloquy of yours has to,**  
6 **whether or not you engaged in sex acts with L.M.**  
7 **When she was a minor?**  
8 MR. PIKE: Objection, no, he cannot.  
9 Argumentative. Compound, harassing.  
10 MR. EDWARDS: Mr. Pike, with all due  
11 respect, it was not my idea for him to give  
12 this speech about a former RRA law firm I  
13 was asking to elaborate on that.  
14 MR. PIKE: Counsel, I'm working with  
15 your follow-up question.  
16 MR. EDWARDS: I understand.  
17 MR. PIKE: I'm objecting, object to the  
18 form and stating the reasons on the record  
19 why the form is required to be objected to,  
20 based upon your question.  
21 MR. EDWARDS: Will he elaborate on the  
22 relevance of that soliloquy to his touching  
23 L.M. when she was 13, 14 and 15 years old in  
24 a sexual manner?  
25 MR. PIKE: I'm going to object again,

8

1 argumentative, compound, harassing and  
2 irrelevant.  
3 **Q You can answer.**  
4 A I would like to answer, however, I'm  
5 going to have to assert my Fifth Amendment, Sixth  
6 Amendment, Fourteenth Amendment right as advised  
7 by my counsel, otherwise I risk losing their  
8 advice.  
9 **Q Mr. Epstein, have you ever been**  
10 **diagnosed with a sex addiction to minors by a**  
11 **psychologist or other medical professional?**  
12 A I intend to respond to all of your  
13 questions at some relevant time; however, today  
14 at the present time, my attorneys have counseled  
15 me that I cannot provide answers to any questions  
16 relevant to this lawsuit and I must accept their  
17 advice or risk losing my Sixth Amendment rights  
18 to effective representation.  
19 Accordingly, I assert my Fifth,  
20 Federal -- Fifth and Sixth and Fourteenth  
21 Amendment rights, to the United States  
22 Constitution.  
23 MR. PIKE: In addition to that, Mr.  
24 Edwards, as the Court has ruled on several  
25 matters, Mr. Epstein's medical history is

9

1 not relevant at this time nor has he placed  
2 same at issue in this case.  
3 MR. EDWARDS: Understood.  
4 **Q Mr. Epstein, were you sexually abused as**  
5 **a minor?**  
6 A Again?  
7 **Q Were you sexually abused, as a minor?**  
8 A You know, again, I would like to respond  
9 to all -- if any questions seem to be relevant.  
10 I would like to respond to any relevant question  
11 at this time; however, my attorneys have  
12 counseled me that I cannot provide answers to the  
13 questions relevant to this lawsuit today. I must  
14 accept their advice or risk losing my Sixth  
15 Amendment right to effective representation.  
16 Accordingly then, I assert my Fifth, Sixth and  
17 Fourteenth Amendment right to the United States  
18 Constitution.  
19 **Q Isn't it true that you have engaged in**  
20 **some sexual interaction with hundreds of underage**  
21 **minor females in the last ten years of your**  
22 **life? Is that true?**  
23 MR. PIKE: Objection, relevance.  
24 A Mr. Edwards, the current U.S. Attorney  
25 has described your law firm as a criminal

1 enterprise and part of the largest fraud in  
2 Florida's history. It has been reported that  
3 your firm fabricated multiple cases, many, many  
4 multiple cases against me in order to fleece  
5 unsuspecting investors out of millions and  
6 millions of dollars. Unfortunately, at this time  
7 in response to your question, my attorneys have  
8 advised me that I must assert my Sixth Amendment,  
9 Fifth Amendment, Fourteenth Amendment right.  
10 Though, I believe, you know, that I would really  
11 like to answer your questions today, but at this  
12 moment I must assert those rights or risk having  
13 my attorneys resign.

14 **Q You're invoking your Fifth Amendment**  
15 **rights to each of these questions because you**  
16 **know your answers will incriminate you and you**  
17 **feel it will result in you being prosecuted for**  
18 **your crimes; isn't that right?**

19 MR. PIKE: Objection, argumentative,  
20 harassing. Calls for a legal conclusion.

21 **Q You can answer.**

22 A No, in fact, the Supreme Court recently  
23 said the Fifth Amendment right is there to  
24 protect the innocent, so, that's the way I would  
25 like to answer that.

1 **Q Are you actually telling the jury that**  
2 **you didn't commit the crimes that have been**  
3 **alleged against you by the various females that**  
4 **were under age when you engaged in sex with**  
5 **them? Are you telling the jury that right now?**

6 MR. PIKE: Objection, argumentative,  
7 harassing.

8 A I would like to respond to that  
9 question, as you know, however, at the present  
10 time my attorneys have counseled me that I cannot  
11 provide answers to any questions relevant to this  
12 lawsuit and I must accept their advice or risk  
13 losing my Sixth Amendment right to effective  
14 representation. Accordingly, I assert my Fifth,  
15 Sixth and Fourteenth Amendment right under the  
16 United States Constitution.

17 **Q Mr. Epstein, you understand that this is**  
18 **the video that will be played to the jury in**  
19 **L.M.'s trial against you and L.M. wants answers.**  
20 **The jury is going to want answers, so I know that**  
21 **you're telling us that you're going to respond at**  
22 **some time in the future; but the time is now.**  
23 **Would you like this opportunity to explain why**  
24 **you engaged in sexual activity with L.M.**  
25 **beginning when she was 13 years old and you were**

1 **50 years old?**

2 MR. PIKE: I'm going to object once  
3 again. We are getting way too argumentative  
4 with the questioning. The questioning is  
5 compound. It is speculative and it is also  
6 harassing. Whether or not this deposition  
7 video, thereof is played in front of a jury  
8 is a question of fact, and it will be  
9 determined by a judge pursuant to a motion  
10 in limine, various portions thereof may or  
11 may not be played, so having placed those  
12 objections on the record I'm going to  
13 instruct Mr. Epstein not to answer that  
14 question.

15 MR. EDWARDS: Mr. Pike, I don't know if  
16 you watched the 13 hours of harassing  
17 questions to L.M., that she sometimes  
18 invoked her Fifth Amendment rights, I  
19 understand the adverse advice that would be  
20 given and she was made to answer these  
21 questions and these exact same questions  
22 were asked of her, in fact, I'm using the  
23 phraseology from Mr. Luttier. I'm not  
24 trying to harass him.

25 **Q I'm simply asking him to explain to the**

1 **jury. If you're saying it didn't happen, if**  
2 **you're saying it did happen, explain to the jury**  
3 **why you did it. That's all I want to hear. I'm**  
4 **being respectful about this.**

5 MR. PIKE: In an effort to keep a clean  
6 record be respectful to the to the court  
7 reporter rather than having a diatribe back  
8 and forth between you and myself, I'll move  
9 to strike your last statement as  
10 irrelevant. Let's move on.

11 **Q Is it true, Mr. Epstein, you were born**  
12 **January 20, 1953?**

13 A Yes.

14 **Q Where?**

15 A New York.

16 **Q Where in New York?**

17 A Brooklyn.

18 **Q Did you go to high school there?**

19 A Yes, sir.

20 **Q Where?**

21 A Lafayette High School.

22 **Q After high school did you attend**  
23 **college?**

24 A Yes.

25 **Q Where was that?**

1 A New York.  
 2 **Q What college did you attend?**  
 3 A Cooper Union.  
 4 **Q Sorry, I didn't hear.**  
 5 A Cooper Union.  
 6 **Q Did you get a degree from Cooper Union?**  
 7 A No, sir.  
 8 **Q How many years were you in college?**  
 9 A I believe, two.  
 10 **Q What did you study?**  
 11 A Physics.  
 12 **Q Why did you leave college early?**  
 13 A I intend to respond to all relevant  
 14 questions regarding this lawsuit, however, at the  
 15 present time my attorneys have counseled me that  
 16 I cannot provide answers to questions that may be  
 17 relevant to this lawsuit, so accordingly I assert  
 18 my constitutional rights as guaranteed by the  
 19 Fifth, Sixth and Fourteenth Amendment.  
 20 **Q Are you invoking your Fifth Amendment**  
 21 **rights as to why you left college, is it safe**  
 22 **then to presume that that answer you believe**  
 23 **would incriminate you in some way?**  
 24 MR. PIKE: I'm going to move to strike,  
 25 speculative, argumentative, harassing.

1 Calls for a legal conclusion, and I know  
 2 exactly what you're trying to do here, Mr.  
 3 Edwards, is lace the record with questions  
 4 that would ultimately give you an adverse  
 5 inference at any potential trial of this  
 6 matter, so having put that on the record,  
 7 I'm going to instruct him not to answer that  
 8 question, based upon his Fifth, Sixth and  
 9 Fourteenth Amendment rights to the United  
 10 States Constitution.  
 11 MR. EDWARDS: With all due respect you  
 12 cannot invoke his Fifth Amendment rights,  
 13 your attorneys instructed me in that fact --  
 14 MR. PIKE: He can.  
 15 MR. EDWARDS: That L.M. Had to do it  
 16 herself, so, I would like to hear it from  
 17 Mr. Epstein.  
 18 **Q Can we assume you're invoking your Fifth**  
 19 **Amendment rights as to why you left college**  
 20 **early, that that answer you feel would**  
 21 **incriminate you?**  
 22 MR. PIKE: Once again, move to strike  
 23 for the same reasons.  
 24 You can answer.  
 25 A I've already answered the question.

1 I'll restate the answer. I would like to  
 2 respond, intend to respond, and would like to  
 3 respond to all questions today. However, counsel  
 4 has advised me I must take the Fifth, Sixth and  
 5 Fourteenth Amendment right under the U.S.  
 6 Constitution.  
 7 **Q After college where were you employed?**  
 8 A You know, I would like to respond to all  
 9 your questions today, however, on advice of  
 10 counsel, I intend to take the Fifth, Sixth and  
 11 Fourteenth Amendment rights provided by the  
 12 United States Constitution or risk losing my  
 13 counsel's representation.  
 14 **Q Isn't it true that you were a teacher at**  
 15 **the Dalton School in New York after college?**  
 16 A Again, I would like to respond to all  
 17 your questions; however, my attorneys have  
 18 counseled me that I cannot provide answers to any  
 19 questions today regarding to this lawsuit so I  
 20 must accept their advice or risk losing my Sixth  
 21 Amendment right to effective representation.  
 22 Accordingly, I assert my Constitutional rights as  
 23 guaranteed by the Fifth, Sixth and Fourteenth  
 24 Amendment of the constitution.  
 25 **Q Mr. Epstein, did you have sex with any**

1 **underage students while teaching at the Dalton**  
 2 **School?**  
 3 A Could you repeat that?  
 4 **Q Yes. Did you have sex with any underage**  
 5 **students while teaching at the Dalton School in**  
 6 **New York?**  
 7 A Mr. Edwards, your firm has been  
 8 described by the U.S. Attorney as one of the  
 9 largest -- as a criminal enterprise, perpetrating  
 10 one of the largest frauds in Florida's history.  
 11 It has been reported that your firm fabricated  
 12 multiple cases against me and others in order to  
 13 fleece unsuspecting investors out of millions and  
 14 millions of dollars.  
 15 Unfortunately at this time in response  
 16 to your question, my attorneys have advised me I  
 17 must assert my Fifth Amendment, Sixth Amendment  
 18 and Fourteenth Amendment rights, though I believe  
 19 you know I would like -- really like to answer  
 20 your questions but at this time I must assert  
 21 those rights or have my attorneys resign.  
 22 MR. EDWARDS: Mr. Pike, I think you know  
 23 he has a couple of options here. He can  
 24 answer questions or he can invoke his Fifth  
 25 Amendment rights. This nonresponsive

18

1 verbiage regarding the RRA law firm is not  
2 one of the options, it's inappropriate in  
3 the deposition and I would ask you to  
4 instruct your client not to obstruct this  
5 process any further. I am not going to  
6 terminate the deposition. I want it to  
7 finish, but obviously this is going to be  
8 the subject matter of some motion in the  
9 courts and you know the judges will not  
10 appreciate this. I would like to just move  
11 this process along by eliminating that  
12 portion of his answer. I understand what he  
13 is saying. I get it, but that's not  
14 something responsive to any of the questions  
15 and I think you know it is inappropriate.

16 MR. PIKE: I think the deponent is  
17 answering the questions. If you believe the  
18 responses are inappropriate and feel you can  
19 take it up with the Court with the motion  
20 you are speaking of, as you've done then you  
21 can, as you've done several times before.

22 **Q After leaving the Dalton School, is it**  
23 **true that you began working as a money manager at**  
24 **Bear Stearns?**  
25 A I intend to respond to all your

19

1 questions regarding this lawsuit at some relevant  
2 time, however, at the present time my attorneys  
3 have counseled me that I cannot provide answers  
4 to any questions relevant to this lawsuit. Since  
5 the U.S. Attorney has described your law firm as  
6 a criminal enterprise, Mr. Edwards, and a part of  
7 the largest fraud in Florida's history, I am  
8 going to assert my Sixth Amendment, Fifth  
9 Amendment and Fourteenth Amendment rights to the  
10 U.S. Constitution.

11 **Q Isn't it true that while you were**  
12 **working at Bear Stearns you were already engaging**  
13 **in sex with underage minors?**  
14 A Again, I believe you know the answers to  
15 those questions, but --  
16 **Q Yes.**  
17 A May I finish?  
18 **Q I do.**  
19 MR. PIKE: Move to strike. Let the  
20 witness --  
21 **Q Sure --**  
22 MR. PIKE: Let the witness answer your  
23 question.  
24 MR. EDWARDS: I would love for him to  
25 finish the questions.

20

1 MR. PIKE: Mr. Edwards, as you know  
2 there are serious Fifth, Sixth and  
3 Fourteenth Amendment constitutional rights  
4 at issue here, and the witness is attempting  
5 to answer your questions to the best of his  
6 ability, despite how laced they are with  
7 adverse inference presumptions.

8 MR. EDWARDS: I don't want the adverse  
9 inferences. I want the answers, that's it.  
10 I don't want the adverse inferences.

11 MR. PIKE: Having said that, please  
12 allow the witness to answer to answer the  
13 question.

14 A Can you please repeat the question?  
15 **Q Isn't it true while working at Bear**  
16 **Stearns you were already engaging in sex with**  
17 **underage minor females?**  
18 A As your firm has been described by the  
19 U.S. Attorney, as a criminal enterprise, using  
20 some of the cases fabricated against me,  
21 personally, I would like to answer that question  
22 today; however, upon advice of counsel I must  
23 assert my Fifth, Sixth and Fourteenth Amendment  
24 rights under the U.S. Constitution or, in fact,  
25 risk losing their representation.

21

1 **Q At some point in time while at Bear**  
2 **Stearns you met and managed the money for a**  
3 **fellow named Leslie Wexler, correct?**  
4 A Again, I would like to answer all  
5 questions relevant to this lawsuit, but today I  
6 must assert my Fifth Amendment, Sixth Amendment  
7 and Fourteenth Amendment right to the U.S.  
8 Constitution.

9 **Q In fact, I read in another deposition of**  
10 **yours that you do not consider yourself to be**  
11 **homosexual, correct?**  
12 A (No response.)  
13 **Q You've answered that question before,**  
14 **correct?**  
15 A Correct.  
16 **Q Do you consider yourself to be**  
17 **bisexual?**  
18 A No.  
19 **Q In any event, you did develop a sexual**  
20 **relationship with Leslie Wexler at some point in**  
21 **time; is that true?**  
22 A No.  
23 **Q Did you have a business relationship**  
24 **with Mr. Wexler?**  
25 A I intend to respond to all relevant

1 questions. I would like to answer most of your  
2 questions, Mr. Edwards, today, however,  
3 especially since your firm has been described by  
4 the United States Attorney in South Florida as a  
5 criminal enterprise purported to -- purported to  
6 have put -- pulled off the largest fraud in  
7 Florida's history, I would like to answer it,  
8 however, my attorneys here today counseled me I  
9 must assert my Fifth, Sixth and Fourteenth  
10 Amendment right under the U.S. Constitution,  
11 therefore I'm going to do that.

12 **Q Are you saying because Rothstein,**  
13 **Rosenfeld, Adler was determined to be a criminal**  
14 **enterprise or somebody was running a criminal**  
15 **enterprise out of that law firm, that is the**  
16 **reason why you are not going to answer these**  
17 **questions today? You linked that together in**  
18 **that answer. I just want to make sure I'm**  
19 **understanding that right?**

20 A I'm going to take the Fifth -- I intend  
21 to respond to all relevant questions today. I  
22 would like to respond; unfortunately my attorneys  
23 have counseled me I can't, I must assert my  
24 Fifth, Sixth and Fourteenth Amendment rights  
25 under the U.S. Constitution.

1 **Q Because other law firms have asked very**  
2 **similar questions and you haven't responded to**  
3 **any of theirs either. I just want to understand**  
4 **what the relationship between Rothstein,**  
5 **Rosenfeld, Adler is to you invoking your Fifth**  
6 **Amendment rights today, if you can articulate**  
7 **that for me.**

8 MR. PIKE: Form, compound,  
9 argumentative.

10 A Rothstein, Rosenfeld, Adler has been  
11 described by the U.S. Attorney as a criminal  
12 enterprise and as part of the largest fraud in  
13 Florida's history. It has been reported that  
14 your firm fabricated multiple cases using me, and  
15 against me in order to fleece unsuspecting  
16 investors out of millions of dollars.

17 **Q Another long time friend of yours is**  
18 **Ghislaine Maxwell, right?**

19 A I intend to respond to all relevant  
20 questions. I would like to answer most of these  
21 questions today, but I can't because my attorneys  
22 have counseled me that I cannot provide answers  
23 to any questions relevant to this lawsuit. I  
24 must accept their advice or risk losing my Sixth  
25 Amendment right to effective representation.

1 Therefore I'll assert my Constitutional  
2 rights under the Fifth, Sixth and Fourteenth  
3 Amendment.

4 THE WITNESS: Excuse me, could we take a  
5 break?

6 MR. EDWARDS: Already?

7 THE WITNESS: Restroom.

8 THE VIDEOGRAPHER: Going off the video  
9 record 11:38 a.m.

10 THE WITNESS: Thank you.

11 (Pause in the proceedings.)

12 THE VIDEOGRAPHER: We're back on the  
13 video record at 11:48 a.m.

14 **Q How did you meet Ghislaine Maxwell?**

15 A I intend to respond to all relevant  
16 questions to this lawsuit; however, at the  
17 present time my attorneys have counseled me that  
18 I cannot provide answers to any questions  
19 relevant to this lawsuit, and must accept this  
20 advice or risk losing effective -- my right to  
21 effective representation. Accordingly,  
22 therefore, I assert my Fifth, Sixth and  
23 Fourteenth Amendment rights to the U.S.  
24 Constitution.

25 **Q You would agree, would you not, that**

1 **Ghislaine Maxwell shares your sexual obsession**  
2 **for underage minor females?**

3 MR. PIKE: Argumentative, speculation,  
4 harassing.

5 A You know, Mr. Edwards, the current U.S.  
6 Attorney has described your law firm as a  
7 criminal enterprise, and as taking part in one of  
8 the largest frauds in Florida's history. It has  
9 been widely reported that your firm fabricated  
10 multiple cases of a sexual nature against  
11 people -- other people and me, in order to fleece  
12 unsuspecting investors out of millions of  
13 dollars, so unfortunately at this time in  
14 response to your questions, my attorneys have  
15 advised me I must assert my Sixth Amendment,  
16 Fifth Amendment and Fourteenth Amendment rights,  
17 though I believe, as you know, I would really  
18 like to answer these questions, but at this  
19 moment, although at this time I have to assert  
20 those rights or risk losing effective counsel.

21 **Q Do you know Annie Farmer?**

22 A I intend to respond to all relevant  
23 questions regarding this lawsuit; however, at the  
24 present time my counsel has advised me that I  
25 cannot provide answers to any questions relevant

1 to this lawsuit. Your firm has been described as  
2 a criminal enterprise, and is part of the largest  
3 fraud in Florida's history fabricating sexual  
4 cases against me and others. Therefore,  
5 unfortunately, although I would like to answer  
6 all of your questions today, I'm going to have to  
7 assert my Fifth, Sixth and Fourteenth Amendment  
8 right.

9 **Q Did you and Ghislaine Maxwell sexually  
10 assault Annie Farmer at Leslie Wexler's house?**

11 A I intend to respond to all relevant  
12 questions regarding this lawsuit; however, at the  
13 present time my attorneys have counseled me I  
14 cannot provide answers to any questions relevant  
15 to this lawsuit and must accept this right or  
16 risk losing my Sixth Amendment rights to  
17 effective presentation. Accordingly, I assert my  
18 Constitutional rights as guaranteed by the Fifth,  
19 Sixth and Fourteenth amendments to the U.S.  
20 Constitution.

21 **Q Stating Ghislaine Maxwell and you had  
22 devised several schemes to lure underage girls to  
23 you for sex; isn't that correct?**

24 MR. PIKE: Form, argumentative,  
25 harassing?

1 present time my attorneys have counseled me that  
2 I cannot provide answers to any questions  
3 relevant to this lawsuit, no matter how much I  
4 would like to.

5 Therefore, I must accept their advice or  
6 risk losing my Sixth Amendment right to effective  
7 representation; therefore, I have to assert my  
8 Fifth, Sixth and Fourteenth Amendment right under  
9 the U.S. Constitution.

10 **Q Do you own a home in New Mexico?**

11 A I intend to respond to all relevant  
12 questions regarding this lawsuit and as I've had  
13 to do with most of your questions here today, I'm  
14 going to have to take my attorneys' advice and  
15 assert my Fifth, Sixth and Fourteenth Amendment  
16 right under the U.S. Constitution or risk losing  
17 effective representation.

18 **Q Is it true that you have had underage  
19 females, at each of those homes, for orgies with  
20 you and Ghislaine Maxwell?**

21 MR. PIKE: Form, argumentative,  
22 speculation and harassing.

23 A I would like to answer that question. I  
24 really would. However, as your firm has been  
25 described by the U.S. Attorney as a criminal

1 A Mr. Edwards, your firm has fabricated  
2 multiple cases of sexual harassment claims and  
3 other types of sexual cases against me and others  
4 in order to be part of what the U.S. Attorney has  
5 described as the largest fraud, the largest fraud  
6 in Florida's history. I would like to answer all  
7 your questions; however, my attorneys have  
8 counseled me that at least today, I must assert  
9 my Fifth, Sixth and Fourteenth Amendment rights  
10 under the U.S. Constitution.

11 **Q Do you own a home in Manhattan?**

12 A I intend to respond to all relevant  
13 questions to this lawsuit; however, at the  
14 present time my attorneys have counseled me that  
15 I cannot provide answers to any questions  
16 relevant to this lawsuit, and I must accept their  
17 advice or risk losing my Sixth Amendment right to  
18 effective representation.

19 Accordingly, therefore, I have to assert  
20 my Fifth, Sixth and Fourteenth Amendment right  
21 under the U.S. Constitution.

