

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 Vioski taken October 15, 2009
22. Deposition of Bradley J. Edwards taken March 23, 2010 (110-116)

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.

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

ATTACHMENT 21

IN THE CIRCUIT COURT OF THE FIFTEENTH JUDICIAL CIRCUIT
IN AND FOR PALM BEACH COUNTY, FLORIDA
CASE NO. 502008CA028051XKMB AD

L.M.,

Plaintiff,

-vs-

JEFFREY EPSTEIN,

Defendant.

DEPOSITION OF LARRY VISOSKI

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

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

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

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WITNESS: DIRECT CROSS REDIRECT RECROSS

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EXHIBITS

NUMBER	DESCRIPTION	PAGE
PLAINTIFF'S EX. 1	FLIGHT LOG BOOK	
(MARKED IN PREVIOUS DEPO)		
PLAINTIFF'S EX. 2	MESSAGE PAD	119
PLAINTIFF'S EX. 3	MESSAGE PAD	119
PLAINTIFF'S EX. 4	COMPLAINT	139
PLAINTIFF'S EX. 5	INMATE VISITOR LOG	161

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APPEARANCES:

On behalf of the Plaintiff:

BRADLEY J. EDWARDS, ESQUIRE
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401 East Las XXXX Boulevard
Suite 1950
Fort Lauderdale, Florida 33394

On behalf of the Defendant:

ROBERT D. CRITTON, JR., ESQUIRE
BURMAN, CRITTON & LUTTIER
303 Banyan Boulevard, Suite 400
West Palm Beach, Florida 33401

On behalf of the Witness:

BRUCE REINHART, ESQUIRE
250 XXXX Australian Avenue
Suite 1400
West Palm Beach, Florida 33401

ALSO PRESENT:

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Miami, Florida 33180

RICHARD H. WILLITS, ESQUIRE (VIA TELEPHONE)
RICHARD H. WILLITS, P.A.
2290 10th Avenue North, Suite 404
Lake Worth, Florida 33461

PROCEEDINGS

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

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

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

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

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

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

5

1 that we're going to work out that these records ■
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 ■ work whatever it is
21 out in court. I'll say that ■ 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.

6

1 MR. EDWARDS: All right.

2 Thereupon,

3 (LARRY VISOSKI)
4 having been first duly ■ 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 ■
15 you questions. You're going to give ■ answers. Try to
16 give us ■ that we ■ understand and that the
17 court reporter can take down, such as yes, no, or some
18 other verbal answer that ■ 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 ■

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 ■ the best ■ 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 ■ time.

1 Q. All right. How many children do you have?

2 A. Two.

3 Q. How old ■ they?

4 A. Fifteen and eighteen.

5 Q. And is ■ 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

9

■ helicopters.

2 Q. And do you have ■ specific boss or somebody

3 you answer to ■ NES, LLC?

■ A. Several people would call to schedule flights

5 from the office, being it either Mr. Epstein or, you

6 know, I would just get ■ phone call and they would

7 schedule a trip.

■ Q. Okay. Aside from Mr. Epstein, who else would

■ there be that would call to schedule flights?

10 A. Leslie.

11 Q. Leslie who?

12 A. Leslie Gruff.

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

14 Gruff?

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

16 Q. And where is she currently?

17 A. I believe in New York, is where I spoke to her

18 on the phone last.

19 Q. What's the telephone number you call to reach

20 Leslie Gruff?

21 A. (212)750-9895.

22 Q. And what address is Leslie Gruff at?

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

24 Q. Correct.

25 A. 301 East 66th Street.

10

1 Q. And it's my understanding from other

2 depositions that there are also apartments in that 301

3 East ■ Street building?

■ A. Yes.

5 Q. And Mr. Epstein either owns or leases or rents

6 certain ■ those apartments. Is that your

7 understanding?

■ ■ CRITTON: Form; speculation.

■ THE WITNESS: I'm only speculating. I

10 don't -- to my understanding, I don't know.

11 BY MR. EDWARDS:

12 Q. Do you know other people that live in that

13 building?

14 A. Well, it would be myself, Dave Rogers -- well,

15 when you say "live," explain.

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

17 A. See, ■ don't live there. I mean, we have --

18 ■ would stay there when we would have a trip.

19 Q. Okay. When you would fly up to New York and

20 land ■ New York, the place where you would stay, is

21 that 301 East ■ Street?

22 A. Yes, that's correct.

23 Q. That's also ■ location you've indicated in

24 this deposition that is the office for NES, LLC?

25 A. Yes.

11

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

2 A. I believe -- well, I don't know that NES, LLC

3 has an office there. I know that's where Leslie ■ the

4 phone number where I call. So I don't know for ■ fact

5 if NES, LLC has ■ office there.

6 Q. And what suite number, then, would Leslie

7 Gruff sit ■ ■ ■ that telephone number at

8 750-9895?

9 A. I think it's 10F.

10 Q. And when you stay at 301 East 66th Street,

11 what suite number or what apartment number do you stay

12 in?

13 A. 12C.

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

15 A. I'm guessing, because it's been some time

16 since we've been there, 10B, but don't quote me on it.

17 Q. Who are the other people in that building that

18 you know to stay there on a regular -- fairly regular

19 basis?

20 A. I've seen people in the elevator that, you

21 know, have been on the airplane. Case in point, maybe

22 Sarah Kellen, but I don't know for a fact that she lives

23 there, or anybody else for that matter.

24 Q. Okay. When you say you've ■ Sarah Kellen

25 on the elevator --

12

1 A. I only ■ she lives there. I don't know

2 for a fact. I'm trying to be honest and factual for

3 you. So I couldn't honestly say if I knew she lived

4 there or not.

5 Q. Where do you think Sarah Kellen lives?

6 A. I would think she lives there.

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

■ A. I don't have another location.

9 Q. Anybody else?

10 A. Not to my knowledge. I mean, I'd only be

11 guessing that people live in that building that -- you

12 know, I don't have any facts to prove that they actually

13 live there. I mean, I don't think you want me to guess.

14 Q. Well, NES, LLC, would you say that the owner

15 or controller of that company is Jeffrey Epstein?

16 MR. CRITTON: Form.

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

18 BY MR. EDWARDS:

19 Q. Jeffrey Epstein ■ somebody you've indicated

20 that you've worked for for 17 or 18 years, right?

21 A. Yes.

22 Q. And over the 17 or 18 years you've become

23 personally close with him as well, correct?

24 MR. CRITTON: Form.

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

13

1 "close." Define that.
 2 BY MR. EDWARDS:
 3 Q. Well, more so than just a pilot that takes him
 4 from Point A to Point B?
 5 A. That is my job.
 6 Q. Right. But you know him ■ ■ personal level
 7 and that you've had personal conversations that don't
 8 necessarily deal with flying from Point A to Point B;
 9 isn't that right?
 10 MR. CRITTON: Form.
 11 THE WITNESS: More specific, meaning ■ talk
 12 about cars. I mean, does that make you ■ personal
 13 friends?
 14 BY MR. EDWARDS:
 15 Q. Have you ever gone to his house ■ eat?
 16 A. No.
 17 Q. Have you been to his New York home?
 18 A. Yes.
 19 Q. How many occasions have you been to his New
 20 York home?
 21 MR. CRITTON: Object to form.
 22 THE WITNESS: We normally pick up luggage in
 23 the lobby, so it would probably be quite often.
 24 Any time we depart out of New York, we stop by the
 25 house and pick up luggage and head to the aircraft.

14

1 BY MR. EDWARDS:
 2 Q. Other than picking up luggage, have you been
 3 to his home to visit or socialize with him?
 4 A. Not to socialize, no.
 5 Q. Have you been to his Palm Beach home?
 6 A. To?
 7 Q. To Mr. Epstein's Palm Beach house?
 8 A. Right.
 9 Q. Have you been there?
 10 A. Yes.
 11 Q. Have you been inside?
 12 A. Yes.
 13 Q. And how many occasions have you been inside
 14 that home?
 15 A. The same, as far as picking up luggage, and
 16 that would be on ■ regular basis, you know, for ■
 17 departure. We wouldn't always go to the house to pick
 18 up luggage, but it made it easier for loading the
 19 aircraft, getting it done prior to departure.
 20 Q. Is that the only reason that you have ever
 21 gone to the Palm Beach home ■ ■ the last 18 years, ■
 22 to pick up luggage?
 23 A. No.
 24 Q. What other reasons have you gone there?
 25 A. I've set up several home theater equipments,

15

1 you know, televisions and such.
 2 Q. Is that another hobby or job or something of
 3 yours?
 4 A. Both.
 5 Q. Does he pay you for that?
 6 A. Not any more than my salary.
 7 Q. What's your current salary?
 8 A. At this time, 180,000.
 9 Q. And what are you paid \$180,000 to do?
 10 A. To manage his aircraft.
 11 Q. What does that entail?
 12 A. Scheduling maintenance. Anything that has to
 13 do with any flight, whether it ■ weather, flight
 14 planning, time and distance to and from a location, any
 15 logistics involved in running ■ operation that has
 16 aircraft.
 17 Q. ■ addition to the 180,000, does ■ give you
 18 bonuses as well?
 19 A. There have been Christmas bonuses.
 20 Q. Over the years, you mean, there have been
 21 Christmas bonuses?
 22 A. Yes.
 23 Q. Is 180,000 ■ most he's ever paid you?
 24 A. No.
 25 Q. All right. Were you making — when was the

16

1 last time that you ■ ■ making an amount different than
 2 180,000?
 3 A. Last year.
 4 Q. That would be 2008?
 5 A. That would be correct. Yeah, we all took a
 6 salary cut, I don't know the exact date. ■ might have
 7 been 2008, ■ year. It was last Christmas we all took
 8 ■ 10 percent salary cut.
 9 Q. Do you know why?
 10 A. Economic reasons.
 11 Q. And who told you that you were going to have
 12 to take the salary cut?
 13 A. Darren Indyke.
 14 Q. And did you ask for ■ explanation?
 15 A. He explained it was due to economic reasons
 16 throughout the country.
 17 Q. Okay. So in 2008, how much was — were you
 18 being paid by NES, LLC?
 19 A. 200,000.
 20 Q. And ■ 200,000 the most that you've ever made
 21 from NES, LLC?
 22 A. Yes, sir.
 23 Q. And on top of that \$200,000, did you get a
 24 bonus that year as well?
 25 MR. REINHART: Which year are you talking

17

1 about?

2 MR. EDWARDS: 2008.

3 THE WITNESS: That year, I think ■ skipped

4 Christmas bonuses that year. The last bonus might

5 have been 2007.

6 BY MR. EDWARDS:

7 Q. If you ■ got ■ bonus from Mr. Epstein --

8 and I'm only deriving this from you using the term

9 "Christmas bonus."

10 A. Holiday bonus.

11 Q. -- am I correct to assume -- sorry. Am I

12 correct to assume that if you got ■ bonus, there was

13 only one and it was at the end of the year, around the

14 holidays?

15 A. Yes.

16 Q. Okay. And how much was the 2007 holiday

17 bonus?

18 A. I'd have to ask my wife, ■ be honest. I

19 haven't seen my paycheck in 27 years, so I believe it

20 ■ \$10,000.

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

22 A. Yes.

23 Q. Okay.

24 A. With ■ question mark. I'm trying to be ■

25 accurate ■ I can, but yes.

18

1 Q. Something pretty close to that?

2 A. Yes, sir.

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

4 roughly?

5 A. Right.

6 Q. Okay. And how long ■ you making that

7 salary?

8 A. Probably -- he ■ very religious about giving

9 annual increases, ■ I would probably say 2006, you

10 know, it ■ -- ■ would get increment -- increases of

11 five or \$10,000 each year. So I would say 2006. So ■

12 graduated, you know, progressive.

13 Q. Okay. Do you remember the progression if we

14 start at 1991? Do you remember roughly what the

15 progression ■ up through 2007/2008, when you were

16 making \$200,000?

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

18 Q. Okay. Do you remember what you were making

19 from -- and was NES, LLC the company paying you back in

20 1991?

21 A. I don't know. I don't remember. Let ■ say

22 ■ that way. I don't remember.

23 Q. Okay. When -- how long do you remember NES,

24 LLC being the payer of your check?

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

19

1 my paycheck. So I don't even know what's written ■ ■

2 top of it.

3 Q. That would be something that only your wife

4 would see, I'm assuming?

5 A. You're right, since she probably wouldn't know

6 the answer either, because she's looking at the right

7 column and not the top column.

8 Q. Right. When is the first time that you had

9 heard the name NES, LLC, that company?

10 A. Five, ■ years, and even questioned what it

11 stood for. And I think to this day I couldn't answer

12 that honestly, what ■ stands for.

13 Q. Okay. ■ it's your understanding that the

14 NES, LLC is paying you for the work that you do as a

15 pilot or maintain the planes for Jeffrey Epstein?

16 A. To my understanding, yes.

17 Q. And back in 1991, do you know if it was ■

18 different company that was paying you or if ■ was

19 Jeffrey Epstein directly paying you?

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

21 Q. Okay. Throughout your career with -- as ■

22 pilot for Jeffrey Epstein, since 1991, has there ever

23 been a time when you believe you were paid directly from

24 Jeffrey Epstein personally versus some company?

25 A. Not to my knowledge, no.

20

1 Q. Okay. So whether it was NES, LLC or some

2 other company, it was ■ of ■ sudden ■ company name, to

3 the best of your knowledge?

4 A. Exactly, yes.

5 Q. And back in 1991, do you remember

6 ■ approximately how much you were being paid that year?

7 A. Fifty-five ■ 80,000, is maybe what I started.

8 Q. Okay.

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

10 Q. Yes.

11 A. I'm trying.

12 Q. Your relationship goes back that far. That's

13 why I chose that year.

14 A. Right.

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

16 A. Yes, sir.

17 Q. And do you remember what your bonuses were

18 approximately?

19 A. 5,000. I mean, that ■ kind of the -- the

20 starting point.

21 Q. Okay. In addition to monetary bonuses, were

22 there ■ gifts ■ any other type of compensation ■

23 NES, LLC ■ Jeffrey Epstein provided you?

24 A. Yes.

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

21

- 1 A. Yes.
 2 Q. Okay. Tell me what some of those items are.
 3 A. I remember ■ specifically was a pool heater.
 4 Q. Excuse me?
 5 A. A pool heater.
 6 Q. When ■ that?
 7 A. 1995-ish.
 8 Q. Okay. Why did you get that?
 9 A. I had built ■ pool and I didn't have a heater
 10 and he kind of laughed at ■ saying, "How can you have a
 11 pool without ■ heater?" So he says, "You ought to get ■
 12 heater."
 13 Q. Where ■ you when you had that conversation?
 14 A. In the airplane.
 15 Q. How did he know that you had built a pool?
 16 A. Just in general conversation.
 17 Q. You ■ having a conversation with Jeffrey
 18 Epstein?
 19 A. Yes.
 20 Q. And ■ is something that was happening on
 21 the airplane, this conversation?
 22 A. During the flight. Yeah, it would have been
 23 like on cruise or something.
 24 Q. Okay. When you say "during the flight," does
 25 that —

22

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

23

- 1 Q. But more so than that, if there's going to be
 2 ■ casual conversation about ■ pool or a pool heater or
 3 whatever, it's going to be with you most likely ■ he's
 4 going to be talking to pilots, right?
 5 MR. CRITTON: Form.
 6 THE WITNESS: Right.
 7 BY MR. EDWARDS:
 8 Q. Okay. And you feel like over the years your
 9 relationship with Jeffrey Epstein has been pretty good?
 10 A. Yes.
 11 Q. And you have been closer to him over the years
 12 ■ you've grown to know him?
 13 MR. CRITTON: Form.
 14 THE WITNESS: The same throughout the ■
 15 year. We never got any closer than 1991 than I am
 16 with him now. I'm very professional at what I do
 17 and know the line between being professional and
 18 thinking you're somebody's buddy.
 19 BY MR. EDWARDS:
 20 Q. Okay. So that's not something that you think
 21 you are? You don't think you're his buddy?
 22 A. No, sir.
 23 Q. Do you consider yourself his friend?
 24 A. I believe so.
 25 Q. Do you think he considers you his friend?

24

- 1 A. I think so.
 2 Q. All right. What makes you think that?
 3 MR. CRITTON: Speculation.
 4 THE WITNESS: He's always been kind and
 5 respectful.
 6 BY MR. EDWARDS:
 7 Q. Ever invited you to dinner?
 8 A. No, sir.
 9 Q. Have you ■ associated or socialized with
 10 him during the day at any of his homes?
 11 A. Only during a business reason.
 12 Q. Okay. What ■ the other — are the places
 13 that you believe that Mr. Epstein owns? I know we've
 14 talked about this Manhattan — the Manhattan house.
 15 I've read the articles about it, the Palm Beach mansion.
 16 But what other places are you familiar with that
 17 Mr. Epstein owns?
 18 MR. CRITTON: Form; predicate, speculation.
 19 THE WITNESS: To answer ■ honestly, I don't
 20 know specifically that he ■ any of the
 21 residences, ■ be honest. I would only assume that
 22 he owns. So ■ you want me ■ answer honestly, I
 23 don't know that he owns any of the other.
 24 BY MR. EDWARDS:
 25 Q. Okay. Well, what would be the basis for your

25

- 1 assumption that he owns the home in Palm Beach?
- 2 A. He goes there, but I don't assume -- you don't
- 3 have to own a house to go to it.
- 4 Q. And not only does he go there, you're [REDACTED]
- 5 that he spends the night there; he resides there
- 6 sometimes, correct?
- 7 A. Yes.
- 8 Q. When he's in Palm Beach, that's where he --
- 9 A. He sleeps.
- 10 Q. -- sleeps? Right. When he's in New York, do
- 11 you know where he sleeps?
- 12 A. No.
- 13 Q. But you've been to a particular house in New
- 14 York that's a very large house that we've [REDACTED] read about
- 15 that you picked up luggage at, right?
- 16 A. Yes, sir.
- 17 [REDACTED] CRITTON: Form.
- 18 BY MR. EDWARDS:
- 19 Q. And that home, do you know that -- I know that
- 20 you're saying that you haven't done a public record
- 21 search to make sure that Jeffrey Epstein owns it.
- 22 A. Yeah.
- 23 Q. But you assume that he does?
- 24 A. Assuming.
- 25 Q. That's where he sleeps when he's in New York?

26

- 1 MR. CRITTON: Form.
- 2 THE WITNESS: I assume.
- 3 BY MR. EDWARDS:
- 4 Q. That's where his luggage is when you pick it
- 5 up?
- 6 A. Doesn't mean he owns it.
- 7 Q. Right. But that's where [REDACTED] is?
- 8 A. Yes, sir.
- 9 Q. Do you know of anybody [REDACTED] who owns that home
- 10 in New York?
- 11 A. No.
- 12 Q. Okay. Have you been to his ranch in New
- 13 Mexico?
- 14 A. Yes.
- 15 MR. CRITTON: Form.
- 16 BY MR. EDWARDS:
- 17 Q. How many times have you been to his ranch in
- 18 New Mexico?
- 19 MR. CRITTON: Form; predicate.
- 20 THE WITNESS: A guesstimate, fifty times, only
- 21 due to the fact that we would fly there.
- 22 BY MR. EDWARDS:
- 23 Q. And where would you land?
- 24 A. Depending upon the aircraft, either
- 25 Albuquerque or Santa Fe.

27

- 1 Q. Are those private airports?
- 2 A. Public.
- 3 Q. Public, okay. Are there any private landing
- 4 places where you would land any airplanes in New Mexico?
- 5 A. There [REDACTED]
- 6 Q. That you have landed --
- 7 A. That I have.
- 8 Q. -- his airplanes?
- 9 A. Yes.
- 10 Q. Where?
- 11 A. We have a 4500-foot strip on the ranch.
- 12 Q. When you say "we," yourself and somebody?
- 13 A. The company.
- 14 Q. What company?
- 15 A. Well, I should say -- I see where you're going
- 16 with that. The ranch owns -- whoever owns the ranch.
- 17 The ranch has a runway on it.
- 18 Q. Okay. And you've landed an airplane on that
- 19 runway?
- 20 A. That ranch, yes.
- 21 Q. How many times do you think you've landed
- 22 there?
- 23 A. Ten.
- 24 Q. All right. And have you been inside his
- 25 ranch?

28

- 1 A. Yes.
- 2 MR. CRITTON: Form to the last question.
- 3 MR. REINHART: Can you clarify, the physical
- 4 ranch or the residences or the structures on the
- 5 ranch?
- 6 MR. EDWARDS: I don't have a good visual
- 7 appreciation for it.
- 8 BY MR. EDWARDS:
- 9 Q. Why don't you describe [REDACTED] in your words what
- 10 this ranch that we [REDACTED] talking about looks like. And
- 11 I've heard [REDACTED] referred to as the Zorro Ranch. Have you
- 12 heard that?
- 13 A. I've heard that.
- 14 Q. That's the ranch we're [REDACTED] familiar with,
- 15 we're talking about where the runway is and everything
- 16 else?
- 17 A. Yes.
- 18 Q. Describe it in your own words, the landscaping
- 19 of this ranch. What do we have on it?
- 20 A. There is a house up [REDACTED] the hill, a large
- 21 house.
- 22 Q. How big?
- 23 A. Big. I've read 40,000 square feet in the
- 24 paper.
- 25 Q. Have you been to it?

29

- 1 A. Yes.
 2 Q. Does that seem like it's feasible,
 3 approximately 40,000 —
 4 A. I think so, yes.
 5 Q. What else do we have on it?
 6 A. There is a compound that has kind of motel
 7 room type — they call it bunkhouse.
 8 Q. Where's the bunkhouse located?
 9 A. At the entrance to the ranch.
 10 Q. Okay. And what is that primarily used for?
 11 A. For the people that work on the ranch, they
 12 reside there. It's also a place where anybody that
 13 traveled the airplane would stay. It's kind of like,
 14 you know, a hotel room.
 15 Q. And how far that from the first house that
 16 you described, the 40,000 square foot house?
 17 A. It's probably 4 miles.
 18 Q. Okay. So the Zorro Ranch is a rather large
 19 area of property?
 20 A. Yes.
 21 Q. And how many times — I know you just talked
 22 about how many times you've been in the house, but how
 23 many times have you been on that ranch in New Mexico,
 24 the Zorro Ranch?
 25 A. Thirty to fifty times the years. That's

30

- 1 a guesstimate.
 2 Q. Is that over — when was the first time that
 3 you went to that ranch?
 4 A. A guess, I don't know when it was, actually,
 5 our first trip, but 1995/94.
 6 Q. Okay. And do you believe Jeffrey Epstein
 7 and/or a corporation owned or controlled by him be
 8 the sole owner of that ranch?
 9 A. I don't know any of those details.
 10 Q. Have you talked to Jeffrey Epstein about
 11 who owns that ranch?
 12 A. No.
 13 Q. Do you know of anybody else who may own that
 14 ranch?
 15 A. Not to my knowledge.
 16 Q. Other than Jeffrey Epstein, do you know of
 17 anybody else who regularly stays there when they're in
 18 New Mexico?
 19 A. Not to my knowledge.
 20 Q. Does Jeffrey Epstein stay there when you're in
 21 New Mexico?
 22 A. He has.
 23 Q. And he has a key to the place?
 24 A. I don't know if there's a key.
 25 Q. One way or another, he gets in, right?

31

- 1 A. Yes, sir.
 2 Q. And he sleeps there?
 3 A. Yes.
 4 Q. Okay.
 5 A. I assume he does.
 6 Q. You assume he sleeps?
 7 A. I do. I think.
 8 Q. Okay.
 9 MR. CRITTON: This is really —
 10 BY MR. EDWARDS:
 11 Q. Other than the pool heater in 1995, have you
 12 ever received any other gifts the top of the compensation
 13 from Mr. Epstein?
 14 A. I did get land on the ranch to build a house.
 15 Q. What do you mean you got land on the ranch?
 16 A. He deeded me land to build a home.
 17 Q. When was that?
 18 A. Ten years ago at least.
 19 Q. Do you know if he's deeded anyone else in
 20 this world land on the ranch to build a home?
 21 A. Not to my knowledge.
 22 Q. Why did he do that?
 23 A. We would vacation out there and my wife fell
 24 in love with New Mexico and we were looking for
 25 property.

32

- 1 Q. And did you talk to him about that?
 2 A. Yes. He knew I — he was aware I was looking
 3 for a home and he says, "Well, I have so much land, I
 4 could give you a spot to build a home on." So I built a
 5 house.
 6 Q. So how long has a home actually been on that
 7 property?
 8 A. Nine years.
 9 Q. And that's a home that you own?
 10 A. Yes, sir.
 11 Q. And that's a home that was — when I say "you
 12 own it," is there a mortgage on it or did he give it to
 13 you free and clear?
 14 A. No, no, I paid for the house. I made payments
 15 on it.
 16 Q. All right. So what did he actually give you?
 17 A. 40-acres of land.
 18 Q. That you did not have to pay for?
 19 A. You know, I'd have to go back and look. I
 20 think it was — I had to pay something for it. I don't
 21 remember.
 22 Q. How often have you visited that piece — that
 23 home that you own?
 24 A. My wife would spend summers out there with the
 25 kids.

33

- 1 Q. Okay. But that's on the Zorro Ranch?
- 2 A. Yes.
- 3 Q. So in addition to the 50 or ■ 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 ■ 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 ■ because he knew I ■
- 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 ■ — sure, he ■
- 20 a friend. I mean...
- 21 Q. Well, did ■ 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

34

- 1 40-acres?" I thought your ■ was, "I don't know,
- 2 I'd have ■ 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 ■ sum of
- 6 money, it was just for, you know, the legal purpose of ■
- 7 transfer of ownership of the land.
- 8 Q. Okay. If it was a substantial amount of
- 9 money, ■ 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 ■ 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 ■ the best of your knowledge, he's
- 20 never given anyone else land out there?
- 21 A. Not to my knowledge.
- 22 ■ CRITTON: Form.
- 23 BY MR. EDWARDS:
- 24 Q. All right. How big is this house that you
- 25 built on the ranch?

35

- 1 A. 1800 square feet.
- 2 Q. Were you ever at that house ■ the same time
- 3 when he's at his house that's ■ ■ 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 ■ point where ■ 2007 you ■ 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, ■ that on ■ 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 ■ couple other
- 17 gifts that have been given to you from Jeffrey Epstein
- 18 over the years; one is ■ pool heater in 1995 and ■
- 19 ■ 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

36

- 1 you feel ■ 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 ■ Zorro Development?
- 10 A. I believe that's the ranch, or at least it has
- 11 the ■ 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 ■ car

37

- 1 that I drive.
 2 Q. All right. You've worked for him for 18
 3 years. I don't know how long the Hummer would
 4 last, but presumably, that's not the you've had
 5 the entire 18 years. Have you always had a company car?
 6 A. No, I haven't, no.
 7 Q. When you get the Hummer?
 8 A. Probably three years ago.
 9 Q. Do any other members of Mr. Epstein's piloting
 10 team have company cars?
 11 A. No.
 12 Q. Only you?
 13 A. Yes.
 14 Q. And do you know how that decision made to
 15 get you a company vehicle?
 16 A. No.
 17 Q. What do you use that vehicle for?
 18 A. To and from the airport.
 19 Q. All right. Do you use it for personal reasons
 20 also?
 21 A. I guess, yes.
 22 Q. I mean, that's your primary vehicle?
 23 A. Yes, or I drive my wife's
 24 Q. Which is?
 25 A. Type of car?

38

- 1 Q. Yes.
 2 A. A Mercedes.
 3 Q. And is that something that was also a gift
 4 from Mr. Epstein?
 5 A. No, sir.
 6 Q. What type of Mercedes that?
 7 A. A ML 430, ten years old.
 8 Q. All right. Are there any other items --
 9 company car, the land in New Mexico, the pool heater --
 10 any other items that Mr. Epstein has given you over time
 11 compensation or reward anything else?
 12 A. No, sir.
 13 Q. And your only income is from Mr. Epstein or
 14 his companies?
 15 A. Correct.
 16 Q. Okay. And it's been that way since 1991?
 17 A. Yes.
 18 Q. How you meet Mr. Epstein or become
 19 involved with him in 1991?
 20 A. We heard at the airport that Mr. Epstein
 21 purchasing airplane when Dave Rogers and myself were
 22 living in Columbus, and had the opportunity
 23 interview with him, and did and got the job.
 24 Q. And this is before he owned the airplane?
 25 A. Yes.

39

- 1 Q. And which airplane that?
 2 A. The Hawker.
 3 Q. Does he still have the Hawker?
 4 A. No.
 5 Q. How long he have that plane?
 6 A. Five years, guesstimate, four or five years.
 7 Q. So sometime the mid '90s?
 8 A. Yes.
 9 Q. Did you keep any type of logs or documentation
 10 to who would have been flying on that airplane if you
 11 transported any individuals?
 12 A. The logs you possess now are the
 13 flight logs.
 14 Q. Okay.
 15 A. That's the standard for the industry.
 16 Q. So that's something you kept, that
 17 Dave Rogers kept?
 18 A. Dave Rogers.
 19 Q. Okay. If there any documents out there
 20 with names of passengers on any of the flights involving
 21 planes owned or controlled by Jeffrey Epstein and/or his
 22 companies, those would be documents in the possession of
 23 Dave Rogers and not yourself?
 24 A. Oh, corporation actually, they belong to.
 25 Q. Okay.

40

- 1 MR. REINHART: That a compound question.
 2 You might want to split it in half.
 3 MR. EDWARDS: Okay.
 4 BY MR. EDWARDS:
 5 Q. What documents do you believe exist that
 6 indicate of individuals that have been passengers
 7 Mr. Epstein's airplanes?
 8 MR. REINHART: Are going back all the way
 9 from '91 to the present?
 10 MR. EDWARDS: Sure.
 11 THE WITNESS: You're talking about the Hawker?
 12 BY MR. EDWARDS:
 13 Q. Any airplanes. What documents would there be?
 14 A. There would be the same: Flight logs and
 15 passenger manifests would exist.
 16 Q. And are either of those required?
 17 A. The flight log is required for the aircraft to
 18 track times and landings.
 19 Q. And in the flight log, is required that you
 20 designate the names of the passengers?
 21 A. No.
 22 Q. That's just something that Dave Rogers on
 23 his own?
 24 A. Everybody does that. It's more for Internal
 25 Revenue.

41

1 Q. Okay. If something happens, they know who ■
2 on the plane?
3 A. Exactly, weight and balance.
4 Q. Have you ■ kept any flight logs that have
5 ■ of people ■ the airplane?
6 A. When you say "kept," I have ■ out flight
7 logs ■ 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 ■ 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 ■ 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 ■ any of Jeffrey
22 Epstein's planes?
23 A. No.
24 Q. Either in the form of paper ■ on a computer?
25 A. No.

42

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 ■ 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 ■ he never
22 came up front, he knew who ■ 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?

43

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 ■ 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 ■ put in ■ 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 ■
16 other depositions where ■ -- 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, ■ you don't do that correctly, you have to
23 spool the engines up just prior ■ touching down
24 that -- because you're losing air speed and it's an
25 uncomfortable sound and feeling for the passengers

44

1 thinking that you're not going to make the runway.
2 And it ■ ■ 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 ■ discussed with you where he wants
9 you to be, whether that is "stay ■ the cockpit when I
10 have people ■ 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 ■ ■ 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?

45

- 1 A. Yes, sir.
 2 Q. How big of a plane is that?
 3 A. Large corporate jet.
 4 Q. How long has he had it?
 5 A. Fourteen years; 13, 14 years.
 6 Q. And other than the Gulfstream, what other
 7 airplanes does he have?
 8 A. When you say "he," obviously, these ■
 9 company-owned —
 10 Q. Jeffrey Epstein or his companies.
 11 A. A Boeing 727.
 12 Q. Well, I know that's ■ very large airplane. I
 13 think that's been described by other people, ■ I'm not
 14 going to have you do that. But there's partitions ■
 15 that airplane — in the back ■ of that airplane,
 16 right?
 17 A. Yes.
 18 Q. Several different partitions to where ■ the
 19 pilot comes out of the cockpit, you don't necessarily
 20 ■ all the passengers?
 21 A. Yes.
 22 Q. That's true?
 23 A. Yes.
 24 Q. Okay.
 25 MR. REINHART: Keep your voice up so she ■

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- 1 hear you.
 2 THE WITNESS: Oh.
 3 MR. REINHART: And so Mr. Willis ■ hear
 4 you.
 5 BY MR. EDWARDS:
 6 ■ Q. Other than the Gulfstream and the Boeing and
 7 the Hawker, what other airplanes has Jeffrey Epstein
 8 owned over the years?
 9 ■ A. That is it.
 10 Q. And currently still owns — or the companies
 11 associated with him own the Gulfstream and the Boeing?
 12 A. Yes.
 13 Q. And in the past two years, have you flown
 14 those two airplanes?
 15 A. Just for routine flights to keep them loose
 16 or, you know — you know what I mean.
 17 Q. Have those two airplanes been flown by anyone
 18 else in the last two years?
 19 A. No.
 20 Q. Have those two airplanes been flown in the
 21 last two years for any reason other than routine
 22 maintenance-type flights?
 23 A. We've had ■ — two flights I think in the
 24 past two years.
 25 Q. And what were the purposes of those flights

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- 1 and who was on the flights?
 2 A. One flight I believe we went to Sebring and
 3 another flight we went to Nassau, Bahamas.
 4 Q. And who did you go to Nassau, Bahamas with?
 5 A. I'd have to look at the flight log, but I
 6 think it was Sarah, Story and Nadia, I believe. I think
 7 that ■ the three passengers, to the best of my
 8 knowledge.
 9 Q. And it's my understanding that little
 10 St. James is ■ island that Jeffrey Epstein owns or
 11 controls?
 12 MR. CRITTON: Form.
 13 THE WITNESS: I don't know that he owns it.
 14 BY MR. EDWARDS:
 15 Q. Has he ever been to ■ island called Little
 16 St. James?
 17 A. Yes.
 18 Q. And have you been there with Jeffrey Epstein?
 19 A. I've been there when he was there.
 20 Q. Have you flown on an airplane with him to that
 21 destination?
 22 A. No.
 23 Q. All right. When you say you've been there
 24 when he ■ there, how did that come about?
 25 A. We flew into St. Thomas and then ■ flew to

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- 1 Little St. James in a helicopter.
 2 Q. And do you fly the helicopter ■ well?
 3 A. Yes.
 4 Q. How many helicopters are owned ■ controlled
 5 by Jeffrey Epstein and/or corporations associated with
 6 him?
 7 MR. CRITTON: Form.
 8 THE WITNESS: At this time, one.
 9 ■ BY MR. EDWARDS:
 10 Q. And has that helicopter been flown in the last
 11 two years?
 12 A. Just for routine maintenance.
 13 Q. And when you and -- let's say when Sarah
 14 Kellen and Story Cowells and Nadia flew to Nassau, do
 15 you know the purpose of that trip?
 16 A. No.
 17 Q. How long did you stay?
 18 A. Five hours.
 19 Q. Did you pick anybody up there?
 20 A. No. Meaning passengers?
 21 Q. Yes.
 22 A. No.
 23 Q. What happened? You landed the airplane and
 24 then what?
 25 A. The passengers left. Dave and I went and had

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1 lunch. The passengers showed up and ■■■ 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 ■ that
 6 home?
 7 A. I don't know that for a fact.
 8 Q. Okay. Do you believe that he ■ the owner ■
 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 ■ 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, ■ 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 ■ 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 ■ 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 ■ well, ■ you on the flight
 23 with him, and I thought your ■ 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 ■ 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 ■ 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 ■ 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 ■ boat to the island. But
 18 normally the helicopter's located ■ 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 ■ —
 2 Q. Well, he either stays there or someone else
 3 picks him up in ■ helicopter or he swims away?
 4 A. Correct.
 5 Q. Okay. You stay on St. Thomas?
 6 A. Yes.
 7 Q. Okay. ■ a place that you've stayed on
 8 St. James, ever?
 9 A. No, I've ■
 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 ■ 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

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- 1 or a stereo.
 2 Q. And do you know Les Wexler?
 3 A. No, I don't.
 4 Q. Have you met him before?
 5 A. I have met him.
 6 Q. Do you know of any relationship between Les
 7 Wexler and Jeffrey Epstein?
 8 A. I don't know what -- to what extent they have
 9 a relationship, no.
 10 Q. Do you know if they know one another?
 11 A. I don't know that for a fact. They talk to
 12 one another, so I would assume. But I don't know to --
 13 Q. How do you know they talk to one another?
 14 A. I've them speak to one another the
 15 foot of the airplane.
 16 Q. All right. Have you ever flown the
 17 airplane -- any of the airplanes with Les Wexler a
 18 passenger?
 19 A. No.
 20 Q. Have you flown the airplanes with Sarah
 21 Kellen a passenger?
 22 A. Yes.
 23 Q. And do you know Sarah Kellen?
 24 A. Yes.
 25 Q. And for how long have you known Sarah Kellen?

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- 1 A. I'm guessing, six years. I mean, don't hold
 2 me to it. I'm not the greatest on length of times, but
 3 six, seven years, I think.
 4 Q. How you meet her?
 5 A. I guess I was introduced. She on a flight
 6 of ours.
 7 Q. You introduced to her by whom?
 8 A. She may have introduced herself. I mean,
 9 you're going back a ways. I don't know the official
 10 introduction, how I went.
 11 Q. And to your knowledge, what is her -- is she
 12 associated or affiliated in some way with Jeffrey
 13 Epstein?
 14 MR. CRITTON: Form.
 15 THE WITNESS: I would assume so. I don't know
 16 to what level or what actually her job description
 17 is.
 18 BY MR. EDWARDS:
 19 Q. All right. Well, how many flights have you
 20 flown where she and Jeffrey Epstein have been passengers
 21 together on of the airplanes that we've been
 22 discussing?
 23 A. I'd only be guessing again.
 24 Q. We're talking hundreds of flights, though?
 25 A. Sure, sure, a lot of flights.

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- 1 Q. It seems to be -- I mean, you seem like
 2 somebody who has common sense. It like somebody
 3 that knows Jeffrey Epstein?
 4 MR. CRITTON: Form.
 5 BY MR. EDWARDS:
 6 Q. Correct, Sarah Kellen?
 7 A. Yes.
 8 Q. All right. And do you believe that there is a
 9 business relationship there a personal relationship
 10 there, from your observations?
 11 A. I'd only be speculating. When they get on the
 12 airplane, my focus is forward and flying safely. So I
 13 don't -- you know, I'd only be guessing at either one of
 14 those two.
 15 Q. Okay. Have you ever socialized with Sarah
 16 Kellen?
 17 A. No.
 18 Q. Other than speaking with her on the airplane,
 19 have you spoken with her elsewhere?
 20 A. Over phone, in passing, I mean, walking
 21 down street in New York. I mean, yes.
 22 Q. Why would you call Sarah Kellen or why would
 23 she call you?
 24 A. She would call to schedule the aircraft for
 25 a departure.

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- 1 Q. And have you ever called her?
 2 A. Yes.
 3 Q. When's the time you talked Sarah
 4 Kellen?
 5 A. A week ago.
 6 Q. What was the occasion?
 7 A. We were discussing carpet for one of the
 8 aircraft.
 9 Q. And where was she when you talking with
 10 her?
 11 A. I don't know. It the phone.
 12 Q. Did she call you or you call her?
 13 A. No, I called her her cell.
 14 Q. Okay. And that's a New York number?
 15 A. I don't know. It's on speed dial.
 16 Q. Do you have your phone with you?
 17 A. Yes.
 18 Q. Could you tell me what that number is?
 19 A. Sure.
 20 Q. Thanks.
 21 A. Sure. (917)855-3363.
 22 Q. Which airplane you discussing carpeting
 23 for?
 24 A. Was actually -- actually, it for the
 25 helicopter. Now that I'm thinking about it, the

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1 helicopter.
 2 Q. In the last two years, did you tell me the
 3 helicopter has flown?
 4 A. Yes.
 5 Q. And where to?
 6 A. I have flown the helicopter to Fort Lauderdale
 7 on several occasions for maintenance. I've flown it to
 8 Miami. And I try to fly the helicopter at least every
 9 two weeks just either by myself to run ■ up to ■ --
 10 it's important that ■ keeps moving.
 11 Q. Other than maintenance-type flights, have you
 12 flown the helicopter in the last couple of years?
 13 A. Yes.
 14 Q. And who ■ on the helicopter?
 15 A. I flew to Miami with Mr. Epstein.
 16 Q. When was that?
 17 A. It was ■ couple weeks ago or a month ago, I
 18 think.
 19 Q. For what?
 20 A. Sorry?
 21 Q. For what occasion?
 22 A. I think he had a meeting with his attorneys in
 23 Miami.
 24 Q. Today is October the 15th. Is this during the
 25 month of October that you had this flight in the

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1 helicopter with Mr. Epstein?
 2 A. I'd have to look at the book to be exact for
 3 you.
 4 Q. Okay. But it's either the end of September or
 5 the beginning of October?
 6 A. Yeah.
 7 Q. How do you know that he ■ meeting with his
 8 attorneys?
 9 A. I believe that he had mentioned that he was
 10 meeting his attorneys.
 11 Q. Did he tell you why?
 12 A. No.
 13 Q. Why did he tell you he ■ meeting with his
 14 attorneys? Did you ask him?
 15 A. No.
 16 Q. Okay. That's just something that he said to
 17 you in conversation?
 18 A. Yes, sir.
 19 Q. Was there anyone else on the airplane besides
 20 you and Mr. Epstein?
 21 A. Yes.
 22 Q. Who was that?
 23 A. Nadia.
 24 Q. Nadia who?
 25 A. Nadia Marcinkova.

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1 Q. How long have you known Nadia Marcinkova?
 2 A. I don't know, five years. A guess again,
 3 four, five years.
 4 Q. Do you know what her relationship is, if any,
 5 with Jeffrey Epstein?
 6 A. I do not know.
 7 Q. Do you know if she knows Jeffrey Epstein?
 8 A. I would assume so. They talk. I would
 9 imagine she knows him.
 10 Q. And how many times has she been on the
 11 airplane or the helicopter on flights at the same time
 12 ■ a passenger with Jeffrey Epstein?
 13 A. Many. I'd have ■ look at the logs.
 14 Q. Hundreds of times?
 15 MR. CRITTON: Form.
 16 THE WITNESS: Sure.
 17 BY MR. EDWARDS:
 18 Q. If you were going to, as somebody who has been
 19 Jeffrey Epstein's pilot for 18 years, tell ■ today who
 20 the five closest people are to Jeffrey Epstein, would
 21 Nadia be one of them?
 22 MR. CRITTON: Form.
 23 THE WITNESS: I'd only be guessing and
 24 speculating. I have no idea.
 25

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1 BY MR. EDWARDS:
 2 Q. Okay. Well, ■ his pilot and the person who
 3 travels with Jeffrey Epstein on the majority of his
 4 flights, who ■ the people who travel most frequently
 5 with Jeffrey Epstein?
 6 A. I'd have to look at the logs.
 7 MR. REINHART: Can ■ get a time period?
 8 BY MR. EDWARDS:
 9 Q. In the last ten years, which people travel
 10 most frequently with him?
 11 A. I'd have to look ■ the flight logs to give
 12 you ■ accurate answer.
 13 Q. You can't give me one single name of somebody
 14 who you would say is a frequent flyer?
 15 A. Sarah.
 16 Q. Sarah Kellen?
 17 A. Yes.
 18 Q. Anybody else?
 19 A. Nadia.
 20 Q. Nadia Marcinkova?
 21 A. Yeah.
 22 Q. Okay. Anybody else?
 23 A. Just mainly those two.
 24 Q. How about Ghislaine Maxwell?
 25 A. Not for some time.

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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 ■ on.
11 Q. And do you know where Nadia Marcinkova is
12 staying these days?
13 A. No.
14 Q. Do you know what ■ she's driving these days?
15 A. No, I don't.
16 Q. Okay. Do you know ■ she's living with
17 Jeffrey Epstein these days?
18 A. I don't know that.
19 Q. Do you know how Nadia Marcinkova ■ 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 ■ clarify? You mean with
2 Mr. Epstein or --
3 MR. EDWARDS: No.
4 BY MR. EDWARDS:
5 Q. Did you ■ bring Nadia Marcinkova from some
6 foreign country into the United States?
7 A. I'd have to look ■ 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 ■
20 together?
21 A. You know, I don't remember. I was out ■ the
22 helicopter and I think they both started walking up. So
23 I don't know if they ■ 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 ■ 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. ■ that typical when they are ■
10 flights together, especially with the helicopter, where
11 you're ■ pretty close quarters, that they would abstain
12 from speaking to ■ another?
13 MR. CRITTON: Form.
14 THE WITNESS: Yeah, it would be typical. It's
15 very noisy and communicating in ■ 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 ■ single specific
2 conversation between Jeffrey Epstein and Nadia
3 Marcinkova?
4 A. An honest answer, no.
5 Q. Okay. And the ■ for Sarah Kellen; have you
6 seen or -- have you seen Jeffrey Epstein speak with
7 Sarah Kellen?
8 A. I've ■ him speak with her, yes.
9 Q. Can you tell me ■ 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 ■ 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

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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 ■■■■ talked to you about massage therapy ■ 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 ■
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 ■■■■ that's what I'm talking about, right?
16 A. That was last year?
17 Q. Well, it ■■■■ 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 ■■■■ weren't --
25 it wouldn't be proper to even bring it up.

66

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 ■■■
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 ■ 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 ■■■■■

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

25 Q. Or engaged in any sexual acts with underage

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1 women?
2 MR. CRITTON: Form.
3 THE WITNESS: No.
4 BY MR. EDWARDS:
5 Q. You think that this ■ just ■ story that ■
6 bunch of underage women have made up?
7 A. Speculation.
8 MR. CRITTON: Objection. Now it's
9 argumentative. Who gives ■ damn 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 ■
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

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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 ■■■ REINHART: I'm going to instruct him not
6 to answer. Move on.
7 ■■■ EDWARDS: Is there ■ 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 ■ the record
13 right now that it ■ -- we ■ allowed discovery
14 into ■ RICO count. We ■ also allowed discovery
15 into the intent of Mr. Epstein in developing ■
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, ■ well as many
22 other witnesses with -- to insure his protection
23 from law enforcement that they not ■ these
24 specific questions. And thus, ■ opinions and
25 beliefs of all of these witnesses that we ■

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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 ■■■ go to the
8 Court.

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

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

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 ■■ 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 ■■ to what his

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

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

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

17 MR. REINHART: Absolutely. Make your record.

18 BY MR. EDWARDS:

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

21 A. I have no ■■■ to believe.

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

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

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

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

8 MR. EDWARDS: Let's break ■■

9 (A break ■■ had at 11:28 a.m.)

10 BY MR. EDWARDS:

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

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

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

20 A. Yes.

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

24 A. What time frame?

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

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1 you would classify as Jeffrey Epstein's friend?

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

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

6 A. Yes.

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

10 A. No.

11 Q. No idea?

12 A. No.

13 Q. Ever asked him?

14 A. No, actually.

15 Q. Ever been curious?

16 A. Sure.

17 Q. Ever done anything to satisfy that curiosity?

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

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

25 A. No, sir.

73

1 Q. I was produced this flight log -- me if
 2 I'm using wrong term. What is this called, book
 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 I
 6 always in a book, maybe that's why you haven't
 7 it. Tell me what we're looking at.
 8 A. Well, judging with the at the bottom, I
 9 believe this is Dave's flight log, log book.
 10 Q. I didn't know it called a flight log.
 11 A. Pilot log book, how's that? That's the
 12 appropriate name.
 13 Q. It was marked Composite Exhibit 1 in
 14 Roger's deposition, as indicated by the exhibit sticker.
 15 We'll mark it the same in your deposition well.
 16 MR. CRITTON: Why don't you refer to it
 17 his?
 18 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 being on the airplane and I want to ask you

74

1 you know who they are. This person right here is Cindy
 2 Lopez. It like she flew on 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 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, I know the
 14 If she walked in here right now, I would probably
 15 look right through her, 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 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.

75

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 8th, 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 you keep that?
 25 MR. REINHART: This is it.

76

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 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 recreate
 12 what you've got and send it to us so 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 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 and send it back to you.
 21 MR. REINHART: I have a copy. just doesn't
 22 have the exhibit sticker on.
 23 MR. EDWARDS: That's what told to me the
 24 other day, that's why I took it.
 25 MR. CRITTON: I want something -- I just don't

77

1 want to -- ■ you give me ■ 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, ■ 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.

78

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 ■ varied between -- if we look a
 5 few lines down, Jeffrey Epstein and Ghislaine Maxwell
 6 ■ the only two passengers. Certainly there ■
 7 flights like ■ 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 ■ 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 ■ 25, but there
 20 ■ 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

79

1 that is, does it?
 2 A. No.
 3 Q. Okay. Do you know what ■ 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 ■ about ■
 8 Cindy Lopez gets on that flight? How does she even know
 9 there's ■ 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 ■ flight that has ■ Clinton, four
 14 Secret Service agents and then instead of listing names
 15 ■ initials or anything else, it's just listed as two
 16 males, ■ 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 ■ Clinton gets ■ 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

80

1 Bill Clinton's going to be ■ 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, ■ would put a little ■ catering ■ board ■
 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, ■
 21 Q. Do you remember him being on the airplane with
 22 younger girls?
 23 MR. CRITTON: Form.
 24 THE WITNESS: No.
 25

81

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 ■■■ 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 ■■■ 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 ■■■ one of these flights. I
 17 mean, you have to, I guess, know that Jeffrey Epstein
 18 has ■■■ 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 ■■■ --
 21 A. Well, it's not publicly offered, no. It would
 22 be no different than you jumping in your ■■■ 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 ■■■ out there to get

82

1 onboard a flight.
 2 Q. Does Jeffrey Epstein charge these people ■■■
 3 passengers?
 4 A. I don't know.
 5 Q. Okay. Are these people such as Bill Clinton,
 6 does that ■■■ that ■■■ 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 ■■■ 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 ■■■ 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 ■■■ this flight?
 21 A. I don't know to what extent or what his
 22 relationship is. He just ■■■ ■■■ passenger ■■■ the
 23 airplane.
 24 Q. Okay. And the next day -- sorry, two days
 25 later on the 19th of March, Bill Clinton flies again,

83

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 ■■■ 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 ■■■ together, even for a day or ■■■
 25 night?

84

1 A. No.
 2 Q. Did you ever hear that Doug Band and Ghislaine
 3 Maxwell ■■■ the people attributed to introducing Bill
 4 Clinton and Jeffrey Epstein?
 5 MR. CRITTON: Form.
 6 THE WITNESS: I don't know.
 7 BY ■■■ EDWARDS:
 8 Q. All right. There's another flight here on
 9 January -- I can't read this upside down. Maybe ■■■ 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 ■■■ 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 ■■■ ■■■ some of the passengers on
 23 the flights, correct?
 24 A. Mm-hmm, yes.
 25 Q. And still, ■■■ you sit here, you being the

85

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 ■ 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 ■
 23 regular flyer for any period of time in Jeffrey
 24 Epstein's life?
 25 A. Not a regular.