22 **Q Do you own an island in the U.S. Virgin  
23 Islands?**

24 A I intend to respond to all relevant  
25 questions regarding this lawsuit; however, at the

1 enterprise, which its principal purpose was  
2 racketeering conspiracy to generate money for the  
3 firm and its co-conspirators through the  
4 operation of enterprise and through various  
5 activities including mail fraud, wire fraud and  
6 money laundering, and fabricating multiple sex  
7 cases against me and others, though I would like  
8 to answer your question today, Mr. Edwards, my  
9 counsel has advised me I must take the Fifth,  
10 Sixth and Fourteenth Amendment right provided by  
11 the U.S. Constitution.

12 **Q Do you know somebody named Galitsea  
13 (phonetic)?**

14 MR. PIKE: Can you spell that, for the  
15 record?

16 MR. EDWARDS: No.

17 MR. PIKE: Or for the court reporter?

18 A No.

19 **Q You don't know the name?**

20 A No. Could you spell it?

21 **Q (Witness shrugs.)**

22 A Okay.

23 **Q Did your sexual obsession with underage  
24 minor females grow at some point in time to allow  
25 you access to these underage minors every single**



1 **day for sex?**

2 MR. PIKE: Overbroad. Speculation,  
3 argumentative, compound, harassing and  
4 confusing as well; as worded. Do you want  
5 to break it down, Mr. Edwards?

6 **Q Isn't it true that for the past ten**  
7 **years you have found a way to engage in sexual**  
8 **conduct with underage minors on an every day**  
9 **basis?**

10 MR. PIKE: Speculation. Argumentative.

11 A As your firm has been described as a  
12 criminal enterprise by the United States Attorney  
13 and is part of the scheme to defraud people in  
14 South Florida of millions of dollars, you have  
15 fabricated sexual cases and sexual claims against  
16 people like me and others. Unfortunately at this  
17 time although I would like to answer your  
18 questions, Mr. Edwards, my counsel has advised me  
19 I cannot. They have advised me I must assert my  
20 Fifth, Sixth and Fourteenth Amendment rights  
21 under the U.S. Constitution.

22 **Q Isn't it true that you have promised**  
23 **underage minors money or other benefits to engage**  
24 **in sexual conduct with you over the past ten**  
25 **years?**

1 A Again, as I've answered many of your  
2 questions today, and unfortunately will probably  
3 end up not answering most of your questions  
4 today, as your firm has been described, the firm  
5 bringing this lawsuit, I believe, if I'm wrong  
6 please, correct me --

7 **Q You're wrong.**

8 A This is the firm that didn't notice this  
9 deposition?

10 **Q Did not?**

11 A Did not?

12 **Q No.**

13 A I apologize. Though your former firm  
14 has been described, and the person you represent,  
15 L.M., in this case was represented by the firm  
16 that was described by the U.S. Attorney as  
17 perpetrating one of the largest frauds in South  
18 Florida's history, fabricating multiple sexual  
19 cases against me and others in order to fleece  
20 unsuspecting investors out of millions and  
21 millions of dollars, so though unfortunately, I  
22 would like to answer each one of your questions  
23 today, my counsel has advised me I must assert my  
24 Sixth Amendment, Fourteenth Amendment and Fifth  
25 Amendment right, though I believe you know, I

1 would like to answer those questions, though at  
2 this moment I must assert those rights or risk  
3 losing my attorneys.

4 **Q Sure, let's test that answer.**

5 A Okay.

6 **Q Let's talk about Jane Doe 102, Jane Doe**  
7 **102, V.R., who was represented by Bob**  
8 **Josephberg's firm, had nothing to do with**  
9 **Rothstein, Rosenfeld, Adler. Do you know V.R.?**

10 A Who?

11 **Q V.R.**

12 A Can you spell it?

13 **Q Common spelling, [REDACTED] like the**  
14 **State --**

15 A Can you spell it for me, please?

16 **Q [REDACTED]**

17 A What's the last name, how is it  
18 spelled?

19 **Q [REDACTED] I believe.**

20 A I intend to respond to all relevant  
21 questions regarding this lawsuit; however, at the  
22 present time my attorneys have counseled me that  
23 I cannot provide answers to any questions that  
24 may be relevant to this lawsuit and I must accept  
25 this advice or risk losing my Sixth Amendment

1 right to effective representation. Accordingly,  
2 I assert my Constitutional rights as guaranteed  
3 by the Fifth, Sixth and Fourteenth Amendment to  
4 the Constitution.

5 **Q Just for the record, I can only spell it**  
6 **the way it was spelled in your flight logs from**  
7 **your airplane. I don't know exactly how she**  
8 **spells her name, only how your pilot would spell**  
9 **her name.**

10 MR. PIKE: Form, speculating.

11 **Q If I misspell it --**

12 MR. PIKE: Form, speculation,  
13 argumentative, harassing.

14 MR. EDWARDS: That's harassing?

15 MR. PIKE: It assumes facts currently  
16 not in evidence in this particular  
17 deposition; therefore, I move to strike.

18 MR. EDWARDS: I was responding to his  
19 question asking me how to spell her name. I  
20 don't know how other than his own pilot.

21 MR. PIKE: Mr. Edwards, he asked you to  
22 spell the name, you then spelled the name,  
23 then went on with another narrative and  
24 there wasn't a question posed, on the floor.

25 **Q You would agree you interacted with V.R.**

1 every day in a sexual way, when she was 15 years  
2 old, right?

3 A Again, I'm sorry?

4 Q Sure. You would agree that you  
5 interacted with V.R. sexually on an every day  
6 basis when she was 15 years old?

7 A You know, again, Mr. Edwards, I would  
8 like to answer all your questions here today. My  
9 attorneys have asked me -- advised me that I must  
10 assert my Sixth Amendment, Fourteenth Amendment  
11 and Fifth Amendment rights provided by the U.S.  
12 Constitution and the fact that the current U.S.  
13 Attorney has described your law firm as a  
14 criminal enterprise, is one of the largest frauds  
15 in Florida's history for fabricating sexual --  
16 cases of a sexual nature against me and others.  
17 Unfortunately, although I would like to answer  
18 those questions, if I do I risk losing my  
19 attorneys' counsel. Therefore, I must assert my  
20 right.

21 MR. EDWARDS: Madam court reporter, I'll  
22 attach as an exhibit, the Jane Doe number  
23 102 versus Jeffrey Epstein complaint, at  
24 some point in time. It will be Exhibit I,  
25 as I'm going to go through some of the facts

1 as alleged in the complaint and as will be  
2 testified to by the plaintiff.

3 (Jane Doe number 102 versus Jeffrey  
4 Epstein complaint was deemed marked as  
5 Exhibit number 1 for identification, as of  
6 this date.)

7 MR. PIKE: Counsel, do you have an extra  
8 copy of that for me?

9 MR. EDWARDS: No.

10 MR. PIKE: May I look at it real quick?

11 MR. EDWARDS: No. It has my notes on  
12 it.

13 MR. PIKE: I understood, I saw the  
14 highlights.

15 MR. EDWARDS: The notes are highlighted  
16 so when we copy it, it will not show up.

17 MR. PIKE: Just for the record, that's a  
18 current, operative pleading, correct?

19 MR. EDWARDS: Correct.

20 THE WITNESS: What does that mean?

21 MR. PIKE: There may have been some  
22 amendments to a complaint and I want to make  
23 sure that's the operative complaint at issue  
24 that he is speaking of today.

25 THE WITNESS: Can I go off the record

1 for a second?

2 May I ask you a question?

3 MR. PIKE: Sure. Can we take a break  
4 for a second?

5 MR. EDWARDS: Again?

6 THE WITNESS: Just a question.

7 MR. PIKE: He wants to speak with me for  
8 a second.

9 THE VIDEOGRAPHER: Off the video record  
10 12:01 p.m.

11 (Pause in the proceedings.)

12 THE VIDEOGRAPHER: We are back on the  
13 video record at 12:02 p.m.

14 Q Is it true, Mr. Epstein, that you and  
15 Ghislaine Maxwell forced V.R. to have sex with  
16 you on a daily basis?

17 MR. PIKE: Form, argumentative,  
18 harassing.

19 A Unfortunately at this time, though I  
20 would really like to answer those questions, and  
21 like I have done for most of your questions here  
22 today, Mr. Edwards, your firm was described as a  
23 criminal enterprise, a serious criminal  
24 enterprise by the current U.S. Attorney. Part of  
25 that criminal enterprise was fabricating cases of

1 a sexual nature against me and others in order to  
2 fleece unsuspecting investors out of millions of  
3 dollars. Though, unfortunately at this time no  
4 matter how I would like to respond to your  
5 questions, I must assert my Sixth Amendment,  
6 Fifth Amendment and Fourteenth Amendment rights  
7 under the U.S. Constitution or risk having my  
8 attorneys resign.

9 Q Isn't it true that V.R. was yours and  
10 Ghislaine Maxwell's sex slave from the time she  
11 was 15 through the time she escaped when she was  
12 19?

13 MR. PIKE: Again objection,  
14 argumentative, harassing.

15 A Mr. Edwards, your firm has been  
16 described as -- excuse me, as a criminal  
17 enterprise by the current U.S. Attorney and part  
18 of the largest fraud in Florida's history. Part  
19 of that fraud was fabricating multiple cases  
20 against people like me and others, of a sexual  
21 nature, in order to fleece unsuspecting investors  
22 out of millions and millions of dollars, so  
23 though I would like to answer that question, my  
24 attorneys have told me today I must assert my  
25 Sixth Amendment, Fourteenth Amendment and Fifth

1 Amendment right.

2 **Q Isn't it true that you and Ghislaine**

3 **Maxwell celebrated her 16th birthday with her and**

4 **had sex with her on that day?**

5 MR. PIKE: Form. Compound, confusing,

6 argumentative, harassing.

7 A Mr. Edwards, I would like to answer that

8 question. My attorneys have told me today, I

9 have to at least today assert my Fifth Amendment,

10 Sixth Amendment and Fourteenth Amendment rights

11 to the U.S. Constitution, especially my concern

12 is, that your firm has filed fraudulent lawsuits,

13 fabricated lawsuits, and the U.S. Attorney, the

14 current U.S. Attorney has described your firm as

15 a criminal enterprise that -- whose main purpose

16 was to generate money for the firm and its

17 co-conspirators through the operation of various

18 criminal activities, including mail fraud, wire

19 fraud and money laundering.

20 **Q Are you saying that the complaint of**

21 **L.M. against you, the allegation in that**

22 **complaint, are false?**

23 MR. PIKE: Form. Misinterprets the

24 witness's testimony.

25 **Q Or saying it is true?**

1 MR. PIKE: Same objection.

2 **Q It is either true or false?**

3 A I'll repeat myself, unfortunately, but

4 the current U.S. Attorney has described your law

5 firm that filed that filed L.M.'s claim -- was

6 involved in the filing of L.M.'s claim,

7 motions -- I'm sorry, do you want to tell me what

8 it was then? Would you like to tell me the

9 firm's involvement in this lawsuit, since we will

10 be here the rest of the day?

11 **Q Answer the question.**

12 A All right.

13 The U.S. Attorney has described that

14 firm as a criminal enterprise perpetrating one of

15 the largest frauds in Florida's history against

16 unsuspecting investors, fleecing them out of

17 millions of dollars by creating, crafting and

18 fabricating fellacious (sic) sexual claims

19 against people like me and others, so

20 unfortunately, though I would like to answer your

21 questions, Mr. Edwards, my counsel has advised me

22 that at least today I must assert my Sixth

23 Amendment, Fifth Amendment and Fourteenth

24 Amendment rights under the U.S. Constitution.

25 **Q Isn't it true, sir, and I'm reading from**

1 **the complaint filed by V.R. against you, isn't it**

2 **true, sir, that a friend of yours sent you three,**

3 **12-year old females for you to sexually abuse on**

4 **one of your birthdays?**

5 MR. PIKE: Form, argumentative,

6 harassing, and irrelevant to this lawsuit.

7 THE WITNESS: Excuse me.

8 A You're saying it is part of the

9 lawsuit?

10 **Q Yes, I'll read it.**

11 **"On one of the defendant Epstein's**

12 **birthdays, a friend of defendant Epstein sent him**

13 **three, 12-year old girls from France who spoke no**

14 **English for defendant to sexually exploit and**

15 **abuse? After doing so they were sent back to**

16 **France the next day."**

17 **Isn't that true?**

18 MR. PIKE: Once again, move to strike,

19 irrelevant, argumentative, harassing, and

20 for the record, the exhibit that's being

21 read from is a complaint that's unrelated to

22 the instant matter and not filed or

23 incorporated by the current plaintiff, L.M.,

24 in this matter.

25 A I would like to answer that question, I

1 really would; however, today my attorneys have

2 told me I have to assert my Fifth Amendment,

3 Sixth Amendment and Fourteenth Amendment rights

4 of the U.S. Constitution, especially because your

5 firm involved in this lawsuit has fabricated,

6 widely reported, multiple cases of sexual

7 harassment cases against individuals like me and

8 others, perpetrating what the U.S. Attorney

9 called one of the largest frauds in Florida's

10 history, fleecing people out of millions of

11 dollars, so though I would like to answer that

12 question, today I have to assert those rights or

13 risk losing my attorneys' counsel.

14 **Q Isn't it true that you forced V.R. as a**

15 **15-year old girl to have sex with numerous**

16 **friends of yours?**

17 A Are you kidding?

18 **Q Reading from a lawsuit.**

19 A Sorry, Mr. Edwards. Though I would like

20 to answer that question as well, as I've answered

21 most of your other questions here today, I would

22 like to respond; however, my attorneys here today

23 have advised me I have to assert my Fifth

24 Amendment, Sixth Amendment and Fourteenth

25 Amendment rights under the U.S. Constitution,

1 especially as your firm has been accused by the  
2 U.S. Attorney as being a criminal enterprise, and  
3 part of the largest fraud in Florida's history.  
4 Basically -- sorry, if I didn't read correctly,  
5 um.... the operation of the enterprise through  
6 various criminal activities including mail fraud,  
7 wire fraud and money laundering, fabricating  
8 sexual harassment cases against people like me  
9 and others.

10 Q By the way --

11 A Yes, sir?

12 Q -- didn't V.R. receive a round trip  
13 ticket paid for by you to Thailand, and she  
14 ultimately did not get back on the plane but  
15 instead escaped to Australia?

16 A I would like to answer that question,  
17 but today I would have to assert my Sixth  
18 Amendment rights, my Fifth Amendment rights and  
19 my Fourteenth Amendment rights under the U.S.  
20 Constitution, especially since your firm has been  
21 described as perpetrating one of the largest  
22 frauds in Florida's history, fleecing investors  
23 out of millions of dollars, being described by  
24 the U.S. Attorney of South Florida, as a criminal  
25 enterprise engaged in various criminal activities

1 spell his name? Are you acting like you don't  
2 know him?

3 MR. PIKE: Form, move to strike,  
4 argumentative and irrelevant as worded.

5 Mr. Edwards, you know that there are  
6 various standing orders, if not in this  
7 case, in various other cases, that  
8 specifically describe the protections of the  
9 Fifth Amendment. Federal Courts have  
10 ordered that certain questions that you are  
11 asking shall not be answered or Mr. Epstein  
12 would risk losing his Fifth Amendment  
13 right --

14 MR. EDWARDS: I understand that. He is  
15 asking to spell people's names.

16 MR. PIKE: -- under the United States  
17 Constitution. A lot of these questions here  
18 today that you're asking have already been  
19 ruled on by various Courts, that the Fifth  
20 Amendment protects any response thereto, so  
21 I would like -- I'm giving you some leeway  
22 here with regard to the argumentative  
23 questions. We've already -- and I'm not  
24 obviously testifying for the witness, but  
25 we've already handled a lot of these issues

1 including mail fraud, wire fraud and money  
2 laundering.

3 Q Do you know a man named Jean Luc  
4 Brunel?

5 A Can you spell it?

6 Q He was at your house last week, does  
7 that remind you?

8 MR. PIKE: Form, move to strike,  
9 speculation, argumentative, harassing.

10 Is there a question on the table, Mr.  
11 Edwards?

12 MR. EDWARDS: Yes.

13 Q Do you know him?

14 A Can you spell his name for me, please?

15 Q I don't need to spell his name. Do you  
16 know who I'm talking about, Mr. Brunel?

17 A Sorry, Mr. what?

18 Q B-r-u-n-e-l.

19 A I would like to answer that question as  
20 well, but my attorneys have counseled me today I  
21 have to assert my Sixth Amendment rights, Fifth  
22 Amendment rights and Fourteenth Amendment rights  
23 under the U.S. Constitution or risk losing my  
24 right to effective representation.

25 Q What's the purpose for you asking me to

1 in court and we have already adjourned one  
2 deposition for being argumentative, and I  
3 think you understand what the Court said  
4 there, so having said that, and I understand  
5 that you have a job to do, but having said  
6 that, I would like to caution you  
7 professionally, if you continue with the  
8 argumentative questions, I am going to have  
9 to terminate this deposition --

10 MR. EDWARDS: I completely understand.

11 MR. PIKE: Okay. We are here today  
12 to --

13 MR. EDWARDS: Mr. Brunel --

14 MR. PIKE: I want the Court to know we  
15 are here today to allow you to ask your  
16 questions, but the harassing and  
17 argumentative tone is not going to be  
18 tolerated.

19 MR. EDWARDS: We have a video. We can  
20 show the Court the tone. It is obviously  
21 not harassing.

22 MR. PIKE: That's fine.

23 Q Mr. Brunel is a long-term friend of  
24 yours, right?

25 A I intend to respond to all relevant

1 questions of this lawsuit; however, today my  
2 attorneys have counseled me I cannot provide  
3 answers to any questions that may be relevant to  
4 this lawsuit and I must accept their advice or  
5 risk losing my Sixth Amendment right to effective  
6 representation.

7 **Q You know him as somebody who has been**  
8 **caught engaging in sex with underage minors in**  
9 **the past; is that correct?**

10 MR. PIKE: Form.

11 A You will have to repeat the question,  
12 I'm sorry.

13 **Q You know Mr. Brunel as somebody who has**  
14 **been caught engaging in sex with minors in the**  
15 **past; is that correct?**

16 MR. PIKE: Form.

17 A I intend to respond to all relevant  
18 questions regarding this lawsuit; however, at the  
19 present time my attorneys have counseled me that  
20 I cannot provide answers to any questions  
21 relevant to this lawsuit, and I must accept their  
22 advice or risk losing my Sixth Amendment right to  
23 effective representation as your firm has been  
24 described by the U.S. Attorney as a criminal  
25 enterprise and part of one of the largest frauds

1 that I cannot provide answers to any questions  
2 relevant to this lawsuit and I must accept their  
3 advice or risk losing my Fifth, Sixth and  
4 Fourteenth Amendment rights under the U.S.  
5 Constitution.

6 **Q When you were being criminally**  
7 **investigated and V.R. was in Australia, is it**  
8 **true that you made a personal telephone call to**  
9 **her telling her not to come forward with any of**  
10 **the information she knew?**

11 MR. PIKE: Form.

12 A Again?

13 **Q Putting a time frame on it, the time**  
14 **frame where you were being criminally**  
15 **investigated --**

16 A What time frame is that?

17 **Q In her complaint it is not specific,**  
18 **but, let's just make it whenever. At some point**  
19 **in time did you place a telephone call to V.R. in**  
20 **Australia warning her not to come forward with**  
21 **any information about you engaging in sex with**  
22 **her while she was a minor?**

23 MR. PIKE: Form.

24 A I intend to respond to all relevant  
25 questions regarding this lawsuit; however, at the

1 in Florida's history specifically said you have  
2 been fabricating -- the law firm has been  
3 fabricating multiple cases of a sexual nature in  
4 order to fleece unsuspecting investors out of  
5 millions of dollars, including mail fraud, wire  
6 fraud and money laundering, so unfortunately,  
7 though I would like to answer all your questions  
8 here today, I must assert my Sixth Amendment,  
9 Fourteenth Amendment and Fifth Amendment right.

10 **Q You were involved in a modeling business**  
11 **with him called M.C. Squared; is that correct?**

12 A Again?

13 **Q You were involved in a modeling agency**  
14 **with --**

15 A What do you mean --

16 **Q -- with Mr. Brunel called M.C. Squared?**

17 A "Involved" means what, what do you  
18 mean?

19 **Q You tell the jury your involvement with**  
20 **the modeling agency. You can clarify for me,**  
21 **I'll let you do that.**

22 MR. PIKE: Object to the form.

23 A I intend to respond to all relevant  
24 questions regarding this lawsuit. However, at  
25 the present time my attorneys have counseled me

1 present time my attorneys have counseled me that  
2 I cannot provide answers to any questions  
3 relevant to this lawsuit and I must accept their  
4 advice or risk losing my Sixth Amendment right to  
5 effective representation.

6 **Q With respect to underage females, isn't**  
7 **it true that you have made the statement, in**  
8 **quotes, "the younger the better"?**

9 MR. PIKE: Form.

10 A Again, as your firm has been described  
11 by the current U.S. Attorney as a criminal  
12 enterprise involved in mail fraud, wire fraud,  
13 money laundering, and specifically crafting,  
14 fabricating multiple cases of sexual -- of a  
15 sexual nature against people like me, and others,  
16 in order to fleece many, many unsuspecting  
17 investors out of millions of dollars; I would  
18 like to answer your questions here today, Mr.  
19 Edwards, but unfortunately, my attorneys have  
20 counseled me that I must assert my Fifth, Sixth  
21 and Fourteenth Amendment right or they will  
22 resign.

23 **Q Who are your current employees?**

24 MR. PIKE: Form.

25 A Say that again.

1 **Q Who are your current employees, people**  
2 **who work for you, that you pay?**

3 A I intend to respond to all relevant  
4 questions regarding this lawsuit; however, at the  
5 present time my attorneys have counseled me that  
6 I cannot provide answers to any questions that  
7 may be relevant to this lawsuit, or risk losing  
8 my Sixth Amendment right to effective  
9 representation. Accordingly, therefore, I must  
10 assert my Sixth Amendment, Sixth Amendment and  
11 Fourteenth Amendment rights as provided by the  
12 U.S. Constitution.

13 **Q Isn't it true you pay your employees to**  
14 **bring you underage minor females for sex?**

15 MR. PIKE: Form, argumentative,  
16 speculation, harassing.

17 A Mr. Edwards, your firm has been  
18 described the current U.S. Attorney as a criminal  
19 enterprise, a criminal enterprise, part of the  
20 largest fraud in South Florida's history; but  
21 part of that fraud was fabricating, um,  
22 fictitious cases against me -- excuse me, against  
23 people like me, of a sexual nature, in order to  
24 fleece unsuspecting investors out of millions of  
25 dollars.

1 responding to one of your questions and you  
2 know that, Mr. Edwards.