86

1 Q. Okay. Jean Luc Brunel, is that a name that
 2 you know?
 3 A. Yes.
 4 Q. How ■ you know that name?
 5 A. Only because it's a unique ■ 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 ■ 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 ■ in the paper, have
 18 you ever talked to Jean Luc Brunel ■ Jeffrey Epstein
 19 about owning or running or managing ■ modeling company?
 20 A. No.
 21 Q. Do you know ■ Jeffrey Epstein's ■
 22 with the modeling company that's owned, run ■ managed
 23 by Jean Luc Brunel?
 24 A. No, I have ■ idea.
 25 Q. And seeing that this is ■ flight now, that

87

1 we're referring to the ■ flight on June 21st of 2002,
 2 that includes Jean Luc Brunel, Virginia Roberts, Jeffrey
 3 Epstein, Ghislaine Maxwell, Sarah Kallen, those ■ the
 4 passengers of this flight, does ■ to jog your
 5 memory ■ to who Virginia Roberts is?
 6 A. No. I mean, you ■ how frequently we fly. I
 7 mean, it's — the passengers ■ 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 ■ the pilot, is there any way that
 11 you would know what's going ■ in the back of the
 12 airplane?
 13 A. No. My ■ all ■ 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

88

1 frequent passenger?
 2 A. Who ■ 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 ■ He may have ■ on the
 8 airplane ■ 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 ■ 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?

89

1 A. No. The ■■■ that would launch it first --
 2 MR. CRITTON: Could I ask you ■ question? You
 3 have the original exhibit marked ■ 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 ■ to you,
 18 I'm giving you my work product ■ well. I don't
 19 see how this works against you, but anyway.
 20 BY MR. EDWARDS:
 21 Q. Melissa Stall, ■ 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, ■ is that why

90

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 ■ 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 ■ the airplane. But the ■■■ that you

91

1 ■■■ her name, that doesn't change your opinion as to
 2 whether ■ not you remember her ■ 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 ■ 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 ■ 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,

92

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 ■ ■ 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 ■ in the cockpit and said hello.
 14 So they conversed, nothing more.
 15 Q. Another ■■■ that is ■ here a few times, I'm
 16 specifically referring right ■■■ 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 ■ our airplane.
 21 Q. Right now that is the first time that you
 22 remember Ron Burkle being ■ your airplane?
 23 A. Yeah.
 24 Q. You don't know the purpose for him being on
 25 that airplane?

93

- 1 A. No. Granted, I'm seeing this for [REDACTED]
 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 [REDACTED] chief pilot for Mr. Epstein, and [REDACTED] you're [REDACTED]
 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. [REDACTED] 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 [REDACTED] on the

94

- 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 [REDACTED] 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 [REDACTED] 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 [REDACTED] 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 [REDACTED] under the
 22 age of 18, right?
 23 MR. CRITTON: Form.
 24 THE WITNESS: I don't remember those flights.
 25

95

- 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 [REDACTED] of 18?
 5 MR. CRITTON: Form.
 6 THE WITNESS: Well, I would have to look [REDACTED]
 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 [REDACTED] all.
 12 Q. Were you [REDACTED] that you, as pilot, [REDACTED]
 13 transporting girls under the age of 18 who were supposed
 14 to be models?
 15 MR. CRITTON: Form.
 16 THE WITNESS: I had [REDACTED] 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.

96

- 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 [REDACTED] 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 tell you how he [REDACTED] 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 [REDACTED] lists generically two females or three females or six
 18 females, do you know why that [REDACTED] done?
 19 A. Just because [REDACTED] didn't know our -- the
 20 person's name. We tried to do the best [REDACTED] 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

97

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 mentioning putting the

9 down, when you said female or male, you know, I

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,

98

1 when you say -- 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

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 -- 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 corporate

20 documents of either JECE 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

99

1 the airport office 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 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 that passenger manifest would

16 you list also generically female or male?

17 A. Yes. That the document I referring to

18 stating that we didn't know a person, did not go

19 out of our way to find out a name. We just put to

20 account for how many people were the aircraft 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

100

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 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

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 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 in jail, right?

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

20 Q. Okay. You know in order to go 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 visiting the jail and

101

1 you ■■■ visiting and you happened to bump into each
2 other. You actually went to ■■■ him while he was ■■■
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 ■■■ 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 ■■■ revolved around
24 it, yes.
25

102

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 ■■■ Jack Goldberger's
12 office, or it may have been downtown ■■■ the Palm Beach
13 County Courthouse or something in that ■■■ there.

14 Q. Okay. So ■■■ 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.

103

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 ■■■ started existence.

5 Q. And did you turn them ■■■ from 1991 ■■■ 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 ■■■ copy of any of
10 those materials?

11 A. No.

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

15 A. That ■■■ 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 ■■■ 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 ■■■ out. That's —

104

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 ■■■ year and a half ■■■ 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, ■■■ Darren
8 Indyke or ■■■ at NES, LLC; is that correct?

9 A. Correct.

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

13 A. Sure.

14 Q. And NES, LLC's address ■■■ 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

105

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 ■ 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 --

106

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, ■ 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 ■ the middle there, yeah.
 9 Q. Okay. How can ■ 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 ■ 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 ■ long ago. I may have said

107

1 hello.
 2 Q. That's somebody who ■ on the airplane
 3 multiple times?
 4 A. More than once. I mean, I have ■ 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 ■
 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, ■ 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 ■ it. I'm talking about

108

1 this line, FBI, ■ 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 ■ 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 ■ the chef.
 22 Q. And Magale Blanchen (phonetic), ■ that
 23 somebody you know to ■ a model these days?
 24 A. I have no idea.
 25 Q. Do you remember that flight?

109

- 1 A. No.
 2 Q. Do you remember Naomi Campbell, picking her up
 3 from St. Thomas along with Jean Luc Brunel?
 4 A. I remember her being on board. I don't
 5 remember the flight.
 6 Q. Do you know Joel Pashcow?
 7 A. Yes.
 8 Q. How do you know him?
 9 A. He was on the airplane.
 10 Q. And is that somebody you knew at one point in
 11 time to be a friend of Jeffrey Epstein's?
 12 A. He was on the airplane. I don't know what the
 13 relationship was.
 14 Q. Do you know what the relationship was today?
 15 A. No idea.
 16 Q. How about Todd Mister, do you know what that
 17 relationship is or was today?
 18 A. No.
 19 Q. Do you remember him?
 20 A. No.
 21 Q. Not at all?
 22 A. I mean, I know the name. I don't know.
 23 Q. Paula Epstein, do you know who that is?
 24 A. Yes.
 25 Q. Who is that?

110

- 1 A. That's Jeffrey's mom.
 2 Q. She's passed away?
 3 A. Yes.
 4 Q. At least that's your understanding, right?
 5 A. That's what I heard, yes.
 6 Q. Okay. Tila Davies, do you know her?
 7 A. Tila Davies, I know her.
 8 Q. Somebody who flew on the airplane with some
 9 regularity?
 10 A. Yes.
 11 Q. And do you know her to be friends of Ghislaine
 12 Maxwell or Nadia Marcinkova or Jeffrey Epstein?
 13 MR. CRITTON: Form.
 14 THE WITNESS: I have no idea who she was
 15 friends with.
 16 BY MR. EDWARDS:
 17 Q. All right. Do you know what role she ever
 18 played, or she played one, in Jeffrey Epstein's life?
 19 A. No.
 20 Q. All right. Glenn Dubin, was you familiar with
 21 him?
 22 A. Yes.
 23 Q. How do you know Glenn Dubin?
 24 A. I met him on the airplane.
 25 Q. Outside of the airplane, have you ever seen

111

- 1 him around Jeffrey Epstein?
 2 A. No.
 3 Q. All right.
 4 A. No.
 5 Q. Alina Webber, do you know that name?
 6 A. No.
 7 Q. She was on several flights. You don't
 8 remember seeing her?
 9 A. No.
 10 Q. All right. And how about Alan Dershowitz, I'm
 11 sure you know who that is?
 12 A. Sure. He's famous.
 13 Q. What was your understanding of Alan
 14 Dershowitz's relationship with Jeffrey Epstein?
 15 A. Never talked about it.
 16 Q. Forrest Sawyer, do you know why he was on your
 17 airplane?
 18 A. Never heard the name, actually.
 19 Q. Really?
 20 A. No.
 21 Q. Larry Summers?
 22 A. I know the name. I don't remember flying him.
 23 Q. Have you ever talked to Joe Fontanela?
 24 A. Yes.
 25 Q. How do you know him?

112

- 1 A. He usually drops Jeffrey off at the airport.
 2 Q. In fact, you've called him directly before,
 3 right?
 4 A. Yes.
 5 Q. You have his number?
 6 A. I haven't -- yes, I think I still got it in my
 7 memory.
 8 Q. Okay. What is it?
 9 A. It's been a few years. (917)945-7500. It's
 10 kind of an easy one.
 11 MR. CRITTON: 917 is the first --
 12 THE WITNESS: Yes.
 13 MR. CRITTON: Who is this for?
 14 MR. REINHART: Joe, Joe Fontanela.
 15 MR. EDWARDS: Fontanela.
 16 BY MR. EDWARDS:
 17 Q. Do you know his address, where he resides?
 18 A. No, I don't.
 19 Q. Do you know if he -- what his role was in
 20 Jeffrey Epstein's life?
 21 A. Not really. He just -- he drove the car.
 22 Q. He drove what car?
 23 A. The car up in New York.
 24 Q. Okay. Do you know if he's a housekeeper up at
 25 that house up in New York?

113

- 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 [REDACTED] that our registration
 17 for the helicopters is under, Air Ghislaine.
 18 Q. Is that somebody who's [REDACTED] paid you, [REDACTED]
 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. [REDACTED] him [REDACTED] the airplane.
 25 Q. What is your understanding of his affiliation

114

- 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 [REDACTED] the airplane?
 8 A. I don't even know the [REDACTED]
 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 [REDACTED] on several -- it's a common first
 15 name. I'm not familiar really [REDACTED] who that is.
 16 Q. What about Bella, do you know who Bella is?
 17 Is that [REDACTED] 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 [REDACTED] 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.

115

- 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 [REDACTED] of these individuals [REDACTED] 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 [REDACTED] role in
 8 Jeffrey Epstein's life, or [REDACTED] 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 [REDACTED] 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...

116

- 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 [REDACTED]
 9 that I'm not really not [REDACTED] 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 [REDACTED] 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.

117

1 Q. What would be ■■■■■ you called Sarah
2 Kellen?
3 ■■■ 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 ■■■ 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 ■■■■■ time.
20 Q. What made you stop calling Ghislaine Maxwell
21 where you thought at one point in time you thought she
22 ■■■ a person to call related ■■■ 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 ---

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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 ■■■ 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 ■■■ exhibit so that we can ■■■ 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 ■■■ dated
19 March 5th, 2005. Do you remember making this telephone
20 call? And just for the record, this looks like ■■■
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

119

1 BY MR. EDWARDS:
2 Q. Do you remember making that phone call after
3 reading the message?
4 A. Let ■■■ 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 ■■■ 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 (Plaintiffs Exhibit Nos. 2 AND 3 ■■■ 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 ■■■ make the representation that this
24 was message pads provided by the ■■■ attorney's office
25 relative to the criminal investigation revolving around

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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 ■■■ out -- "convention center with new
9 boat. They ■■■ 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 ■■■ the
15 center."
16 BY MR. EDWARDS:
17 Q. ■■■ you remember making that call?
18 A. No. I mean, "Tom from Midnight Express is at
19 convention center with new boat. They ■■■ two parts
20 of" -- I mean --
21 Q. But as Jeffrey Epstein's pilot, why would you
22 be leaving such ■■■ 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 ■■■ do with, you know, that moves. So I mean,

121

1 I...

2 Q. Okay. When you say "you help out with boat

3 purchases," what do you mean?

4 A. Give my opinion, whether or not whether to buy

5 a certain boat. It's just a hobby. I have knowledge ■

6 boats. Not only just airplanes but, you know.

7 Q. You give your opinion to whom?

8 A. To Jeffrey.

9 Q. Okay. And Jeffrey Epstein obviously, at ■

10 in your mind, you believe he wants your opinion?

11 A. Yes.

12 Q. Okay. So boats ■ another thing that the two

13 of you have discussed?

14 A. Yes.

15 Q. All right. And so this ■ conversation or at

16 least ■ evidence that a conversation existed between

17 yourself and Jeffrey Epstein relative to a boat or ■

18 boat show?

19 A. Correct.

20 Q. Do you remember having that conversation?

21 A. We've had many conversations about boats and

22 different boat shows. If you're referring to this one

23 in '05, I don't recall this one.

24 Q. Okay. So aside from being a pilot — which

25 throughout this entire deposition I believe your

122

1 testimony has been, you know, you're just ■ pilot for

2 him — it looks like there's some other role that you're

3 playing here in his life. I'm not suggesting that you

4 ■ or you ■ not. I'm just saying from the appearance

5 of this, it looks that way. Is there anything else that

6 you want to tell me or that you want to clarify in terms

7 of the role that you play in Jeffrey Epstein's life

8 outside of being just his pilot?

9 MR. REINHART: Let me object ■ form. He also

10 told you he installs the audio and video equipment

11 before.

12 MR. EDWARDS: Correct.

13 THE WITNESS: I have an interest in boats.

14 You know, with the island, I don't think I bought

15 any boats, you know, for the company, but he

16 appreciates my opinion on boat purchases.

17 BY MR. EDWARDS:

18 Q. Okay.

19 A. Having the knowledge of aviation and things

20 that move quite fast. So I have consulted with him on

21 boat items.

22 Q. How many boat purchases are you ■ of

23 Jeffrey Epstein making in the time period that you've

24 known him?

25 A. Two or three.

123

1 Q. And ■ ■ consulted ■ you on ■ of those

2 purchases?

3 A. Not every ■ of them, no.

4 Q. Does he ■ any boats ■ that you're ■

5 of?

6 A. I don't know ■ he ■ them or not.

7 Q. Okay. Do you know of any boats that he

8 controls or maintains?

9 A. Himself or?

10 Q. How about this — I'll ask you this way. I

11 don't want to split hairs with you here: I know we've

12 been talking about corporations and things like that.

13 A. Yes he.

14 Q. Do you know of any boats that he is the person

15 with the most control over?

16 A. Yes.

17 Q. Okay. Where would those boats be located and

18 what kind of boat are we talking about?

19 A. St. Thomas is the location. It would ■ a

20 34-foot inflatable boat. I know that one specifically.

21 Q. Okay. Do you know when he made that purchase?

22 A. Eight years ago, ■ years ago. It was a

23 while ago.

24 Q. Is that something you had had input in?

25 A. Not ■ that ■ specifically, no.

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1 Q. ■ there any other boat that you know of

2 Jeffrey Epstein being the primary ■ of or the primary

3 controller of?

4 A. I mean, there's boats in St. Thomas. I mean,

5 it's not part of my job, you know, what goes on with the

6 boats or who controlled them. It's more of ■ opinion

7 of what horsepower should ■ on ■ back of the boat,

8 hull designs. It's out of my area.

9 Q. But your sole responsibility or your sole

10 obligation that you have ever had with Jeffrey Epstein

11 relative to boats ■ just giving some opinions about the

12 boat?

13 A. Mm-hmm.

14 Q. ■ that yes?

15 A. Yes, yes.

16 Q. Okay. All right. Has he ever given you his

17 opinions about boats?

18 A. Sure. We've discussed it back and forth.

19 Q. Other than boat conversations, have you ever

20 talked other conversations, such as —

21 A. Cars.

22 Q. Okay. How about such ■ — have you ever

23 known Jeffrey Epstein to have a girlfriend, somebody you

24 consider ■ girlfriend?

25 A. No.

125

1 Q. In the 18 years and all the travels you had
2 with him, do you know anything about Jeffrey Epstein's
3 life?
4 A. No.
5 Q. Do you know who he has with?
6 A. No.
7 Q. Do you know if he has with anybody?
8 A. I don't know.
9 Q. Do you know if he's ever had sex on the
10 airplane while you've been piloting it?
11 A. I have no idea.
12 Q. That's something that you just wouldn't know
13 because you're up in the cockpit?
14 A. That is correct.
15 THE WITNESS: Could I take a two-minute
16 bathroom break just to lose my coffee?
17 MR. EDWARDS: Sure.
18 (A break was had ■ 12:35 p.m.)
19 BY MR. EDWARDS:
20 Q. All right. We're back on the record. Over
21 the years you've indicated ■ the — any gifts or
22 other items or things given to you by Jeffrey Epstein
23 exclusively ■ the pool heater, the 40-acres of land
24 and the —
25 A. Use of a company —

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1 Q. — and the use of a company car?
2 A. Yes.
3 Q. That's it?
4 A. (Nodding.)
5 Q. Okay.
6 A. Yes, I'm sorry, yes.
7 Q. And the flight to Miami that ■ recently
8 taken, other than Jeffrey Epstein and Nadia Marcinkova,
9 was there anybody else ■ that flight?
10 A. No.
11 Q. How long — did you also fly them back from
12 ■ to Palm Beach?
13 A. No. He drove back.
14 Q. When you say "he drove back," who drove back?
15 A. Well, I assume he drove back. I did not fly
16 him back.
17 Q. When's the next time you saw him again?
18 A. I would only be guessing. A week later, I
19 mean.
20 Q. Okay. And ■ that in Palm Beach County when
21 you saw him the next time?
22 A. Yes, sir.
23 Q. Do you know of him leaving Palm Beach County
24 in the last two years on any other occasion?
25 A. No.

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1 Q. Did he ■ fly anywhere else with you either
2 by helicopter or airplane in the last two years?
3 A. We flew one time to the Sikorsky plant.
4 Q. What's the Sikorsky plant?
5 A. That's where they build the Sikorsky
6 helicopters. It's in Palm Beach County.
7 Q. And when ■ that?
8 A. Probably a month ago, I'm guessing.
9 Q. For what purpose?
10 A. They gave us ■ tour at a facility.
11 Q. Who's they?
12 A. Sikorsky.
13 Q. And who requested the tour of the facility?
14 A. They offered it to our flight department.
15 Q. And who went?
16 A. Jeffrey, myself, Nadia and Igor.
17 Q. And if I wanted documentation of either of
18 those trips, the trip to Miami or the trip to the
19 Sikorsky plant, who would have that documentation?
20 A. I would.
21 Q. So I could request it from your attorney to
22 get it from you?
23 MR. REINHART: Let ■ just check.
24 (Off the record discussion.)
25 MR. REINHART: Okay. He has custody of it.

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1 but they're corporate documents. So you'd have to
2 request it from Mr. Critton, who I understand
3 represents all the corporations.
4 THE WITNESS: Yes.
5 BY MR. EDWARDS:
6 Q. What's the corporation that the document was
7 prepared for?
8 A. Meaning who — what, like Air Ghislaine, ■
9 owner of the helicopter? Yes, Air Ghislaine.
10 Q. Air Ghislaine?
11 A. That's the helicopter.
12 Q. And the ■ Ghislaine is obviously not that
13 typical of ■ name. Is that reference or related to
14 Ghislaine Maxwell?
15 A. I would assume. I have no knowledge.
16 Q. Nobody's ever told you that?
17 A. Nobody's brought it up.
18 Q. Okay. And how long ■ you at the Sikorsky
19 facility?
20 A. Three hours, four hours.
21 Q. And what time of day ■ this?
22 A. Nine in the morning. Nine, I think, and we
23 returned at one, something like that.
24 Q. And was the purpose to buy or purchase
25 anything?

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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 [REDACTED] just kind of pushing their product.
4 Q. Do you know what Jeffrey Epstein does for [REDACTED]
5 living for business today, these days?
6 A. No.
7 Q. Do you know or have you [REDACTED] 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 [REDACTED] 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 [REDACTED] 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 [REDACTED] CRITTON: Form.
18 THE WITNESS: Yes.
19 BY MR. EDWARDS:
20 Q. And you walk in and there's [REDACTED] 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. [REDACTED] in his office?
2 A. Yes, sir.
3 Q. What [REDACTED] that conversation?
4 A. Give [REDACTED] 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, [REDACTED] you
21 ever [REDACTED] to him about the fact that [REDACTED] 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 [REDACTED] 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 [REDACTED] systems, you know, [REDACTED] the Palm Beach
5 house. That's usually the main thrust of our
6 conversations these days.
7 Q. How would you know [REDACTED] go [REDACTED] the Florida
8 Science Foundation on [REDACTED] of those occasions? Would [REDACTED]
9 just [REDACTED] you?
10 A. Yeah, he would call [REDACTED] and say come on by or I
11 got a brochure on [REDACTED] Samsung.
12 Q. With each time you [REDACTED] 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 [REDACTED] conversation about [REDACTED] 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: [REDACTED] it [REDACTED] pertaining to a TV and
23 I'd have [REDACTED] brochure, a picture [REDACTED] TV -- [REDACTED]
24 particular TV we looked at it was [REDACTED] size of a --
25 like five foot diagonal, [REDACTED] I had a photo of myself

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1 standing next to it or the salesperson. So I mean,
 2 there's ■■■■■ 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 ■■■ on my computer, you know,
 15 with — I have to type in the prompts for ■■■ because
 16 it's ■■■ 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 ■■■■ done that in the past.
 22 Q. Well, in the past he ■■■■ in jail or have some
 23 restrictions?
 24 A. The restrictions, yes.
 25 Q. So you you'd see him ■■■ the airplane

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1 frequently?
 2 A. Exactly.
 3 Q. So when you didn't ■■■ him on the airplane
 4 frequently, then some of your correspondence ■■■ 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 ■■■ 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 ■■■ —
 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 ■■■■ 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 ■■■■ that he has ■■■■ 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, ■■■ 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 ■■■■ house?
 10 ■■■■ CRITTON: Form.
 11 THE WITNESS: In Paris, yes, there ■■■■
 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 ■■■■ no need for that?
 2 A. Okay. I just wanted to ■■■■
 3 Q. Where do you stay when Jeffrey Epstein is in
 4 Paris?
 5 A. A hotel.
 6 Q. Okay. And ■■■ New Mexico, when you land there,
 7 you stay on the ranch somewhere, but at your place?
 8 A. I stay ■■■ my place.
 9 Q. And in New York, you have ■■■ apartment that he
 10 sets you up at, right, the 301?
 11 A. Yes, I have ■■■ place I could stay.
 12 Q. And in St. Thomas?
 13 A. Hotel.
 14 Q. And in Paris you stay ■■■ 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 ■■■■ sole ■■■■ direct owner, but any other
 19 properties that you're familiar with that Jeffrey
 20 Epstein is — has direct access to and at least ■■■ gives
 21 the appearance to you that he is the ■■■■ or controller
 22 of that property?
 23 MR. CRITTON: Form.
 24 THE WITNESS: Name the list that you've
 25 stated.

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1 BY MR. EDWARDS:
 2 Q. The Manhattan house.
 3 A. Yes.
 4 Q. Mansion or whatever ■ 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 ■ of ■ 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 ■ ■ imply that
 23 to you, right?
 24 A. A list, yes, you ■
 25 Q. Okay. Have you ever been made aware that

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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 ■ that Ghislaine
 7 Maxwell keeps a list of girls in the nearby ■ of
 8 each of -- at Jeffrey Epstein's residences ■ service
 9 him sexually?
 10 A. No.
 11 MR. CRITTON: Form.
 12 BY MR. EDWARDS:
 13 Q. Okay. Have you ever read ■ of the
 14 complaints that have been filed against him ■ the
 15 various courts, whether ■ 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, ■ of the
 23 22, versus Epstein ■ Exhibit No. 4 to this deposition.
 24 (Plaintiff's Exhibit No. 4 ■ marked for
 25 identification.)

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1 BY MR. EDWARDS:
 2 Q. And ask you about some of the allegations ■
 3 here and ■ if you know anything about them. ■
 4 indicates he owns ■ flight of aircraft that includes a
 5 Gulfstream, ■ 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 ■ of him owning a Gulfstream IV
 10 aircraft, a helicopter and ■ 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

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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 ■ 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 ■ ■ 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 ■ sexual
 25 relationships with many minor girls, some ■ young as 12

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1 years old?
 2 MR. CRITTON: Form.
 3 THE WITNESS: No.
 4 BY MR. EDWARDS:
 5 Q. Never?
 6 A. Never.
 7 Q. Have you ever ■■■ any photographs in any of
 8 his homes depicting young-looking girls engaging in sex
 9 acts?
 10 A. No.
 11 Q. Or reading directly from the complaint,
 12 "engaged in lewd acts"?
 13 A. No, absolutely not.
 14 Q. Have you looked around the walls of his
 15 various homes when you're in there picking up luggage?
 16 A. I mean, not any more than I walked in here and
 17 not looking ■ the walls over there, I couldn't tell you
 18 what those are; ■ nothing specific.
 19 Q. Sometimes we're talking about a 50,000 square
 20 foot house?
 21 A. Exactly.
 22 Q. In Manhattan?
 23 A. It's pretty big.
 24 Q. Okay. Have you ever looked at any of his
 25 computers for any reason?

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1 A. No.
 2 Q. I know that you helped set up some of the --
 3 A. Computers ■ not my expertise.
 4 Q. All right. Have you ■ been told that
 5 Mr. Epstein committed sex acts against underage girls on
 6 a literal daily basis, that's what he does?
 7 A. I've never been told that.
 8 Q. Have you ever read the complaints against him
 9 that indicate that's what ■ does ■ daily basis?
 10 MR. CRITTON: Form.
 11 THE WITNESS: No.
 12 BY MR. EDWARDS:
 13 Q. So in your mind, you never believed that you
 14 ■ transporting around somebody whose sole goal in
 15 life is to get -- have sex with little girls?
 16 MR. CRITTON: Form.
 17 THE WITNESS: I never believed that, no.
 18 BY MR. EDWARDS:
 19 Q. Okay. Have you ever been told that he
 20 conspired with others, including assistants and/or his
 21 drivers and/or pilots and his friend Ghislaine Maxwell,
 22 to further these sex acts and to avoid police detection?
 23 MR. CRITTON: Form.
 24 BY MR. EDWARDS:
 25 Q. Have you ever -- anybody ■ questioned you

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1 about that?
 2 MR. REINHART: Hold on. The question is have
 3 you ever been told that fact that he just read ■
 4 you?
 5 BY MR. EDWARDS:
 6 Q. Right.
 7 A. I have never been told that fact.
 8 Q. Has anybody ever questioned you about your
 9 possible involvement with helping to facilitate
 10 Mr. Epstein have sex with underage girls?
 11 A. No.
 12 Q. When you were questioned by either the police
 13 or the -- whoever the investigative resource that was
 14 being used at the time?
 15 A. Right.
 16 Q. Do you remember who that person was that was
 17 questioning you?
 18 A. No, I don't remember.
 19 Q. I know you don't know the location where it
 20 was, but do you remember who they ■ affiliated with?
 21 A. No.
 22 Q. Was it only one time?
 23 A. Yes.
 24 Q. Did you also have to testify before a grand
 25 jury proceeding?