3 MR. EDWARDS: This is on the video.

4 MR. PIKE: Nonetheless you know the  
5 rules. Nonetheless. If we have a question  
6 on the table, would you please repeat it so  
7 I can recall it and Mr. Epstein can endeavor  
8 to answer it.

9 MR. EDWARDS: Sure, and if it was only  
10 the court reporter, I would agree, but the  
11 jury is going to see a video and everybody  
12 knows commonly, if somebody shakes their  
13 head, they are saying "no," and if that was  
14 the answer, I wanted to give him a chance to  
15 elaborate on it, that's it.

16 **Q Isn't it true that when underage females**  
17 **would come to your house, you would engage in**  
18 **sexual activity with them and then pay them?**

19 MR. PIKE: Same objections.

20 A Unfortunately I would like to answer  
21 that question today, but my attorneys have  
22 counseled me that I must assert my Sixth  
23 Amendment right, my Fifth Amendment right and my  
24 Fourteenth Amendment right under the U.S.  
25 Constitution.

1 Unfortunately at this time, though, I  
2 would like to answer every one of your  
3 questions. My attorney has advised me I must  
4 assert my Sixth Amendment, Fourteenth Amendment  
5 and Fifth Amendment rights or risk losing them as  
6 my attorneys.

7 **Q Isn't it true when underage females were**  
8 **brought to you, you would engage in sex with them**  
9 **and pay them?**

10 MR. PIKE: Form, argumentative,  
11 harassing.

12 A (Witness shakes head.)

13 **Q Are you shaking your head to say "no" --**

14 A Excuse me.

15 **Q Are you shaking your head to say "no, I**  
16 **don't know how to interpret that answer?"**

17 A I didn't realize I was shaking my head.

18 MR. EDWARDS: I thought he was actually  
19 answering a question.

20 MR. PIKE: We'll just strike. The rules  
21 are well-known to every lawyer who practices  
22 in the State of Florida, that it is clear  
23 that a nod of the head or shake of the head  
24 is not understood by the record, so  
25 therefore Mr. Epstein was clearly not

1 The fact that your firm has been  
2 described as a criminal enterprise and part of  
3 one of the largest frauds in Florida's -- South  
4 Florida's history, part of that fraud has been  
5 described as fabricating cases of sexual nature  
6 against me and others in order to fleece  
7 unsuspecting investors out of millions of  
8 dollars. I would like to answer that question,  
9 Mr. Edwards; however, today, I must assert my  
10 Fifth, Sixth and Fourteenth Amendment right.

11 **Q In addition to paying these underage**  
12 **females for sexual activity, you also paid them**  
13 **to bring their underage friends to you, to also**  
14 **engage in sexual activity with them?**

15 MR. PIKE: Form.

16 **Q Is that correct?**

17 A I intend to respond to all relevant  
18 questions regarding this lawsuit; however, at the  
19 present time my attorneys have counseled me that  
20 I may not, and I must assert -- they have advised  
21 me I must assert my Sixth Amendment right, my  
22 Fifth Amendment right and my Fourteenth Amendment  
23 rights under the U.S. Constitution.

24 **Q You would pay underage females 200 to**  
25 **\$300 for engaging in sexual activity with you or**

1 **for procuring another underage female to engage**  
2 **in sexual activity with you; is that correct?**

3 MR. PIKE: Form, move to strike.

4 Assumes facts not in evidence and calls for  
5 a legal conclusion as well, argumentative.

6 A I intend to respond to all relevant  
7 questions regarding this lawsuit; however, at the  
8 present time my attorneys have counseled me that  
9 I cannot provide answers to any questions that  
10 may be relevant to this lawsuit, and I must  
11 accept their advice or risk losing my Sixth  
12 Amendment right to effective representation.

13 Accordingly, therefore, I must assert my  
14 constitutional rights as guaranteed by the Fifth,  
15 Sixth and Fourteenth Amendment to the U.S.  
16 Constitution.

17 **Q Would you agree that your scheme was**  
18 **devised to coerce these underage minors to bring**  
19 **you as many other underage minors, as were**  
20 **available for you to engage in sexual activity**  
21 **with?**

22 MR. PIKE: Form.

23 A Can you repeat the question?

24 **Q Yes. Would you agree that your scheme**  
25 **was devised to coerce underage girls into**

1 Attorney, and as part of the largest fraud in  
2 South Florida's history, and as part of the fraud  
3 fabricating malicious cases of sexual harassment  
4 and other cases of sexual nature against people  
5 like me and others, although I would like to  
6 answer that question today, my attorneys have  
7 advised me I must assert my Sixth Amendment,  
8 Fourteenth Amendment and Fifth Amendment rights  
9 of the U.S. Constitution. Although I believe you  
10 know I would really like to answer your  
11 questions, but at this moment if I don't assert  
12 those rights, I risk having my attorneys resign.

13 **Q Isn't it true with this method you were**  
14 **able to interact sexually with underage girls**  
15 **every single day?**

16 MR. PIKE: Form, asked and answered.

17 Same objections.

18 **Q Go ahead.**

19 A Oh, I'm sorry. Can you repeat it?

20 **Q Sure. With this method of --**

21 A "This method" being what, sorry?

22 **Q Your method of using underage minors to**  
23 **bring you other underage minors for sex; isn't it**  
24 **true that that method resulted in you engaging in**  
25 **sexual activity with underage minors on an every**

1 **bringing as many other underage girls to you, as**  
2 **were available for sexual purposes?**

3 MR. PIKE: Form.

4 A Did you say "for sexual purposes"?

5 **Q Yes, for sexual purposes.**

6 A I'm not surprised. Since your firm was  
7 described as perpetrating one of the largest  
8 frauds in Florida's history by crafting,  
9 fabricated sexual harassment cases against people  
10 like me and others in order to fleece  
11 unsuspecting investors out of millions of  
12 dollars, I would like to answer that question.  
13 However, today my attorneys have advised me I  
14 must assert my Sixth Amendment, Fifth Amendment  
15 and Fourteenth Amendment right under the U.S.  
16 Constitution, and if I don't do so, I risk  
17 losing -- uh... losing effective representation.

18 **Q Utilizing this method of using underage**  
19 **minors to bring you other underage minors, you**  
20 **were able to engage in sex with hundreds of**  
21 **underage minor females. Is that true?**

22 MR. PIKE: Form, argumentative,

23 harassing and calls for speculation.

24 A Since, Mr. Edwards, your firm has been  
25 described as a criminal enterprise by the U.S.

1 **day basis?**

2 MR. PIKE: Same objections.

3 A Your firm has been described by the  
4 current U.S. Attorney as a criminal enterprise  
5 engaged in one of the largest frauds in South  
6 Florida's history, and as part of that fraud,  
7 creating, fabricating, malicious cases of sexual  
8 nature against people like me and others, so  
9 unfortunately, though I would like to answer that  
10 question today, I must assert my Sixth Amendment,  
11 Fourteenth Amendment and Fifth Amendment rights  
12 to my counsel's advisement to do, although I  
13 believe you know I would really like to answer  
14 those questions today, I must assert those rights  
15 or risk losing my attorney's representation.

16 **Q To keep track of all these underage**  
17 **minors, you stored their names and telephone**  
18 **numbers in your home computer; isn't that**  
19 **correct?**

20 MR. PIKE: Form, argumentative,  
21 speculation.

22 A Again? Sorry.

23 **Q Are you going to answer the question or**  
24 **just read? If you are going to answer the**  
25 **question, of course, I'll keep reading it as many**

1 times.

2 A Excuse me?

3 MR. PIKE: The witness is attempting to

4 answer your question. He asked you to

5 repeat the question.

6 MR. EDWARDS: He is?

7 MR. PIKE: He asked you to repeat the

8 question.

9 MR. EDWARDS: I don't mind going through

10 that, Mike, because I do want answers, but

11 if I'm going to repeat the question multiple

12 times and get the same answer, we are

13 wasting time. I want to stop us wasting

14 time repeating questions if I'm getting the

15 same nonresponsive answer.

16 MR. PIKE: I understand your intention

17 here.

18 MR. EDWARDS: Yeah.

19 MR. PIKE: -- however, these questions

20 are similar in nature, if not identical to

21 various questions that you've asked in other

22 indications, so you coming here today is of

23 no surprise that Mr. Epstein is required to

24 invoke his Fifth, Sixth and Fourteenth

25 Amendment rights under the United States

1 Constitution --

2 MR. EDWARDS: I understand that.

3 MR. PIKE: -- if you came here today

4 thinking you were going to pull a rabbit out

5 of a hat, and Mr. Epstein was going to

6 waive his Fifth, Sixth and Fourteenth

7 Amendment rights to the U.S. Constitution,

8 at least not today. That will not be

9 occurring.

10 **Q Isn't it true that to keep track of the**

11 **names and phone numbers of these underage minor**

12 **females, to interact with sexually, you stored**

13 **those names and phone numbers in your home**

14 **computer?**

15 A Thank you. I've heard the question

16 now. It didn't surprise -- again, I've now heard

17 the question and the fact that your firm has been

18 described as a criminal enterprise by the current

19 U.S. Attorney in South Florida, and part of one

20 of the largest frauds in Florida's history, it is

21 reported that your firm fabricated malicious

22 cases of a sexual nature against people and

23 against me, in order to fleece unsuspecting

24 investors out of millions of dollars.

25 Unfortunately, though I would like to

1 answer each one of your questions today, Mr.

2 Edwards, my attorneys have advised me that I must

3 assert my Sixth Amendment, Fifth Amendment and

4 Fourteenth Amendment rights under the U.S.

5 Constitution. So although I would like to

6 answer, I must assert those rights or risk having

7 my attorneys resign.

8 **Q Do you know Sarah Kellen?**

9 A I intend to respond to all relevant

10 questions regarding this lawsuit; however, at the

11 present time my attorneys have counseled me that

12 I cannot provide answers to any questions

13 relevant to this lawsuit and must accept their

14 advice or risk losing my Sixth Amendment right to

15 effective representation.

16 **Q Isn't it true you employed Sarah Kellen**

17 **to contact underage minor females and make them**

18 **appointments to be at your house?**

19 A Sorry, again?

20 **Q Isn't it true you employed Sarah Kellen**

21 **for the purposes of contacting underage minor**

22 **females and scheduling them appointments to be at**

23 **your house?**

24 A The current U.S. Attorney has described

25 your law firm, Mr. Edwards, as a criminal

1 enterprise engaged in one of the largest frauds

2 in South Florida's history. It has been reported

3 that your firm fabricated multiple cases of a

4 sexual nature against me and others, in order to

5 fleece unsuspecting investors out of millions and

6 millions of dollars, so, though unfortunately I

7 would like to answer every one of your questions

8 today my attorneys have counseled me that today I

9 must assert my Sixth Amendment, Fifth Amendment

10 and Fourteenth Amendment rights under the U.S.

11 Constitution. Though I believe you know I would

12 like to answer those questions, although today I

13 must assert those rights or risk having my

14 attorneys resign.

15 **Q Tell the jury how you know Nadia**

16 **Marcinkova.**

17 MR. PIKE: Form move to strike.

18 MR. EDWARDS: Move to strike my

19 question?

20 MR. PIKE: (Nods.)

21 MR. EDWARDS: What basis?

22 \*\* MR. PIKE: Do I have to state a

23 basis? Usually I'm just required to state

24 "form."

25 MR. EDWARDS: You have done more than



1 that today.

2 MR. PIKE: If I went on a diatribe of  
3 explaining, you know, what's confusing,  
4 compound and relevant, then you would blame  
5 for testifying for the witness. So I just  
6 move to strike the question.

7 MR. EDWARDS: Make sure you mark that  
8 somewhere on this transcript, somehow.

9 **Q Tell the jury how you know Nadia**  
10 **Marcinkova?**

11 MR. PIKE: Move to strike.

12 A I intend to respond to all relevant  
13 questions regarding this lawsuit. However, at  
14 the present time my attorneys have counseled me  
15 that I cannot provide answers to any questions  
16 relevant to this lawsuit and must accept their  
17 advice or risk losing my Sixth Amendment right to  
18 effective representation. Accordingly, I assert  
19 my Fifth Amendment, Sixth Amendment and  
20 Fourteenth Amendment right under the U.S.  
21 Constitution.

22 **Q Isn't it true that you brought her to**  
23 **this country when she was underage and made her**  
24 **your sex slave, and you've bragged about this?**

25 MR. PIKE: Form, argumentative,

1 your firm, Mr. Edwards, as a criminal enterprise  
2 involved in mail fraud, wire fraud, money  
3 laundering and, in fact, fabricating multiple  
4 cases of a sexual nature against me, others, in  
5 order to fleece unsuspecting investors in South  
6 Florida out of millions and millions of dollars.

7 Unfortunately, though I would like to  
8 answer each one of your questions here today, my  
9 attorneys have advised me I must assert my Sixth  
10 Amendment, Fourteenth Amendment and Fifth  
11 Amendment right under the U.S. Constitution,  
12 although I believe you know I would like to  
13 answer your questions, but at this moment I must  
14 assert those rights or risk having my attorneys  
15 resign.

16 **Q Isn't it true that with each of these**  
17 **underage minor females that were brought to your**  
18 **house, your method of sexually exploiting them**  
19 **was nearly identical; is that correct?**

20 MR. PIKE: Objection, argumentative,  
21 confusing, overbroad and vague.

22 A I don't even understand the question.

23 **Q Okay. When a 14 or 15-year old would be**  
24 **led into your bedroom, you would appear from the**  
25 **shower first, usually naked; is that correct?**

1 compound, harassing and calls for  
2 speculation.

3 A I intend to respond to all relevant  
4 questions regarding this lawsuit; however, at the  
5 present time my attorneys have counseled me that  
6 I cannot provide answers to any questions  
7 relative to this lawsuit and I must accept this  
8 advice or risk losing my Sixth Amendment right to  
9 effective representation. However, I would like,  
10 so I'm clear, the question was, did I bring her  
11 here? Specifically --

12 **Q Your answer is fine.**

13 A Okay.

14 **Q Is it true that you demanded numerous**  
15 **underage minor females to have sex with Nadia**  
16 **Marcinkova inside your home while you watched,**  
17 **masturbating?**

18 MR. PIKE: Same objections.

19 A You have to repeat the question.

20 **Q Isn't it true that you have ordered**  
21 **several underage minor females to have sex with**  
22 **Nadia Marcinkova in your home while you watched,**  
23 **masturbating?**

24 MR. PIKE: Same objections.

25 A The current U.S. Attorney has described

1 MR. PIKE: Objection, argumentative,  
2 assumes facts not in evidence, and  
3 harassing.

4 A I intend to respond to all relevant  
5 questions regarding this lawsuit; however, today  
6 my attorneys have advised me that I cannot  
7 provide answers to any questions relevant to this  
8 lawsuit and must accept their advice or risk  
9 losing my Sixth Amendment right to effective  
10 representation. Accordingly, therefore, I must  
11 assert my Constitutional rights -- the Fifth  
12 Amendment, Sixth Amendment and Fourteenth  
13 Amendments to the U.S. Constitution.

14 MR. PIKE: Can we go off the record for  
15 a second?

16 MR. EDWARDS: If it is necessary.

17 MR. PIKE: Yes, let's go off the  
18 record.

19 THE VIDEOGRAPHER: Going off the video  
20 record at 12:35 p.m.

21 (Pause in the proceedings.)

22 THE VIDEOGRAPHER: Back on the video  
23 record 12:44 p.m.

24 MR. EDWARDS: Can you tell me what my  
25 last question is?

1 THE COURT REPORTER: Certainly.  
2 (The record was read.)

3 **Q After appearing from the shower naked,**  
4 **you would order the underage minor female to**  
5 **disrobe; isn't that true?**

6 MR. PIKE: Same objections. Form.

7 A I intend to respond to all relevant  
8 questions regarding this lawsuit; however, at the  
9 present time my attorneys have counseled me I  
10 cannot provide answers to any questions relevant  
11 to this lawsuit and must accept their advice or  
12 risk losing my Sixth Amendment right to effective  
13 representation.

14 **Q You would then order them to, or order**  
15 **her to begin providing you a massage; is that**  
16 **correct?**

17 MR. PIKE: Form.

18 A I intend to respond to all relevant  
19 questions regarding this lawsuit and I would like  
20 to answer each and every one of your questions  
21 today, Mr. Edwards; however, my attorneys have  
22 told me that I cannot do that today unless and I  
23 must assert my Sixth Amendment, Fifth Amendment  
24 and Fourteenth Amendment rights under the U.S.  
25 Constitution or risk losing my counsel.

1 Therefore, I'm going to assert those rights as  
2 guaranteed by the Fifth Amendment, Sixth  
3 Amendment and Fourteenth Amendment.

4 **Q You would then roll over and continue**  
5 **with masturbating; is that correct?**

6 MR. PIKE: Form.

7 A I intend to respond to all relevant  
8 questions regarding this lawsuit. It is -- it is  
9 my understanding that the current U.S. Attorney  
10 has described your law firm as a criminal  
11 enterprise, yours and Mr. Jaffe's firm, as a  
12 criminal enterprise and part of the largest fraud  
13 in Florida's history, fabricating malicious cases  
14 of a sexual nature against me and others, in  
15 order to fleece investors out of millions of  
16 dollars, through bogus schemes including  
17 conspiracy to -- excuse me -- to commit mail  
18 fraud, wire fraud and money laundering, so though  
19 I would like to answer each and every one of your  
20 questions here today, my attorneys have counseled  
21 me I cannot, and must assert my Fifth, Sixth and  
22 Fourteenth Amendment rights under the U.S.  
23 Constitution.

24 **Q You would then rub the underage minor**  
25 **female's vagina and/or insert your fingers into**

1 **her vagina; is that correct?**

2 MR. PIKE: Form.

3 A I intend to respond to all relevant  
4 questions regarding this lawsuit. Unfortunately,  
5 today my attorneys have advised me I cannot, must  
6 assert my rights under the U.S. Constitution,  
7 under the Fifth Amendment and Sixth amendment and  
8 Fourteenth amendments of the U.S. Constitution,  
9 especially since your firm has been described as  
10 a criminal enterprise by the current U.S.

11 Attorney perpetrating one of the largest frauds  
12 in South Florida's history, fleecing investors  
13 out of millions of dollars by fabricating  
14 malicious cases, malicious cases of a sexual  
15 nature against people like me and others.

16 **Q With many of these underage minors you**  
17 **would use vibrators on them; is that correct?**

18 MR. PIKE: Form.

19 A I would like to respond to that question  
20 as I would like to respond to all your other  
21 questions today. However, my attorneys have  
22 counseled me that I must assert my Sixth  
23 Amendment rights, my Fifth Amendment rights and  
24 my Fourteenth Amendment rights under the U.S.  
25 Constitution.

1 **Q And with many of these underage minors,**  
2 **you would give and/or receive oral sex from them;**  
3 **is that correct?**

4 MR. PIKE: Form.

5 A I intend to respond to all relevant  
6 questions regarding this lawsuit, and I would  
7 like to answer each and every one of your  
8 questions; however, my attorneys have counseled  
9 me that today I must assert my Sixth Amendment,  
10 Fifth Amendment and Fourteenth Amendment rights  
11 under the U.S. Constitution, especially since  
12 your firm has been described by the current U.S.  
13 Attorney as perpetrating one of the largest  
14 frauds in Florida -- in Florida's history, by  
15 fabricating malicious cases of a sexual nature  
16 against me and others.

17 **Q In June of 2008 you pled guilty to a**  
18 **couple of felonies, right?**

19 MR. PIKE: Form, vague and confusing.

20 A Again?

21 **Q In June of 2008, you pled guilty to two**  
22 **felonies; is that correct?**

23 MR. PIKE: Same objection.

24 A Yes.

25 **Q And what were those felonies that you**

1 **pled guilty to?**  
 2 A Solicitation of prostitutes, not  
 3 underage prostitutes but simply prostitutes.  
 4 Solicitation of prostitutes and one count of  
 5 procuring a minor for underage sex.  
 6 **Q You have taken the Fifth as to questions**  
 7 **related to many of these underage minors, but the**  
 8 **underage minors that were the victims in the**  
 9 **cases where you pled guilty, were A.H.; is that**  
 10 **one of them?**  
 11 MR. PIKE: Form, mischaracterizes the  
 12 witness's testimony. Calls for a legal  
 13 conclusion?  
 14 A Again.  
 15 **Q What was the name of the any of the**  
 16 **underage minors that were the subject of the**  
 17 **criminal charges to which you pled guilty?**  
 18 A I don't know.  
 19 **Q So, tell me about those charges. What**  
 20 **were the allegations of those charges?**  
 21 MR. PIKE: Form.  
 22 A Solicitation of prostitution, not  
 23 underage prostitution... Prostitution.  
 24 **Q Were the victims or the prostitutes, as**  
 25 **you would say, were they minors?**

1 MR. PIKE: Form.  
 2 A I pled guilty to solicitation of  
 3 prostitution.  
 4 **Q Okay, so tell me what those cases were**  
 5 **about. What happened?**  
 6 MR. PIKE: Form again.  
 7 A I... (Witness shrugs.) I can't tell you  
 8 any more than that.  
 9 **Q You don't know what you pled guilty to?**  
 10 A I just told you --  
 11 MR. PIKE: Object to the form, asked and  
 12 answered.  
 13 **Q Do you know what you pled guilty to, the**  
 14 **facts?**  
 15 A Solicitation of prostitution.  
 16 **Q I understand that that's the charge.**  
 17 **What were the underlying facts? What did you do,**  
 18 **did you pull up in a car, talk to the person, did**  
 19 **they come over to your house, how did you get**  
 20 **them, those kinds of things. Tell the jury what**  
 21 **were the underlying facts about the charges you**  
 22 **pled guilty to?**  
 23 MR. PIKE: Object to the form. Move to  
 24 strike.  
 25 A I don't know.

1 **Q You don't know what you pled guilty to?**  
 2 A I pled guilty to solicitation of  
 3 prostitution, not underage prostitution, but  
 4 prostitution.  
 5 **Q My understanding from reading the court**  
 6 **files that one of these females was A.H. Do you**  
 7 **know who that is?**  
 8 A I intend to respond to all relevant  
 9 questions in this lawsuit. However, at the  
 10 present time my attorneys have counseled me that  
 11 I cannot provide answers to any of these  
 12 questions today. So accordingly, I must assert  
 13 my constitutional rights under the Fifth, Sixth  
 14 and Fourteenth Amendments of the U.S.  
 15 Constitution.  
 16 **Q You're aware A.H. is somebody that**  
 17 **alleges she was at your house on more than 100**  
 18 **occasions; is that true?**  
 19 MR. PIKE: Form.  
 20 A Can you repeat the question, sir?  
 21 **Q Are you aware that A.H. is a female that**  
 22 **alleges that when she was underage, she was at**  
 23 **your house on more than 100 occasions?**  
 24 MR. PIKE: Form, predicate.  
 25 A I intend to respond to all relevant

1 questions to this lawsuit, Mr. Edwards. However,  
 2 today my attorneys have counseled me that I must  
 3 respond by invoking my Fifth Amendment right, my  
 4 Sixth Amendment right and my Fourteenth Amendment  
 5 right under the U.S. Constitution or risk losing  
 6 them as my attorneys, so therefore I must assert  
 7 those rights.  
 8 **Q You understand that her complaint was**  
 9 **that Epstein turned H. on to her stomach on the**  
 10 **massage bed and inserted his penis in to her**  
 11 **vagina, H. Stated Epstein began to pump his penis**  
 12 **in her vagina and, she became upset over this.**  
 13 **She said her head was being held against the bed**  
 14 **forcibly as he continued to pump inside of her**  
 15 **while she screamed "no."**  
 16 **Are you aware of those allegations?**  
 17 MR. PIKE: Form, predicate.  
 18 A I'm sorry, did you say there is a  
 19 complaint?  
 20 **Q In the incident report that led to a**  
 21 **charging document, that led to a charge that you**  
 22 **have pled guilty to. Are you aware of that**  
 23 **information coming from A.H.?**  
 24 MR. PIKE: I'm sorry, Mr. Edwards; what  
 25 are you reading from?