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1 A. No, I did not.
 2 Q. Have you ever known Mr. Epstein to get ■
 3 massage while on an airplane?
 4 PHONE ATTORNEY: This is everybody in Boone,
 5 Charles ■ the witness ■ here and the court
 6 reporter and ■ videographer.
 7 MR. EDWARDS: Fantastic, ■ I think ■ you
 8 ■ may have the wrong room.
 9 PHONE ATTORNEY: 'I ■ told to ask for 866.
 10 MR. EDWARDS: Let's go off the record.
 11 (Off the record discussion.)
 12 BY ■ EDWARDS:
 13 Q. All right. In the complaint, I'm going to
 14 tell you what it alleges and I'm going to ask if this
 15 helps to refresh your recollection about any of Jeffrey
 16 Epstein's activities. The defendant, Jeffrey Epstein,
 17 transported the plaintiff to another ■ in order to
 18 engage in ■ acts with her. And this occurred when she
 19 ■ merely 15 years old.
 20 Do you remember transporting somebody that
 21 looked like they were 15 years old on your airplane?
 22 A. No, sir.
 23 Q. You ■ remember taking ■ 15-year-old, or
 24 somebody that looks around that approximate age, ■ your
 25 airplane?

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1 A. Can you be more specific?

2 Q. Well, I know that you've indicated earlier in

3 the deposition that you remember ■■■ girls under the

4 age of 18 on the airplane. And so let me ask, before I

5 get back into this, whether ■■■ those individuals you

6 were talking about were accompanied by a parent or some

7 of those people were on the airplane for some other

8 purpose, modeling, or you don't know why they were

9 there? I'm going to let you elaborate ■■■ who these

10 people ■■■ that you believe may have been under the age

11 of 18 and why you think they were on the airplane?

12 MR. CRITTON: Form.

13 THE WITNESS: We've had younger people ■■■ the

14 airplane that have been, you know, with their

15 family members, like you said. I don't remember

16 transporting anybody ■■■ was of questionable age.

17 I'm not — I'd only be guessing at somebody's age

18 if I didn't ID them at the foot of the airplane.

19 So I can't guess to their age.

20 BY MR. EDWARDS:

21 Q. All right. "Mr. Epstein used his private jet

22 to transport the minor plaintiff to Manhattan where he

23 provided her spending money and accommodations ■■■ him

24 ■■■ his mansion."

25 Do you have any idea who that might be

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1 referring to?

2 MR. CRITTON: Form.

3 THE WITNESS: No, sir.

4 BY MR. EDWARDS:

5 Q. And you don't remember being a pilot of an

6 airplane where he was transporting a 15-year-old ■■■

7 Manhattan from Miami or Palm Beach?

8 A. No. I'd be guessing at somebody's age and I

9 can't guess.

10 Q. "Defendant transported plaintiff in his

11 private jet to locations that included Palm Beach, New

12 York City, Santa Fe, Los Angeles, San Francisco,

13 St. Louis."

14 Do you remember ■■■ piloting his airplane to

15 those destinations that I just mentioned?

16 MR. REINHART: Can we break them down?

17 Objection; compound.

18 MR. EDWARDS: Okay.

19 BY MR. EDWARDS:

20 Q. Have you ever flown his airplane to Palm

21 Beach?

22 A. Yes, sir.

23 Q. Okay. Have you ever flown it to New York

24 City?

25 A. Yes.

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1 Q. To Santa Fe?

2 A. Yes.

3 Q. To Los Angeles?

4 A. Yes.

5 Q. To San Francisco?

6 A. Yea.

7 Q. To St. Louis?

8 A. Yes.

9 Q. All right. Continuing to international

10 destinations, including Europe, have you ever flown it

11 to Europe?

12 A. Yes.

13 Q. The Caribbean?

14 A. Yes.

15 Q. And Africa?

16 A. Yes.

17 Q. On those flights to those various places, is

18 it your — to the best of your knowledge, you ■■■

19 ■■■ of Jeffrey Epstein engaging in ■■■ with underage

20 girls ■■■ his airplane?

21 MR. CRITTON: Form.

22 THE WITNESS: I have no knowledge of any of

23 that.

24 BY MR. EDWARDS:

25 Q. "He provided accommodations with him in order

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1 to have her available to him at all times whenever he

2 wanted, including while transporting the minor plaintiff

3 on his private jet."

4 That's something that you had ■■■ knowledge of?

5 A. (Witness shakes head.)

6 Q. You have to a yes or no.

7 A. I'm sorry, no.

8 Q. "Each time they would travel to ■■■ of these

9 destinations, the ■■■ pattern of sexual abuse would

10 occur, often with a vast array of aspiring models,

11 actresses, celebrities, and/or other females, including

12 minors from all over the world."

13 Again, that's something you have no personal

14 knowledge of?

15 A. No.

16 Q. Has anybody ever indicated that if you did

17 have personal knowledge of some of these things, then

18 you could also have been implicated ■■■ some form of a

19 crime? Has any law enforcement or anybody ever

20 indicated that to you?

21 A. No.

22 Q. Okay. ■■■ that something you've ■■■ worried

23 about?

24 A. No.

25 Q. All right. "Upon Information and belief,

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1 defendant transported minor girls from Turkey." Did you
 2 ■■■ leave in ■■■ of ■■■ 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 ■■■ out of Turkey?
 10 A. I'd have to look ■■■ 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 ■■■ 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 ■■■ flight logs that's marked ■■■ Composite
 11 Exhibit 1, or ■■■ 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 ■■■ 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 ■■■ 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 ■■■ 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 ■■■ 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 ■■■ slaves --
 5 A. Never heard of such ■■■ 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 ■■■ remember
 12 that?
 13 A. Zero, do not.
 14 Q. All right. The complaint goes ■■■ say,
 15 "Plaintiff ■■■ 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 ■■■ 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

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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 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.

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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 was 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.

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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 --
 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

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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 through 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.

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1 A. Okay.
 2 Q. And I'm just asking you ■ you did have
 3 knowledge that Jeffrey Epstein ■ having ■ with
 4 ■ little girls either ■ the plane or ■ place that you
 5 were taking him to or from on ■ daily basis, that's what
 6 he did, would you have continued ■ be his pilot?
 7 MR. CRITTON: Let me object. Object to the
 8 form. It's argumentative. It has no more value
 9 than assuming he was chopping up bodies or anybody
 10 ■ chopping up bodies in the plane you're flying.
 11 What difference does ■ make? Form.
 12 MR. EDWARDS: What difference does ■ make in
 13 a case about him having sex with little girls? I'm
 14 not going to argue with you about it. You've
 15 stated your objection.
 16 MR. CRITTON: Exactly. It's an argumentative
 17 question.
 18 MR. EDWARDS: I'm not going to argue with you
 19 about it.
 20 MR. CRITTON: You're arguing with him about
 21 now.
 22 MR. EDWARDS: No, I'm asking him the
 23 hypothetical.
 24 BY MR. EDWARDS:
 25 Q. Can you answer that? Would you have continued

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1 to be a pilot for somebody who's traveling to and from
 2 destinations with the goal of having sex with underage
 3 girls?
 4 MR. CRITTON: Form.
 5 THE WITNESS: ■ could be any person. It
 6 doesn't have to be Jeffrey Epstein, then, right?
 7 BY MR. EDWARDS:
 8 Q. True.
 9 A. No, I wouldn't pilot ■ airplane if there ■
 10 wrongdoing going on.
 11 Q. That you knew about?
 12 A. That I knew you about, sure.
 13 Q. ■ reading this complaint to you, is this the
 14 first time you've heard these allegations —
 15 A. Yes.
 16 Q. — against Mr. Epstein?
 17 A. Yes.
 18 Q. It goes on to say, "On one of Epstein's
 19 birthdays, a friend of Epstein sent him three
 20 12-year-old girls from France who spoke no English for
 21 the purpose of — for defendant ■ sexually exploit and
 22 abuse. After doing so, they were sent back to France
 23 the next day."
 24 Are you familiar with that occasion?
 25 MR. CRITTON: Form.

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1 THE WITNESS: Never heard of such a thing.
 2 BY MR. EDWARDS:
 3 Q. Do you know of any friends that he has in
 4 France that would send him birthday — ■ birthday
 5 present?
 6 A. No.
 7 Q. Do you know of him receiving any birthday
 8 gifts or birthday people from anyone?
 9 A. Never.
 10 Q. This particular person that filed this
 11 complaint, Jane Doe 102, indicates "Defendant and
 12 Ghislaine Maxwell acknowledged and celebrated
 13 plaintiff's 16th birthday."
 14 Do you remember them celebrating somebody who
 15 you flew ■ the airplane's 16th birthday?
 16 A. I don't recall.
 17 Q. Any of this jog your memory as ■ who Virginia
 18 Roberts is?
 19 A. No.
 20 Q. "From the age of 15, plaintiff — this Jane
 21 Doe 102 — "was sexually exploited and abused by
 22 defendant on a daily basis and often multiple times each
 23 day."
 24 So going back, was there ■ a day where you
 25 were with Jeffrey Epstein where you could observe him

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1 and Virginia Roberts during an entire day?
 2 MR. CRITTON: Form.
 3 THE WITNESS: I don't remember Virginia
 4 Roberts, so I couldn't answer the question.
 5 BY MR. EDWARDS:
 6 Q. "In September 2002, Defendant Epstein
 7 purchased a commercial round-trip airline ticket and
 8 provided ■ passport, U.S. currency and accommodations
 9 for plaintiff to fly to Thailand."
 10 Do you remember him doing that for anybody
 11 around that time period?
 12 A. No, sir.
 13 MR. CRITTON: What was the date?
 14 MR. EDWARDS: September 2002.
 15 MR. CRITTON: Okay, thanks.
 16 MR. EDWARDS: I have here — and this is
 17 actually my only copy, ■ I don't mind marking ■
 18 ■ composite exhibit, but we'll either have to
 19 copy this while thing or we'll have an agreement of
 20 counsel. It's the visitor inmate log from when
 21 Mr. Epstein ■ in jail in Palm Beach.
 22 MR. CRITTON: Well, before we get started, it
 23 is now 1:15. We started at 10:00.
 24 MR. EDWARDS: We didn't really start at 10:00.
 25 MR. CRITTON: Shortly thereafter. I was here

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1 pretty much after 10. But we've been here since
 2 10:00. I want to [REDACTED] a lunch break.
 3 MR. EDWARDS: Let's do it.
 4 MR. CRITTON: For [REDACTED] hour?
 5 MR. EDWARDS: Sure.
 6 (A break [REDACTED] had [REDACTED] 1:15 p.m.)
 7 BY MR. EDWARDS:
 8 Q. All right. I looked through the inmate log of
 9 the visitors who visited Jeffrey Epstein and your name
 10 appears one, two, three, four, five, six, seven, eight
 11 times.
 12 A. Okay.
 13 Q. Seem to be accurate in terms of how many times
 14 you went to visit him?
 15 A. I thought six, but yes, that's...
 16 Q. I'll let you review the records and tell me if
 17 you dispute any of that record. And I'll go ahead and
 18 mark that [REDACTED] Composite Exhibit 5.
 19 (Plaintiff's Exhibit No. 5 was marked for
 20 identification.)
 21 MR. REINHART: It's two pages.
 22 MR. EDWARDS: Two pages.
 23 MR. REINHART: Okay.
 24 BY MR. EDWARDS:
 25 Q. Seem accurate?

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1 A. Yes.
 2 Q. Okay. Jeffrey Epstein's plea, I believe, was
 3 June 30th, 2008. I think that's when he was taken in
 4 custody from there. Your first visit is July 3rd, 2008.
 5 And the other name on that visit is Igor Zinoviev. Did
 6 you go with Igor to visit Jeffrey Epstein?
 7 A. Yes.
 8 Q. Why did you go with Igor?
 9 A. It just happened he wanted to [REDACTED] us both at
 10 the [REDACTED] time. There was [REDACTED] apparent [REDACTED]
 11 Q. How [REDACTED] you know that Jeffrey wanted to [REDACTED]
 12 you?
 13 A. I don't recall who called and told [REDACTED] that he
 14 wanted to [REDACTED] me. I couldn't give you an accurate name,
 15 whether it was, you know, his attorney, Darren. And
 16 actually, I would put a lot weight to I think it was
 17 Darren, his attorney.
 18 Q. That would have made a phone call to you that
 19 said --
 20 A. Yeah, to go.
 21 Q. And what did you talk about with Jeffrey
 22 Epstein four days after he pled guilty to offenses that
 23 landed him in jail?
 24 A. I think the first visit was how disappointed
 25 or how scared he was, you know, being inside there. We

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1 just talked about general happenings that go on in
 2 there.
 3 Q. What [REDACTED] he say?
 4 A. It's terrible; it's cold; he can't sleep.
 5 They wake him up every two hours. You know, just items
 6 like that, uncomfortable things. We talked about the
 7 airplanes [REDACTED] great deal. You know, we got major
 8 maintenance [REDACTED] the big airplane, [REDACTED] we discussed that [REDACTED]
 9 little bit. And then it was really just how
 10 uncomfortable he [REDACTED] there.
 11 Q. How long [REDACTED] you visit with him on that first
 12 visit, July 3rd?
 13 A. I think [REDACTED] stayed the full hour.
 14 Q. All right. [REDACTED] that what the time allotment
 15 was?
 16 A. I believe it is, yeah. I don't think you
 17 could leave early, or I'm not [REDACTED] that you could leave
 18 early, until later on we found out you could stay for
 19 five minutes or longer. But I don't think any of [REDACTED]
 20 knew that was -- once you got in there, you stayed there
 21 for the hour.
 22 Q. Okay. So you talked to him for an hour and
 23 for the most part it was just about the conditions and
 24 his disappointment with the conditions?
 25 A. Sure, yeah, absolutely.

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1 Q. And did Igor talk to him [REDACTED] well?
 2 A. Briefly. I mean, not that much. You're going
 3 back a little ways again to remember exactly what was
 4 discussed. You know, he asked how his family was doing.
 5 I guess Igor's got [REDACTED] son, I think he asked how his son
 6 was doing. You know, just general questions like that.
 7 Q. Did you ride to the jail that day with Igor?
 8 A. I believe we did. I believe I met Igor
 9 probably at Jeffrey's house and picked him up, [REDACTED] if
 10 not, we may have met at the airport and drove together.
 11 [REDACTED] [REDACTED] drive together on that occasion.
 12 Q. In what vehicle did you drive?
 13 A. The Hummer.
 14 Q. That's the vehicle you described earlier as
 15 the company vehicle?
 16 A. Yes, sir.
 17 Q. Is that a vehicle paid for by Jeffrey Epstein?
 18 A. Meaning?
 19 Q. Well, is that a vehicle paid for by you?
 20 A. What do you [REDACTED] "paid for"?
 21 Q. Did you purchase the vehicle with your money?
 22 A. I didn't purchase that one, no.
 23 Q. Do you know if it was purchased by Jeffrey
 24 Epstein or a corporation of Jeffrey Epstein's?
 25 A. Probably [REDACTED] corporation.

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1 MR. CRITTON: Form; ■■■■ to strike. Sounds
2 like ■ guess.
3 BY ■. 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 ■■■■ usually held in
7 corporate names, to your knowledge?
8 A. To my knowledge, exactly, yes.
9 Q. And ■ when you're saying the -- when you're
10 talking about the Hummer vehicle and you're stating ■
11 it's likely ■ 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 ■ registered ■ 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 ■ a visitor. Did you go with him together on
3 that occasion?
4 A. I didn't even realize ■ 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 ■ on
9 7/5/08?
10 A. No, because it's probably similar to the first
11 one. I mean, ■ talked -- actually, one of the visits
12 ■ talked about fishing and just trying to -- you know,
13 ■ 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 ■ day, I
16 tried to give my ■ 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 ■ CRITTON: Let me just object to form to
22 the last question.
23 BY MR. EDWARDS:
24 Q. Well, ■ least if these records are accurate,
25 which are the records that ■ 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 ■ listed on the top
3 of ■ 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 ■ 7/1/08 and then,
8 you know, ■ I ■, somebody could have ■ him 7/1 or
9 7/2, but those records ■ provided to us. You
10 ■ 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, ■ ■ yourself and Igor
16 Zinoviev?
17 A. Mm-hmm.
18 Q. And that's something ■ talked about in this
19 deposition. I'm going to ask you again, I don't know
20 that you elaborated last time, what ■ 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 ■ 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 ■ fair to say you
12 had ■ form of communication either ■ 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 ■ inmate in the
18 jail, is it ■ 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 ■ good assumption.
22 Q. Okay. And what was the form -- what ■ the
23 substance of that conversation that you ■ remember
24 related to Jeffrey Epstein and the location you were
25 going ■ 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 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 I 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 and
4 give support like that, because prior to him going away,
5 it was known to me that there was going to be no
6 visitors, because I offered to him that I would be
7 happy to 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 I was a bit bad there, that he may have
11 changed his mind and wanted to have 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 of 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 allegedly
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. -- of?

14 A. None. I wasn't aware of any, to be honest.

15 Q. The next visit was 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 were
7 as addresses, 301 East 86th Street -- 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, 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 you 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 ■■■ 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 ■■■ him is on August 9th,
 13 2008, ■■■ the jail. In that occasion ■■■ 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 ■■■ 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 ■■■ it was. It was either the 9 or
 2 the 16, and then the other ■■■ 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 ■■■ ■■■ drive
 9 together? Does it make ■■■ 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 ■■■ 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 ■■■ take ■■■ of the suburbs

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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 ■■■ them.
 5 Q. What ■■■ 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 ■■■ 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 ■■■ his two main cars that he would be
 16 driven in or --
 17 Q. What ■■■ the other cars that you regularly see
 18 parked ■■■ 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 ■■■ 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 ■■■ 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 filled, 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 [redacted] 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 [redacted] come up?
 17 A. No, [redacted] didn't talk about that among ourselves
 18 really.
 19 Q. And have you [redacted] been [redacted] that Nadia
 20 Marcinkova provides the role of a [redacted] 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, [redacted] 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 [redacted] 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 [redacted] 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 [redacted] vulnerable disadvantaged
 24 females, underage females, and [redacted] 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 [redacted] 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 [redacted] involved in
 8 conversations related to his motive [redacted] bias, to
 9 continue [redacted] work for Jeffrey Epstein or believed
 10 the [redacted] 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 [redacted] minute?
 16 Because maybe -- [redacted] I talk with -- well, I know I
 17 can talk with Bruce. Let's just take a break.
 18 (A break [redacted] had at 2:45 p.m.)
 19 [redacted] EDWARDS: We're back on the record. Do
 20 you have the [redacted] position?
 21 MR. REINHART: Let [redacted] 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 [redacted] the age of 24, do you
 7 agree with those laws?
 8 A. Yes.
 9 Q. And you agree [redacted] 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 [redacted] confirmed information that Jeffrey
 18 Epstein was [redacted] 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, [redacted] you [redacted]
 25 convinced that Jeffrey Epstein was guilty of those acts

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1 which he pled guilty to --
 2 MR. CRITTON: Form.
 3 MR. REINHART: Can we -- for purposes of your
 4 hypothetical, what facts do you want him to [REDACTED]
 5 [REDACTED] true? You said the facts to which he pled
 6 guilty, but the witness already said he doesn't
 7 know what he pled guilty to. He knows the charge
 8 he doesn't know the facts.
 9 BY MR. EDWARDS:
 10 Q. Solicitation of prostitution of a minor,
 11 somebody under the age of 18.
 12 MR. EDWARDS: That's the charge, right,
 13 solicitation of prostitution of a minor?
 14 MR. CRITTON: No. I think you've got it
 15 wrong. I'll object to the form.
 16 MR. EDWARDS: Okay.
 17 BY MR. EDWARDS:
 18 Q. Then we'll handle the question this way: If
 19 you were to believe based on information and evidence
 20 that Mr. Epstein engaged in sex [REDACTED] some form of sex acts
 21 with people of the age range of 12, 13, 14, 15 years
 22 old, would you continue your employment with
 23 Mr. Epstein?
 24 MR. CRITTON: Form; speculation.
 25 THE WITNESS: I would certainly be speculating

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1 and I have to discuss it with my wife long and
 2 hard. I don't think I could give you a correct and
 3 honest answer at this time.
 4 BY MR. EDWARDS:
 5 Q. Okay. Given the allegations that have been
 6 made in this case, is this something that you have
 7 discussed with anyone other than your attorney?
 8 A. No, not really. Only from the fact that
 9 they're allegations and there's still a lot [REDACTED] work,
 10 I'm sure, to [REDACTED] discovered.
 11 MR. CRITTON: Let [REDACTED] put on there, for the --
 12 if this deposition [REDACTED] not typed -- and [REDACTED] request
 13 [REDACTED] -- I'd like at least this portion where
 14 Mr. Edwards' last question back about five pages
 15 worth, so just if you could mark it from this
 16 page back about five pages.
 17 If nobody requests the deposition, I'd just
 18 like those five pages.
 19 MR. EDWARDS: I'm going to request the
 20 deposition, so...
 21 MR. CRITTON: Okay. We'll mark this then, [REDACTED]
 22 you could tell [REDACTED] where it is, approximately.
 23 BY MR. EDWARDS:
 24 Q. Is there a reason why you have not discussed
 25 with Jeffrey Epstein the allegations that have been made

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1 against him and the allegations contained within many of
 2 these civil complaints [REDACTED] behalf of girls who were under
 3 the age of 18? Is there any [REDACTED] why you haven't
 4 discussed that?
 5 MR. REINHART: If that's based on
 6 conversations you had with your lawyer, then don't
 7 disclose what you and your lawyer talked about.
 8 BY MR. EDWARDS:
 9 Q. Correct.
 10 A. I have not spoken to Jeffrey about any of
 11 this, and [REDACTED] my understanding that is illegal to
 12 have conversation about this. So I've never presented
 13 any questions to him reference this case or any others.
 14 Q. It [REDACTED] your understanding that it was illegal
 15 to talk [REDACTED] Jeffrey Epstein about the allegations made
 16 against Jeffrey Epstein?
 17 A. Yes, or anything to do with the case. That's
 18 why we never discussed any portions of it.
 19 Q. Okay. So --
 20 A. I may be wrong in that assumption, but I
 21 don't --
 22 Q. So the reason why you haven't discussed this
 23 with Jeffrey Epstein is you believed it was illegal?
 24 A. Correct, yes.
 25 Q. Who led you to believe that it was illegal?

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1 MR. REINHART: Again, if it was a discussion
 2 you had with any lawyer, then you can just give a
 3 name, don't give a discussion of the conversation
 4 you had.
 5 THE WITNESS: It was my own assumption. I
 6 mean, just basic criminal knowledge of knowing
 7 you're not supposed to -- you know, if somebody's
 8 in [REDACTED] or in a deposition or whatever, I don't --
 9 I didn't think it [REDACTED] appropriate to discuss the
 10 matter with them.
 11 BY MR. EDWARDS:
 12 Q. Okay. So the next two visits and I think the
 13 last two visits we'll talk about [REDACTED] on 9/6/2008.
 14 Actually, it looks [REDACTED] you visited him twice in one
 15 day; is that right?
 16 A. I don't think that's possible. I mean, that
 17 will show how accurate the court record is. There's no
 18 way.
 19 Q. You wouldn't have visited him twice in [REDACTED]
 20 day?
 21 A. No. I think there's only [REDACTED] visitation per
 22 day.
 23 Q. Okay. And it looks like the same visitors
 24 each time, except that it says for period three and then
 25 the next one's for period four. So there [REDACTED] two

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1 different periods. Was there ever a time when they
 2 allowed you to stay for [REDACTED] 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 [REDACTED] the discussion with
 9 Jeffrey Epstein along [REDACTED] Sarah Kellen and Nadia
 10 Marcinkova?
 11 A. On the last visits, it [REDACTED] mainly airplane
 12 stuff and later on in the visitations, we [REDACTED] 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 [REDACTED] 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 [REDACTED] never called back to visit.
 24 Q. Okay. Well, shortly after that then he [REDACTED]
 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 [REDACTED]
 5 him would have been [REDACTED] the Florida Science Foundation,
 6 where we talked about earlier?
 7 A. I've [REDACTED] him there, yes.
 8 Q. Okay. And in fact, I think you said you [REDACTED]
 9 him 20 or [REDACTED] times --
 10 A. Sure.
 11 Q. -- over the [REDACTED] two years, last year and [REDACTED]
 12 [REDACTED] or so?
 13 A. Yes.
 14 Q. And how long would you stay each time at the
 15 Florida Science Foundation and [REDACTED] 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 [REDACTED] you're not going to [REDACTED] 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 [REDACTED] the
 18 typical week like? I mean --
 19 A. How many times?
 20 Q. Yes.
 21 A. Maybe once in [REDACTED] 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 [REDACTED] 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 [REDACTED] the telephone
 10 there?
 11 A. Once I think I've called the house. Normally
 12 he calls [REDACTED] 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 [REDACTED] bigger stereo in the
 18 gym, let's put [REDACTED] bigger, bigger stereo in the gym, let's
 19 go redo what we've done. It's always audio. He's [REDACTED]
 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 [REDACTED] 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 ■ the house, ■ 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, ■ 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 ■ expand
 2 on his previous answer. Why don't you expand.
 3 THE WITNESS: Can ■ go back to that one?
 4 BY MR. EDWARDS:
 5 Q. Sure. The question dealt with the structural
 6 architectural changes you're ■ of.
 7 A. There has been a kitchen extension, but when
 8 you asked the question, I ■ of when ■
 9 actually took place. So to be accurately answering your
 10 question, I know there's been ■ 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 ■
 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 ■ bigger room than what it was.
 21 Q. All right. Do you know who Martin Nowack is?
 22 A. No.
 23 Q. Do you ■ remember him being ■ 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 ■ the last
 4 month, do you know which attorney he ■ 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 ■
 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 ■ definition of it, but I
 24 know the name is out there.
 25 Q. Okay. Is that a company that you believe ■

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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 ■
 5 early days of when Zorro existed.
 6 Q. Who was ■ 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 ■ ■ 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 ■
 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 ■
 24 office ■ the Florida Science Foundation?
 25 A. Not that I know of.

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- 1 Q. All right. And ■■■ you deeded ■■■ property
2 that we spoke about earlier on the New Mexico ranch? ■
3 that deeded to you?
4 A. Yes.
5 Q. And has ■ 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 ■ property that I think you
12 said you have ■ mortgage on it, that's a property that
13 you pay -- you mortgaged that property?
14 A. Yes, sir.
15 Q. All right. And ■ well, the home you own
16 here, you have ■ mortgage ■ that property as well?
17 A. That is correct.
18 Q. All right. Are you familiar with a vehicle, ■
19 Chevy Suburban 1500, year 1999?
20 A. Do you have ■ 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?

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- 1 A. I'm guessing. ■ 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 ■ 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 ■■■ in Jeffrey's driveway,
9 but...
10 Q. Why?
11 A. Just for an extra ■■ to ■■■
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 ■ 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 ■■■ more activity here in West Palm
20 Beach. We ■■■ 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 ■■ them use
25 the Hummer ■ the house.

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- 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 ■ reason why?
7 MR. CRITTON: Wait. You guys ■■ both talking
8 over one another. You need to let him wait and
9 finish his question because if I want to assert ■
10 objection, neither one of you gives ■■ a chance,
11 which may be the plan. Form.
12 MR. EDWARDS: Yeah, we have ■ 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 ■■■ -- did Jeffrey say that he
18 wanted ■■ vehicle ■ use ■ to be parked ■ his house?
19 A. No.
20 Q. Then how did it ■■■ 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 ■ out of my driveway
25 as an eyesore. So hence, I decided to let people at the

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- 1 house drive ■ 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 ■ anybody. I
9 may have just left them ■ the counter there and told
10 Yanush this is an extra car if you guys needed it to run
11 around because ■■ an eyesore at my driveway.
12 Q. Are you familiar with ■ 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 ■■ -- 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 ■ Land Rover, Range
25 Rover Sport 2008?

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- 1 A. Yes.
 2 Q. Registered in your name?
 3 A. Yes.
 4 Q. And whose ■ is that?
 5 A. That's another extra ■ for the household ■
 6 use at Jeffrey's house.
 7 Q. And when ■ that car purchased?
 8 A. Last year.
 9 Q. And who purchased that car?
 10 A. It was purchased in my name.
 11 Q. By whom? Who purchased the car ■ your name?
 12 A. Well, I put the ■ in my name, but the funds
 13 came from -- they ■ wired to my account from New
 14 York.
 15 Q. From whom, though? A mysterious source just
 16 sent funds? We know that didn't happen, so I'm just
 17 trying to elaborate here.
 18 A. Jeffrey had paid for the car.
 19 Q. Okay. And why did Jeffrey pay for a car and
 20 put it in your name?
 21 A. I don't know.
 22 Q. I mean, you had to agree for this to happen.
 23 So what ■ the conversation between you and Jeffrey
 24 that resulted in Jeffrey paying for ■ Land Rover, ■ 2008
 25 Land Rover and putting it in your name?

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- 1 A. I don't recall exactly how the conversation
 2 came about. He just says we want to buy an '08 Land
 3 Rover and put it in my name. So we did. I didn't ask
 4 any further questions.
 5 Q. Did this conversation happen when he ■ ■
 6 jail ■ after he ■ out?
 7 A. Meaning out on house arrest?
 8 Q. Right.
 9 A. When you say "out" I think of the Science
 10 Foundation. On work release, so you have to ■ more
 11 specific.
 12 Q. You ■ ■ what happened, when the
 13 conversation happened relative to where Jeffrey was ■
 14 the time.
 15 A. I'd only be guessing again. I would say this
 16 probably happened ■ year ago, maybe less than ■ year
 17 ago. I'd have to look. I don't remember exactly the --
 18 Q. So ■ ■ either ■ a time when he's at ■
 19 Florida Science Foundation ■ possibly on house arrest?
 20 A. It was -- no, it was definitely before house
 21 arrest. It was probably during the time of the Florida
 22 Science Foundation, to be accurate.
 23 Q. Okay. Are you aware --
 24 A. About eight or nine months ago.
 25 Q. Okay. Are you aware of ■ Mercedes-Benz CLK

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- 1 2005 registered in your name?
 2 A. Yes.
 3 Q. And whose car is that?
 4 A. That car also ■ a Palm Beach house car to be
 5 used at the house.
 6 Q. What does that mean, "a Palm Beach house car"?
 7 A. It's a car that we park in Jeffrey's driveway
 8 for people to use. Anybody that comes to the house can
 9 select ■ car to go anywhere. I mean, run errands, go
 10 shopping, do whatever they need to do. And that was
 11 purchased the same way. It was in my name.
 12 Q. And the funds ■ from Jeffrey Epstein?
 13 A. They ■ wired to my account. I don't know
 14 exactly what account they ■ from.
 15 Q. Again, that's ■ conversation that has to take
 16 place before -- that you have to agree to put ■ car in
 17 your name?
 18 A. Yes, yes.
 19 Q. And is that ■ conversation between yourself
 20 and Jeffrey Epstein that takes place?
 21 A. Yes.
 22 Q. And what is the substance of that conversation
 23 that results in a Mercedes-Benz 2005 being placed in
 24 your name?
 25 A. He just said we need ■ fun car for the house

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- 1 in Palm Beach.
 2 Q. But why put it in your name?
 3 A. I don't know.
 4 Q. You didn't ask any questions about that?
 5 A. No, I didn't.
 6 Q. Okay. Are you ■ of ■ Jaguar X-Type 2005
 7 registered ■ your name?
 8 A. I forgot about ■ one, yes.
 9 Q. Whose car ■ that?
 10 A. That's ■ Palm Beach car.
 11 Q. What do you mean "a Palm Beach car"?
 12 A. It's the Palm Beach house car, another run
 13 around for people to use.
 14 Q. And again, that's ■ conversation that has ■
 15 take place that results in ■ car being placed --
 16 registered in your name?
 17 A. Yes.
 18 Q. Okay. Now we're talking about several cars
 19 here?
 20 A. Yes.
 21 Q. That are ■ being placed in your name?
 22 A. Yes.
 23 Q. You never at any time ask any questions to
 24 Jeffrey Epstein why ■ you placing these cars in my
 25 name?

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- 1 A. I did not.
 2 Q. So your suspicions ■■■ never -- your
 3 curiosity ■■■ never piqued at ■■■ as to why these cars
 4 ■■■ being placed in your name?
 5 A. My curiosity ■■■ piqued.
 6 Q. You never asked him the question, you just
 7 agreed to do it?
 8 A. That's correct.
 9 Q. That goes for the Jaguar X-Type?
 10 A. Yes.
 11 Q. Are you familiar with ■ motorcycle, Big Dog
 12 Chopper Motorcycle, 2003?
 13 A. That is mine.
 14 Q. Yours?
 15 A. Yes.
 16 Q. Registered in your name for a good purpose,
 17 right?
 18 A. Yes, it is.
 19 Q. At your house?
 20 A. Yes.
 21 Q. You ■■■ it?
 22 A. Absolutely.
 23 Q. All right. Ford F-250, 2008, registered in
 24 your name, ■■■ you familiar with that?
 25 A. It's not registered in my name.

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- 1 Q. Okay. So if that's registered in your name,
 2 that would be ■ shock to you? That would be ■ surprise
 3 to you?
 4 A. Yes, it would be.
 5 Q. There should be no documentation from you
 6 where you would be the registered ■■■ of the Ford
 7 F-250?
 8 A. What year?
 9 Q. 2008.
 10 A. I remember buying that car. I just -- that
 11 shouldn't be in my ■■■
 12 Q. What do you ■■■ you remember buying ■■■ car?
 13 A. I do a lot -- I do all ■■■ car purchases for
 14 Mr. Epstein. I'm a car fanatic, ■■■ for years I've ■■■
 15 the car-shopper. I'm the ■■■ fanatic.
 16 Q. Okay. But these ■■■ aren't classic vehicles.
 17 These are vehicles that ■■■ not being refurbished ■■■
 18 anything, they're being driven around town?
 19 A. No, but they're fun. The new Range Rover is ■■■
 20 nice car.
 21 Q. This Ford F250, that's ■■■ car also that's Palm
 22 Beach -- as you would say ■■■ Palm Beach car?
 23 A. No.
 24 Q. That's a car that stays at your house?
 25 A. No.

203

- 1 Q. Who drives that car, Ford F-250?
 2 A. That ■■■ shipped to St. Thomas.
 3 Q. For who to ■■■ and for what purpose?
 4 A. Well, that car should have been put under LSJ,
 5 LLC.
 6 Q. What's LSJ, LLC?
 7 A. Little St. James.
 8 Q. And that's ■■■ corporation?
 9 A. Yes.
 10 Q. Your understanding is that's ■■■ corporation
 11 affiliated with Jeffrey Epstein?
 12 A. I know it's ■■■ corporation. I don't know its
 13 affiliation ■■■ Jeffrey.
 14 Q. At this point in time, the way that this car
 15 comes about is through ■■■ conversation with yourself and
 16 Jeffrey Epstein?
 17 A. Yes, yes.
 18 Q. So to make some representation that this --
 19 that this corporation LSJ, LLC, you're not ■■■ if that
 20 has any affiliation with Jeffrey Epstein?
 21 A. I don't have any facts to tie the two
 22 together.
 23 Q. Common sense would dictate?
 24 A. Yes.
 25 Q. Okay.

204

- 1 MR. CRITTON: Form.
 2 BY MR. EDWARDS:
 3 Q. Again, that's not a ■■■ that you use, the Ford
 4 F-250?
 5 A. No, it's not even here.
 6 Q. And when you say on St. Thomas, is it on
 7 actual St. Thomas, or is it ■■■ Little St. James?
 8 A. No, it's ■■■ St. Thomas. It's ■■■ work vehicle.
 9 Q. For whom?
 10 A. For the workers, for the island.
 11 MR. REINHART: Be careful to ■■■ his
 12 question. I think his question is, is it on
 13 St. Thomas or Little St. James island? Where
 14 physically is the car, if you know.
 15 THE WITNESS: I don't know for ■■■ fact.
 16 BY MR. EDWARDS:
 17 Q. It's your understanding it's on St. Thomas?
 18 A. Yes.
 19 Q. And when you say "the workers," what's going
 20 on on St. Thomas to where there's workers that need an
 21 F-250?
 22 A. Just moving sand. I don't know the exact
 23 detail for it.
 24 Q. What were you ■■■ about the need for this car
 25 to be ■■■ St. Thomas?

205

- 1 A. They need a work truck.
 2 Q. To do what?
 3 A. I don't know what the detail or the -- you
 4 know, what the job detail was for the truck. They just
 5 needed a work truck.
 6 Q. So Jeffrey Epstein tells you they need a work
 7 truck ■ St. Thomas and that's the only description that
 8 you're given?
 9 A. Yes, to go purchase and get the best deal I
 10 can on a pickup truck, and that's what I did and for
 11 some reason it got put in my name.
 12 (Off the record discussion.)
 13 BY MR. EDWARDS:
 14 Q. Whose money ■ used to purchase the truck.
 15 You say you purchased the truck. I want the record to
 16 be clear whether you're purchasing it with your money?
 17 A. No, this was wire-transferred. It was a -- I
 18 don't remember how that -- I think ■ wire
 19 transfer ■ a check was FedExed from the New York office
 20 to pay for that. That should not be in my name, is what
 21 I'm getting at. I'll certainly change that, but I
 22 thought you were --
 23 Q. I understand that.
 24 A. No, I'm being -- yeah, I didn't.
 25 MR. REINHART: There's no question.

206

- 1 BY MR. EDWARDS:
 2 Q. 34-foot JVC Powerboat, 2000, owner LSJ, LLC,
 3 registered to Larry Visoski. Do you know that?
 4 A. Yes.
 5 Q. You knew that that boat ■ registered in your
 6 name?
 7 A. It's registered to LSJ. It's Jeffrey's boat
 8 ■ that we keep here ■ West Palm Beach.
 9 Q. And do you keep it at your home?
 10 A. No.
 11 Q. Do you know that the registration ■ ■ your
 12 home?
 13 A. It's used in my home address, yes.
 14 Q. Why was that done?
 15 A. We were eventually going to ship ■ out to
 16 St. Thomas for it to live, but since Jeffrey's here,
 17 we're keeping ■ in Florida, and when we ship the boat
 18 over, we will change title to the Little St. James
 19 address.
 20 Q. What do you ■ "since Jeffrey's here we're
 21 keeping ■ in Florida"? What does Jeffrey being here
 22 have to do with keeping a boat that's registered in your
 23 name ■ to your address --
 24 A. Well, I have access to use the boat, you know,
 25 here in Florida, but it's Jeffrey's boat.

207

- 1 Q. Okay. And by "Jeffrey's boat," it ■
 2 purchased with Jeffrey's money?
 3 A. That ■ correct.
 4 Q. Do you know how much that cost?
 5 A. I think it was 60,000.
 6 Q. Do you know how much the Ford F-250 cost?
 7 A. Twenty-five, I'm guessing, ballpark.
 8 Q. Do you know how much the Jaguar X-Type cost?
 9 A. 11,000.
 10 Q. Do you know how much the Mercedes-Benz CLK
 11 cost?
 12 A. 35,000.
 13 Q. Do you know how much the Land Rover cost?
 14 A. 68,000.
 15 Q. Do you know how much the Mercedes-Benz SUV
 16 cost, that's yours, right? The Chevy Suburban is yours
 17 as well?
 18 A. Yes, I remember how much those cost too.
 19 Q. Is there another boat, 35-foot Donzi
 20 powerboat, 1999?
 21 A. That's the ■ I thought you were talking
 22 about originally.
 23 Q. That's the same boat?
 24 A. That's the ■ boat.
 25 Q. Is there any other boat that's registered in

208

- 1 your name?
 2 A. No.
 3 Q. Did you know that in -- let me ask you this:
 4 ■ Do you have ■ 2003 Ferrari F75-M?
 5 A. No.
 6 Q. Any ■ why the car is registered in your
 7 name and the asking price is \$159,000 being sold in New
 8 ■ York?
 9 A. That car is not registered in my name.
 10 Q. If it's registered --
 11 A. The ad is in my name.
 12 Q. Why is the ad ■ your name?
 13 A. Because I was trying to sell it.
 14 Q. Why were you trying to sell it?
 15 A. It was Jeffrey's car and ■ didn't want it
 16 anymore.
 17 Q. Why would he put his pilot in charge of
 18 selling his Ferrari?
 19 A. Because I bought it.
 20 Q. How much did you buy it for?
 21 A. 179,000. Now, when I say "I bought it," ■
 22 was his money. I was the ■ that negotiated it, to be
 23 clear. It was his car for ■ in New York.
 24 Q. Are you aware of the Zorro Trust winning an
 25 85 million-dollar Power Ball lottery ■ 2008?

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1 A. No.
 2 MR. CRITTON: Say that again.
 3 MR. EDWARDS: The Zorro Trust winning an
 4 85 million-dollar — claiming the ticket for
 5 85 million-dollar Power ticket in 2008.
 6 THE WITNESS: No.
 7 BY MR. EDWARDS:
 8 Q. Have you ever listed your employer ■
 9 Ghislaine Air in making political contributions?
 10 A. I may have.
 11 Q. Did you know that you had made political
 12 contributions —
 13 A. Yes, I have.
 14 Q. — listing your —
 15 A. I needed ■ company name for that event, and I
 16 had put Air Ghislaine.
 17 Q. And NES, LLC wouldn't do?
 18 A. I didn't think of ■ at the time.
 19 Q. ■ somebody tell you to use Air Ghislaine
 20 rather than the company that has been paying you?
 21 A. No.
 22 Q. You just chose to use ■ employer that isn't
 23 actually your employer, nor have they ■ been?
 24 A. I represent Air Ghislaine, JEJE and Hyperion
 25 as chief pilot, so I consider those really the companies

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1 that I work for and never really associated myself with
 2 NES, LLC as my realistic employer. So when I go to a
 3 convention, an aviation convention, and somebody says
 4 who do you work for, I use the name JEJE because that's
 5 the ■ of the Boeing company.
 6 Q. But when I sit here and ask you who you work
 7 for, you give ■ a different ■
 8 A. You're asking for ■ absolute correct answer,
 9 which ■ where my paycheck comes from, which is NES,
 10 LLC. I probably have used that twice in 17 or 18 years
 11 as my employer.
 12 Q. Do you know Dana Burns?
 13 A. I know the ■ yes.
 14 Q. How do you know her?
 15 A. I've seen her on the airplane ■ couple times.
 16 Q. Somebody that you know to be involved
 17 romantically or sexually with Jeffrey Epstein at any
 18 time?
 19 A. I don't know that.
 20 Q. Are there any other cars, vehicles, items,
 21 other things that ■ registered in your name that ■
 22 actually Jeffrey Epstein's?
 23 A. No. You've actually covered them all and
 24 actually shed light on some that I did not realize, like
 25 that Ford.

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1 MR. REINHART: Mr. Edwards, he needs to expand
 2 upon ■ earlier answer he gave when you asked him
 3 if he knew anybody else who worked ■ the Florida
 4 Science Foundation.
 5 BY MR. EDWARDS:
 6 Q. Okay.
 7 A. My wife worked there. When you used the words
 8 "worked there" — or not referring to her ■ ■ past
 9 tense, but she worked there when it first opened
 10 answering the phones.
 11 Q. What's your wife's name?
 12 A. Eileen.
 13 Q. How does she spell that?
 14 A. E-I-L-E-E-N.
 15 Q. Same last name ■ you?
 16 A. Yes.
 17 Q. How long did she work there?
 18 A. A month, maybe.
 19 Q. And she was answering the phones for ■
 20 Florida Science Foundation?
 21 A. Yes.
 22 Q. Do you have a good relationship with your
 23 wife?
 24 A. I think so.
 25 Q. You ■ don't know what the Florida Science

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1 Foundation does?
 2 A. No, because she doesn't.
 3 Q. She doesn't know what it does either?
 4 A. We never talked about it.
 5 Q. You ■ talked to your wife about what ■
 6 did?
 7 A. No.
 8 MR. CRITTON: He knew she ■ answering
 9 phones.
 10 BY MR. EDWARDS:
 11 Q. Do you know of any other employees, friends,
 12 agents, relatives of Jeffrey Epstein who he places his
 13 property in their names, registers them in his ■ or
 14 anybody else?
 15 A. Not to my knowledge. I don't know.
 16 Q. To your knowledge, you're the only person?
 17 A. I'm the only one I'm aware of.
 18 Q. And with respect to minor girls being ■ the
 19 airplane, that being under the age of 18, how many times
 20 would you say that you have flown girls into the
 21 country, into the United States where you have given a
 22 date of birth ■ Customs of somebody ■ the airplane
 23 that is under the age of 18?
 24 A. I'd have to look ■ flight records to verify
 25 or give you a correct answer. I don't know any to my

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1 knowledge at this point.
 2 Q. What flight records would you have to look at?
 3 A. The passenger manifests.
 4 Q. Passenger manifests would have the date of
 5 on it?
 6 A. No. It would have a name, but I don't have --
 7 Q. But at some point in time you remember people,
 8 minor date of births, coming into the country and that
 9 being turned over to Customs?
 10 MR. CRITTON: Form.
 11 THE WITNESS: I don't remember anybody
 12 transporting on the airplane from the country back
 13 into the U.S. that was a minor, to my knowledge.
 14 BY MR. EDWARDS:
 15 Q. Okay. Within the country, minors flying --
 16 A. I don't know.
 17 Q. -- on a plane?
 18 A. I don't know dates of birth.
 19 Q. And any people that you knew to be minors on
 20 the airplane, were they always accompanied by parents or
 21 were there minors on the airplane that you're aware of
 22 that were not accompanied by parents?
 23 A. I didn't know either way. I mean, people
 24 would get on the airplane and get off the airplane. I
 25 could see you there were times people would get on that

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1 I didn't even know on the airplane. Our focus is
 2 up front.
 3 Q. Was there a massage table on the airplane?
 4 A. Which aircraft?
 5 Q. On any of them?
 6 A. The Boeing used to have a table on there, but
 7 it stayed in the same spot and appeared to be
 8 used.
 9 Q. Okay. So to the best of your knowledge, you
 10 have no knowledge of that massage table on the airplane
 11 ever being used?
 12 A. Correct.
 13 MR. EDWARDS: I don't have anything else.
 14 CROSS (LARRY VISOSKI)
 15 BY MR. CRITTON:
 16 Q. Mr. Visoski, I have just a few questions. You
 17 were just asked about a massage table on the -- any of
 18 Mr. Epstein's airplanes and you said there was a massage
 19 table on the Boeing?
 20 A. Yes.
 21 Q. Okay. Was there always a massage table on the
 22 Boeing or just for a period of time?
 23 A. Just for a period of time.
 24 Q. All right. And who's responsible for cleaning
 25 up the airplane after Mr. Epstein and/or the guests

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1 leave?
 2 A. Us as the crew.
 3 Q. Okay. So a massage table had been
 4 used, it would have been you and the crew who would have
 5 been responsible for either taking towels or doing
 6 something with a massage table?
 7 A. Absolutely.
 8 Q. And if I understood your testimony, you never
 9 saw a circumstance where it appeared to you that the
 10 massage table had been used in any manner; is that
 11 correct?
 12 A. That is correct. It stayed in the same
 13 location since the day it was put on there.
 14 Q. You were asked a bunch -- a number of
 15 questions about Mr. Epstein, I'll use this --
 16 Mr. Epstein is the person who directed you generally
 17 unless one of -- someone else who worked on his behalf
 18 called you and asked you to, say, set up a time to leave
 19 or pick up luggage, cetera. My question to you is
 20 this: Have you flown in the past for other private
 21 individuals like Mr. Epstein, i.e., as distinct from a
 22 commercial?
 23 A. Yes, I have.
 24 Q. And approximately have you flown for four,
 25 five, six other private individuals over the years?

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1 A. Three. I had a short career as far as
 2 transferring of owners.
 3 Q. In terms of transferring the other owners,
 4 separate and apart from Mr. Epstein, again, every
 5 individual is different, but your relationship
 6 really any different with any of those other
 7 individuals? That is, you in -- you
 8 hired to perform a specific task: Fly an airplane to
 9 get from Point A to Point B and get the people there
 10 safely?
 11 A. My first job, corporate-wise, was for an owner
 12 in and I was hired as a pilot, but yet, I would go
 13 to his house and maintain a boat that was in the back of
 14 his house above and beyond my call of duty because I had
 15 an interest in boats. It's just something I like to do.
 16 But I always treated Mr. Epstein like any of the other
 17 prior clients that I had as owners. I knew that I was
 18 not afraid to work for a living, and they understood
 19 that.
 20 Q. And it sounds like at least the first owner
 21 that you worked for asked you to do similar things that
 22 you've done for Mr. Epstein, such as take care of a boat
 23 or purchase a boat or maintain the boat?
 24 A. Sure, absolutely.
 25 Q. So your relationship with Mr. Epstein with

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1 regard to if you bought boats or you bought ■■■ 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 ■■■ same you've
9 done with other private individuals?

10 A. Right, exactly the ■■■ We wouldn't ■■■
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 ■■■ 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 ■■■ your
18 obligation to get the passengers there safely -- onboard
19 and safely ■■■ the destination and then return?

20 A. Yes, that was always job number one.

21 Q. And most of ■■■ 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

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1 snacks or liquids. Maybe I'm not ■■■ ■■■ 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 ■■■ ■■■ the back of the airplane?

7 A. No, not at all. They stay ■■■ their station up
8 front.

9 Q. You got -- ■■■ the captain of the planes, when
10 you're flying, you have substantial responsibilities not
11 only to the people ■■■ 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 -- ■■■ started about ten. It's
16 now 3:30. Did you ever hear the ■■■ L.M.? Has
17 Mr. Edwards ever asked you ■■■ 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 ■■■ CRITTON: I'll break them down.

23 MR. EDWARDS: ■■■ doesn't matter to me.

24 ■■■ MR. CRITTON:

25 Q. Did you ■■■ meet an individual by the name of

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1 L.M.?

2 A. No, I have not.

3 Q. Did ■■■ Edwards, ■■■ approximately four hours,
4 ■■■ 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 ■■■ E.W.? Did you
8 ■■■ know ■■■ named E.W.?

9 A. Never heard that name.

10 Q. In approximately four-and-a-half hours of
11 questioning by Mr. Edwards, ■■■ he ever ask you about
12 E.W.?

13 A. No, he did not.

14 Q. In approximately the -- ■■■ 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

220

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 ■■■ private individuals?

8 A. That is correct.

9 Q. And who are those people?

10 A. Herb Glimpsure in Columbus, Ohio, and Edward
11 Seitzer in Miami. And then the other was Tom Boyd, and
12 that ■■■ ■■■ of a Learjet charter, but he ■■■ the owner
13 of five Learjets. Those ■■■ 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 ■■■ was pertaining to; but no, I never
25 visited any of them in jail, no, sir.