1 MR. EDWARDS: The 87-page Palm Beach  
2 Police Department incident report where  
3 there are numerous underage females  
4 describing their interaction with Mr.  
5 Epstein at his house. I'm reading  
6 specifically from page 41 related to A.H.,  
7 who was one of the victims he pled guilty  
8 to.

9 MR. PIKE: Is that the same document  
10 that you're seeking production of, in this  
11 same exact case?

12 MR. EDWARDS: I don't know what you're  
13 talking about. This is something from the  
14 State Attorney's file.

15 MR. PIKE: Okay. Sorry. What's the  
16 question?

17 **Q Are you aware of that allegation? What**  
18 **I just read to you.**

19 A I would like to answer that question,  
20 but, however, today my attorneys have advised me  
21 I must assert my Fifth Amendment, Sixth Amendment  
22 and Fourteenth Amendment rights under the U.S.  
23 Constitution.

24 **Q Assuming your attorneys have advised you**  
25 **but because of Res Judicata, double jeopardy, you**

1 **cannot be charged for any crimes that you have**  
2 **already pled guilty to relating to A.H., so I**  
3 **would like you to explain to the jury, in your**  
4 **words, or your version of the story, what was**  
5 **your interaction with A.H. at your house when she**  
6 **was a minor?**

7 MR. PIKE: Object to the form as  
8 worded. Could disclose attorney/client  
9 communications.

10 A I intend to respond to all relevant  
11 questions regarding this lawsuit. I would like  
12 to answer each of your questions today, however,  
13 my attorneys have counseled me that I may not.  
14 They've advised me that I must assert my Fifth  
15 Amendment, Sixth Amendment and Fourteenth  
16 Amendment rights under the U.S. Constitution.  
17 Therefore, if I don't, I risk losing their  
18 counsel. Therefore, I must assert those rights  
19 here today, Mr. Edwards.

20 **Q Are you aware that A.H. Advised police**  
21 **that she was ripped and torn in her vagina area**  
22 **and had difficulty walking to the car after this**  
23 **episode where you forcibly inserted your penis**  
24 **into her vagina?**

25 MR. PIKE: Objection, relevance,

1 argumentative, compound, harassing.

2 A This was who?

3 **Q The question is, are you aware A.H.?**

4 A A.H.

5 The current U.S. Attorney, since he has  
6 described your firm as a criminal enterprise and  
7 part of one of the largest frauds in Florida's  
8 history by fabricating, fabricating, malicious  
9 cases of a sexual nature against people like me  
10 and others, and fleecing investors out of  
11 millions of dollars by using means described in  
12 the complaint against your firm, including mail  
13 fraud, wire fraud, money laundering; I'm afraid  
14 today, though I would like to answer each one of  
15 your questions, my attorneys have counseled me  
16 that I must not, I must assert my Sixth  
17 Amendment, Fifth Amendment and Fourteenth  
18 Amendment rights under the U.S. Constitution, and  
19 I believe you know I would like to answer those  
20 questions. I must assert those rights or risk  
21 losing my attorney's representation.

22 **Q Do you know S.G.?**

23 A Spell it, please.

24 **Q I don't know how to spell her name, but**  
25 **do you know a S.G.? I don't know that she would**

1 **have ever spelled her name for you.**

2 MR. PIKE: Form, move to strike.

3 **Q Her name is "S.G."**

4 A I intend to respond to all relevant  
5 questions regarding this lawsuit. However, at  
6 the present time my attorneys have counseled me  
7 that I may not provide answers today, though I  
8 would like to, and I must, in fact, take their  
9 advice or risk losing their representation, so  
10 therefore, I must assert those rights under the  
11 U.S. Constitution.

12 **Q Do you know the names of any of the**  
13 **females that you allegedly solicited for**  
14 **prostitution and pled guilty to?**

15 MR. PIKE: Relevance.

16 A Sitting here today, no, I do not.

17 **Q You asked me to spell S.G.'s name.**  
18 **That's somebody that your attorneys took her**  
19 **deposition about a year and a half ago. Does**  
20 **that help to refresh your recollection as to who**  
21 **S.G. is?**

22 A I would like to answer that question but  
23 today, according to my attorneys, I must assert  
24 my Fifth Amendment, Sixth Amendment and  
25 Fourteenth Amendment rights under the U.S.

1 Constitution. I must accept their advice or risk  
2 losing my Sixth Amendment right to effective  
3 representation, Mr. Edwards, so though I would  
4 like to answer the question, today I must assert  
5 those rights.

6 **Q There is another victim, her name is**  
7 **A.D., that was listed as one of the females at**  
8 **your house and you pled guilty to the**  
9 **solicitation of.**

10 **I would like to ask you if you remember**  
11 **her?**

12 MR. PIKE: Form, confusing, compound.

13 A A.D.?

14 **Q I don't know her first time, initial "A"**  
15 **last name is "D."**

16 MR. PIKE: Same objection.

17 A I intend to respond to all relevant  
18 questions regarding this lawsuit. However, at  
19 the present time my attorneys have counseled me  
20 that I cannot provide answers to any questions  
21 relevant to this lawsuit, and I must accept their  
22 advice or risk losing my right to effective  
23 representation. Therefore, though I would like  
24 to answer the questions, I must assert those  
25 rights.

1 and Fourteenth Amendment rights to the U.S.  
2 Constitution or risk losing effective  
3 representation. Accordingly, I must assert my  
4 rights as guaranteed by the Constitution.

5 **Q Just so you are clear, since your**  
6 **attorney made it an objection that it was**  
7 **unclear, then you invoked your Fifth Amendment**  
8 **rights --**

9 A Sorry.

10 **Q I'm talking about the cases where you**  
11 **already pled guilty and you can't be charged**  
12 **again. What were the facts and circumstances**  
13 **that led up to you pleading guilty to these**  
14 **felonies?**

15 A I've answered the question.

16 MR. PIKE: Same objection, asked and  
17 answered.

18 THE VIDEOGRAPHER: Counsel.  
19 (Indicating five minutes left on tape.)

20 MR. EDWARDS: Okay.

21 **Q Just so the jury understands, these**  
22 **three females that were the subject of the guilty**  
23 **pleas in State Court, were procured by your**  
24 **method of having underage minor females locate**  
25 **other underage minor females and bring them to**

1 **Q With each case that results in a**  
2 **charge --**

3 THE WITNESS: Excuse me, is there some  
4 water?

5 THE VIDEOGRAPHER: Off the record?

6 MR. EDWARDS: Stopping again?

7 THE WITNESS: Can I get some water? Mr.  
8 Jaffe, can you pass some water?

9 THE VIDEOGRAPHER: There is no water  
10 here.

11 THE WITNESS: Sorry.

12 **Q With each conviction, charge, or with**  
13 **each charge that leads to a conviction, there are**  
14 **facts and circumstances that lead up to that plea**  
15 **of guilty.**

16 MR. PIKE: Form.

17 **Q What are the facts and circumstances**  
18 **that led to you pleading guilty to the two**  
19 **felonies that you've described?**

20 MR. PIKE: Form, overbroad, compound,  
21 confusing, calls for a legal conclusion.

22 A I would like to respond to that  
23 question. I would like to respond to that  
24 question, but today my attorneys have advised me  
25 I must assert my Fifth Amendment, Sixth Amendment

1 **your house; isn't that correct?**

2 MR. PIKE: Objection, argumentative,  
3 compound, harassing, assumes facts not in  
4 evidence. I move to strike.

5 A You have to repeat the question.

6 **Q Okay, A.H., A.D., S.G. are all people**  
7 **that were, at the time you engaged in sexual**  
8 **activity with them, were underage and were**  
9 **brought by other underage minor females; is that**  
10 **true?**

11 MR. PIKE: Same objections incorporated  
12 as well as motion to strike.

13 A I don't understand -- I'm sorry, I don't  
14 understand the question.

15 **Q Isn't it true that you used underage**  
16 **minor females to bring other underage minor**  
17 **females to your house for sex?**

18 MR. PIKE: Asked and answered.

19 A (Witness shrugs.)

20 MR. PIKE: Way earlier on.

21 MR. EDWARDS: He doesn't understand the  
22 question --

23 MR. PIKE: You can answer the question.

24 **Q I'm going through the progression.**

25 MR. PIKE: You can answer, but it is

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1 asked and answered.  
2 A As your firm, Mr. Edwards and Mr.  
3 Jaffe's has been described by the U.S. Attorney  
4 as perpetrating one of the largest frauds in  
5 South Florida's history by crafting malicious  
6 cases of a sexual nature against people like me  
7 and others, in order to fleece, using bogus  
8 schemes, in the U.S. Attorney's words, investment  
9 schemes. Unfortunately, though I would like to  
10 answer every one of your questions if I'm able,  
11 my attorneys have advised me I must assert my  
12 Sixth Amendment, Fourteenth Amendment and Fifth  
13 Amendment rights under the U.S. Constitution.  
14 Therefore, at the moment I cannot answer that  
15 question.  
16 Q The acts related to your guilty plea  
17 occurred at your Palm Beach house; is that  
18 correct?  
19 MR. PIKE: Form.  
20 A Again, sorry.  
21 Q If you were soliciting prostitutes, it  
22 wasn't out on the street, it wasn't at a hotel.  
23 These were girls that you solicited to be  
24 prostitutes at your house in Palm Beach,  
25 correct?

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1 MR. PIKE: Objection, relevance,  
2 argumentative. Calls for speculation as  
3 worded and assumes facts not in evidence.  
4 A Though I would like to answer that  
5 question, my attorneys today have advised me I  
6 cannot answer you today, and they've advised me I  
7 must assert my Sixth Amendment, Fifth Amendment  
8 and Fourteenth Amendment rights under the U.S.  
9 Constitution. Otherwise I risk losing their  
10 representation. So, accordingly I must assert  
11 those rights, Mr. Edwards, and Mr. Jaffe.  
12 Q In what county did you plead guilty to  
13 these felony offenses?  
14 A Palm Beach County.  
15 Q These were crimes that occurred here in  
16 Palm Beach County?  
17 MR. PIKE: Form.  
18 Q Is that correct?  
19 A ... I pled guilty in Palm Beach County.  
20 Q Isn't it true that you kept a calendar  
21 or schedule --  
22 THE VIDEOGRAPHER: I have to change the  
23 tape.  
24 MR. EDWARDS: Change it.  
25 THE VIDEOGRAPHER: Off the video record

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1 1:05 p.m.  
2 (Pause in the proceedings.)  
3 THE VIDEOGRAPHER: Back on the video  
4 record 1:15 p.m.  
5 Q Mr. Epstein, as it relates to the  
6 charges you pled guilty to, are you saying today  
7 that those females that you interacted with  
8 sexually, were prostitutes prior to meeting you?  
9 A I'm saying I pled guilty to the  
10 solicitation of prostitution.  
11 Q Right, and you would certainly agree  
12 that that would require yourself and one other  
13 individual for that act of prostitution,  
14 correct?  
15 MR. PIKE: Form. Also calls for a legal  
16 conclusion.  
17 A I pled guilty to solicitation of  
18 prostitution.  
19 Q Are you saying that those females that  
20 were the victims, at least listed as victims by  
21 the State, were prostitutes prior to meeting  
22 you?  
23 MR. PIKE: Form. Vague. Irrelevant?  
24 A I pled guilty to solicitation of  
25 prostitution.

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1 Q Do you have any remorse for your  
2 actions --  
3 MR. PIKE: Form.  
4 Q -- against these victims that led to  
5 your plea of guilty?  
6 MR. PIKE: Form, argumentative.  
7 A I pled guilty to solicitation of  
8 prostitution, not underage prostitution, simply,  
9 prostitution.  
10 Q Are you saying now that the subjects of  
11 that, which were called victims, were not  
12 underage when you engaged in sex with them?  
13 MR. PIKE: Form, argumentative,  
14 speculation, assumes facts not in evidence,  
15 as well as mischaracterizes the witness's  
16 testimony.  
17 A I pled guilty to solicitation of  
18 prostitution, not underage prostitution,  
19 solicitation of prostitution.  
20 Q I was under the impression you pled  
21 guilty to a second degree felony, that being  
22 procuring a minor for the purposes of  
23 prostitution.  
24 A That's correct.  
25 Q So a minor is somebody under the age of

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1 **18, and I'm asking for the guilty plea related to**  
2 **that count; are you at all remorseful for your**  
3 **interactions with that minor?**  
4 MR. PIKE: Same objections.  
5 A What minor?  
6 **Q The charge is procuring a minor. You**  
7 **tell me. Who was that minor?**  
8 A I don't know.  
9 **Q You were never told during the State**  
10 **Attorney's prosecution of you, who this person**  
11 **was?**  
12 A No.  
13 **Q Why did you plead guilty to a felony**  
14 **charge that resulted in you going to jail,**  
15 **without even knowing who the victim was?**  
16 MR. PIKE: Form. That question calls  
17 for attorney/client information, and  
18 therefore, I'm going to instruct him not to  
19 answer that.  
20 **Q If it has anything to do with any**  
21 **conversations with your attorney, I don't want to**  
22 **know. I'm just going off of the plea colloquy**  
23 **between you and the Judge, where you understood**  
24 **the charges and have been advised and apprised of**  
25 **the charges and you still willingly, willfully**

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1 **pled guilty to the charges. I'm taking now that**  
2 **you're saying, you don't even know what those**  
3 **charges were about?**  
4 MR. PIKE: What was the question? I  
5 don't know the question on the table now.  
6 **Q Who was the minor?**  
7 A I don't know.  
8 **Q You were never told the name or initials**  
9 **of that minor victim by the State Attorney's**  
10 **Office or the prosecutor?**  
11 A Not that I recall.  
12 **Q Just so the jury understands, this**  
13 **method of paying underage minor females to bring**  
14 **you other underage minor females for sex, is**  
15 **something that you do in New York, and New**  
16 **Mexico, Florida, everywhere, not just West Palm**  
17 **Beach; isn't that right?**  
18 MR. PIKE: Again, form, compound, again  
19 assumes facts not in evidence.  
20 Argumentative and harassing, and moreover,  
21 we have already been down this road before  
22 in separate related questions that have  
23 already been asked and answered.  
24 A I would like to respond to each one of  
25 your questions; however, today my attorneys have

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1 advised me I cannot and they've advised me I must  
2 assert my Sixth Amendment right, my Fifth  
3 Amendment right and my Fourteenth Amendment right  
4 under the U.S. Constitution, therefore, that's  
5 what I'm going to do.  
6 **Q Where is the calendar or schedule of**  
7 **your underage sex appointments?**  
8 MR. PIKE: Form, speculation.  
9 A You said where is...  
10 MR. PIKE: "Again."  
11 **Q Where is the calendar or schedule that**  
12 **Sarah Kellen kept for you for your appointments**  
13 **for sex with underage females?**  
14 MR. PIKE: Same objection.  
15 **Q If there is not one, you can tell me**  
16 **there is not one.**  
17 A I would like to answer each one of your  
18 questions today. However, I have been advised by  
19 counsel that I must assert my Fifth Amendment,  
20 Sixth Amendment and Fourteenth Amendment rights  
21 under the U.S. Constitution or risk losing their  
22 representation. Therefore, I'm going to have to  
23 assert those constitutional rights, though I  
24 would like to answer that question.  
25 **Q Are you still in possession of the**

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1 **computers that were taken from your house prior**  
2 **to the execution of the search warrant?**  
3 A Again. Am I still...?  
4 **Q Are you still in possession of the**  
5 **computers that were removed from your house just**  
6 **prior to the execution of the search warrant?**  
7 A I intend to respond to all relevant  
8 questions regarding this lawsuit. However, at  
9 the present time my attorneys have counseled me I  
10 cannot respond to any questions that may be  
11 relevant to this lawsuit, no matter how much I  
12 might want to. I must accept this advice or risk  
13 losing my Sixth Amendment right to  
14 representation. Therefore, I must assert my  
15 rights under the Fifth, Sixth and Fourteenth  
16 Amendments of the U.S. Constitution.  
17 **Q Who is it that removed those computers**  
18 **from your house prior to the execution of the**  
19 **search warrant?**  
20 MR. PIKE: Objection, predicate.  
21 A I intend to respond to all relevant  
22 questions regarding this lawsuit. However, at  
23 the present time my attorneys have counseled me  
24 that I cannot provide answers to any questions  
25 that may be relevant to this lawsuit, no matter

1 how much I would like to, and I must accept their  
2 advice or risk losing their representation.  
3 Accordingly, therefore, I would have to assert  
4 those rights, Mr. Edwards.

5 **Q It is my understanding, through**  
6 **information and belief, it is my understanding**  
7 **that this computer system contained the complete**  
8 **list of names of underage minor females with whom**  
9 **you engaged in sexual activity; is that correct?**

10 A You're --

11 MR. PIKE: Objection.

12 A -- you're asking for my understanding?

13 **Q No --**

14 A Are you asking me to tell you what your  
15 understanding is?

16 **Q Did the computers that were removed from**  
17 **your home just prior to the execution of the**  
18 **search warrant contain the complete list of**  
19 **underage minor females with whom you engaged in**  
20 **sexual activity?**

21 MR. PIKE: Form.

22 A Though I would like to answer that  
23 question, like all your other questions here  
24 today, unfortunately my attorneys have counseled  
25 me that I'm going to have to assert my Sixth

1 Amendment, Fifth Amendment and Fourteenth  
2 Amendment rights under the U.S. Constitution. I  
3 point -- excuse me. I would point out that your  
4 firm was described by the current U.S. Attorney  
5 as a criminal enterprise involved in money  
6 laundering, creating and fabricating malicious  
7 cases of a sexual nature against people like me  
8 and others, in order to fleece local investors  
9 out of millions of dollars.

10 I believe the senior partner of that  
11 firm currently sits in jail. Unfortunately  
12 though I would like to answer all of your  
13 questions, today my attorneys have counseled me I  
14 must assert my rights under the Sixth Amendment,  
15 Fourteenth Amendment and Fifth Amendment of the  
16 U.S. Constitution.

17 **Q Isn't it true, you and Sarah Kellen and**  
18 **Ghislaine Maxwell and Nadia Marcinkova operated**  
19 **as an organized criminal enterprise designed to**  
20 **sexually exploit minor?**

21 MR. PIKE: Objection, argumentative,  
22 speculation, calls for a legal conclusion  
23 and continues to assume facts not in  
24 evidence.

25 A Though I would like to answer that

1 question, Mr. Edwards, like most of your other  
2 questions here today... and hopefully will get to  
3 do so at some point, my lawyers have advised me I  
4 must today assert my constitutional rights under  
5 the Sixth Amendment, Fifth Amendment and  
6 Fourteenth Amendment of the U.S. Constitution and  
7 I must accept their advice or risk losing  
8 effective representation.

9 **Q And as part of that organization you**  
10 **developed code terms such as "Work" or "Massage"**  
11 **as opposed to engage in sex with minors; is that**  
12 **true?**

13 MR. PIKE: Form, argumentative,  
14 speculation, harassing, assumes facts not in  
15 evidence.

16 A Can you... you...?

17 **Q You developed code terms such as you --**

18 A "You" me?

19 **Q Yes, you, would ask these girls if they**  
20 **would like to give you a massage or work for you,**  
21 **rather than asking them to do what was going to**  
22 **be done, which is engage in sexual activity with**  
23 **you; isn't that true?**

24 MR. PIKE: Same objections.

25 A Are you asking if I developed code

1 words? Is that the question?

2 **Q Right. Code words.**

3 A I would like to respond to that  
4 question, but unfortunately today my attorneys  
5 told me I have to respond by taking -- invoking  
6 my Sixth Amendment, Fourteenth Amendment and  
7 Fifth Amendment rights of the U.S. Constitution,  
8 or risk losing my amendment right to effective  
9 representation. Accordingly I assert my  
10 Constitutional rights as guaranteed by those  
11 amendments.

12 **Q What did it mean within your**  
13 **organization when someone, some underage minor**  
14 **female was coming over to work for you?**

15 MR. PIKE: Form.

16 A What did it mean?

17 **Q Right, what did it mean? What did it**  
18 **mean to you was going to happen when an underage**  
19 **minor female would either call to work or Sarah**  
20 **Kellen would tell you this person was coming to**  
21 **work for you at a specific time?**

22 MR. PIKE: Objection, vague,  
23 speculative, assumes facts not in evidence.

24 A I would like to answer that question, as  
25 most of your other questions today. However,



1 today my attorneys have counseled me that I must  
2 invoke my Sixth Amendment, Fourteenth Amendment  
3 and Fifth Amendment right, or risk -- and if I  
4 don't, I risk losing them as my attorneys so,  
5 therefore, I must assert those rights.

6 **Q You're laughing as if my questions are  
7 ludicrous right now but you're aware that there  
8 were trash pulls from your home where there were  
9 message pads, messages taken by various employees  
10 of yours, where these terms, "Massage," "Work"  
11 were used in conjunction with underage minor  
12 females coming over to your house, weren't you?**

13 MR. PIKE: Same objections, form, as  
14 well. Move to strike, and also assumes  
15 facts not in evidence. Lack predicates.

16 **Q You're aware of the trash pull and the  
17 message pads, correct?**

18 MR. PIKE: Same objections.  
19 Do you have any documents with you here  
20 today that you speak of?

21 MR. EDWARDS: No, but at this point in  
22 time in the trial, they will already about  
23 in evidence.

24 A I'm aware of a trash pull? What's a  
25 "trash pull"? I'm sorry.

1 **Q Are you aware of -- I'll ask it of you  
2 this way: When Sarah Kellen would take a phone  
3 message for you, what did she write it down  
4 with?**

5 MR. PIKE: Form.

6 A The question makes no sense to me,  
7 sorry.

8 **Q If another employee of yours were to  
9 answer the telephone, be it your housekeeper,  
10 housemanager, would answer the phone, take a  
11 message for you and write it down so that you  
12 could read it later, what would that message be  
13 written on?**

14 A Most likely paper.

15 **Q Okay, is that paper typically in the  
16 form of a message pad that has a carbon copy  
17 sheet to the back?**

18 A No.

19 **Q You're unfamiliar with the documents  
20 that I'm talking about, that being a message pad  
21 that informs you as to who called, the time they  
22 called and the purpose for calling?**

23 MR. PIKE: For purposes of the question  
24 you're specifically talking about a message  
25 pad, nothing related to what you're defining

1 as a trash pull, just what someone takes as  
2 a message at Mr. Epstein's home and --

3 A Do I know what a message pad is?

4 **Q No. In your home, do you typically have  
5 your housekeeper, housemanager, or somebody else,  
6 when they take a message for you, write on a  
7 specific pad that informs you as to who is  
8 calling, the time they are calling and the  
9 purpose for their calling, and there is a carbon  
10 copy sheet evidencing that message?**

11 MR. PIKE: Objection, asked and  
12 answered.

13 **Q You know what I'm talking about?**

14 A I know what a message pad is.

15 **Q Do you use them commonly in your home or  
16 did you back prior to your arrest?**

17 A I would like to answer that question,  
18 but today my attorneys have advised me I have to  
19 assert my Fifth Amendment, Sixth Amendment and  
20 Fourteenth Amendment rights under the U.S.  
21 Constitution, so therefore, I'm going to do that  
22 or I risk losing their representation.

23 **Q Is my question to you confusing? Do you  
24 know what I'm talking about?**

25 MR. PIKE: Form.

1 A Not specifically, no.

2 **Q Okay.**

3 The information --

4 A Is there something you have to show me,  
5 so I know what you're talking about?

6 **Q I don't have it to show you today, but  
7 if the information and evidence that I have  
8 learned through this process is accurate and  
9 correct, it would seem a foregone conclusion that  
10 you and I would be on the same page, at least  
11 about this document, so --**

12 A Okay.

13 **Q -- if we are going to get to a point you  
14 tell me "This document doesn't exist" or "I don't  
15 know what you're talking about," okay, that's  
16 fine, but that's something we can hash out.**

17 Here is my question: When a  
18 housekeeper/housemanager would take a message for  
19 you from any caller, is there a specific message  
20 pad that has a carbon copy located near your  
21 telephone, for them to write down the name of the  
22 caller, the purpose for the call and the time  
23 called?

24 MR. PIKE: Form.

25 **Q Is that something you're familiar with?**

1 A I would like to respond to that  
2 question. Today my attorneys have counseled me I  
3 must assert my Sixth Amendment, Fifth Amendment  
4 and Fourteenth Amendment right under the U.S.  
5 Constitution.

6 **Q You're invoking your Fifth Amendment  
7 right is not that you understand the question.  
8 You understand my question and are electing to  
9 invoke your Fifth Amendment rights; is that  
10 correct?**

11 A Yes.

12 **Q When Sarah Kellen or a housekeeper or  
13 housemanager, whoever happened to be employed at  
14 the time, would take messages, what form would  
15 you normally or typically receive them in?**

16 A (Witness shrugs.)

17 MR. PIKE: Same objections.

18 A I don't understand the question.

19 **Q When a caller would call the home,  
20 housemanager or housekeeper or Sarah Kellen, I  
21 don't know what you would call her, assistant,  
22 would answer the phone, and take a message for  
23 you so that you would know who called, what would  
24 they typically write down the message on so that  
25 you would have it?**

1 **Q Between the years 2002 and 2005, who was  
2 your house manager?**

3 A (No response.)

4 **Q If there is more than one, tell us  
5 that.**

6 A The question is unclear. I'm sorry.

7 **Q Okay, let me start with between 2002 and  
8 2005, did you employ a housemanager?**

9 MR. PIKE: Form.

10 A Where?

11 **Q At your Palm Beach home.**

12 A I intend to respond to all relevant  
13 questions here today, Mr. Edwards. Hopefully we  
14 will get some. But my attorneys have advised me  
15 that today I must invoke my Sixth Amendment,  
16 Fifth Amendment and Fourteenth Amendment rights  
17 under the U.S. Constitution; or risk losing them  
18 as counsel. So today I have to assert those  
19 privileges.

20 **Q Do you know L.M.?**

21 A I intend to respond to all relevant  
22 questions regarding this lawsuit. However, at  
23 the present time no matter how much I would like  
24 to answer that question, I cannot, because my  
25 counsel -- the attorneys have told me that I have

1 MR. PIKE: Objection. Object to the  
2 form, lacks predicate. You have not  
3 established anything here today relative to  
4 a housekeeper or housemanager or the like.  
5 Um... And I'm trying to understand the  
6 question. But --

7 MR. EDWARDS: Really?

8 MR. PIKE: -- it lacks predicate.

9 MR. EDWARDS: This will play well.

10 A Piece of paper.

11 **Q Normally they would write it down on a  
12 piece of paper and give it to you?**

13 A I didn't say that.

14 **Q Have you ever been given a message that  
15 is ripped out of a message pad that has a carbon  
16 copy to it?**

17 A Oh, I see. Okay. I intend -- I would  
18 like to answer that question, but today my  
19 attorneys have advised me I must respond by  
20 invoking my Sixth Amendment right, my Fifth  
21 Amendment right and my Fourteenth Amendment  
22 rights under the U.S. Constitution. Though I  
23 would like to answer these questions, accordingly  
24 I must assert those rights or I risk losing my  
25 representation here today.

1 to invoke my Sixth Amendment, Fifth Amendment and  
2 Fourteenth Amendment or, in fact, risk losing  
3 their representation. Therefore, I'm going to  
4 have to assert my rights under those.

5 **Q L.M. is a female that was born in July  
6 of 1988.**

7 A Is that a question?

8 **Q Not yet. When is the first time that  
9 you met her?**

10 MR. PIKE: Objection, speculation.

11 MR. EDWARDS: That assumes that he did  
12 meet her; is that what you're saying?

13 MR. PIKE: Your question assumes --

14 MR. EDWARDS: He met her?

15 MR. PIKE: -- exactly what he just said  
16 which hasn't been established on the record  
17 yet pursuant to the appropriate Florida  
18 Rules of Civil Procedure and the Evidence  
19 Code. Lacks predicate.

20 A That being said, I would like to answer  
21 that question, but today my attorneys have  
22 counseled me that I cannot, and they've advised  
23 me I must assert my Sixth Amendment right, my  
24 Fourteenth Amendment right, and my Fifth  
25 Amendment right under the U.S. Constitution.

1 THE WITNESS: Can you throw me one of  
2 the suckey candies, please

3 Thank you.

4 MR. EDWARDS: (Handing candy.)

5 THE WITNESS: Appreciate it.

6 **Q Isn't it true you met L.M. for the first**  
7 **time in July or August of 2002 just before her**  
8 **fourteenth birthday?**

9 MR. PIKE: Same objections.

10 A You know, your firm has been accused by  
11 the U.S. Attorney of perpetrating one of the  
12 largest frauds in South Florida history by  
13 crafting sexually charged lawsuits against people  
14 like me and others in order to fleece  
15 unsuspecting investors here in South Florida out  
16 of millions of dollars. The firm of you and Mr.  
17 Jaffe. The U.S. Attorney described it as bogus  
18 schemes contrived by your firm.

19 I would like to answer every one of your  
20 questions here today; however, my attorneys have  
21 counseled me that I may not, and have advised me  
22 that I have to invoke my Sixth Amendment, Fifth  
23 Amendment and Fourteenth Amendment rights under  
24 the U.S. Constitution. Therefore, that's what I  
25 will do, otherwise I risk losing their

1 A And now the question?

2 **Q You know who she is, correct?**

3 MR. PIKE: Form.

4 A I would like to answer that question  
5 here, Mr. Edwards, but unfortunately today my  
6 attorneys have counseled me I must invoke my  
7 Fifth Amendment, Sixth Amendment and Fourteenth  
8 Amendment rights under the U.S. Constitution, and  
9 if I don't, I risk losing their representation,  
10 therefore I must assert those rights.

11 **Q When I asked you about L.M. or Carolyn**  
12 **Andriano, you sat there for a while thinking hard**  
13 **about whether or not you knew them. Do you**  
14 **remember either L.M. or Carolyn Andriano?**

15 MR. PIKE: I move to strike counsel's  
16 statement because the statement as worded  
17 assumes facts certainly not in evidence. It  
18 is argumentative, speculates as to what is  
19 "thinking hard," and, counsel, I don't  
20 understand the question on the table,  
21 combined with your narrative. If you could  
22 repeat the question?

23 MR. EDWARDS: Sure.

24 **Q I'm asking if during this questioning**  
25 **process, has it refreshed your recollection as to**

1 representation.

2 **Q Isn't it true L.M. as a 13 or 14-year**  
3 **old girl was taken to your house by another**  
4 **underage minor female, that being Carolyn**  
5 **Andriano?**

6 MR. PIKE: Form.

7 THE WITNESS: Tissue, please.

8 MR. EDWARDS: (Handing tissue.)

9 A I would like to answer that question  
10 like all the other questions you've asked me here  
11 today, but today my attorneys have counseled me  
12 that I have to invoke my Sixth Amendment right,  
13 my Fifth Amendment right and Fourteenth Amendment  
14 rights under the U.S. Constitution; therefore  
15 that's what I will do.

16 **Q Do you know who Carolyn Andriano is,**  
17 **right, she had a lawsuit against you previously?**

18 MR. PIKE: Form.

19 A Again the last name?

20 **Q Carolyn Andriano.**

21 A Could you spell it for me?

22 **Q Well, the pseudonym that she used in her**  
23 **lawsuit against you alleging similar facts to**  
24 **those alleged in L.M. versus Jeffrey Epstein was**  
25 **C.M.A. versus Jeffrey Epstein.**

1 **who L.M. is or do you really have no idea who**  
2 **that is?**

3 MR. PIKE: Form. Asked and answered.

4 **Q Do you remember L.M.?**

5 A Are you going to ask one question?  
6 Which question would you like answered first?

7 **Q Do you remember L.M.?**

8 A I would like to answer that question. I  
9 would like to answer that question today; however  
10 my attorneys today have advised me that I must  
11 assert my Fourteenth Amendment, Fifth Amendment  
12 and Sixth Amendment rights under the U.S.  
13 Constitution, no matter how much I would like to  
14 answer these questions. So unfortunately, I'm  
15 going to assert those rights.

16 **Q When you first met L.M., isn't it true**  
17 **that she was just about to begin her ninth grade**  
18 **year in high school?**

19 MR. PIKE: Same objections. Form.

20 A I believe her testimony in front of the  
21 FBI, in a sworn deposition says something else,  
22 but I don't recall exactly what. I don't have  
23 any recollection.

24 **Q Of L.M.**

25 MR. PIKE: Form.

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1 A You asked the question when I met her, I  
2 think, if I met her.  
3 Q You have no recollection as to when you  
4 met her?  
5 A I don't have recollection if I ever met  
6 her. I just told you, I did read her FBI  
7 statement, so I know what she has said and it is  
8 not what you've just represented to me.  
9 Q Your only knowledge of any interaction  
10 you may have had with L.M. is derived from an FBI  
11 statement that she gave; is that true?  
12 A I believe what you just represented she  
13 said was not what she had sworn to.  
14 Q I'm not asking what she said. I'm  
15 asking do you independently remember if she was  
16 entering into her ninth grade year of high school  
17 when you met her? Independent of anything you've  
18 read.  
19 MR. PIKE: All right, let me just move  
20 to strike the... Diatribe between Mr.  
21 Edwards and Mr. Epstein. I'm confused as to  
22 what question is on the table now.  
23 MR. EDWARDS: Okay.  
24 Q Independent of anything you've ever  
25 read -

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1 A Okay.  
2 Q -- do you remember meeting L.M., just  
3 before she entered into her ninth grade year in  
4 high school?  
5 A I would like to answer that question,  
6 however my attorneys today have advised me that  
7 though her own statements are contradictory to  
8 what you just said, her sworn statements to the  
9 FBI contradict what you just said. I have to  
10 invoke my Sixth Amendment, Fifth Amendment and  
11 Fourteenth Amendment rights to the U.S.  
12 Constitution.  
13 Q Just a few minutes ago when you asked  
14 when you met her, you said, "I don't know if I've  
15 ever met her," so is that your testimony, that  
16 you don't know if you ever met L.M.?  
17 A My testimony is very clear. I must  
18 assert the rights my attorneys have asked me to  
19 assert today, though her testimony under oath to  
20 the FBI is not what you represented it to be, to  
21 me, and the ladies and gentlemen of the jury who  
22 are watching this, hopefully.  
23 MR. PIKE: Form.  
24 Q We will get into that.  
25 A Okay.

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1 Q When you first came into the room today,  
2 didn't you look at me and say "I like L.M." Isn't  
3 that the statement that you made to me?  
4 MR. PIKE: Form. Move to strike.  
5 A I don't believe I said that.  
6 Q What is it that you believe you did say  
7 referencing L.M. when you sat down in that seat  
8 prior to the cameras rolling?  
9 MR. PIKE: Form. Counsel, I was here  
10 during that whole time and I don't recall  
11 any such statement.  
12 MR. EDWARDS: You weren't in the room.  
13 A I don't remember. I don't know.  
14 Sorry.  
15 Q So is it your testimony right now that  
16 you did not say to me "I like L.M."?  
17 A That's --  
18 MR. PIKE: Objection.  
19 A -- that's correct.  
20 Q Do you like L.M.?  
21 MR. PIKE: Form, predicate, and  
22 relevance.  
23 A I would like to answer all your  
24 questions here as I've... tried to do my best,  
25 however, my attorneys have advised me that I must

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1 assert my Sixth Amendment, Fourteenth Amendment  
2 and Fifth Amendment rights under the U.S.  
3 Constitution.  
4 Q When you first met L.M., isn't it true  
5 that you knew she was an economically  
6 disadvantaged girl that needed money?  
7 MR. PIKE: Objection, speculation,  
8 assumes facts not in evidence, and it is  
9 argumentative as worded.  
10 A I would like to answer all your  
11 questions here today, Mr. Edwards, and Mr.  
12 Jaffe. However, on advice of counsel I have to  
13 assert my Sixth Amendment, Fifth Amendment and  
14 Fourteenth Amendment rights under the U.S.  
15 Constitution, or risk losing my right to  
16 effective representation. So accordingly I must  
17 assert those rights as guaranteed by the Sixth,  
18 Fifth and Fourteenth amendments.  
19 Q When she was a 14-year old girl, she was  
20 taken into your bedroom and you ordered her to  
21 take her clothes off; is that correct?  
22 MR. PIKE: Objection, vague, confusing.  
23 As to "her," I'm not quite sure who you...  
24 Q When L.M. was a 14-year old girl, she  
25 was taken up to your bedroom and you ordered her

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1 **to take her clothes off; isn't that true?**  
2 MR. PIKE: Objection, speculation, and  
3 assumes facts not in evidence. Lacks  
4 predicate.  
5 A Though once again what you've just  
6 represented to me is a total contradiction to the  
7 FBI sworn statement that I read of L.M., I must  
8 unfortunately respond by asserting the rights  
9 demanded by my attorneys today, which is my Sixth  
10 Amendment, Fifth Amendment and Fourteenth  
11 Amendment right against -- sorry, given by the  
12 U.S. Constitution, though her testimony is  
13 exactly -- does not purport in any way to what  
14 you've just said.  
15 **Q And when L.M. was 14 years old, you**  
16 **ordered she begin to give you a massage while she**  
17 **was naked and you were naked; isn't that true?**  
18 MR. PIKE: Same objections.  
19 A Sorry, you have to repeat the question  
20 for me.  
21 **Q When L.M. was a 14-year old girl --**  
22 A Right. Yes?  
23 **Q -- you laughed and said, "right" about**  
24 **what?**  
25 A I didn't hear the first part of your

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1 question. Now I understood it.  
2 **Q When L.M. was a 14-year old girl, wasn't**  
3 **it true that you received a massage from her**  
4 **while she was naked and you were naked?**  
5 MR. PIKE: Objection, speculation,  
6 assumes facts not in evidence, lacks  
7 predicate.  
8 A I understand that your firm has been  
9 accused by the U.S. Attorney of South Florida,  
10 perpetrating one of the largest frauds in  
11 Florida's history, by crafting malicious,  
12 sexually charged allegations against people like  
13 me. I understand L.M.'s testimony is not what  
14 you've just described, though she swore to the  
15 FBI.. under oath. Though I would like to answer  
16 your questions here today, my attorneys have  
17 advised me I may not. I must assert my Sixth,  
18 Fifth and Fourteenth Amendment rights under the  
19 U.S. Constitution or risk losing their  
20 representation.  
21 THE WITNESS: Restroom break.  
22 MR. EDWARDS: Excuse me?  
23 THE WITNESS: Restroom break.  
24 MR. EDWARDS: Stopping again?  
25 THE WITNESS: Yeah.

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1 THE VIDEOGRAPHER: Going off the video  
2 record 1:49 p.m.  
3 THE WITNESS: Thank you.  
4 (Pause in the proceedings.)  
5 THE VIDEOGRAPHER: Back on the video  
6 record 2:04 p.m.  
7 **Q Mr. Epstein, when L.M. was a 14-year old**  
8 **girl, isn't it true that while you were naked on**  
9 **the massage table, you ordered L.M. to take off**  
10 **her clothes and provide you a massage?**  
11 A I believe I've answered that question,  
12 didn't I?  
13 **Q I don't remember where we left off,**  
14 **that's why.**  
15 MR. PIKE: Form, argumentative,  
16 speculation. It is compound and assumes  
17 facts not in evidence and has been asked and  
18 answered. But we did take a break, so you  
19 can respond.  
20 (Counsel addressing Mr. Epstein.)  
21 A The current U.S. Attorney has described  
22 your law firm as a criminal enterprise involved  
23 in fabricating sexually charged cases against  
24 people like me in order to fleece unsuspecting  
25 investors out of millions of dollars. He used

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1 words like "bogus schemes."  
2 Unfortunately at this time in response  
3 to your questions, though I would like to answer  
4 each and every one, I'm going to have to, on  
5 advice of counsel, assert my Sixth Amendment,  
6 Fifth Amendment and Fourteenth Amendment rights  
7 under the U.S. Constitution, though I would like  
8 to answer those questions.  
9 **Q While L.M. was a naked 14-year old girl**  
10 **providing you a massage, you ordered her to pinch**  
11 **your nipples during that massage; isn't that**  
12 **true?**  
13 MR. PIKE: Same objections,  
14 argumentative, speculation, harassing,  
15 assumes facts not in evidence and lacks  
16 predicate.  
17 A I asked her to pinch her nipples?  
18 **Q Pinch your nipples?**  
19 A I believe her own sworn testimony  
20 contradicts that statement. However, I would  
21 like to answer all your questions here today, but  
22 my attorneys advised me, at least today, Mr.  
23 Edwards, I must take my constitutional privileges  
24 of the Sixth Amendment, Fifth Amendment and  
25 Fourteenth Amendment, keeping in mind that your

1 firm, of you, Mr. Edwards, and Mr. Jaffe's firm  
2 has been accused by the U.S. Attorney of  
3 perpetrating one of the largest frauds in  
4 Florida's history by crafting sexually charged  
5 lawsuits against people like me, to fleece from  
6 local people millions of dollars.

7 **Q And during this massage by L.M., you  
8 began to masturbate in front of her; isn't that  
9 true?**

10 MR. PIKE: Same objections?

11 A Unfortunately, though I would like to  
12 answer each one of your questions here today, my  
13 attorneys have counseled me today at least, I  
14 have to assert my Fifth Amendment, Sixth  
15 Amendment and Fourteenth Amendment rights under  
16 the U.S. Constitution, otherwise I risk losing  
17 their effective representation, and the fact that  
18 your firm has been accused of fabricating these  
19 malicious lawsuits to fleece investors out of  
20 millions of dollars, as described by the U.S.  
21 Attorney here in South Florida as a criminal  
22 enterprise involved in mail fraud, money  
23 laundering... Unfortunately I would like to  
24 answer each question, but I can't today.

25 **Q Isn't it true that while you were**

1 **masturbating you inserted your fingers into her  
2 14-year old vagina?**

3 MR. PIKE: Objection, argumentative.  
4 Speculation. It is harassing. It assumes  
5 facts not in evidence. The question  
6 continues to lack predicate, and I also  
7 believe the question has been asked and  
8 answered sometime ago.

9 A Though I would like to answer each one  
10 of your questions today, Mr. Edwards, my counsel  
11 has told me I cannot answer any questions that  
12 may be relevant to this lawsuit. The fact that  
13 your firm has been accused of major fraud, the  
14 largest fraud in South Florida history, by the  
15 U.S. Attorney calling your firm a criminal  
16 enterprise involved in money laundering -- I  
17 believe it is racketeering, but I could be  
18 wrong... Monetary transactions via fraud, mail  
19 fraud, conspiracy -- sorry -- I would like to  
20 answer your questions but today on advice of  
21 counsel, I am going to have to assert my rights.

22 **Q Isn't it true also that while L.M. was a  
23 14-year old female, you masturbated to the point  
24 of ejaculating while inserting your fingers into  
25 L.M.'s vagina?**

1 MR. PIKE: Same objections incorporated?

2 A Again, the question?

3 **Q Isn't it true that during this sexual  
4 massage, while you were -- that you masturbated  
5 to the point of ejaculating while you were  
6 inserting your fingers into L.M.'s vagina?**

7 MR. PIKE: Objection, argumentative,  
8 speculation. It is compound. It is vague.  
9 It assumes facts not in evidence and lacks  
10 predicate.

11 A Though I would like to answer that  
12 question with specificity and detail today, no  
13 matter how much I would like to, my attorneys  
14 have advised me I cannot. They advised me I must  
15 assert my Fifth Amendment, Sixth Amendment and  
16 Fourteenth Amendment rights under the U.S.  
17 Constitution or potentially lose effective  
18 representation, so therefore, I will assert those  
19 rights.

20 **Q Isn't it true that the ritual that I'm  
21 describing occurred with L.M., approximately 100  
22 times when she was between the ages of 13 and 16?**

23 MR. PIKE: Same objections, with the  
24 additional objection of vague and  
25 confusing.

1 A Since your firm has been involved --  
2 according to the U.S. Attorney in crafting these  
3 fraudulent lawsuits in order to fleece local  
4 investors, and the fact that I believe in L.M.'s  
5 sworn statements, that's what you've just alleged  
6 at least is totally contradicted by your client's  
7 own sworn statements, though I would like to  
8 answer these questions today, my attorneys have  
9 advised me I may not and advised me I must assert  
10 my Fifth, Sixth and Fourteenth Amendment rights  
11 under the U.S. Constitution or potentially risk  
12 losing effective representation.