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1 BY MR. EDWARDS:
 2 Q. Even the ■ 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 ■ 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 RECROSS (LARRY VISOSKI)
 22 BY MR. CRITTON:
 23 Q. With regard to the private individuals that
 24 you worked for prior to Mr. Epstein, what ■ the
 25 longest period of time that you worked for those?

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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 ■ 3:37 p.m.)
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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 ■ and ■ duly
 8 sworn ■ 15th day of October, 2009.
 9
 10 Dated this 22nd day of October, 2009.
 11
 12
 13
 14
 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
 21
 22
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 24
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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 ■ 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 ■ of ■
 11 deposition.
 12 I further certify that said deposition was
 13 taken at the time ■ place hereinabove set forth and
 14 that the taking of said deposition ■ commenced and
 15 completed ■ hereinabove ■ out.
 16 I further certify that I ■ not attorney ■
 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, ■ I financially interested in the
 20 action.
 21 The foregoing certification of this transcript
 22 does not apply to any reproduction of ■ by any
 23 means unless under the direct control and/or direction
 24 of the certifying reporter.
 25 Dated ■ 22nd day of October, 2009.
 Wendy Beath Anderson, RPR, CRR, FPR
 Job #127542

225

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

6 [REDACTED] take notice that on Thursday, the 15th
 7 of October, 2009, you gave your deposition in [REDACTED]
 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 [REDACTED] noted any changes, [REDACTED]
 20 sure to sign and date the errata sheet and return these
 21 pages [REDACTED] [REDACTED].

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 [REDACTED] ordering attorney, may be filed with [REDACTED] Clerk of
 the Court. [REDACTED] you wish to [REDACTED] your signature, sign
 your name [REDACTED] 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 [REDACTED] my signature.

LARRY VISOSKI

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ERRATA SHEET

1 IN RE: L.M. VS. EPSTEIN CR: WMB
 2 DEPOSITION OF: LARRY VISOSKI
 3 TAKEN: 10.15.09 JOB NO.: 127542

4 DO NOT [REDACTED] ON TRANSCRIPT - ENTER CHANGES [REDACTED]

5 PAGE [REDACTED] LINE # CHANGE REASON

6 _____
 7 _____
 8 _____
 9 _____
 10 _____
 11 _____
 12 _____
 13 _____
 14 _____
 15 _____
 16 _____

17 Please forward [REDACTED] original signed errata sheet to [REDACTED]
 18 office [REDACTED] that copies may be distributed to all parties.

19 Under penalty of perjury, I declare that I have read my
 20 deposition and that it is true and correct subject to
 21 any changes in form [REDACTED] substance entered here.

22 DATE: _____

23 SIGNATURE OF DEPONENT: _____
 24 _____
 25 _____

226

CERTIFICATE

1 THE STATE OF FLORIDA
 2 COUNTY OF PALM BEACH

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

9 Dated this _____ day of _____
 10 2009.

11 _____
 12 LARRY VISOSKI
 13 Job #127542

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****JEFFREY EPSTEIN****September 21, 2009  
11:30 a.m.****One Penn Plaza,  
New York, New York****Jacklyn Lisi****ESQUIRE**  
Alexander Golto Company**Toll Free: 800.211.3376  
Facsimile: 954.331.4418****Suite 1300  
515 East Las Olas Boulevard  
Fort Lauderdale, FL 33301  
[www.esquireolutions.com](http://www.esquireolutions.com)**

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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?



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# 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  
6 business?  
7 A. No, he worked for Mr. Epstein. He will  
8 maintain the computers.  
9 Q. Was he there everyday?  
10 A. No, ma'am.  
11 Q. Do you know whether 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 — and I don't know  
16 the technical term, forgive me, but 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, phones.  
2 Q. Would he also repair the televisions  
3 they needed work?  
4 A. No.  
5 Q. No. Did you have any kind of intercom  
6 system the house?  
7 A. Yes, ma'am.  
8 Q. And what kind of system that?  
9 A. It was standard office equipment, Lucid  
10 Technologies maybe, but it intercom we  
11 using right now.  
12 MS. EZELL: Just 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 that in your work?  
18 A. Yes, ma'am.  
19 Q. And what did you use it for?  
20 A. Mr. Epstein used to me when he  
21 needed me.  
22 Q. Did you have of those phones in the  
23 kitchen?  
24 A. Yes, ma'am.  
25 Q. And there out in the staff house

1 said he didn't 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 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 wrong.  
13 How 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 to  
18 the house and he the programmer. very  
19 sophisticated.  
20 MR. CRITTON: Form the last question,  
21 move to strike the answer 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 in charge of computers,

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

1 names and phone numbers?  
 2 MR. CRITTON: Form.  
 3 THE WITNESS: Yes, ma'am.  
 4 BY MS. EZELL:  
 5 Q. Do you know ■ she kept pictures of the  
 6 girls ■ 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 ■ ■ casual.  
 22 Q. ■ they look ■ 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 ■ 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 ■  
 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 ■ 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 ■ 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 ■ 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 ■ 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 ■ those pictures the more casual  
 4 ■ that you described when I asked whether or  
 5 not the subject looked ■ though she knew she ■  
 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 ■ to the house to give massages that were  
 12 ■ 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 [REDACTED]  
 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 [REDACTED] be?  
 10 A. Yes.  
 11 Q. More than three?  
 12 A. More than three.  
 13 Q. Whether [REDACTED] was four [REDACTED] five you don't  
 14 know, but [REDACTED] than three?  
 15 A. More than three, sir.  
 16 Q. In terms of F.E.'s age, [REDACTED] you [REDACTED] ask  
 17 her what her age was?  
 18 A. No, sir.  
 19 Q. [REDACTED] she appear to you [REDACTED] be someone at  
 20 least from seeing her and recalling her that she  
 21 appeared [REDACTED] to you [REDACTED] be while [REDACTED] young [REDACTED]  
 22 appeared to [REDACTED] 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 [REDACTED]

1 concerned about that such that you told someone?  
 2 A. No, sir.  
 3 Q. Haven't you told the police, sir -- let  
 4 [REDACTED] strike that, [REDACTED] ask [REDACTED] this way.  
 5 In your taped statement that you gave to  
 6 the police did you not [REDACTED] them that [REDACTED] of the  
 7 girls appeared to you to be [REDACTED] or above?  
 8 A. Sir, [REDACTED] far as when [REDACTED] these actions  
 9 that [REDACTED] taking place I was under an environment  
 10 that I thought I [REDACTED] going to be -- in other  
 11 words, I [REDACTED] 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 [REDACTED] and old.  
 16 Q. Right. Let [REDACTED] just take you back to my  
 17 question again and [REDACTED] if you [REDACTED] my  
 18 question.  
 19 MR. CRITTON: Could you please read [REDACTED]  
 20 back?  
 21 (Thereupon, a portion of the record [REDACTED]  
 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 [REDACTED] 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 [REDACTED] required  
 9 to tell the police officers the truth [REDACTED] that  
 10 time?  
 11 A. Yes.  
 12 Q. And if [REDACTED] understood your testimony I  
 13 believe from July 29th through today, you at [REDACTED]  
 14 time asked any of these girls how old they [REDACTED]  
 15 True?  
 16 A. No.  
 17 Q. And [REDACTED] whether the girls [REDACTED] under [REDACTED]  
 18 or 18 or over 18, you really didn't know [REDACTED] way  
 19 or the other at the time. Would that [REDACTED] 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 [REDACTED] there is [REDACTED] person who's

1 covered, the lady that Ms. [REDACTED] asked you about I  
 2 believe [REDACTED] on the right-hand side of the  
 3 photograph. There [REDACTED] young lady [REDACTED] the  
 4 left-hand side with [REDACTED] black hat on.  
 5 Do you recognize her [REDACTED] all?  
 6 A. No, I don't recognize her.  
 7 Q. Okay. Thank you. With regard to the  
 8 photograph four that you [REDACTED] that you think  
 9 possibly might be A.H., I think you told [REDACTED] that  
 10 you recall seeing that [REDACTED] in the sauna at Mr.  
 11 Epstein's house on one occasion and she [REDACTED] 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 [REDACTED] January 2005, sir, and I [REDACTED]  
 16 terminated in March, so that [REDACTED] 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 [REDACTED] 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 ■■■

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



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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?



# 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?

that 16 A Yes.

17 Q And when you were hired, who exactly hired
to work 18 you, who -- let ■ 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

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 BY: ALAN S. ROSS, ESQ.
 Also Present: Sean McGuire, Videographer
 U.S. Legal Support

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.

(Whereupon, Witness's Exhibit 1 was marked for identification.)

VIDEOGRAPHER: We are now ■ 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.

The court reporter is Janet McKinney; the
 videographer is Sean McGuire, both of U.S. Legal
 Support.

Will counsel and all present please introduce
 yourself and the court reporter will swear the
 witness.

MR. EDWARDS: Brad Edwards. I represent the
 plaintiff, Jane Doe also "Jane Doe"; EW, "EW"; LM,
 "LM".

MR. MERMELSTEIN: Stuart Mermelstein. I
 represent Jane Doe Numbers 2 through 8.

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MR. PIKE: Michael Pike ■ behalf of Jeffrey Epstein.

MR. ROSS: And good morning, my name is Alan Ross. I represent the witness, Adriana Ross.

THE REPORTER: Would you raise your right hand, please.

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?

THE WITNESS: I do.

MR. ROSS: Before the deposition begins and in
 an effort to streamline the process of getting
 through this deposition ■ behalf of the witness we
 have had marked ■ 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 ■
 target letter identifying her as a target of a
 federal Grand Jury investigation in the Southern
 District of Florida and outlining ■ number of
 offenses that were the subject matter of
 investigation.

As a result of that, it is anticipated that
 some of the questions that may be asked during the
 ■ of this deposition she may invoke her Fifth

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 ■■■ other privilege,
 9 attorney-client privilege or some other objection
 10 that I may have to ■ 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 ■ follows:
 5 DIRECT EXAMINATION
 6 BY MR. EDWARDS:
 7 Q. Can you tell us your full -- full ■■■
 8 A. Adriana Ross.
 9 Q. At some point in time you ■■■ known as
 10 Adriana Mucinska; ■ 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 ■■■ and then -- because immigration kind of
 15 made a mistake of not changing my ■■■ 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 ■■■ 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 ■■■ to formally change it ■ Ross?
 6 A. Correct.
 7 Q. Okay. Were you married ■ this country?
 8 A. Correct.
 9 Q. When ■ you ■■■ to ■ 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 ■ Elite Models
 17 that invited you?
 18 A. Actually ■ 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 ■■■
 22 Q. How long have you been modeling?
 23 A. Since about I was 16 years old.
 24 Q. Since 16, ■ mid-90's? Late 90's?
 25 A. Probably around '98, '99, I believe.

9

1 Q. Okay. And what agencies ■■■ you model for ■
 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 ■
 6 my second trip to Milan ■ 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 ■■■ continue.
 10 A. Yeah. I was represented in Japan by agency
 11 Zucca. I was in South Korea, I do not recall the ■■■
 12 of the agency. I was represented in Taiwan by Fashion
 13 Management.
 14 Q. Okay. And these were ■ 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 ■■■
 20 invited by Elite Models ■ ■ 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 ■ the time you ■ ■ Polish

10 1 citizen? 2 A. Yes. 3 Q. So in order to come ■ ■ ■ United States you 4 needed ■ get ■ work visa? 5 A. I was invited actually just ■ kind of get ■ 6 feeling if I will be suitable. So I came on ■ business 7 tourist visa which is, I believe, B1/B2. 8 Q. Okay. And where did you first ■ when you 9 ■ ■ ■ United States, what state? 10 A. Florida. 11 Q. And what city in Florida? 12 A. Miami. 13 Q. And what ■ you do for your two weeks when 14 you first arrived ■ Miami, Florida? 15 A. I do not recall. 16 Q. Okay. But did you do any modeling? 17 A. Well, like I would ■ ■ ■ photographers, the 18 agency would send me like on ■ calls ■ see 19 photographers to kind of introduce ■ ■ 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	12 1 A. Since fall 2008. 2 Q. And when do you expect ■ graduate? 3 A. Fall 2010. 4 ■ 5 Q. Are you ■ full-time student or part-time? 6 A. I'm a full-time student ■ this time. 7 Q. When you first arrived in Miami, Florida in 8 fall of 2002 did you decide during that two weeks that 9 you were going ■ stay permanently? 10 ■ 11 A. No. 12 Q. Okay. ■ you ■ back ■ Poland? 13 A. Yes, I have. I have — I went back for 14 Christmas. 15 Q. Okay. Poor question. Going back to 2002 I'm 16 trying ■ just understand how it ■ that — you came 17 over here ■ a two-week business visa, but eventually 18 you ended up staying for a longer period of time, 19 correct? 20 A. Right. 21 Q. Okay. And how ■ that come about, just ■ 22 me? 23 A. Well, I got romantically involved with my 24 current husband and so when — you know, we just 25 started dating, we got engaged, and that's how, you know, our relation evolved — evolved, and eventually, you know, I got married and — and stayed.
11 1 something that I did. And I decided to take ■ 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 ■ you graduate from high school? 6 A. In Warsaw, Poland. 7 Q. What year? 8 A. 2002, I believe. 9 Q. And ■ you have any college? Have you gone ■ 10 college after that? 11 A. I have ■ 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 ■ ■ ■ accounting 25 program?	13 1 Q. Okay. And since coming ■ ■ ■ United States 2 have you always lived in Miami, Florida? 3 A. No. 4 Q. ■ right. Where ■ have you lived in ■ 5 United States? 6 A. New York. 7 Q. Where ■ New York? 8 A. Manhattan. 9 Q. What ■ 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 — ■ you familiar with an 15 address at 301 East 66th Street in New York? 16 A. I refuse to ■ 17 MR. PIKE: May ■ take a break for ■ 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 ■ 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. ■ right. So I'm going ■ ask ■ question
 18 again, ■ don't remember whether you'd responded yet,
 19 but are you familiar with the address ■ 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 ■ 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 ■ 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. ■ 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 ■ only
 11 take down ■ of us. Give us ■ ■ ■ ■ ■
 12 understand. Nodding of the head or shaking the head
 13 are easy to ■ and I get what you're saying, but she
 14 doesn't. Ah-ha ■ un-ah ■ things that are commonly
 15 said. They look ■ same on paper.
 16 If I ask a bad question which could happen, as
 17 already happened and probably will again, just ■ 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 ■ that address?

1 A. I'm sorry, I don't understand your question.
 2 Q. How long ■ you live at the ■ 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 ■ the first time that you moved
 8 from that address ■ live elsewhere?
 9 A. I do not recall.
 10 Q. Okay. I know that you told ■ you lived in
 11 New York City and we're ■ going ■ discuss -- I'm
 12 assuming you're not going to answer a ■ 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 ■ 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 ■
 20 Q. Okay. ■ you know a guy by the ■ Jean
 21 Luc Brunel?
 22 A. I refuse ■ ■ ■ ■ ■
 23 Q. Where ■ your parents?
 24 A. They're in Warsaw, Poland.
 25 Q. And since you've been in the United States

1 have they ■ 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 ■ ■ ■ ■ ■
 7 Q. Where ■ 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 ■ of 2006
 16 I went on a trip to Taiwan.
 17 Q. And why ■ 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 ■ go and pursue a college degree.
 21 Q. Okay. ■ 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?

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 [redacted] to
 6 Mr. Brunel?
 7 A. I refuse to answer.
 8 Q. When [redacted] time that you talked [redacted]
 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 [redacted] by the [redacted] of Sarah
 15 Kellen?
 16 A. I refuse to answer.
 17 Q. [redacted] you know a person named Nadia Marcinkova?
 18 A. I refuse to [redacted]
 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. [redacted] you ever live in a place in New York City
 23 owned [redacted] controlled by Jeffrey Epstein?
 24 A. I refuse to answer.
 25 Q. Are you familiar with the modeling agency MC

1 Squared?
 2 A. I refuse to answer.
 3 Q. Do you know of underage females being
 4 transported into this country [redacted] work for [redacted] 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. [redacted] 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 [redacted] you hired [redacted] work for
 21 Mr. Epstein?
 22 MR. PIKE: Form.
 23 MR. EDWARDS: You [redacted] [redacted] answer the
 24 question. Mr. Pike is making a legal objection.
 25 A. I refuse to answer.

1 Q. And how did -- how did it [redacted] 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 [redacted] [redacted] time period that you worked for
 9 [redacted]
 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 [redacted] in [redacted] 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 [redacted] in Jeffrey
 23 Epstein's house?
 24 MR. PIKE: Form.
 25 A. I refuse to answer.

1 Q. Did you sign a confidentiality agreement with
 2 Jeffrey Epstein?
 3 A. I refuse to answer.
 4 MR. PIKE: Form.
 5 Q. [redacted] confidentiality agreement outline
 6 what you [redacted] say [redacted] authorities [redacted] [redacted] be caught
 7 with underage females?
 8 MR. PIKE: Form.
 9 A. I refuse to [redacted]
 10 Q. Is there another book [redacted] manual [redacted] written
 11 memorialization of what you, [redacted] [redacted] 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 [redacted] you [redacted] learn that Jeffrey Epstein
 24 [redacted] a sexual obsession for underage females?
 25 A. I refuse to answer.

1 MR. PIKE: Form.
 2 Q. Isn't it true that you have [redacted] 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 [redacted] include the age range 12
 9 to 17?
 10 MR. PIKE: Form.
 11 A. I refuse to answer.
 12 Q. Have you [redacted] 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 [redacted]
 19 Q. Do you know if Nadia Marcinkova had sex with
 20 Jeffrey Epstein when she [redacted] 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?

1 MR. PIKE: Form.
 2 A. I refuse to answer.
 3 Q. Isn't it true that Jeffrey Epstein interacted
 4 sexually [redacted] underage minors [redacted] everyday [redacted]
 5 MR. PIKE: Form.
 6 A. I refuse to [redacted]
 7 Q. And most of the time Mr. Epstein would
 8 interact with underage minors [redacted] least two times a day;
 9 is that true?
 10 MR. PIKE: Form.
 11 A. I refuse to answer.
 12 Q. Can you explain [redacted] the jury how Mr. Epstein
 13 would access [redacted] underage minor females for [redacted] every
 14 day?
 15 MR. PIKE: Form.
 16 A. I refuse to answer.
 17 Q. How many assistants [redacted] Jeffrey Epstein hire
 18 [redacted] 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 [redacted] helped
 22 to bring [redacted] underage minor females?
 23 MR. PIKE: Form.
 24 A. I refuse to [redacted].
 25 Q. I know that the laws [redacted] Poland [redacted] probably

1 different than they are here, [redacted] you familiar with
 2 [redacted] 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 [redacted] ask you some
 8 questions about it.
 9 It says: "A person who intentionally touches
 10 in a [redacted] lascivious [redacted] breasts, genitals,
 11 genital area or buttocks [redacted] clothing covering them
 12 of a person less than [redacted] years of age [redacted] forces [redacted]
 13 entices a person under 16 years of [redacted] to [redacted] 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 [redacted] an everyday [redacted]
 19 while you [redacted] working for him?
 20 MR. PIKE: Form.
 21 A. I refuse to answer.
 22 Q. And that's a [redacted] [redacted] violated with
 23 [redacted] than 100 underage females; [redacted] true?
 24 MR. PIKE: Form.
 25 A. I refuse to answer.

1 Q. When [redacted] you become [redacted] Mr. Epstein [redacted]
 2 a child molester?
 3 MR. PIKE: Form.
 4 A. I refuse to answer.
 5 Q. Have you ever [redacted] him with a female under the
 6 [redacted] 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 [redacted] 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 [redacted]
 16 Q. When [redacted] 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 [redacted] of these questions may sound
 22 repetitive but during [redacted] case we've learned of key
 23 terms that different people [redacted] 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 [redacted] 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 [redacted] having with underage

17 females?

18 MR. PIKE: Form.

19 A. I refuse to [redacted]

20 Q. Now, just [redacted] that the record [redacted] clear there is

21 not a single piece of evidence [redacted] ever indicates that

22 you [redacted] involved with underage females, I'm not [redacted]

23 implying [redacted] and I realize that you invoking it may --

24 may give [redacted] wrong light and that's not -- that's not

25 my intention, so -- but [redacted] 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 [redacted]

4 the criminal investigation into Mr. Epstein?

5 A. I refuse to [redacted]

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 [redacted] the code word

13 "massage"?

14 A. I refuse to answer.

15 Q. [redacted] when referring to these underage minor

16 females that would [redacted] over to Mr. Epstein's house did

17 anybody also tell you to use the [redacted] "work"?

18 A. I refuse to answer.

19 MR. PIKE: Form.

20 Q. Meaning when somebody would call to schedule

21 [redacted] 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 [redacted] [redacted] written

2 anywhere that [redacted] -- that [redacted] with underage minors is

3 to [redacted] referred to as a "massage"?

4 A. I refuse to answer.

5 MR. PIKE: Form.

6 Q. Were there [redacted] 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 [redacted] to gain

14 [redacted] 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 [redacted] modeled for MC Squared?

22 MR. PIKE: Form.

23 A. I refuse to answer.

24 Q. [redacted] Jeffrey Epstein [redacted] promised you anything

25 related to a modeling career?

1 MR. PIKE: Form.

2 A. I refuse to answer.

3 Q. Have you ever [redacted] to Jean Luc Brunel about

4 modeling?

5 A. I refuse to [redacted]

6 Q. Have you ever [redacted] [redacted] Jean Luc Brunel about

7 [redacted] desire [redacted] 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 [redacted]

16 modeling agencies back in the 80's and 90's related to

17 agency [redacted] having [redacted] with underage minors?

18 MR. ROSS: Answer the question.

19 A. No, I'm not.

20 Q. Okay. [redacted] 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?

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?

1 MR. PIKE: Form.
 2 A. I refuse to answer.
 3 Q. Were there surveillance cameras, hidden
 4 surveillance in 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 did 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 criminal

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

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 known Virginia Roberts?
 9 A. I refuse to answer.
 10 MR. EDWARDS: All right. Let me go ahead and
 11 mark -- 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 read the lawsuit Jane Doe v.
 19 Jeffrey Epstein?
 20 A. I refuse to answer.
 21 Q. Does the lawsuit indicate the plaintiff was
 22 15 years old when Ghislaine Maxwell and Jeffrey Epstein
 23 had a threesome with her 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 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. You also indicate 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
23 international child sex trade?

24 MR. PIKE: Form.

25 A. I refuse to answer.

1 Q. Is Jean Luc Brunel a partner in that
2 international child sex trade?

3 MR. PIKE: Form.

4 A. I refuse to answer.

5 Q. Are you aware after -- Jeffrey
6 Epstein forced Jane Doe 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 you 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 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 [redacted] 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 brought to him 12 -- three 12-year-old
9 girls from France who spoke English for Epstein to
10 sexually exploit, abuse and after doing so 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 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 ■ the property ■ 358
 7 ■ ■ 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 ■ his island in — it was
 14 Little St. James, I believe he calls ■ Little
 15 St. Jeff's now?
 16 MR. PIKE: Form.
 17 A. I refuse to answer.
 18 Q. And have you witnessed underage child ■
 19 orgies ■ 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 ■
 3 A. I refuse to answer.
 4 MR. PIKE: Form.
 5 Q. Isn't it true that she gets paid just to bring
 6 ■ 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 ■ ■
 11 molest?
 12 A. I refuse to answer.
 13 MR. PIKE: Form.
 14 Q. You know Dana Burns?
 15 A. I refuse ■ answer.
 16 Q. ■ she still work for Ghislaine Maxwell?
 17 A. I refuse to answer.
 18 Q. Was she ■ underage minor ■ victim of
 19 Jeffrey Epstein's?
 20 A. I refuse to answer.
 21 Q. Through discovery we've talked ■ ■
 22 witnesses about, you know, Jeffrey Epstein and people
 23 that work for him. ■ don't know if you'll be able ■
 24 ■ any of these questions but I'll ask them anyway
 25 ■ at a time.

1 ■ Sarah ■ somebody who travels ■
 2 Jeffrey Epstein?
 3 MR. PIKE: Form.
 4 A. I refuse to answer.
 5 Q. And when Jeffrey Epstein ■ coming to town
 6 doesn't he call Sarah Kellen, his number ■ assistant?
 7 MR. PIKE: Form.
 8 A. I refuse to answer.
 9 Q. And at ■ point in time, it looks like in
 10 early 2005 ■ late 2004, you were also ■ assistant of
 11 Jeffrey Epstein's, correct?
 12 MR. PIKE: Form.
 13 A. I refuse to answer.
 14 Q. And how ■ it that you transitioned from
 15 being involved in modeling to being ■ employee of
 16 Jeffrey Epstein?
 17 MR. PIKE: Form.
 18 A. I refuse to answer.
 19 Q. Other ■ arranging for underage minor
 20 females ■ ■ 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 ■ fly ■ Jeffrey Epstein's
 25 airplane?