13 **Q In addition to the sexual abuse directed  
14 against L.M. that I've just described, isn't it  
15 true that you also paid her money to bring you  
16 more than 50 other underage minor females for you  
17 to similarly abuse?**

18 MR. PIKE: Same objections.

19 A Though I believe in her own sworn  
20 testimony to the U.S. government that she  
21 contradicts those assertions, and I'm sure maybe  
22 you'll have some explanation at trial, but the  
23 ladies and gentlemen of the jury should know  
24 about your firm being accused by the U.S.  
25 Attorney of perpetrating one of the largest

1 frauds in U.S. history by crafting malicious  
2 lawsuits of a sexual nature in order to fleece  
3 investors out of millions of dollars, local  
4 investors; and though I would like to answer your  
5 questions in detail today, Mr. Edwards, and Mr.  
6 Jaffe, my counsel says I may not and have asked  
7 me to assert those rights, which I must  
8 unfortunately.

9 **Q You keep bringing up this fraud of the**  
10 **former law firm known as Rothstein, Rosenfeld,**  
11 **Adler in response to my questions, so I would**  
12 **like you to tell the jury at this time which**  
13 **allegation are you now saying is fraudulent or**  
14 **untrue, that's been made by L.M.?**

15 MR. PIKE: Form, confusing, compound,  
16 and irrelevant.

17 MR. EDWARDS: Only made irrelevant by  
18 his answers.

19 MR. PIKE: Same objections.

20 **Q Do you understand the question?**

21 A No.

22 **Q You made reference to -- in response to**  
23 **my questions about what you did sexually to**  
24 **L.M. --**

25 A Yes, sir?

1 described as one of the largest frauds in South  
2 Florida's history. So, it concerns me. It is a  
3 factor in the way I'm thinking about answering.  
4 Sorry.

5 **Q Each time that you digitally penetrated**  
6 **L.M. or otherwise fondled her sexually, you paid**  
7 **her \$200; is that correct?**

8 MR. PIKE: Objection, argumentative,  
9 speculative, harassing. It assumes facts  
10 not in evidence, and with regard to this  
11 line of questioning, the Court has already  
12 ruled that the demeanor in which you're  
13 presenting this question is improper, and  
14 harassing, so if you would --

15 MR. EDWARDS: I'm very comfortable with  
16 the demeanor right now, Mr. Pike. These are  
17 just the facts of the lawsuit. The facts  
18 are outrageous and I understand that, but  
19 they have to be asked.

20 MR. PIKE: Maybe the demeanor and tone  
21 of your question is laced in a manner that  
22 it is proper for the video, but the content  
23 of the question is the same exact harassing  
24 question that was deemed by the Judge to be  
25 argumentative. I'm not saying that he's not

1 **Q -- you have responded with these fraud**  
2 **allegations against the firm of Rothstein,**  
3 **Rosenfeld, Adler. I want you to tell the jury**  
4 **which allegations that L.M. is making against you**  
5 **are you disputing at this time or calling a fraud**  
6 **or calling untrue?**

7 MR. PIKE: Confusing, compound and -- if  
8 the court reporter would read back Mr.  
9 Epstein's response, I think you will see the  
10 way you just phrased the question  
11 mischaracterizes his testimony. Because --  
12 well, I'll keep it there unless you want me  
13 to go further. You want me to go further?

14 MR. EDWARDS: No, I want him to go  
15 further.

16 MR. PIKE: Mischaracterizes the  
17 witness's testimony.

18 A L.M.'s own statements contradict every  
19 one of your allegations that you've made to me  
20 today, as a hypothetical. In her own words. And  
21 you -- and the potential reasons this concerns me  
22 is the fact that the law firm that represented  
23 L.M. and two others have been accused by the U.S.  
24 Attorney of fraudulently producing cases against  
25 me and others, to fleece investors in what he's

1 going to answer your question.

2 MR. EDWARDS: Okay.

3 MR. PIKE: Or that you don't know what  
4 his answer will be, but what I'm saying is:  
5 could you rephrase the question?

6 **Q Answer that question. I'll work on**  
7 **rephrasing it for you at some point.**

8 A Sorry, I forgot what the question is by  
9 now.

10 **Q Isn't it true that each time that you**  
11 **interacted with L.M. sexually, meaning digitally**  
12 **penetrated her or fondled her in some other way,**  
13 **that you paid her \$200 each time?**

14 MR. PIKE: Form.

15 THE WITNESS: Sorry?

16 MR. PIKE: Form. Go ahead.

17 A I would like to answer each one of your  
18 questions here today. However, my attorneys have  
19 counseled me that today I have to assert my Fifth  
20 Amendment, Sixth Amendment and Fourteenth  
21 Amendment rights under the U.S. Constitution and  
22 I'm cognizant of the fact that your firm has  
23 crafted these malicious lawsuits, it has been  
24 reported that the lawsuits are of a sexual  
25 nature, in order to fleece investors, so though I

1 would like to answer those questions, Mr.  
2 Edwards, and Mr. Jaffe, today I must keep my  
3 counsel's advice.

4 **Q Isn't it true that for each underage**  
5 **minor that L.M. brought to you for the purposes**  
6 **of you engaging in sexual activity, you paid her**  
7 **\$200?**

8 MR. PIKE: Objection, speculation.

9 Compound question, and it assumes facts not  
10 in evidence. Therefore lacks predicate.

11 A Though I would like to answer that  
12 question, as most of your other questions here  
13 today, Mr. Edwards, I intend to respond,  
14 hopefully at some point to all of your questions,  
15 but today my attorneys have advised me I must  
16 invoke my Sixth Amendment, Fifth Amendment and  
17 Fourteenth Amendment right under the U.S.  
18 Constitution.

19 **Q Over the course of relatively a roughly**  
20 **three years, isn't it true that you touched or**  
21 **fondled L.M. in a sexual manner on more than 50**  
22 **occasions?**

23 MR. PIKE: Objection, argumentative.

24 Calls for speculation. It is overbroad,  
25 confusing and vague, and it assumes facts

1 MR. PIKE: Objection, argumentative,  
2 irrelevant and move to strike. I'm simply  
3 going to instruct the witness not to answer  
4 that question because... I don't understand  
5 it. I don't know what to say about that  
6 question.

7 A (Gesturing.)

8 **Q All of the things that I've told you or**  
9 **that I've asked you about, you touching her while**  
10 **she was underage, you paying her for sexual**  
11 **conduct, those are all things that really**  
12 **happened, there is nothing about that, that**  
13 **anybody has fabricated or made up, is there?**

14 MR. PIKE: Objection, argumentative,  
15 speculative, it assumes facts not in  
16 evidence, it certainly mischaracterizes the  
17 witness's testimony all day, since I have  
18 been here, and I have been here the whole  
19 time. It assumes facts not in evidence. It  
20 is also overbroad and substantially compound  
21 because you're attempting to incorporate all  
22 of your questions today into one question.

23 MR. EDWARDS: I think you know, Mr.  
24 Pike, your objection should be limited to  
25 the form. If you object to the form, it is

1 not in evidence.

2 A Could you repeat the question for me?  
3 I'm sorry, Mr. Edwards.

4 **Q Yes. The three-year period between 2002**  
5 **and 2005 when you were engaging in sexual conduct**  
6 **with L.M., isn't it true that that conduct took**  
7 **place on more than 50 occasions?**

8 MR. PIKE: Same objections.

9 A I believe if you read your own client's  
10 FBI statements, what her statement -- it changed  
11 dramatically after she decided to file a  
12 different lawsuit, at the request of you and your  
13 firm, with one of your firms -- there have been  
14 many firms it seems, was accused of major fraud.  
15 Since the testimony has changed dramatically, I  
16 would like to answer those questions, but today  
17 my attorneys have advised me I must assert my  
18 Sixth Amendment right, my Fifth Amendment right  
19 and my Fourteenth Amendment right.

20 **Q \*\* Your answers are not going to**  
21 **incriminate you if the answer is "no," it is only**  
22 **if the answer is "yes" that it will incriminate**  
23 **you, so aren't you telling the jury every single**  
24 **thing I've asked you is not part of a fraud, just**  
25 **happens to be true, isn't it?**

1 fine.

2 MR. PIKE: I'm sorry, that's --

3 MR. EDWARDS: You --

4 MR. PIKE: You've asked me several times  
5 today to tell you why. I thought I was  
6 helping. I'm sorry. I certainly will keep  
7 objecting to --

8 MR. EDWARDS: Appreciate it.

9 MR. PIKE: -- the form.

10 MR. EDWARDS: Thank you.

11 **Q And your answer is?**

12 A Repeat the question.

13 **Q Every single allegation that L.M. has**  
14 **made and I have now questioned you about in terms**  
15 **of your sexual involvement with L.M., they are**  
16 **all true; isn't that correct? There is nothing**  
17 **fabricated about any of these allegations,**  
18 **correct?**

19 MR. PIKE: Objection, argumentative,  
20 speculative, compound. It is vague,  
21 overbroad --

22 MR. EDWARDS: You're objecting to form?

23 MR. PIKE: Yes, assumes facts not in  
24 evidence and lacks predicate. That is  
25 form.



1 A And I would like to answer that question  
2 specifically today, however, on advice of counsel  
3 they've suggested I take the Sixth amendment --  
4 assert my Sixth Amendment, Fifth Amendment and  
5 Fourteenth Amendment rights under the U.S.  
6 Constitution, keeping well aware of your firm's  
7 responsibility in the largest fraud in Florida's  
8 history by crafting sexually charged lawsuits  
9 against people like me and others.

10 I believe in addition, since her  
11 allegations, as you've phrased them, have changed  
12 dramatically since her sworn statement, until in  
13 fact, after she joined this firm charged with  
14 this major fraud and most of her statements have  
15 changed, I believe, so...

16 **Q You remember when L.M. became pregnant  
17 when she was 16 years old, don't you?**

18 MR. PIKE: Form, relevance, move to  
19 strike?

20 A I would like to answer each one of your  
21 questions here today, Mr. Edwards; each and every  
22 one of your questions. However, today my counsel  
23 has told me I must assert my Sixth Amendment,  
24 Fourteenth Amendment and Fifth Amendment rights  
25 under the U.S. Constitution.

1 MR. EDWARDS: It is not a responsive  
2 answer so I won't allow --

3 MR. PIKE: That --

4 MR. EDWARDS: We'll move to strike it.  
5 Let's have an answer to the question.

6 MR. PIKE: The witness is trying. If  
7 there is a legal basis for your moving to  
8 strike, it would be taken up with the Court  
9 and you can move to strike.

10 You can continue.

11 MR. EDWARDS: Strike it, it is  
12 nonresponsive?

13 A Your allegations that you keep throwing  
14 at me, relate to the fact that L.M. testimony,  
15 after giving a sworn statement to the FBI,  
16 changed dramatically after she decided to file a  
17 lawsuit for money, joining your firm that's been  
18 accused by the U.S. Attorney of one of the  
19 largest frauds in Florida's history. I would  
20 like to answer those questions; however, on  
21 advice of counsel today I must assert my Fifth  
22 Amendment, Sixth Amendment and Fourteenth  
23 Amendment rights under the U.S. Constitution.

24 **Q When L.M. was a pregnant 16 year-old,  
25 she brought you at least ten underage minor**

1 **Q Isn't it true that when L.M. was 14  
2 years old, 15 years old and 16 years old, you  
3 touched her genitals?**

4 A Separate from the fact that in her own  
5 testimony, her own sworn testimony under oath  
6 before she decided to file a lawsuit for money,  
7 there was never any discussion about anything  
8 like that. I would like to answer that question,  
9 but my attorneys have advised me, at least today,  
10 that I must assert my Sixth Amendment, Fifth  
11 Amendment and Fourteenth Amendment rights under  
12 the U.S. Constitution.

13 **Q Isn't it true when she became pregnant  
14 at age 16, you no longer interacted with her  
15 sexually but still demanded that she bring you  
16 other underage minor females for you to sexually  
17 exploit?**

18 MR. PIKE: Objection, speculation.  
19 Compound. Harassing, and assumes facts not  
20 in evidence.

21 A I believe her testimony changed  
22 dramatically from her sworn statements to the  
23 FBI --

24 **Q That's not a responsive --**

25 MR. PIKE: Excuse me --

1 **females during her pregnancy; isn't that true?**

2 MR. PIKE: Objection, argumentative,  
3 speculation. It is vague and assumes facts  
4 not in evidence and lacks predicate.

5 A I -- I -- I unfortunately would like to  
6 answer that question as well as every other  
7 question you've asked me here today, but my  
8 attorneys have advised my I must assert my Fifth  
9 Amendment, Sixth Amendment and Fourteenth  
10 Amendment rights under the U.S. Constitution.

11 **Q After L.M. had her son at 16 years old,  
12 and you were being criminally investigated for  
13 some of the conduct that we've discussed here  
14 today; isn't it true that you personally hired  
15 and retained and paid for an attorney to  
16 represent L.M.?**

17 MR. PIKE: Objection, speculation --

18 MR. EDWARDS: Object to the form, Mr.  
19 Pike.

20 MR. PIKE: I will not. I am allowed to  
21 assert the basis for my objections, I am not  
22 limited to just saying "form." I'm able to  
23 assert the basis as to why, so I don't waive  
24 that basis.

25 MR. EDWARDS: It is just more of this

1 obstructionist --

2 MR. PIKE: It's not obstructionist, it

3 is objecting to form. What is

4 obstructionist is what we are doing now. I

5 will be finished within four seconds. So I

6 am going to object to form, it's

7 argumentative, speculative and it assumes

8 facts not in evidence and it lacks

9 predicate. That's it.

10 A I'm sorry. (Witness shrugs.) Again?

11 **Q The response to the question.**

12 A I don't know the question.

13 **Q You don't remember the question? Did**

14 **you hire L.M. an attorney at some point in time?**

15 **Do you remember that?**

16 MR. PIKE: Same objection.

17 A Not to the best of my recollection.

18 **Q Do you know James Eisenberg?**

19 A ... Do I know James Eisenberg? I don't

20 believe I've ever met James Eisenberg.

21 **Q Is it your testimony today then that you**

22 **never paid for an attorney to represent L.M.?**

23 A (Witness shakes head.)... On advice of

24 my counsel, I would like to answer that question,

25 but on advice of counsel I'm going to have to

1 assert my Sixth Amendment, Fourteenth Amendment

2 and Fifth Amendment rights against -- excuse me,

3 Sixth Amendment rights of the U.S. Constitution.

4 **Q And that attorney that was paid for by**

5 **you, informed L.M. that if she were to tell the**

6 **FBI exactly what happened at your house, that her**

7 **son could be taken from her. You're aware of**

8 **that, correct?**

9 MR. PIKE: Same objections.

10 A I recognize, I believe she made one of

11 the statements at her deposition after she

12 decided to sue me for a bunch of money and your

13 firm has represented a number of... cases of a

14 sexually charged nature that turned out to be

15 fraudulent in order to fleece local investors.

16 The U.S. Attorney described your firm and these

17 cases as a bogus scheme, and I'm aware of that,

18 and would like to answer your question in more

19 detail today, Mr. Edwards; however my attorneys

20 advised me that at least today, I must assert my

21 rights under the Sixth Amendment, Fourteenth

22 Amendment and Fifth Amendment.

23 MR. PIKE: It is the food.

24 MR. JAFFE: I didn't want him in the

25 room in mid answer.

1 THE WITNESS: Ready? Thank you.

2 THE VIDEOGRAPHER: Going off the video

3 record 2:29 p.m.

4 (Pause in the proceedings.)

5 THE VIDEOGRAPHER: Back on the video

6 record 2:50 p.m.

7 **Q Isn't it true, Mr. Epstein, that you**

8 **gave L.M. money to coerce her into interacting**

9 **with you sexually?**

10 A Mr. Edwards, I would like to answer each

11 and every one of your questions here today, but

12 unfortunately, like I've done with mostly all of

13 your other questions, I'm going to have to assert

14 my rights, Sixth Amendment, Fourteenth Amendment

15 and Fifth Amendment on advice of counsel.

16 Although I would like to answer, if I don't

17 follow my counsel's advice, I risk losing

18 representation.

19 **Q While committing these sexual acts**

20 **against L.M. when she was just a minor, you knew**

21 **it would psychologically damage her; isn't that**

22 **true?**

23 MR. PIKE: Form, lacks predicate,

24 speculation.

25 A I intend to respond at some point to --

1 I would like to respond to each and every one of

2 your questions, but today on advice of my counsel

3 they've required me to assert my Fifth Amendment,

4 Sixth Amendment and Fourteenth Amendment rights

5 under the U.S. Constitution, though I would like

6 to answer each of these questions.

7 **Q In fact, you deliberately and**

8 **intentionally caused severe emotionally distress**

9 **to underage minor females, including L.M.; isn't**

10 **that true?**

11 MR. PIKE: Objection, argumentative,

12 speculation, it is compound. And it assumes

13 facts not in evidence.

14 MR. EDWARDS: Okay.

15 A I would like to answer that question, as

16 I would like to answer all of your other

17 questions today regarding L.M. However, my

18 attorneys today have advised me that I must

19 assert my Sixth Amendment right to effective

20 representation and my Fifth Amendment right and

21 my Fourteenth Amendment right. Though I would

22 like to answer that with specificity, I must

23 follow my attorney's advice.

24 **Q Will you admit for the jury that you**

25 **were investigated federally for your illegal**

1 activities with underage minors?

2 MR. PIKE: Same objections.

3 A I would like to answer that question, as  
4 well as all the other questions you've asked me  
5 here today, especially since your firm has been  
6 accused by the federal, I guess, the federal  
7 government,... being considered a criminal -- you  
8 firm has been considered and investigated as  
9 being a criminal enterprise using sexually  
10 fabricated, sexual cases... fabricated cases, to  
11 fleece investors out of millions of dollars, but  
12 I would like to answer your questions; however my  
13 attorneys have demanded that I assert my rights  
14 under the Sixth Amendment, Fifth Amendment and  
15 Fourteenth Amendment.

16 **Q In fact, as a result of that**  
17 **investigation, you, as well as the United States**  
18 **Attorney's Office entered into what has now been**  
19 **known and referred to as the nonprosecution**  
20 **agreement; isn't that correct?**

21 MR. PIKE: Same objection. The document  
22 speaks for itself?

23 A You have to repeat the question.

24 **Q As a result of the criminal**  
25 **investigation into your activities with minor**

1 **Graff or Nadia Marcinkova." Can you explain to**  
2 **the jury what each of those four individuals did**  
3 **for you or conspired with you to do?**

4 MR. PIKE: Object to the form of the  
5 question?

6 A I would like to answer that question,  
7 however, today my attorneys advise me that I must  
8 assert my Sixth Amendment, Fifth Amendment and  
9 Fourteenth Amendment rights under the U.S.  
10 Constitution.

11 **Q Isn't it fair to say that you, as well**  
12 **as the co-conspirators, operated as an organized**  
13 **criminal enterprise designed to sexually exploit**  
14 **underage minors?**

15 MR. PIKE: Object to argumentative,  
16 speculation. It is vague and it assumes  
17 facts not in evidence.

18 A Are you suggesting it was a criminal  
19 enterprise? Is that the words?

20 **Q Yes.**

21 A Though I would like to answer that  
22 question today, I think the only criminal  
23 enterprise that I have been reading about today  
24 was your firm, that's been accused of being a  
25 criminal enterprise involved in defrauding

1 females, you reached a resolution with the United  
2 States Attorney's Office, in what has now been  
3 described as the nonprosecution agreement; is  
4 that correct?

5 MR. PIKE: I'm going to object. Vague,  
6 confusing, misrepresents the agreement and  
7 the document is the best evidence. Will you  
8 mark it?

9 MR. EDWARDS: I can mark it. We will  
10 copy it at the end and mark it as Exhibit 2.

11 (Document, Nonprosecution Agreement, was  
12 deemed marked as Exhibit number 2 for  
13 identification, as of this date.)

14 A Yes.

15 **Q In that agreement, there are listed**  
16 **co-conspirators of Jeffrey Epstein, those being**  
17 **Sarah Kellen, Adriana Ross, Leslie Graff**  
18 **(phonetic) and Nadia Marcinkova. Can you explain**  
19 **to the jury what those individuals did for you**  
20 **related to the crimes that were investigated by**  
21 **the federal government?**

22 A Co-conspirators?

23 **Q Yes, it says "criminal charges against**  
24 **any co-conspirators of Epstein including but not**  
25 **limited to Sarah Kellen, Adriana Ross, Leslie**

1 people, using mail fraud, wire fraud, money  
2 laundering, the operation of the enterprise --  
3 this is by the U.S. Attorney (indicating), but  
4 though I would like to answer your questions with  
5 specificity today, on advice of counsel, though I  
6 would like to answer it, they demanded I assert  
7 my Sixth Amendment, Fourteenth Amendment and  
8 Fifth Amendment right or I risk losing their  
9 representation.

10 **Q Did you care about any of the underage**  
11 **minor females at the time when you were engaging**  
12 **in sexual conduct with them?**

13 MR. PIKE: Objection, argumentative.  
14 Harassing, already been ruled upon by the  
15 Court relative to this exact question.

16 MR. EDWARDS: I feel comfortable with  
17 the question. It goes to punitive damages.  
18 The issue related to the Court was a  
19 repetitive question on that topic or around  
20 that general subject matter. I'm just  
21 asking for Mr. Epstein to tell the jury how  
22 he felt about these girls, whether he cared  
23 about them, when he was engaging in illegal  
24 sexual conduct with them.

25 MR. PIKE: Counsel, I'm going to

1 instruct him not to answer the question.  
 2 You can certify it to the Court, if you  
 3 like. You know what the answer is going to  
 4 be; however you're attempting to lace this  
 5 video. You know the Court has already  
 6 ordered that these types of questions are  
 7 not permitted because they are argumentative  
 8 and harassing. In fact, other questions  
 9 bordered but this question is on exact point  
 10 with the Court's order. If you want to  
 11 withdraw the question, that's fine.

12 MR. EDWARDS: I don't want to withdraw  
 13 the question.

14 MR. PIKE: Then I instruct him not to  
 15 answer.

16 MR. EDWARDS: Mark that somehow, that  
 17 page, so we can find it in the record,  
 18 relative to the hearing that will be had on  
 19 that question and others similar.

20 **Q At the time when you were engaging in**  
 21 **sexual conduct with underage females, you knew**  
 22 **that exposing them to this, was not beneficial or**  
 23 **good for these girls; isn't that true?**

24 MR. PIKE: Objection, argumentative,  
 25 speculation, assumes facts not in evidence.

1 question; however, today my attorneys have  
 2 advised me I must take -- assert my rights under  
 3 the Fourteenth, Sixth and Fifth Amendments of the  
 4 U.S. Constitution, or else I risk losing their  
 5 representation.

6 MR. PIKE: And Mr. Edwards, just so we  
 7 don't have to come back on the question that  
 8 I instructed him not to answer, if you would  
 9 go ahead and repeat that question, I will be  
 10 more than happy to let him respond.

11 MR. EDWARDS: I don't remember the  
 12 question we will take it up with the Court  
 13 and we'll get a ruling on it.