1 A. I refuse to answer.
 2 Q. ■ you witness Jeffrey Epstein abuse —
 3 sexually abusing underage minor females ■ ■
 4 airplane?
 5 MR. PIKE: Form.
 6 A. I refuse to answer.
 7 Q. ■ 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. ■ you ■ object ■ Jeffrey Epstein
 13 interacting sexually with underage minor females?
 14 MR. PIKE: Form.
 15 A. ■ refuse to answer.
 16 Q. Would Jeffrey Epstein get angry at you ■ you
 17 did ■ have an appointment ■ for ■ 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 ■ contacted you within the last

42 1 year? 2 A. I refuse to answer. 3 Q. ■ 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 ■ I ■ 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 ■ 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 ■ 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	44 1 A. I refuse to answer. 2 MR. ROSS: Form. 3 Q. Are you ■ of Jeffrey Epstein's for lack of 4 ■ 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 ■ ■ yourself and 10 telling you that he's going to ■ in town ■ the ■ 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 ■ interconnected 19 from his New York home, his New Mexico home, his 20 island, ■ home ■ 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?
43 1 females that Jeffrey Epstein interacted with sexually 2 during a time when you ■ working for him; isn't that 3 true? 4 A. I refuse ■ answer. 5 MR. PIKE: Form. 6 Q. And LM ■ somebody that went over ■ Jeffrey 7 Epstein's house and ■ molested at a young age by him 8 ■ than ■ times; ■ 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 ■ ■ a hundred times; isn't ■ 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 ■ than 15 times ■ be molested by 19 Jeffrey Epstein when she ■ 14 ■ 15 years old; is 20 that true? 21 MR. PIKE: Form. 22 A. I refuse to answer. 23 Q. Is it also true ■ LM brought ■ Jeffrey 24 Epstein's house between 50 and 75 other underage minor 25 females for Jeffrey Epstein to molest?	45 1 MR. PIKE: Form. 2 A. I refuse to answer. 3 Q. And isn't it ■ there ■ over a thousand 4 girls at ■ given time between the ■ range of 12 ■ 5 17 ■ of which have been molested by Jeffrey Epstein? 6 MR. PIKE: Form. 7 A. I refuse to ■ 8 Q. And when Mr. Epstein would call and ■ you 9 the time ■ ■ going ■ ■ in town it would ■ 10 be your job to get an underage ■ female ■ his 11 house and set a specific appointment for that person; 12 is that correct? 13 MR. PIKE: Form. 14 A. I refuse to ■ 15 Q. ■ he would tell you ■ exact time of day 16 that he wanted ■ two ■ three appointments to molest 17 underage minor females? 18 MR. PIKE: Form. 19 A. I refuse to answer. 20 Q. And you would go ■ ■ computer system and 21 call ■ person that ■ ■ you he wanted to see for 22 that day; ■ ■ correct? 23 MR. PIKE: Form. 24 A. I refuse to answer. 25 Q. And that may ■ Brittany ■ Tatum or Courtney

1 ■ somebody local that you would call ■ telephone
2 and tell them to ■ 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 ■ way
6 you need to tell these girls is that they are working
7 ■ they do ■ feel that they have ■ option ■
8 decline?

9 MR. PIKE: Form.

10 A. I refuse to answer.

11 Q. I mean, the psychology of ■ 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 ■ 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 ■

20 Q. And the underage minor female would show up at
21 the house and be greeted ■ the door by either
22 yourself, the house manager, ■ Sarah Kellen, correct?

23 MR. PIKE: Form.

24 A. I refuse to ■

25 Q. Many of these underage minor females including

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 ■ you would ■ them upstairs to ■
6 bedroom and leave ■ alone in ■ 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 ■ 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 ■

25 Q. And you know ■ ritual because ■ point

1 ■ time Jeffrey Epstein showed you exactly what ■ 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 ■

9 Q. And then he would roll ■ and begin to
10 masturbate with ■ right hand, correct?

11 A. I refuse to answer.

12 Q. And then he would begin also grabbing the
13 breasts, buttocks, and vagina ■ of these underage
14 minor females, correct?

15 A. I refuse to answer.

16 MR. PIKE: Form.

17 Q. And his ritual ■ so specific that with each
18 of them ■ 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 ■ fetish that you know that Jeffrey
23 Epstein has, right, he likes his nipples pinched very
24 hard?

25 MR. PIKE: Form.

1 A. I refuse to ■

2 Q. And as he's masturbating with one hand and has
3 his other ■ groping ■ inserting ■ fingers into
4 ■ 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 ■ using vibrators, correct?

10 MR. PIKE: Form.

11 A. I refuse to answer.

12 Q. And have you seen vibrators ■ ■ Beach
13 mansion house?

14 MR. PIKE: Form.

15 A. I refuse to answer.

16 Q. And other times ■ orders Nadia Marcinkova to
17 participate in these encounters with underage minor
18 females; is that correct?

19 A. I refuse to ■

20 Q. Are you familiar with Nadia Marcinkova
21 strapping ■ ■ have sex ■ ■ underage
22 minor females?

23 MR. PIKE: Form.

24 A. I refuse to answer.

25 Q. And when ■ Marcinkova would have ■ with

1 the underage minor females Jeffrey Epstein would watch
2 and continue to ejac -- continue ■ masturbate,
3 correct?
4 MR. PIKE: Form.
5 A. I refuse to answer.
6 Q. ■ he ■ 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 ■ 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 ■ ■ 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.

1 Q. And ■ always ends with ■ ejaculating?
2 A. I refuse to answer.
3 MR. PIKE: Form.
4 Q. And then he offers ■ to \$300 cash ■ the
5 underage minor female, correct?
6 MR. PIKE: Form.
7 A. I refuse to ■
8 Q. And then he also gives them another -- another
9 option to make money which is each time you ■ 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 ■ pay you \$200
13 per person.
14 MR. PIKE: Form.
15 Q. ■ that something you're familiar with?
16 A. I refuse ■
17 Q. And LM ■ offer ■ 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 ■ pyramid of
22 underage minor females where the computer system has a
23 thousand of these females ready ■ come over to work
24 for him?
25 MR. PIKE: Form.

1 A. I refuse to answer.
2 Q. ■ you know what Jeffrey Epstein does for ■
3 living?
4 A. I refuse to answer.
5 Q. Does ■ 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 ■ how it is that he made ■ money
10 where he ■ purported to ■ a billionaire?
11 A. I refuse ■
12 MR. PIKE: Form.
13 Q. Do you know David Copperfield?
14 A. I refuse to answer.
15 Q. ■ Copperfield somebody that would come
16 into town and interact sexually with underage minor
17 females?
18 A. I refuse to ■
19 Q. Do you know Martin Nowak?
20 A. I refuse to answer.
21 Q. ■ 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.

1 Q. ■ that somebody you've ■ 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 ■
7 Q. When Mr. Epstein ■ being investigated
8 criminally how ■ you first learn about that?
9 A. I refuse to answer.
10 Q. At some point ■ time ■ was tipped off that
11 his home -- that ■ search warrant ■ going to ■
12 executed on ■ home, correct?
13 MR. PIKE: Form.
14 A. I refuse to answer.
15 Q. And just ■ month before the execution of that
16 search warrant -- less ■ a month before the
17 execution of that search warrant he ordered you to do
18 something ■ 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 ■ lot of the information ■
23 I've been asking you about. You're familiar with these
24 computers that were in his house, correct?
25 MR. PIKE: Form.

1 A. I refuse to answer.
 2 Q. And he ordered you to ~~move~~ 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 ~~him~~ 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 ~~could~~ 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.

1 Q. There was one other guy with you that helped
 2 that assisted you to take these computers from ~~him~~
 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 ~~Reilly~~ that
 9 went to the home?
 10 A. I refuse to ~~answer~~.
 11 Q. Do you know who ~~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 ~~in~~ your
 17 house?
 18 A. I refuse to answer.
 19 Q. And I guess ~~his~~ house ~~was~~ I would be talking
 20 about ~~the~~ the 1040 South Shore Drive, have those
 21 computers ever been ~~in~~ ~~his~~ 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

1 search warrant ~~was~~ imminent?
 2 A. I refuse to answer.
 3 Q. ~~Did~~ you ever question when you were directed
 4 ~~to~~ ~~take~~ 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 ~~from~~
 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~~ ~~the~~ point in ~~the~~ what's ~~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 ~~from~~ I know that,
 24 you know, ~~the~~ substance of it you're ~~going~~ ~~to~~ tell
 25 me about. But this letter is dated August 31st, 2007,

1 the search warrant was executed ~~in~~ his home back in
 2 October of 2005. So during those two years leading ~~to~~
 3 ~~the~~ 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 ~~personal~~ computer --
 12 computer -- was your initial attorney ~~in~~ case,
 13 correct?
 14 MR. ROSS: You ~~say~~ yes ~~or~~ no?
 15 A. Yes.
 16 Q. Okay. And that ~~was~~ an attorney that ~~you~~ ~~had~~
 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 ~~as~~ criminal attorney ~~you~~
 25 it seemed like you did something wrong?

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 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 if you would just listen to what he said?
 16 MR. PIKE: Form.
 17 A. I refuse to answer.
 18 Q. At what point in time you have contact with
 19 him as a molester, did 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.

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 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 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 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 he would destroy their

1 credibility?
 2 A. I refuse to answer.
 3 Q. Did he tell you that he could scare them to
 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 1 and we're going
 11 to write 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 is for anybody who takes a message
 21 they write it down that somebody called, the reason for
 22 calling, the time they called?
 23 MR. PIKE: Form.
 24 A. I refuse to answer.
 25 Q. And many a time anytime Jeffrey Epstein

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 is 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 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 ■■■ there is this group
2 of girls in New York that were summoned ■ his home ■
3 generally the exact ■■■ thing ■■■ 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 ■■ exhibit here, we'll
8 mark it as — you know what, it's a bunch of message
9 pads, I'm going to mark ■ as 2A, -B, -C, -D, whatever.
10 So we'll say 2A.

11 (Whereupon, Plaintiff's ■■■ 2A through ■
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. ■■ you recognize the handwriting ■■ it?

19 A. I refuse to answer.

20 Q. It indicates "Adriana hasn't confirmed Julie
21 for 11 yet, so she ■ keeping Brittany ■ ■■ ■ 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 ■■ would promise these girls something in order ■
2 get them to allow him ■ sexually abuse them?

3 MR. PIKE: Form.

4 A. I refuse to answer.

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

7 A. I refuse to answer.

8 Q. And ■■ you have many meetings about what to
9 ■ if any of these girls ■■■ police?

10 A. I refuse to answer.

11 MR. PIKE: Form.

12 Q. Was it always known ■■ Jeffrey Epstein would
13 hire everyone attorneys and tell everyone just ■■ to
14 talk?

15 MR. PIKE: Form.

16 A. I refuse to answer.

17 Q. And at the ■■ time then ■■ could employ a
18 bunch of investigators, dig ■■ a ■■■ of dirt ■■ these
19 girls, ■■ intimidate them ■■ scare them to ■■ 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 ■■ underage minor female that Jeffrey
2 Epstein ■■ 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 ■■
6 another underage minor female named Brittany ■■ could
7 step ■ her place and ■■ 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 ■■■ I'm assuming you're not going ■■ be able ■
14 answer ■■ to whether or not you — you recognize that
15 either, right?

16 A. I refuse to ■■■

17 Q. Okay. ■■ ■ a message ■■ 9/4/05, ■
18 September 4th, 2005, 7:25 p.m. saying "Adriana
19 cancelled Julie. She would like to speak ■ you ■
20 believe about college," and a telephone number. And
21 then ■ 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. ■■ fact, it ■■ ■■ opposite, ■■ liked to hurt
3 them; isn't that true?

4 MR. PIKE: Form.

5 A. I refuse to answer.

6 Q. And after they ■■ forward if they ■■ ■
7 truth he ■■ ■■ set ■■ hurting them ■■ 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 ■■ well, correct?

13 A. I refuse to answer.

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

21 Can you ■■ us what that message means?

22 MR. PIKE: Form.

23 A. I refuse to ■■■

24 Q. It's another underage minor female that
25 Jeffrey Epstein's ■■ 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 see any of the girls cry or
 17 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 one 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 [redacted] for," and then [redacted] name is blotted out. The
 7 State Attorney's Office blotted the [redacted] of minors out
 8 sometimes in their file. So do you -- do you know --
 9 did you fill in [redacted] blank?
 10 A. I refuse to answer.
 11 Q. Do you know if this was the [redacted] that he rented
 12 for Jane Doe 4?
 13 A. I refuse to answer.
 14 Q. Is that right. Or [redacted] 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 [redacted] somebody that [redacted] 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 an 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 [redacted]
 12 worked anywhere else where there is somebody sexually
 13 molesting underage minor females on a daily basis
 14 this?
 15 MR. PIKE: Form.
 16 A. I refuse to answer.
 17 Q. At [redacted] point in time [redacted] you [redacted] your
 18 parents that [redacted] 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 [redacted] 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 [redacted] a minor [redacted] Jeffrey Epstein?
 5 MR. PIKE: Form.
 6 A. I refuse to [redacted]
 7 Q. Well, this is what she [redacted] police: "She
 8 arrived at the house, went upstairs to the bedroom.
 9 She advised [redacted] immediately removed her clothing and
 10 Nadia Marcinkova [redacted] 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 [redacted] AH remembered that she climaxed and [redacted]
 14 removing herself from the massage table. Epstein then
 15 turned [redacted] onto her stomach on [redacted] table and
 16 inserted his penis into her vagina. AH [redacted] Epstein
 17 began to pump his penis in her vagina. AH became upset
 18 over this. She said her head [redacted] being held forcibly
 19 against the [redacted] as he continued to pump inside her.
 20 She screamed 'No,' and Epstein stopped. [redacted] 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 [redacted] encounter?
 24 A. I refuse to answer.
 25 MR. PIKE: Form.

1 Q. Do you remember a time when AH as a
2 16-year-old I believe at [REDACTED] time [REDACTED] 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 [REDACTED] and had difficulty walking [REDACTED] the car;
8 do you remember that?

9 MR. PIKE: Form.

10 A. I refuse to [REDACTED]

11 Q. These message pads [REDACTED] message pads that [REDACTED]
12 taken from trash pulls outside of Jeffrey Epstein's
13 home and for [REDACTED] most -- well, there's so many messages
14 here, but [REDACTED] of them are by somebody other than
15 yourself. So my question is who [REDACTED] 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 [REDACTED]

20 Q. And the messages include CL, "Can I [REDACTED] 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

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 [REDACTED] girls
6 would [REDACTED] in tandem, isn't that true, [REDACTED] at a time?

7 MR. PIKE: Form.

8 A. I refuse to answer.

9 Q. And [REDACTED] being the girl that would bring [REDACTED]
10 [REDACTED] girl there, would wait downstairs while [REDACTED] new
11 girl [REDACTED] upstairs getting molested [REDACTED] 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 [REDACTED] to why he did this?

17 MR. PIKE: Form.

18 A. I refuse to answer.

19 Q. Do you know when it [REDACTED] 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. [REDACTED] you know that [REDACTED] was a school teacher at
25 the Dalton School?

1 A. I refuse to answer.

2 Q. And [REDACTED] that point in time -- well, are you
3 aware of him molesting underage minors while he [REDACTED]
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 [REDACTED] on it I
8 [REDACTED] mark it as what [REDACTED] -- I -- 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 [REDACTED] that while I fix what I've messed up
15 [REDACTED] here.

16 MR. ROSS: I'm going to show this to the
17 witness.

18 MR. EDWARDS: Yes. Yes.

19 Q. [REDACTED] you recognize that document?

20 A. I refuse to [REDACTED]

21 Q. There are a lot of different things [REDACTED] here
22 [REDACTED] don't necessarily relate to you. At least I can't
23 tell that they do. But [REDACTED] does indicate "Adriana's
24 parents are going to the embassy on the 23rd."

25 Do you remember when that happened?

1 A. I refuse to answer.

2 Q. Why did your parents [REDACTED] to the embassy?

3 A. I refuse to [REDACTED]

4 Q. More importantly why [REDACTED] Mr. Epstein concerned
5 that your parents [REDACTED] going to [REDACTED] 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. [REDACTED] Mr. Epstein [REDACTED] offered to get you a visa
18 for the United States?

19 A. I refuse to [REDACTED]

20 MR. PIKE: Form.

21 Q. [REDACTED] 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 [REDACTED] any of [REDACTED] 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 me a lot of
7 time.

8 MR. ROSS: It did.

9 Q. Have you ever [REDACTED] Clinton?

10 A. I refuse to [REDACTED]

11 Q. [REDACTED] 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 [REDACTED] evidence shows, there's no evidence that I
20 have that indicates that that happened, but if you were
21 going to [REDACTED] that question I'm willing to ask it.

22 Have you [REDACTED] at Jeffrey Epstein's house in
23 Palm Beach County?

24 MR. PIKE: Form.

25 A. I refuse to answer.

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

3 A. I refuse to answer.

4 Q. As well [REDACTED] Clinton [REDACTED] you're [REDACTED] of
5 that, right?

6 MR. PIKE: Form.

7 A. I refuse to answer.

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

10 MR. PIKE: Form.

11 A. I refuse to answer.

12 Q. And [REDACTED] many times it is [REDACTED] Clinton, Secret
13 Service agents, Jeffrey Epstein, Ghislaine Maxwell,
14 Sarah Kellen, and others. Have you -- [REDACTED] you know
15 about these flights?

16 A. I refuse to answer.

17 MR. PIKE: Form.

18 Q. And have you [REDACTED] witnessed [REDACTED] 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 [REDACTED] Ghislaine Maxwell's
25 sex slave?

1 A. I refuse to answer.

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

4 A. I refuse to answer.

5 MR. PIKE: Form.

6 Q. And [REDACTED] of [REDACTED] qualifications is that [REDACTED]
7 section slave be underage, correct?

8 MR. PIKE: Form.

9 A. I refuse to [REDACTED]

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

13 MR. PIKE: Form.

14 A. I refuse to answer.

15 MR. PIKE: Form.

16 Q. [REDACTED] you know President Andres Pastrana?

17 A. I refuse [REDACTED] answer.

18 Q. Do you know him as somebody who has had [REDACTED]
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 [REDACTED] heard of Ehud Barak?

24 A. I refuse to answer.

25 MR. PIKE: Form.

1 Q. [REDACTED] that another person [REDACTED] 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 [REDACTED] assuming?

6 A. I refuse to answer.

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

10 MR. PIKE: Form.

11 MR. ROSS: You [REDACTED] 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 [REDACTED] 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 [REDACTED] 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

1 underage minor females staying ■ 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 ■ 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 ■ underage minor?
25 A. I refuse to answer.

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 ■■■■■
5 Q. What airport ■ 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 ■■■ before?
12 A. I refuse to answer.
13 Q. Have you been ■ the airplane with ■■■
14 Clinton before?
15 A. I refuse to ■■■■■
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 ■ numerous occasions, correct?
20 MR. PIKE: Form.
21 A. I refuse to ■■■■■
22 Q. In fact, during the year 2005 you flew ■
23 Jeffrey Epstein's plane would you ■ ■■■ than 50
24 times?
25 A. I refuse to answer.

1 MR. PIKE: Form.
2 Q. And you flew ■ ■■ island, right?
3 A. I refuse to answer.
4 MR. PIKE: Form.
5 Q. You flew ■ 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 ■ answer.
11 Q. Several of the flights ■■ just yourself,
12 Jeffrey Epstein, and Sarah Kellen. What did you do ■
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. ■ ■■ somebody that you ■■■ made to have
19 sex with?
20 A. I refuse to answer.
21 Q. Did Jeffrey Epstein ■■■ 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

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 ■■■■■ with
7 ■■ Clinton at ■■ 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 ■ 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. ■ ■■ somebody that's involved with underage
18 minors?
19 A. I refuse to answer.
20 Q. Do you know Igor Zinoviev?
21 A. I refuse to answer.
22 Q. Andrea Metrovich?
23 A. I refuse to answer.
24 Q. Have you flown ■ the airplane with Alan
25 Dershowitz before?

1 MR. PIKE: Form.
 2 A. I refuse to [REDACTED]
 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 [REDACTED] airplane
 8 there [REDACTED] 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 on this airplane? Is
 13 there any sort of separation or is it [REDACTED] big room?
 14 MR. PIKE: Form.
 15 A. I refuse to answer.
 16 Q. So if Jeffrey Epstein and Jean Luc Brunel [REDACTED]
 17 engaged in [REDACTED] acts with underage minors [REDACTED] 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 [REDACTED] numerous of the flights [REDACTED] flight logs
 23 indicate someone's name then oftentimes initials, but
 24 sometimes it would just say "three females". Do you
 25 know why?

1 A. I refuse to answer.
 2 MR. PIKE: Form.
 3 Q. Who's Claire Hazel?
 4 A. I refuse to [REDACTED]
 5 Q. Do you know Jo-Jo [REDACTED] Lynn Fontanella?
 6 A. I refuse to answer.
 7 Q. They're the house managers [REDACTED] [REDACTED] mansion
 8 up in Manhattan, correct?
 9 MR. PIKE: Form.
 10 A. I refuse to answer.
 11 Q. And they assist Mr. Epstein in engaging [REDACTED]
 12 underage [REDACTED] with minors in New York, correct?
 13 MR. PIKE: Form.
 14 A. I refuse to [REDACTED]
 15 Q. They also [REDACTED] 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 [REDACTED]
 24 only Jeffrey Epstein but [REDACTED] various assistants. [REDACTED]
 25 you [REDACTED] speeding around the neighborhood they wouldn't

1 give you a ticket, correct?
 2 MR. PIKE: Form.
 3 A. I refuse to answer.
 4 Q. Was it [REDACTED] 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 [REDACTED]
 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 [REDACTED] 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 Zina 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.

1 Q. Somebody that he had engaged in sex [REDACTED] when
 2 she [REDACTED] 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 [REDACTED] Jean Luc Brunel?
 14 A. I refuse to answer.
 15 MR. PIKE: Form.
 16 Q. Isn't it true that [REDACTED] three of [REDACTED]
 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 ■ 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 ■■■ message that I
 7 wanted to ask you about. As I mentioned, I'm not going
 8 ■■■ through all of the messages that I have, but
 9 there's ■■■ from 9/4/2005, 9:08 a.m. from Adriana. "Is
 10 ■■■ 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 ■■■ answer.
 16 Q. I mean, some of these messages are 9:08 in the
 17 morning and others are ■■■ late as 8:30 or ■■■ at night.
 18 So what ■■■ your hours?
 19 A. I refuse to ■■■■■
 20 Q. Another message from 9/4 also, ■■■ day,
 21 "Ashley," I think, "confirmed ■■■ 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 ■■■ message?

1 A. I refuse to answer.
 2 MR. EDWARDS: Do you care how I attach ■■■
 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 ■■■
 15 friend?
 16 A. I refuse to ■■■■■.
 17 MR. PIKE: Form.
 18 Q. ■■■ you ever think of Jeffrey Epstein ■■■
 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 Barak and
 24 Prince Andrew ■■■ you meet any other people of royalty
 25 being friends with Jeffrey Epstein?

1 MR. PIKE: Form.
 2 A. I refuse ■■■■■
 3 Q. Can you ■■■ ■■■ 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. ■■■ you know a ■■■ 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 ■■■ time ■■■ associated
 12 with Jeffrey Epstein; ■■■ 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 ■■■ that Jeffrey Epstein
 17 then started supplying underage females ■■■ Glenn Dubin?
 18 MR. PIKE: Form.
 19 A. I refuse to ■■■■■
 20 Q. Do you know Johanna Sjöberg?
 21 A. I refuse to answer.
 22 Q. Is that somebody who also worked for Jeffrey
 23 Epstein?
 24 A. I refuse to ■■■■■
 25 MR. PIKE: Form.

1 Q. ■■■ Jeffrey Epstein ■■■ 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 ■■■■■ about
 6 particularly, LM, EW, and Jane Doe, those girls were
 7 not prostitutes, ■■■ 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 ■■■ girls that you knew had ■■■
 13 committed prostitution in ■■■ past, right?
 14 A. I refuse to answer.
 15 Q. And that goes for all of these girls ■■■ the
 16 phone ■■■ of underage minors ■■■ call, these were not
 17 prostitutes, correct?
 18 A. I refuse to ■■■■■
 19 Q. You ■■■ 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 ■■■ well you ■■■ called a legitimate
 24 massage parlor for Jeffrey Epstein, correct?
 25 A. I refuse to answer.

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 [REDACTED] 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 [REDACTED]
 10 Q. And did Jeffrey Epstein tell you that [REDACTED] made
 11 him happy the younger [REDACTED] girl was?
 12 A. I refuse to answer.
 13 MR. PIKE: Form.
 14 Q. The less developed the girl is [REDACTED] more
 15 excited Jeffrey Epstein gets; is that true?
 16 MR. PIKE: Form.
 17 A. I refuse to answer.
 18 Q. [REDACTED] you [REDACTED] plan to talk to Jeffrey Epstein [REDACTED]
 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.

1 MR. PIKE: Form.
 2 Q. [REDACTED] you -- well, you knew that [REDACTED] illegal
 3 what he was doing [REDACTED] [REDACTED] you [REDACTED] doing it,
 4 correct?
 5 A. I refuse to answer.
 6 Q. Did you know that you were part of a large
 7 [REDACTED] molestation ring?
 8 MR. PIKE: Form.
 9 A. I refuse to answer.
 10 Q. [REDACTED] you ever tell anyone while you [REDACTED]
 11 working for him that you wanted [REDACTED] stop?
 12 A. I refuse to answer.
 13 MR. PIKE: Form.
 14 Q. [REDACTED] you continue working there because you
 15 [REDACTED] just scared [REDACTED] 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 [REDACTED] [REDACTED] you if you quit performing
 20 your services for [REDACTED] child molestation ring?
 21 A. I refuse to answer.
 22 MR. PIKE: Form.
 23 Q. [REDACTED] Jeffrey Epstein ever threaten you?
 24 A. I refuse to answer.
 25 MR. PIKE: Form.

1 Q. Did Ghislaine Maxwell ever threaten you?
 2 A. I refuse to answer.
 3 Q. How [REDACTED] it decided who would call which girl?
 4 A. I refuse to answer.
 5 Q. And by that, just so it's clear, [REDACTED] I said,
 6 there's going to be many, many, many message pads, I
 7 have not counted them, but [REDACTED] lot created by either
 8 yourself or [REDACTED] named Janusz Banasiak [REDACTED] Lonella
 9 Rabuyo, Alfredo Rodriguez, Nadia Marcinkova, Sarah
 10 Kellen, various people that we know [REDACTED] 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 [REDACTED] 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 [REDACTED]
 24 Q. Weren't you just [REDACTED] just to pay her to keep
 25 her happy?