14 MR. PIKE: It was whether or not he  
 15 cared about these -- I believe you quoted it  
 16 as underage minors, but I would like the  
 17 court reporter to read back the question  
 18 just to conserve judicial resources and not  
 19 go back. So if she can reread the question  
 20 that would be good.

21 MR. EDWARDS: If you can find the  
 22 question.

23 THE COURT REPORTER: Certainly.

24 MR. EDWARDS: I think I know it.

25 **Q Did you care about any of these underage**

1 Lacks predicate.

2 A Though I would like to answer that  
 3 question, like most of your other questions here  
 4 today, on advice of counsel I must assert my  
 5 Fourteenth Amendment, Fifth Amendment and Sixth  
 6 Amendment rights. Though I would like to answer,  
 7 if I do so, I risk losing my effective  
 8 representation of counsel.

9 **Q Isn't it true, Mr. Epstein, that the**  
 10 **only thing that you cared about was accessing as**  
 11 **many underage females as possible, for the**  
 12 **purposes of sex?**

13 MR. PIKE: Argumentative, speculation,  
 14 harassing.

15 A What's the question?

16 MR. PIKE: And assumes facts not in  
 17 evidence.

18 **Q Isn't it true that the only thing that**  
 19 **you cared about when you were interacting with**  
 20 **these underage females in a sexual manner, was**  
 21 **ejaculating or your own personal gratification?**

22 MR. PIKE: Form, same exact objections.

23 A Though I would like to answer that  
 24 question, and to the ladies and gentlemen of the  
 25 jury, I would very much like to answer that

1 **minor females that you were engaging in sex with,**  
 2 **at the time when you were engaging in these**  
 3 **sexual activities?**

4 MR. PIKE: Same objections, as before.

5 A Though I would like to answer that  
 6 question as well as most of your other questions,  
 7 if not all of your other questions here today, on  
 8 advice of counsel I will have to assert my  
 9 Fourteenth Amendment right, my Sixth Amendment  
 10 right and my Fifth Amendment right, because no  
 11 matter how much I actually want to answer that  
 12 question, if I do so I risk losing my counsel's  
 13 representation.

14 **Q At the time you were engaging in sexual**  
 15 **activity with these underage minors, including**  
 16 **L.M., you knew that this conduct was illegal,**  
 17 **didn't you?**

18 MR. PIKE: Same objections. Form.

19 A I would like to answer that question, as  
 20 well as most of your other questions here today;  
 21 however, today my counsel has instructed me to  
 22 assert my Fourteenth Amendment, Sixth Amendment  
 23 and Fifth Amendment right, and if I do not, and  
 24 if, in fact, I answer that question -- if I can  
 25 answer that question, I potentially risk losing

1 my effective counsel's representation.

2 **Q In fact, you told many of these underage**  
3 **minor females not to tell anybody what happened**  
4 **with you in the house, or else they would be in**  
5 **trouble; isn't that true?**

6 MR. PIKE: Form.

7 A I would like to answer that question, as  
8 well as the other questions; however, my counsel  
9 has advised me that today I must assert my  
10 Fourteenth Amendment, Sixth Amendment and Fifth  
11 Amendment rights under the U.S. Constitution.

12 **Q The underage minor females that have**  
13 **come forward with information about your sexual**  
14 **interactions with them have been investigated,**  
15 **harassed, humiliated in an effort for you to**  
16 **intimidate them to go away. Is that true?**

17 MR. PIKE: Objection. Argumentative,  
18 speculative, compound. It is overbroad, and  
19 assumes facts not in evidence.

20 A Can you repeat the question?

21 **Q Sure. Any underage minor female that**  
22 **you engaged in sexual activity with, that has now**  
23 **pursued a lawsuit against you, isn't it true that**  
24 **you've spent a lot of money and a lot of**  
25 **resources investigating them in an effort to**

1 intimidate them and hopefully make them go away?

2 MR. PIKE: Same objections.

3 A I believe your client's testimony  
4 changed dramatically when she joined up with you  
5 and your law firm, accused of fraud, when she  
6 decided to change her testimony, at least from  
7 what the statements said, both to the police and  
8 to the FBI, and decided to seek money. However,  
9 anything above that or beyond that, I'm going to  
10 have to, in fact, assert my Fifth Amendment,  
11 Sixth Amendment and Fourteenth Amendment rights  
12 as directed by my competent counsel.  
13 Unfortunately, they have told me if I don't, I  
14 risk losing their representation.

15 **Q All right, I'll give you a chance here**  
16 **since you keep bringing up her statement to the**  
17 **FBI as opposed to her sworn testimony for 13**  
18 **hours under oath in this case. Are you saying**  
19 **that the sworn testimony to the FBI was, in fact,**  
20 **the truth?**

21 A What I'm saying is, it seems her  
22 testimony has changed dramatically after she  
23 joined your firm, that's all.

24 **Q Okay. Irrespective of her testimony,**  
25 **you've read her testimony and you read her**

1 testimony -- to the FBI. You watched her  
2 deposition when it was being taken. Which --

3 A You're making assumptions, I'm sorry.

4 MR. PIKE: Let him finish the question.

5 THE WITNESS: Sorry.

6 A My fault.

7 MR. PIKE: Then I'll object and you'll  
8 respond.

9 **Q Which are you saying is the truthful**  
10 **testimony, her statement to the FBI or the**  
11 **videotaped deposition that you watched?**

12 MR. PIKE: Object to the form.

13 A What I've said, and I think I'll repeat  
14 myself is until she joined your firm and started  
15 to seek money, her testimony was different.  
16 That's my understanding.

17 **Q Are you denying any sexual involvement**  
18 **with L.M. at this time?**

19 MR. PIKE: Form.

20 A I would like to answer that question. I  
21 would like to answer it as with most of your  
22 questions here today; however, my attorneys have  
23 advised me that I must take that -- assert my  
24 rights under the Sixth Amendment, Fourteenth  
25 Amendment and Fifth Amendment, no matter how much

1 I would like to answer that question, or  
2 potentially risk losing my counsel.

3 **Q Isn't your game plan with all of these**  
4 **civil lawsuits that have been filed against you,**  
5 **to spend as much money as you can to investigate,**  
6 **and harass these young women into hopefully**  
7 **dropping the lawsuits against you?**

8 MR. PIKE: Objection. Relevance. Move  
9 to strike. It is argumentative and  
10 harassing.

11 A I would like to answer that question. I  
12 think you know the answer to that question.

13 **Q Yes.**

14 A (Witness nods.) However, today my  
15 attorneys have advised me I must assert my Sixth  
16 Amendment rights, my Fourteenth Amendment rights  
17 and my Fifth Amendment rights.

18 **Q You don't have any remorse for the**  
19 **sexual abuse that you committed against L.M., do**  
20 **you?**

21 MR. PIKE: Objection. It is  
22 argumentative. It is harassing. It is, I  
23 believe, confined under the Judge's order  
24 and it assumes facts not in evidence?

25 A That being said, I would like to answer

1 that question today, but my attorneys have  
2 advised me that I must assert my Fourteenth  
3 Amendment rights, my Fifth Amendment rights and  
4 my Sixth Amendment rights.

5 **Q** In fact, you recently sued L.M., didn't  
6 you?

7 **A** Yes, and you and your firm that's been  
8 accused of the largest fraud in Florida's  
9 history, described by the U.S. Attorney as a  
10 criminal enterprise involved in money laundering,  
11 conspiracy to commit one crime -- excuse me, mail  
12 fraud, commit conspiracy to commit wire fraud.  
13 Yes, I sued you, your firm and L.M.

14 **Q** \*\* Tell the jury --

15 **A** Yes.

16 **Q** -- the basis for the evidence that you  
17 have to support the allegations in the complaint  
18 against L.M.

19 **MR. PIKE:** I'm going to instruct the  
20 witness not to answer that question in this  
21 medium, as it is wholly irrelevant  
22 currently, as were it, to this particular  
23 lawsuit.

24 **MR. EDWARDS:** Just so you can rethink  
25 that position, the lack of remorse goes to

1 **Q** \*\* But as it relates to, obviously L.M.  
2 sued you making the allegations that you sexually  
3 molested her from when she was 13 years old to  
4 when she was 16 years old and now you've sued her  
5 in something that is seemingly related to that  
6 case, and I just want to understand what your  
7 factual basis is, or what evidence you're using  
8 to support your lawsuit against L.M., so that the  
9 jury can be valuate whether that is evidence of  
10 lack of remorse that would go to punitive damages  
11 claims that L.M. has against you.

12 **MR. PIKE:** I would instruct him not to  
13 answer that question, for the same reasons  
14 stated.

15 **MR. EDWARDS:** Let's mark that.

16 **Q** Is it your feeling that because you are  
17 wealthy and these children are poor, that you are  
18 entitled to sexually abuse them?

19 **MR. PIKE:** Argumentative.

20 **Q** In speaking about these children, and  
21 including L.M.

22 **MR. PIKE:** Argumentative, speculation,  
23 compound, it's vague, and it assumes facts  
24 not in evidence.

25 **A** In keeping with your firm's propensity

1 punitive damages, that is an aspect of the  
2 case that L.M. has against Mr. Epstein.

3 **MR. PIKE:** This lawsuit, the current one  
4 Mr. Epstein is noticed for, and the lawsuit  
5 in which Mr. Epstein has filed against the  
6 former Rothstein, Rosenfeld, Adler, L.M. and  
7 Mr. Brad Edwards, is not proper for this  
8 medium --

9 **MR. EDWARDS:** I understand your  
10 position.

11 **MR. PIKE:** -- in that regard, I'm going  
12 to instruct him not to answer any questions  
13 relative to that lawsuit because of that  
14 objection, as well as, it is my  
15 understanding that Mr. Scarola has set Mr.  
16 Epstein's deposition, I believe, either  
17 early next week or mid-March, on the case of  
18 Epstein versus RRA, Rothstein, Rosenfeld and  
19 Adler, Mr. Edwards, as well as L.M.  
20 Therefore when that time approaches, that  
21 would be the appropriate time for those type  
22 of questions, related to that lawsuit.

23 **MR. EDWARDS:** I understand your position  
24 completely, Mr. Pike.

25 **MR. PIKE:** Thank you.

1 for filing fellacious (sic), manufactured,  
2 sexually charged cases, based on nothing but thin  
3 air, accused by the U.S. Attorney of the largest  
4 fraud in South Florida's history, by  
5 manufacturing sexual cases, I would like to  
6 answer each and every one of your questions,  
7 including why I sued you, but today I'm not going  
8 to be able to. I have to simply listen to my  
9 counsel and assert my Sixth Amendment, Fourteenth  
10 Amendment and Fifth Amendment right.

11 **Q** This answer that you keep reciting,  
12 about the Rothstein, Rosenfeld, Adler firm --

13 **A** You do know who they are, right?

14 **Q** -- you are aware, obviously, that all of  
15 the lawsuits that were filed against you,  
16 including L.M.'s, were filed at least a year  
17 before, or approximately a year before Rothstein,  
18 Rosenfeld, Adler had any of these cases; you're  
19 aware of that, right?

20 **MR. PIKE:** Form.

21 **A** I do not know when Rothstein Adler got  
22 involved in these cases. I do know that the  
23 moment that they did surface, and, in fact, I  
24 understand you shared information with all the  
25 other attorneys that you so -- that the jury

1 should understand that the information  
2 gathered -- according to the U.S. Attorney, by  
3 illegal means, has been shared with all the other  
4 attorneys that you keep representing have filed  
5 cases against me; yes, I'm aware of that.

6 **Q I don't understand that answer. Steven,  
7 do you --**

8 MR. PIKE: Do you have a question?

9 MR. EDWARDS: I want to understand what  
10 his answer was. As in all depositions, if  
11 you don't understand the answer, clarify the  
12 answer.

13 MR. PIKE: No, you have to ask a  
14 question.

15 MR. EDWARDS: I did. And he's  
16 responding to it.

17 MR. PIKE: The witness has answered the  
18 question. Do you have another question to  
19 clarify his answer?

20 MR. EDWARDS: Yes.

21 **Q Please clarify your answer.**

22 MR. PIKE: I will instruct him not to  
23 answer. It's vague and confusing, it's  
24 narrative.

25 MR. EDWARDS: Me saying "clarify your

1 your house when she was 13, 14, 15, 16 years  
2 old --

3 A Is that a claim?

4 **Q -- she was in your bedroom. You  
5 instructed her to get naked. You inserted your  
6 fingers into her vagina. You used a vibrator on  
7 her. You coerced her into recruiting other  
8 underage minor females, roughly 50 or so more.**

9 **These are all claims that have amounted  
10 to various counts, coercion, prostitution,  
11 intentional infliction of emotional distress,  
12 battery, committing various crimes against her.  
13 What are your defenses to that? Normal defenses  
14 are "I didn't do it," "I did it, but it didn't  
15 hurt her," we are trying to understand so we know  
16 how to provide this case to the jury, what are  
17 your defenses to these allegations?**

18 MR. PIKE: I'm going to object to this  
19 line of questioning. It is compound; as  
20 worded it could call for disclosure of  
21 attorney/client information as well as work  
22 product. I believe in this particular case  
23 there is a document filed, answer in  
24 affirmative defenses, and the affirmative  
25 defenses are set forth there and the

1 answer" is narrative?

2 MR. PIKE: What do you mean by "clarify  
3 your answer?"

4 MR. EDWARDS: I didn't hear what he  
5 said. Say it again so I can hear it.

6 MR. PIKE: Would you please read back  
7 what Mr. Epstein just testified to, madam  
8 court reporter.

9 (The record was read.)

10 MR. EDWARDS: Okay.

11 MR. PIKE: It was an answer, a  
12 question --

13 MR. EDWARDS: I understand -- I mean I  
14 don't understand the answer, but now I know  
15 the answer.

16 MR. PIKE: Okay.

17 **Q At this point in time, please tell the  
18 jury what is your defense of the claims being  
19 asserted against you in this lawsuit by L.M.?**

20 MR. PIKE: I'm going to object. Calls  
21 for a legal conclusion.

22 A What are the claims? So since you're  
23 representing L.M., can you tell me what the  
24 claims are?

25 **Q Yes, we've gone through it. She went to**

1 document there speaks for itself.

2 MR. EDWARDS: Okay.

3 **Q Respond.**

4 A The document speaks for itself.

5 **Q \*\* So you agree with the affirmative  
6 defenses that were filed in your case? If you  
7 were to testify, we could expect that to be your  
8 testimony?**

9 MR. PIKE: That's not what the witness  
10 testified. The witness testified that the  
11 document speaks for itself, and again, I'm  
12 going to object to attorney/client, work  
13 product and instruct the witness not to  
14 answer.

15 **Q I'm not asking what your legal defense  
16 is. I'm asking: What is your response to the  
17 claims?**

18 MR. PIKE: Same objection.

19 **Q What is your personal response?**

20 A I would like to respond to that  
21 question. I would like to respond today to that  
22 question; however, today my attorneys have told  
23 me that I cannot respond. They've asked me to  
24 assert my Fourteenth Amendment, Sixth Amendment  
25 and Fifth Amendment rights of the U.S.

1 Constitution, though I would really like to  
2 respond. They are telling me if I did so, I will  
3 lose risking their representation.

4 **Q I know you've invoked your Fifth**  
5 **Amendment rights related to many of these**  
6 **questions, but isn't it true you recently**  
7 **contacted George Rush at The New York Daily News**  
8 **and spoke to him about L.M.'s case as well as**  
9 **several of the other girls, who have claims**  
10 **against you?**

11 A Who?

12 **Q George Rush, New York Daily News.**

13 A Can you repeat the question?

14 **Q Didn't you recently, within the last**  
15 **year, contact George Rush of The New York Daily**  
16 **News and discuss these cases that have been filed**  
17 **against you and the allegations made by these**  
18 **various females?**

19 MR. PIKE: Form.

20 A I would like to answer that question,  
21 but unfortunately today my attorneys have advised  
22 me I cannot. They've advised me I must assert my  
23 Sixteenth -- excuse me, my Fourteenth Amendment,  
24 Sixth Amendment and Fifth Amendment right, so  
25 therefore, I will do so.

1 **Q Why is it that you will talk to George**  
2 **Rush about this but you will not talk to the jury**  
3 **about this?**

4 MR. PIKE: Form. Argumentative,  
5 speculation. Misstates the witness's  
6 testimony. It assumes facts -- the question  
7 assumes facts not in evidence and now lacks  
8 predicate.

9 A So who is George Rush again?

10 **Q George Rush, reporter with The New York**  
11 **Daily News. Did you not talk to him? If you**  
12 **didn't talk to him, tell me that. That's fine.**

13 MR. PIKE: Same objections.

14 A I would like to tell you answers to each  
15 one of your questions, however today my attorneys  
16 have demanded that I respond by asserting my  
17 Fourteenth Amendment, Sixth Amendment, Fifth  
18 Amendment privilege, though I would like to  
19 respond, but they said if I do so, I risk losing  
20 their representation.

21 **Q Didn't you tell George Rush these**  
22 **underage minors were not victims at all and that**  
23 **regardless of their age, you did not personally**  
24 **consider them victims?**

25 MR. PIKE: Same objection.

1 A (Laughter.)... Did I tell... I would  
2 like to answer that question, but today on advice  
3 of my counsel, I must -- as I have done with  
4 mostly each one of your questions, I have to  
5 assert my Fifth Amendment, Sixth Amendment and  
6 Fourteenth Amendment rights under the U.S.  
7 Constitution.

8 **Q You were 51 when L.M. was 14, and you**  
9 **were interacting with her sexually. Is it your**  
10 **testimony that despite the disparity in age you**  
11 **do not consider L.M. to be a victim?**

12 MR. PIKE: Argumentative, speculation,  
13 assumes facts not in evidence. Compound,  
14 lacks predicate.

15 A Not only does it contradict your own  
16 client's statements to the FBI under sworn  
17 testimony, I would like to answer that question.  
18 Hopefully one day I can answer that question, but  
19 today my attorneys have said I cannot. They  
20 advised me I must assert my Sixth Amendment,  
21 Fifth Amendment and Fourteenth Amendment rights.

22 **Q In the last ten years, what is the**  
23 **youngest underage minor female that you have**  
24 **interacted with sexually?**

25 MR. PIKE: Argumentative, speculation,

1 assumes facts not in evidence.

2 A The answer to that question is -- I  
3 would like to give you an answer to that today,  
4 but my attorneys have advised me I must assert my  
5 Fourteenth Amendment rights, my Sixth Amendment  
6 rights and Fifth Amendment rights.

7 **Q Do you know Michael Friedman?**

8 A Doesn't ring a bell.

9 **Q Former housekeeper/employee of yours,**  
10 **worked at the Palm Beach house?**

11 A ... Could. Don't know.

12 **Q So you would be unable to answer what**  
13 **Michael Friedman did for you?**

14 A Yes.

15 **Q Are you aware that our investigator**  
16 **spoke with Michael Friedman, former housekeeper**  
17 **for you, or housemanager for you, out in**  
18 **California?**

19 A No.

20 **Q Any reason why when asked about the**  
21 **activity that occurred in your house, he would**  
22 **tear up and say, "I was hoping to forget**  
23 **everything I saw"?**

24 MR. PIKE: Objection, argumentative.  
25 Speculative. Assumes facts not in



1 evidence.  
 2 A Again, the question?  
 3 **Q Is there any reason that when asked --**  
 4 A I don't know who he is.  
 5 MR. PIKE: Also, hearsay.  
 6 THE VIDEOGRAPHER: Counsel?  
 7 MR. EDWARDS: Go ahead.  
 8 THE VIDEOGRAPHER: Going off the video  
 9 record 3:23 p.m.  
 10 (Pause in the proceedings.)  
 11 THE VIDEOGRAPHER: Back on the video  
 12 record 3:30 p.m.  
 13 **Q This person that I asked you about,**  
 14 **Michael Friedman, is that somebody who has**  
 15 **contacted you within the last six months?**  
 16 A ... No.  
 17 **Q In taking a break and thinking about**  
 18 **some of these questions, have you remembered who**  
 19 **that person is, or still no real memory of him at**  
 20 **all?**  
 21 A No real memory.  
 22 **Q To the best of your knowledge, he never**  
 23 **worked for you?**  
 24 MR. PIKE: Form.  
 25 A Not that I can recall, but there are

1 lots of people who work for me, so...  
 2 **Q Can you tell the jury who the various**  
 3 **people are that work for you now?**  
 4 A I believe I answered that question  
 5 already.  
 6 **Q In that you invoked your Fifth**  
 7 **Amendment, correct?**  
 8 A That's correct, Sixth Amendment and  
 9 Fourteenth Amendment.  
 10 **Q Eighteen and twenty-first?**  
 11 A (Witness shrugs.)  
 12 MR. PIKE: Move to strike.  
 13 **Q \*\* Have you, during this litigation, and**  
 14 **by "this litigation," I don't only mean L.M.'s**  
 15 **case, but the various other lawsuits that have**  
 16 **been filed against you by other females alleging**  
 17 **sexual misconduct by you against them. Who have**  
 18 **you retained attorneys for, what witnesses have**  
 19 **you retained attorneys for?**  
 20 MR. PIKE: Object to the form.  
 21 MR. EDWARDS: Okay.  
 22 MR. PIKE: I'll instruct him not to  
 23 answer because I don't understand the  
 24 question. Okay?  
 25 MR. EDWARDS: All right.

1 **Q During this civil discovery and**  
 2 **litigation --**  
 3 A Um-hum?  
 4 **Q -- have you paid for, and/or retained an**  
 5 **attorney for any other witnesses?**  
 6 A Any other witnesses?  
 7 **Q Yes, like I'll give you an example that**  
 8 **you may, just to refresh your recollection or**  
 9 **tell you what I'm talking about, Lowella Rabuyo;**  
 10 **you know who that is, right?**  
 11 A Yes.  
 12 **Q She is someone to works for you now,**  
 13 **she's a housekeeper. We took her deposition**  
 14 **already. At least that's what her testimony**  
 15 **was.**  
 16 MR. PIKE: Form.  
 17 A I would like to answer that question but  
 18 I have to assert my Sixth Amendment, Fourteenth  
 19 and Fifth.  
 20 **Q That somebody who has informed us that**  
 21 **you paid for and obtained an attorney by the name**  
 22 **of Bruce Reinhart to represent her during this**  
 23 **process. Is that --**  
 24 MR. PIKE: Form.  
 25 A I have to assert my Fifth Amendment,

1 Sixth Amendment and Fourteenth Amendment, right.  
 2 **Q Other people that have indicated that**  
 3 **you retained and paid for an attorney to**  
 4 **represent them are Michael Friedman, Louella**  
 5 **Rabuyo, Janusz Banaziak, Nadia Marcinkova,**  
 6 **Ghislaine Maxwell, your brother, Mark Epstein,**  
 7 **Naley Robson, Sarah Kellen, Larry Visoski, Larry**  
 8 **Morrison, David Rogers, Igor Zinoviev. Have I**  
 9 **missed anybody else that during this litigation**  
 10 **you've paid for or retained attorneys?**  
 11 MR. PIKE: Form, same objection.  
 12 A I'm not clear. Are you suggesting I've  
 13 paid for attorneys for all these people?  
 14 **Q Yes.**  
 15 A (Laughter.) I would like to answer those  
 16 questions today, but on the advice of counsel I  
 17 have to invoke my Sixth Amendment, Fifth  
 18 Amendment and Fourteenth Amendment right.  
 19 **Q If you have not, tell me which of those**  
 20 **on that list that you have not paid for or**  
 21 **retained attorneys for?**  
 22 MR. PIKE: Same objection.  
 23 A Same answer.  
 24 **Q You're invoking your Fifth Amendment,**  
 25 **right?**

1 A And Sixth Amendment and Fourteenth  
2 Amendment... and Fifth Amendment.  
3 Q **\*\* Is it a company or is it you,**  
4 **personally, that is paying for the attorneys'**  
5 **fees related to your representation?**  
6 MR. PIKE: I'm going to object to the  
7 form. I'm going to instruct him not to  
8 answer that question based on relevance; and  
9 it is vague also.  
10 Q **Who is writing the check to your**  
11 **attorneys for your representation in this**  
12 **lawsuit?**  
13 A (No response.)  
14 Q **Who is paying the bill?**  
15 A I believe I am.  
16 Q **And is it you, personally, or is this**  
17 **one of your corporations or companies?**  
18 MR. PIKE: Form, speculation.  
19 A I'm not sure.  
20 Q **As you sit here today, you're not really**  
21 **sure whether it is coming from one of the other**  
22 **corporations that we've discovered during**  
23 **discovery or it is coming from you, personally?**  
24 **Is that correct?**  
25 MR. PIKE: Asked and answered.

1 A I believe -- I would like to answer but  
2 I have to invoke my Sixth, Fourteenth and Fifth  
3 Amendment rights.  
4 Q **As it relates to any of the other**  
5 **witnesses who have had attorneys retained for**  
6 **them, is it also your response to invoke your**  
7 **Fifth Amendment rights, rather than to provide me**  
8 **with an answer, as to who is paying the bill for**  
9 **those attorneys?**  
10 A I would like to answer those questions,  
11 but today my attorneys have asked me not to  
12 respond to any questions that may be relevant to  
13 this lawsuit, so I must follow their advice and  
14 invoke the Sixth Amendment, Fifth Amendment and  
15 Fourteenth Amendment, right.  
16 Q **Have you interacted sexually with any**  
17 **underage minors in the last year, while on house**  
18 **arrest or work release from jail?**  
19 MR. PIKE: Objection. Argumentative and  
20 compound and lacks predicate.  
21 A I would like to answer that question,  
22 but on advice of counsel, at least today, they've  
23 advised me I must invoke my Sixth Amendment,  
24 Fourteenth and Fifth Amendment right.  
25 MR. PIKE: It is also overbroad.

1 Q **If me narrowing down will help you to**  
2 **respond, I will. Is there any need for that?**  
3 A (Witness shakes head.)  
4 MR. EDWARDS: Okay.  
5 THE WITNESS: Sorry.  
6 Q **Is it your intent to interact sexually**  
7 **with minors in the future?**  
8 MR. PIKE: Same objection.  
9 A I would like to answer that question,  
10 but today my counsel has advised me I must invoke  
11 the rights of the Sixth Amendment, the Fourteenth  
12 Amendment and the Fifth Amendment of the U.S.  
13 Constitution.  
14 Q **Are you currently treating with a**  
15 **psychologist related to any sex addiction that**  
16 **you have with minors?**  
17 A I would like to answer that question, as  
18 well, as most of the other... questions you've  
19 asked me today; however, on advice of counsel  
20 they've asked me to invoke my Sixth Amendment,  
21 Fourteenth Amendment and Fifth Amendment right,  
22 therefore, though I would like to answer that  
23 question, as well as the other ones, I risk  
24 losing the representation if I do so.  
25 MR. PIKE: Moreover I'm going to object

1 to relevance as I have in the past since Mr.  
2 Epstein's medical history is not at issue in  
3 this case; under the legal terms.  
4 Q **You would agree, wouldn't you, that you**  
5 **targeted these underage girls including L.M.**  
6 **because of their young age?**  
7 MR. PIKE: Argumentative, speculative,  
8 harassing. Assumes facts not in evidence.  
9 A I would like to answer that question, as  
10 well as most of the other questions you've asked  
11 me here today. My counsel has advised me that I  
12 must assert my Fourteenth Amendment, Sixth  
13 Amendment and Fifth Amendment right. Though I  
14 would like to answer those questions today... if  
15 I do so, I risk losing their representation.  
16 Q **You would also agree, wouldn't you, that**  
17 **you targeted these underage females for sex,**  
18 **including L.M., because they were poor?**  
19 MR. PIKE: Same objections.  
20 A I would like to answer that question. I  
21 would really like to answer that question, as  
22 well as the other questions you've asked me here  
23 today, however, on advice of my counsel they've  
24 demanded that I assert my Fifth Amendment, Sixth  
25 Amendment and Fourteenth Amendment rights. If I

1 answer that question, I risk losing their  
2 representation.

3 **Q You would agree, wouldn't you, that you**  
4 **sexually molested L.M. for three years?**

5 MR. PIKE: Same objection.

6 A I think you've asked me that question  
7 before. I assert the same rights as before.

8 **Q That's the Fifth, Sixth and Fourteenth**  
9 **amendments, just so the record is clear?**

10 A Yes.

11 **Q You would agree, wouldn't you, that you**  
12 **coerced L.M. into prostitution?**

13 MR. PIKE: Same objections.

14 A I believe her own testimony reflects, at  
15 least the sworn statement to the FBI, reflects  
16 that that is not the case; and though I would  
17 like to answer that question in great detail, I  
18 cannot do so today on advice of counsel, that  
19 have asked me to assert my Sixth Amendment, Fifth  
20 Amendment and Fourteenth Amendment rights. If I  
21 do so, I risk losing their representation.

22 **Q You would agree with me that you groomed**  
23 **L.M. into becoming a prostitute?**

24 MR. PIKE: I'm going to object.  
25 Argumentative, speculative. Certainly lacks

1 predicate and assumes facts not in  
2 evidence.

3 A You know I would like to answer that  
4 question, but I can't today. Under advice of  
5 counsel I have to assert my Fourteenth Amendment,  
6 Sixth Amendment and Fifth Amendment rights. If I  
7 answer the question, I risk losing their  
8 counsel.

9 **Q You would agree, wouldn't you, that you**  
10 **brainwashed L.M. into believing that this**  
11 **lifestyle of prostitution was right?**

12 MR. PIKE: Same objections.

13 A I would like to answer that question, as  
14 most of your other questions here today, Mr.  
15 Edwards. On advice of counsel today, I'm going  
16 to have to assert my Fifth Amendment, Sixth  
17 Amendment, Fourteenth Amendment rights. If I  
18 answer that question, I risk losing their  
19 representation.

20 **Q Would you agree that your interaction**  
21 **with L.M. when she was a minor, was degrading to**  
22 **her?**

23 MR. PIKE: Same objections.  
24 A I would like to answer that question. I  
25 would like to answer all of your questions here

1 today; however, my counsel has advised me that I  
2 must assert my Fourteenth Amendment rights, my  
3 Sixth Amendment rights and my Fifth Amendment  
4 rights, and though I would like to answer those  
5 questions, if I do so I risk losing their  
6 representation.

7 THE WITNESS: Can we take a ten-minute  
8 break for some air?

9 MR. EDWARDS: We have 15 minutes and  
10 we're done.

11 THE WITNESS: Continue then?  
12 MR. EDWARDS: Okay.

13 **Q Would you agree that you intentionally**  
14 **indoctrinated L.M. into this very deviant sexual**  
15 **lifestyle?**

16 MR. PIKE: Okay, I'm going to object.  
17 It is argumentative. It is confusing. It  
18 is speculative, vague, lacks predicate and  
19 assumes facts not in evidence.

20 A And on top of that, I would like to  
21 answer that question, but my counsel has advised  
22 me I must assert my Fourteenth Amendment, Sixth  
23 Amendment and Fifth Amendment rights under the  
24 U.S. Constitution. Although I would like to  
25 answer all your questions today, I cannot do so

1 risking losing their representation.

2 **Q Would you agree that you were personally**  
3 **responsible for destroying her life?**

4 MR. PIKE: Same act objections.  
5 A Her life?  
6 **Q L.M.'s?**

7 A I would like to answer that question,  
8 and I understand how your firm has been accused  
9 of fabricated sexually charged lawsuits in order  
10 to fleece investors locally in South Florida.  
11 The U.S. Attorney has called your law firm a  
12 criminal enterprise based on filing fellacious  
13 (sic) sexually charged cases. Although I would  
14 like to answer that question today, Mr. Edwards,  
15 and Mr. Jaffe, my counsel has told me that I have  
16 to assert my rights under the Sixth Amendment,  
17 Fifth Amendment and Fourteenth Amendment, and if  
18 I don't do so, I risk losing their  
19 representation.

20 **Q We have a factual basis for asking every**  
21 **question and making every allegation. I want to**  
22 **provide you with a last opportunity to tell the**  
23 **jury which of these allegations, if any, being**  
24 **made by L.M., are false or fabricated in any**  
25 **way?**

1 MR. PIKE: Same objections. Mr.  
2 Edwards, you know the tenor of that question  
3 cannot be answered without waiver of Fifth,  
4 Sixth and Fourteenth. I appreciate the  
5 question and the semantics of it, but it  
6 is... It is -- can you rephrase it?

7 MR. EDWARDS: Yes.

8 **Q Many times -- you know the allegations**  
9 **now, we've gone through them, L.M.'s allegations**  
10 **and assertion of facts as to what happened**  
11 **between you and her when she was 13, 14 and 15**  
12 **years old and you were 50, 51, 52 years old.**  
13 **Several times you responded saying something**  
14 **about Rothstein, Rosenfeld & Adler, something**  
15 **about her FBI statement, what have you; I want to**  
16 **give you a chance to tell the jury, which of her**  
17 **allegations, if any, that you believe now are**  
18 **false or fabricated in any way.**

19 MR. PIKE: Same objections.

20 A I would like to respond to that  
21 question, the fact that her firm, the law firm  
22 representing her has been accused by the U.S.  
23 Attorney of being a criminal enterprise,  
24 manufacturing, fabricating, out of thin air,  
25 cases involving sexual allegations, sexual

1 allegations in order to simply fleece local  
2 investors out of millions of dollars, so I would  
3 very much like to answer that question regarding  
4 the truthfulness of L.M.'s allegations; however  
5 today my counsel has told me that I must assert  
6 my Fifth Amendment rights, Sixth Amendment rights  
7 and Fourteenth Amendment rights under the U.S.  
8 Constitution, though I would very much like to  
9 answer that questions but if I do I risk losing  
10 their representation.

11 **Q Would you agree you owe L.M. at least**  
12 **\$15,000,000 to compensate her for the damage**  
13 **which you have caused?**

14 MR. PIKE: Objection. I move to  
15 strike. Argumentative. Compound. Lacks  
16 substantial predicate. Assumes... facts...  
17 not in evidence.

18 A As you might imagine, though your law  
19 firm has been accused of perpetrating a fraud  
20 involving millions and millions of dollars, on  
21 unsuspecting investors here in South Florida,  
22 millions of dollars by fabricating similar  
23 allegations, convincing people to give money to  
24 the firm that helped bring this lawsuit, I'm  
25 afraid I would like to answer those questions but

1 no matter how much I would like to answer those  
2 questions, I am going to have to decline based on  
3 my counsel's advice to invoke, at least today, my  
4 Fifth Amendment, Sixth Amendment and Fourteenth  
5 Amendment rights under the U.S. Constitution;  
6 because if I don't, I risk losing their  
7 representation.

8 **Q Is it true that you're currently worth**  
9 **more than one billion dollars personally?**

10 A I would like to answer that question, as  
11 I would like to answer most of your other  
12 questions. I know that's a lot of money --  
13 actually the amount of money that the U.S.  
14 attorneys accused your firm of trying to steal  
15 from the people of South Florida. It was 1.2  
16 billion dollars, the U.S. Attorney claimed your  
17 firm perpetrated the largest fraud in South  
18 Florida's history by stealing that sum of money  
19 from local investors, based on false allegations  
20 of sexually charged claims, and although I would  
21 like to answer these questions with specificity,  
22 under advice of counsel today, I'm going to have  
23 to refuse, based on my Sixth Amendment,  
24 Fourteenth Amendment and Fifth Amendment right,  
25 and though I would like to answer the question, I

1 have been told if I do so I risk losing their  
2 representation, Mr. Edwards.

3 **Q I'm simply asking: What is your**  
4 **personal net worth at this time?**

5 MR. PIKE: Form.

6 A I think I've answered the question,  
7 but...

8 **Q What is your personal net worth at this**  
9 **time? So the answer should be a number or should**  
10 **be you invoking your Fifth Amendment rights.**  
11 **Seemed like the opposite.**

12 MR. PIKE: Asked and answered, he did  
13 invoke his Fifth, Sixth and Fourteenth.

14 MR. EDWARDS: His answer included  
15 something about Rothstein, Rosenfeld and  
16 Adler stealing some certain amount of money,  
17 which obviously is nonresponsive, I move to  
18 strike it and ask that he actually responds  
19 to the question with something that's  
20 responsive. He can answer the question,  
21 invoke Fifth Amendment rights, and we will  
22 get out of here.

23 **Q We will start over again.**

24 **Can you please tell the jury what your**  
25 **current personal net worth is currently?**

1 A I would like to do that today, however,  
2 I'm sure that one of the reasons, since your firm  
3 has been accused of stealing millions of dollars  
4 from local investors based on fabricated, totally  
5 fabricated claims, this is not by me but the U.S.  
6 Attorney, has called your firm a criminal  
7 enterprise charged with stealing hundreds of  
8 millions of dollars frankly, from local  
9 investors, based on false claims of sexually  
10 charged nature, I would like to answer that  
11 question in detail. However, my attorneys have  
12 advised me I cannot answer any questions that may  
13 be relevant to this lawsuit and by doing so, I  
14 must invoke my Sixth Amendment, Fifth Amendment,  
15 Fourteenth Amendment right and by answering the  
16 question, I risk losing their representation.

17 **Q Is it true you're worth 1.8 billion**  
18 **dollars?**

19 MR. PIKE: Same objection.

20 A Same answer.

21 **Q Put the answer.**

22 MR. PIKE: For the record.

23 A I'm sure that's an interesting question  
24 and I would like to answer that question for  
25 you. I'm sure you would like to know as your

1 Though I would like to answer with specificity,  
2 however if I do so, I risk losing their  
3 representation so I must assert my rights under  
4 Sixth, Fifth and Fourteenth Amendment.

5 **Q Isn't it true, Mr. Epstein, that as long**  
6 **as you have the money to do it, you will continue**  
7 **to engage in sex with minors?**

8 MR. PIKE: Again, extremely  
9 argumentative, speculative. I'm allowing  
10 the question to give leeway, so we don't  
11 have to come back here again. It is  
12 harassing.

13 A And with that, I'm sure this -- ladies  
14 and gentlemen of the jury, will... be able to see  
15 you and your partner, who your firm has been  
16 accused of massive fraud in South Florida trying  
17 to steal hundreds of millions of dollars from  
18 local investors, from creating, fabricating  
19 malicious, sexually charged claims, called by the  
20 U.S. Attorney a criminal enterprise charged with  
21 money laundering, conspiracy to commit other --  
22 federal violations, so though I would like to  
23 answer that question, Mr. Edwards, and Mr. Jaffe,  
24 today, I cannot. I must invoke my Sixth, Fifth  
25 and Fourteenth Amendment rights, on advice of

1 firm has been charged with stealing over a  
2 billion dollars from local investors and your  
3 senior partner of both you and Mr. Jaffe sitting  
4 there shaking his head, sits in jail accused of  
5 fleecing local and foreign investors based on  
6 false sexual claims from people. And although I  
7 would like to answer that question, like I would  
8 answer most of your other questions, my counsel  
9 has advised me today, ladies and gentlemen of the  
10 jury, I cannot answer that question. Maybe I can  
11 in the future. However, if I do so today, I risk  
12 losing their representation, so I must assert  
13 those rights under the Sixth, Fifth and  
14 Fourteenth amendments.

15 **Q You would agree, would you not, that it**  
16 **would take a jury award of at least 45 million**  
17 **dollars in punitive damages to punish you for**  
18 **doing what you did to L.M.?**

19 MR. PIKE: Same objections.

20 A I would like to answer that question, as  
21 I would like to answer all your other and Mr.  
22 Jaffe's questions today. However, while he sits  
23 shaking his head I'm going to have to respond  
24 to -- my counsel has advised me I cannot answer  
25 that question today, though I would like to.

1 counsel or risk losing their representation.

2 **Q Am I correct in my understanding that**  
3 **you have invoked your Fifth Amendment rights**  
4 **because your answers would incriminate you and**  
5 **lead to your prosecution?**

6 MR. PIKE: I'm going to --

7 MR. EDWARDS: Exactly as phrased by Mr.  
8 Luttier to L.M. I did not say anything but  
9 allow her to answer the question.

10 MR. PIKE: Object to the form.

11 A In fact, since you are a lawyer I'm sure  
12 you're aware the Supreme Court has said the Fifth  
13 Amendment is used more often to protect innocent  
14 people. So that's -- but today on advice of  
15 counsel I've taken that right.

16 MR. EDWARDS: (Gesturing.)

17 MR. PIKE: I have no questions.  
18 We will read.

19 MR. EDWARDS: No further questions.

20 THE VIDEOGRAPHER: Off the video record,  
21 3:52 p.m.

22 THE COURT REPORTER: Can he read your  
23 copy Mr. Pike?

24 MR. PIKE: Yes.

25 THE COURT REPORTER: Thank you all.

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1 MR. PIKE: On the record, I don't want a  
 2 word index.  
 3 THE COURT REPORTER: Okay.  
 4 (Discussion off the record.)  
 5 MR. PIKE: I would like this tomorrow,  
 6 please.  
 7 Let's go regular but definitely before  
 8 that -- before Tuesday, if possible.  
 9 THE COURT REPORTER: Sure, that will be  
 10 50 percent expedite?  
 11 MR. PIKE: That's fine.  
 12 THE COURT REPORTER: My pleasure.  
 13 (Time noted: 4:00 o'clock p.m.)  
 14  
 15  
 16  
 17  
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 19  
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 24  
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1 THE STATE OF FLORIDA)  
 2 COUNTY OF PALM BEACH)  
 3 I, TERRI BECKER, a Registered  
 4 Professional Reporter and Notary Public for the  
 5 State of Florida at Large, do hereby certify that  
 6 I reported the videotaped deposition of JEFFREY  
 7 EPSTEIN, the DEFENDANT, called by the PLAINTIFF  
 8 in the above-entitled action; that the witness  
 9 was duly sworn by me; that the foregoing pages,  
 10 numbered from 1 to 183, inclusive, constitute a  
 11 true record of the deposition by said witness.  
 12 I further certify that I am not attorney  
 13 or counsel of any of the parties, nor a relative  
 14 or employee of any attorney or counsel connected  
 15 with the action, nor financially interested in  
 16 the action.  
 17 WITNESS MY HAND and official seal in the  
 18 City of West Palm Beach, County of Palm Beach,  
 19 State of Florida, this 22nd day of February 2010.  
 20  
 21 \_\_\_\_\_  
 22 TERRI BECKER, Registered  
 23 Professional Reporter and  
 24 Notary Public, State of Florida  
 25 at Large. My Commission expires  
 March 13, 2011.

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1 THE STATE OF FLORIDA)  
 2 COUNTY OF PALM BEACH)  
 3  
 4  
 5 The foregoing certificate was  
 6 acknowledged before me this \_\_\_\_\_  
 7 day of \_\_\_\_\_ 2009, by TERRI  
 8 BECKER, who is personally known to me.  
 9  
 10  
 11  
 12  
 13  
 14  
 15  
 16 \_\_\_\_\_  
 17 Notary Public, State of Florida.  
 18 My commission No.  
 19 Expires March 13, 2011.  
 20  
 21  
 22  
 23  
 24  
 25

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1 I, JEFFREY EPSTEIN, do hereby  
 2 certify that I have read the foregoing transcript  
 3 of my deposition given on February 17, 2010; that  
 4 together with the correction page attached hereto  
 5 noting changes in form or substance, if any, it  
 6 is true and correct.  
 7  
 8 \_\_\_\_\_  
 9 JEFFREY EPSTEIN  
 10  
 11  
 12  
 13  
 14 I do hereby certify that the deposition  
 15 of JEFFREY EPSTEIN was submitted to the witness  
 16 for reading and signing; that after he had stated  
 17 to the undersigned Notary Public that he had read  
 18 and examined her deposition, he signed the same  
 19 in the presence of the undersigned authority on  
 20 the \_\_\_\_ day of \_\_\_\_\_ 2010.  
 21  
 22  
 23  
 24  
 25

1 ERRATA SHEET  
2 In Re: L.M. V. EPSTEIN  
3 DO NOT WRITE ON TRANSCRIPT  
ENTER CHANGES HERE:

4  
5 PAGE LINE CHANGE REASON

6				
7				
8				
9				
10				
11				
12				
13				
14				

15 \_\_\_\_\_  
JEFFREY EPSTEIN

16  
17  
18 THE STATE OF FLORIDA)  
19 COUNTY OF PALM BEACH)  
20 I DO HEREBY CERTIFY THAT JEFFREY EPSTEIN  
21 appeared before me and stated that he has read  
22 his deposition; further, that this Errata Sheet  
23 was signed in my presence on this \_\_\_\_\_ day  
of \_\_\_\_\_ 2010.

24  
25

1 U.S. LEGAL SUPPORT  
Registered Professional Reporters  
2 444 West Railroad Avenue  
Suite 300  
3 West Palm Beach, Florida 33401  
(561)835-0220

4 February 22, 2010

5  
6 BURMAN, CRITTON, LUTTIER & COLEMAN  
303 Banyon Boulevard  
7 Suite 400  
West Palm Beach, Florida 33401

8 ATTENTION: MICHAEL PIKE, ESQ.

9 In Re: L.M. V. EPSTEIN

10 Deposition of: JEFFREY EPSTEIN

11  
12 Dear Mr. Pike:

13  
14 Since counsel have agreed that you may  
have the witness read and sign your copy of the  
15 deposition, for your convenience, enclosed  
herewith you will find an Errata Sheet for the  
witness' use in entering any changes to the  
16 deposition.

17 Thank you for your prompt attention.  
18 Cordially yours,  
U.S. LEGAL SUPPORT

19  
20 \_\_\_\_\_  
21 TERRI BECKER, Registered  
Professional Reporter, Notary  
Public, State of Florida at  
22 Large. My commission expires  
March 13, 2011.

23 CC: Bradley Edwards, Esq.

24  
25