1 A. I refuse to answer.
 2 Q. And isn't part of the whole scheme that these
 3 girls were typically [REDACTED] "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 [REDACTED] because
 8 these girls [REDACTED] young and they're poor and they're
 9 underprivileged type girls they're likely not going [REDACTED]
 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 [REDACTED] Jeffrey Epstein angry?
 18 A. I refuse to answer.
 19 Q. Isn't it true that he's very nice and engaging
 20 [REDACTED] long as [REDACTED] gets his way and gets you [REDACTED] cooperate,
 21 right?
 22 A. I refuse to answer.
 23 Q. [REDACTED] if he doesn't get [REDACTED] way he gets very,
 24 very angry and [REDACTED] [REDACTED] scary; isn't that true?
 25 A. I refuse to answer.

- 1 Q. And you've ■■■ both ■■■ of him, right?
- 2 A. I refuse to answer.
- 3 Q. In fact, you know of girls who ■■■ 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 ■■■
- 9 yelled ■■ and told to grab their money ■■■ get out of
- 10 there, right?
- 11 A. I refuse to answer.
- 12 Q. Wouldn't you agree that ■■■ house upstairs
- 13 can ■■ somewhat confusing ■■ how it's — how it's ■■■
- 14 out?
- 15 A. I refuse to answer.
- 16 Q. ■■ fact, there's ■■ stairwell that starts from
- 17 the kitchen, there's ■■ door and ■■ almost blends in in
- 18 ■■■ kitchen with ■■■ 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 ■■■ to the left and there's another
- 23 door ■■ the top of that stairway, right?
- 24 A. I refuse to answer.
- 25 Q. And then when you exit that stairway you take

- 1 ■■ right and you head towards a little hallway that
- 2 eventually leads into Mr. Epstein's bedroom, right?
- 3 A. I refuse ■■ answer.
- 4 Q. And ■■ it's your first ■■■ ■■■ 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 ■■ 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. ■■■ Jeffrey — didn't Jeffrey Epstein ■■■ you
- 11 that he would act ■■ 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 ■■■ despite ■■■ law is okay?
- 17 A. I refuse to answer.
- 18 MR. PIKE: Form.
- 19 Q. And they could continue ■■ ■■■ a lot of money
- 20 if they would ■■■ over and be ■■■ ■■■ victims, right?
- 21 MR. PIKE: Form.
- 22 A. I refuse to answer.
- 23 Q. And you ■■■ aware when my client, LM, was
- 24 pregnant ■■ 16 years old that Jeffrey Epstein bought
- 25 everything on her baby registry, right?

- 1 A. I refuse to answer.
- 2 MR. PIKE: Form.
- 3 Q. Was it you or Sarah Kellen that took ■■ of
- 4 the gifts over to her home?
- 5 MR. PIKE: Form.
- 6 A. I refuse to answer.
- 7 Q. I believe it ■■■ Sarah Kellen ■■ — ■■■
- 8 Jeffrey Epstein ■■■ a Mercedes?
- 9 MR. PIKE: Form.
- 10 A. I refuse to ■■■
- 11 Q. And do you remember when Sarah Kellen loaded
- 12 ■■ the Mercedes with ■■ ■■■ baby gifts and took ■■
- 13 my client's trailer?
- 14 A. I refuse to answer.
- 15 Q. And that ■■■ ■■ that while LM — that was ■■
- 16 thank her while she was pregnant she continued ■■ 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 ■■■ would no longer qualify as somebody
- 21 he'd be sexually interacting with ■■ she was pregnant,
- 22 correct?
- 23 MR. PIKE: Form.
- 24 A. I refuse to answer.
- 25 Q. Because the only real disqualifications for

- 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 ■■■
- 6 Q. You've never known ■■■ to interact with ■■
- 7 African-American ■■ black girl, have you?
- 8 A. I refuse to answer.
- 9 Q. ■■ you've been pregnant?
- 10 A. I refuse to answer.
- 11 Q. Or if you ■■■ pregnant, correct?
- 12 A. I refuse to answer.
- 13 Q. ■■■ certainly he ■■■ ■■■ above having a
- 14 pregnant 16-year-old girl bringing ■■■ 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 ■■■ doing her a
- 20 favor in ■■■ he ■■■ giving her ■■■ for providing ■■
- 21 service, correct?
- 22 MR. PIKE: Form.
- 23 A. I refuse to answer.
- 24 Q. ■■ it Jeffrey Epstein's belief that he ■■■
- 25 these girls a favor?

1 A. I refuse to [REDACTED]
 2 Q. I mean, doesn't he think [REDACTED] these girls are
 3 lucky that he ever -- that they [REDACTED] -- 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 [REDACTED]
 9 least I read [REDACTED] you earlier and now we've [REDACTED]
 10 [REDACTED] this scheme of Jeffrey Epstein gaining [REDACTED]
 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 [REDACTED]
 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 [REDACTED] chooses to import underage minor females from?
 5 A. I refuse to [REDACTED]
 6 MR. PIKE: Form.
 7 Q. Was Nadia -- do you know how [REDACTED]
 8 Marcinkova [REDACTED] when she [REDACTED] to this country?
 9 A. I refuse to answer.
 10 Q. Have you [REDACTED] conversations with Nadia
 11 Marcinkova about Jeffrey Epstein bringing [REDACTED] to this
 12 country?
 13 A. I refuse to answer.
 14 Q. She's been described by [REDACTED] as his
 15 Yugoslavian lesbian sex slave. Is that something that
 16 is [REDACTED] accurate description based [REDACTED] the observations
 17 you have?
 18 A. I refuse to answer.
 19 MR. PIKE: Form.
 20 Q. Did you ever engage [REDACTED] any lesbian [REDACTED] 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 [REDACTED]
 2 Q. Do you know how it [REDACTED] Sarah Kellen met
 3 Jeffrey Epstein?
 4 A. I refuse to answer.
 5 Q. [REDACTED] 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 [REDACTED] bringing him underage minor females for
 11 sex, correct?
 12 A. I refuse to answer.
 13 MR. PIKE: Form.
 14 Q. And [REDACTED] Monroe, you know who that is?
 15 A. I refuse to answer.
 16 Q. Also somebody that through MC Squared or [REDACTED]
 17 affiliation with that modeling agency would help for
 18 Jeffrey Epstein [REDACTED] gain [REDACTED] 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 [REDACTED]
 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.

1 Q. All right. I ask you ■■■ 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 ■■■ included your
7 name ■ 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 ■ 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 ■■■
20 Q. ■ is certainly not because you sought out
21 this ■■■ molestation ring in hopes of rising to ■
22 top, correct?
23 MR. PIKE: Form.
24 A. I refuse to ■■■
25 Q. Didn't you do everything that you ■■ that

1 anybody could ■■■ say is illegal at the direction of
2 Jeffrey Epstein?
3 A. I refuse to answer.
4 Q. And if it wasn't ■■■ ■■■■■ of Jeffrey
5 Epstein ■■■ at ■■■ direction of Ghislaine Maxwell or
6 Sarah Kellen, correct?
7 MR. PIKE: Form.
8 A. I refuse to answer.
9 Q. I mean, these things were ■■■ 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 ■ do these things either
15 out of fear ■ because you ■■■ just impressed with
16 Jeffrey Epstein's lifestyle?
17 A. I refuse ■ answer.
18 Q. Aren't you angry for ■■■ involving you in ■
19 criminal activity?
20 A. I refuse to answer.
21 MR. PIKE: Form.
22 Q. ■ you ■■■ 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.

1 Q. Wouldn't you ■■■ ■ separate yourself being
2 the person that you ■■■ 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 ■■■
10 MR. ROSS: Well, actually you ■■■ ■■■
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 ■■■
17 Jeffrey Epstein's enemies?
18 MR. PIKE: Form.
19 A. I refuse to ■■■
20 Q. ■■■ you ever find out that Jeffrey Epstein and
21 Ghislaine Maxwell had been targeting and preying upon
22 underage females for ■■■ for ■■■■ than a decade?
23 MR. PIKE: Form.
24 A. I refuse to ■■■
25 Q. Who is Jeffrey Epstein's girlfriend now, if

1 you know?
2 A. I refuse to answer.
3 MR. PIKE: Form.
4 Q. Since being ■ house arrest ■■■ Jeffrey
5 Epstein continued to ■■■ in ■■■ with underage minor
6 females?
7 MR. PIKE: Form.
8 A. I refuse to answer.
9 Q. Knowing that ■■■ habit was ■■■■ than ■■■ ■
10 least two underage minor females for sex every single
11 day do you believe ■■■ 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 ■ entitled to have ■■■ 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 ■ molest underage
25 minors within the United States?

106 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 ■■■■ 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 ■ answer. 17 Q. How many times ■ Jean Luc Brunel shown up ■ 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.	108 1 Epstein out of the trouble that he would have been in 2 related ■ his sexual interactions with minor females? 3 A. I refuse to answer. 4 MR. PIKE: Form. 5 Q. Did Jeffrey Epstein tell you ■■■■ you need ■ 6 cooperate if you want the protection that ■ 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 ■■■■ LM ■ ■■■ telephone 11 for her to ■■■■ 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 ■ ■■■ 17 telephone for the purposes of her coming ■ Jeffrey 18 Epstein's ■■■■ for ■■■■ 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 ■■■ her to ■■■■ 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.
107 1 Q. What ■■■■ done -- or let me ask it a different 2 way. Strike that. 3 Where ■ ■■■ scheduling book for the massage 4 appointments for Jeffrey Epstein? 5 MR. PIKE: Form. 6 A. I refuse to ■■■■ 7 Q. Is ■■■■ something else ■■■■ 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, ■■■ 12 Jeffrey Epstein ever tell you that because of the 13 people he knew ■■■ would not be going to prison for the 14 crimes that ■■■ committed? 15 A. I refuse ■ answer. 16 MR. PIKE: Form. 17 Q. And is it your understanding that Ken Starr 18 ■■■ played a major role in devising the non-prosecution 19 agreement ■■■ having the government agree not ■ 20 prosecute Jeffrey Epstein for ■■■ crimes against 21 minors? 22 A. I refuse to answer. 23 MR. PIKE: Form. 24 Q. ■ it ■■■ your understanding that Bill 25 Clinton played somewhat of a role ■ helping Jeffrey	109 1 Q. The first trial that is set in these ■■■■ is 2 ■ July of this year. Do you intend ■ be in ■ local 3 area? 4 MR. ROSS: You can answer. 5 A. Yes. 6 Q. Okay. And what address will you ■ at? 7 MR. ROSS: You can ■■■■ 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 ■ I needed ■ find you ■ 14 locate you or anything else I could go through your 15 attorney? 16 A. Yes. 17 Q. Okay. Who do you live ■ 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 ■ ■■■ house with you, I'm

1 **sorry?**
 2 A. His sister.
 3 **Q. And her [redacted] is?**
 4 A. Stella Erin Ross.
 5 **Q. And have you [redacted] Monica or Stella your**
 6 **involvement with Jeffrey Epstein?**
 7 A. I refuse to answer.
 8 **Q. Have you [redacted] your parents?**
 9 A. I refuse to answer.
 10 **Q. Are your parents [redacted] country now?**
 11 MR. ROSS: You can answer.
 12 A. No.
 13 **Q. Do they have plans to [redacted] back?**
 14 MR. ROSS: You [redacted] 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 [redacted] 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 [redacted] 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 [redacted] 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 [redacted] 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 **[redacted] Europe, correct?**
 2 A. Correct.
 3 **Q. And did [redacted] have [redacted] different employment or**
 4 **profession then?**
 5 A. Yes.
 6 **Q. [redacted] was [redacted] 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 [redacted] to Europe for [redacted] DJ event. DJing
 10 event.
 11 **Q. And where [redacted] [redacted] Europe?**
 12 A. He went to Spain and then I was in Monaco [redacted]
 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 [redacted]**
 16 **United States?**
 17 A. Yes.
 18 **Q. And how [redacted] 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, [redacted] photographic work [redacted] well
 22 himself.
 23 **Q. So he [redacted] a DJ and [redacted] professional**
 24 **photograph -- photographer?**
 25 A. Yes. You may say so, yes.

1 **Q. And a scientist [redacted] 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 [redacted] --
 7 **Q. Well, did [redacted] perform work [redacted] services for**
 8 **particular modeling agencies [redacted] 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, [redacted] client that you may have.
 15 **Q. So [redacted] a photographer he would hire models for**
 16 **[redacted] particular modeling agency?**
 17 MR. PIKE: Form.
 18 A. Yes.
 19 **Q. And do you know which modeling agencies [redacted]**
 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

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

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1 primary assistant Sarah Kellen?

2 MR. PIKE: Form.

3 A. I refuse to answer.

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

5 that he recruited from western Palm Beach County

6 underage girls 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

12 underage high school girls in Palm Beach County and

13 their contact information so that he could have these

14 underage minors at 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 was 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 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 -- to give Jeffrey Epstein a massage

18 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

23 Epstein's Palm Beach house did you receive calls from

24 Jane Doe 4 regarding 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 Did 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 his 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 girls'

23 contact information for Jane Doe 7?

24 MR. PIKE: Form.

25 A. I refuse to answer.

1 Q. Do you know who Jane Doe 1 is?
 2 A. I refuse to answer.
 3 Q. Do you know who Jane Doe 2 is?
 4 A. I refuse to answer.
 5 Q. Did the computer database [redacted] Epstein
 6 maintained [redacted] computers in his home have [redacted]
 7 [redacted] contact information for Jane Doe 1 so that Epstein
 8 could contact her for -- for [redacted] his [redacted] 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. [redacted] the computer database [redacted] Epstein
 15 maintained [redacted] his home of underage girls who he would
 16 have [redacted] over for massages and sexual activity [redacted]
 17 that computer database include [redacted] [redacted] contact
 18 information for Jane Doe 6?
 19 A. I refuse to [redacted]
 20 Q. Do you know the [redacted] Jane Doe 3?
 21 A. I refuse to answer.
 22 Q. Did the computer database [redacted] Jeffrey Epstein
 23 maintained [redacted] home include the [redacted] and contact
 24 information of Jane Doe 3 so [redacted] [redacted] could contact Jane
 25 Doe 3 to [redacted] to his Palm Beach home and give him a

1 message which would become sexual activity?
 2 A. I refuse to answer.
 3 Q. [redacted] the computer database that Jeffrey Epstein
 4 maintained [redacted] [redacted] include [redacted] Jane Doe 4?
 5 MR. PIKE: Form.
 6 A. I refuse to [redacted]
 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 1 in
 11 his computer database in [redacted] 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 [redacted]
 16 Q. [redacted] you know for a fact that [redacted] computer
 17 database included the name Jane Doe 1 [redacted] that Jeffrey
 18 Epstein could contact her and she would [redacted] to the
 19 [redacted] Beach mansion to give Jeffrey Epstein a massage?
 20 MR. PIKE: Form.
 21 A. I refuse to [redacted]
 22 Q. [redacted] you know that [redacted] 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.

1 Q. I'm sorry -- [redacted] would contact Jane Doe 7
 2 and have her come to his house to give him a massage?
 3 A. I refuse [redacted] answer.
 4 Q. Are you [redacted] the computer database that
 5 Jeffrey Epstein maintained in [redacted] home contained [redacted]
 6 [redacted] Jane Doe 1 [redacted] that he could contact Jane Doe 1 and
 7 have him [redacted] the house in Palm Beach for purposes
 8 of giving him a massage?
 9 MR. PIKE: Form.
 10 A. I refuse to [redacted]
 11 Q. You removed three computers from [redacted] 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; [redacted] correct?
 19 MR. PIKE: Form, asked and answered.
 20 A. I refuse to [redacted]
 21 Q. And Jeffrey Epstein told you that the reason
 22 he was instructing you [redacted] the computers was [redacted]
 23 hide [redacted] sexual activities with underage minors from
 24 the authorities?
 25 MR. PIKE: Form.

1 A. I refuse to answer.
 2 Q. As [redacted] employee of Jeffrey Epstein [redacted] you know
 3 Janusz Banaszak?
 4 A. I refuse to answer.
 5 MR. PIKE: Form.
 6 Q. Was Janusz Banaszak [redacted] an employee of
 7 Jeffrey Epstein?
 8 MR. PIKE: Form.
 9 A. I refuse to answer.
 10 Q. When Janusz Banaszak testified [redacted] you [redacted]
 11 another gentleman removed the three computers from
 12 Jeffrey Epstein's [redacted] he was telling [redacted] truth,
 13 correct?
 14 A. I refuse to [redacted]
 15 MR. PIKE: Form.
 16 Q. [redacted] you observe Jeffrey Epstein persuading,
 17 inducing, [redacted] enticing underage girls to [redacted] [redacted]
 18 sexual activities with him?
 19 A. I refuse to answer.
 20 Q. [redacted] you -- strike [redacted]
 21 [redacted] you observe Jeffrey Epstein persuading,
 22 inducing, or enticing girls who came [redacted] house for
 23 the purpose of giving [redacted] a massage [redacted] engage in sexual
 24 activity with him?
 25 MR. PIKE: Form.

1 A. I refuse to answer.

2 Q. Did Jeffrey Epstein ■ you that ■ 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 ■ a massage?

6 MR. PIKE: Form.

7 A. I refuse to answer.

8 Q. Would you instruct — when y ■ 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 ■ and say they ■ 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 ■ what ■
15 say to the girls who you contacted by telephone ■ make
16 appointments ■ schedule massages ■ Epstein's home?

17 A. I refuse to answer.

18 MR. PIKE: Form.

19 Q. And would Jeffrey Epstein ■ you to have the
20 girls who you contacted by ■ telephone ■ make
21 appointments to ■ the mansion to give Jeffrey
22 Epstein massages, that they should — that these girls
23 should ■ about their ■ to Jeffrey Epstein?

24 MR. PIKE: Form.

25 A. I refuse to answer.

1 Q. Prior ■ May 2005 ■ you ■ that Jeffrey
2 Epstein had numerous appointments with Jane ■ 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 ■ May 2005 ■ you ■ Jane Doe
8 ■ would ■ to the mansion to give Jeffrey Epstein a
9 massage ■ a frequent and regular basis?

10 A. I refuse to ■

11 MR. PIKE: Form.

12 Q. Are you ■ that prior to May 2005 Jeffrey
13 Epstein engaged with — engaged in sexual activities
14 with Jane Doe 4 at the Palm Beach mansion ■ to a
15 hundred times?

16 A. I refuse to ■

17 MR. PIKE: Form.

18 Q. ■ Jeffrey Epstein admit to you ■ ■
19 numerous occasions he — when Jane ■ 4 was ■
20 underage minor he touched her breasts?

21 MR. PIKE: Form.

22 A. I refuse to answer.

23 Q. ■ Jeffrey Epstein admit to you that on
24 numerous occasions when Jane Doe ■ was an underage
25 minor he touched and groped her buttocks?

1 A. I refuse to ■

2 Q. Did Jeffrey Epstein admit to you ■ numerous
3 occasions when Jane Doe ■ was ■ underage minor that ■
4 rubbed Jane Doe 4's vagina?

5 A. I refuse to answer.

6 MR. PIKE: Form.

7 Q. Did Jeffrey Epstein admit ■ you that on
8 occasions prior to Jane Doe 4 turning the ■ of 18
9 that he performed oral ■ on Jane ■ ■

10 MR. PIKE: Form.

11 A. I refuse to ■

12 Q. ■ Jeffrey Epstein admit to you that on
13 ■ occasions prior to Jane Doe 4 reaching the ■
14 of 18 he would place ■ vibrator ■ 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 ■ ■ would masturbate
20 in her presence?

21 A. I refuse to ■

22 MR. PIKE: Form to the last question.

23 MR. MERMELSTEIN: Hum?

24 MR. PIKE: Form to the last question.

25 Q. ■ Jeffrey Epstein admit ■ you that prior ■

1 Jane Doe 7 reaching the ■ of 18 years old he would
2 touch her breasts?

3 MR. PIKE: Form.

4 A. I refuse to answer.

5 Q. ■ Jeffrey Epstein admit to you that prior to
6 Jane ■ 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 ■ 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 ■

14 MR. PIKE: Form.

15 Q. ■ you know who Haley Robson is?

16 A. I refuse to answer.

17 Q. ■ Jeffrey Epstein instruct you to call Haley
18 ■ on ■ 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. ■ Jeffrey Epstein instruct you ■ numerous
24 occasions to contact Haley Robson for the purpose of
25 scheduling underage girls for appointments to ■ to

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 had his contact in western [redacted] 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 [redacted]
11 MR. PIKE: Form.
12 Q. Did Sarah Kellen instruct you how to
13 contact underage girls for the purpose of bringing them
14 to the Palm [redacted] mansion for massages and what [redacted] 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 [redacted] the Palm Beach
20 mansion and — and provide Jeffrey Epstein with
21 massages?
22 A. I refuse to [redacted]
23 MR. PIKE: Form.
24 Q. Was [redacted] of your primary duties scheduling
25 regular appointments, at least two per day, for Jeffrey

1 Epstein to have underage girls come to [redacted] 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 [redacted] photograph taken from
15 an Internet newspaper. Can you [redacted] me where that
16 picture [redacted] taken?
17 A. I refuse to answer.
18 MR. PIKE: May I see that, counsel?
19 Q. Was [redacted] related — this event, [redacted] related
20 to MC Squared?
21 A. I refuse to answer.
22 Q. All right. What is — I know [redacted] you [redacted]
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.

1 Q. Excuse me?
2 A. CPA firm.
3 Q. Okay. What was the [redacted] of that CPA firm?
4 A. William Owens, CPA, P.A.
5 Q. William Owens. And is that in [redacted]
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?

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 [redacted] you [redacted] 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 [redacted] there?
11 A. May of 2009.
12 Q. Okay. May '09, so that brings us back to late
13 [redacted] or something when you started there?
14 A. Yes. That would be about right, yes.
15 Q. And then [redacted] was sometime earlier than that in
16 2006 when you [redacted] 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.

1 Q. And where ■■■ 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 ■■■ 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 ■ the letter I --
 20 A. Yes.
 21 Q. -- letter D?
 22 And who ■■■ person that got you hooked up
 23 ■■■ Models?
 24 A. My husband had that contact.
 25 Q. Okay. How long did you work with ID Models?

1 A. I'm trying to think. I do not recall exact
 2 timeframe.
 3 Q. All right. Well, if the clothing store ■■■
 4 sometime late ■■■ ■■■ talking about earlier ■ ■■
 5 year 2006 when you ■■■ working with ■■■ ■ Miami and
 6 ■■■ 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 ■ working ■ 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 ■
 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 ■■■
 25 modeling in Europe, you ■■■ ■■■ here in 2002.

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 ■■■ over here
 5 in ■■■ you ■■■ 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 ■■■ Let's
 9 start over.
 10 2002 you ■■■ ■■■ to ■■■ United States,
 11 you're working at Elite?
 12 A. Yes, I've been invited by Elite.
 13 Q. Okay. And ■■■ if I understand you correctly
 14 ■■■ time you continue ■■■ work with ■■■ through Elite?
 15 A. Well, I've been, you know, changing agencies
 16 throughout the period.
 17 Q. Okay. What are ■■■ of the other modeling
 18 agencies you have worked for ■■■ with?
 19 A. I refuse to ■■■
 20 Q. Okay. The only other ■■■ of modeling
 21 agencies that you can ■■■ 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.

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. ■■■ there anybody else ■■■ you're
 6 able to -- ■■■ ■■■ where you worked?
 7 MR. ROSS: Invoke ■■■ to any further
 8 information.
 9 THE WITNESS: I'm sorry?
 10 MR. ROSS: Invoke your privilege.
 11 A. I refuse to ■■■ any questions.
 12 MR. EDWARDS: All right. That's all I got.
 13 MR. MERMELSTEIN: Can I just follow up a
 14 couple?
 15 RECROSS-EXAMINATION
 16 BY MR. MERMELSTEIN:
 17 Q. ■■■ what ■■■ been marked as ■■■ 2C ■■■ a
 18 phone message from you to Adri -- from you to Jeffrey
 19 Epstein dated September 10th, ■■■ ■■■ 1:15 p.m.
 20 And the message that you ■■■ ■■■ "Lauren
 21 confirmed ■ 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 ■■■ you schedule Lauren --
 3 MR. PIKE: Form.
 4 Q. -- Lauren Murphy to ■■■■ to the Palm Beach
 5 mansion ■■ an underage female to give Jeffrey Epstein
 6 massages?
 7 MR. PIKE: Form.
 8 A. I refuse to answer.
 9 Q. Also what ■■■ been marked as Exhibit 2F is a
 10 phone message from you to Jeffrey Epstein dated
 11 September 11th, 2005 ■■ 9:15 a.m. And ■■■ message was
 12 that you got a car for ■■ particular person. Do you
 13 recall that?
 14 MR. PIKE: Form.
 15 A. I refuse to answer.
 16 Q. ■■ the ■■■ that you obtained ■■
 17 September 11th, ■■■ for Jane Doe 4?
 18 MR. PIKE: Form.
 19 A. I refuse to answer.
 20 Q. And Jane Doe 4 is a girl who ■■■ 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 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 ■■■ been marked as Exhibit 2G is a
 8 message from you to Jeffrey Epstein dated
 9 September 3rd, 2005 ■■ 8:50 p.m. And the message you
 10 ■■■ is, quote, "I left message for Ashley to confirm
 11 for 11:00 ■■■ and Vanessa for 4:30 p.m."
 12 ■■■ 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 ■■■■
 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 and no word index.
 2 MR. MERMELSTEIN: I'll take a copy with ■■
 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 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 ■■■ duly sworn.
 10 Signed this 21st day of March, 2010.
 11
 12
 13

14 
 Janet L. McKinney

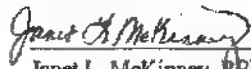
15 Registered Professional Reporter
 16 Florida Professional Reporter
 17 Certified LiveNote Reporter
 18 Notary Public, State of Florida
 19 Commission No.: DD552183
 20 Expires: June 2, 2010
 21
 22
 23
 24
 25

CERTIFICATE OF REPORTER
STATE OF FLORIDA
COUNTY OF BROWARD

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

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

Dated this 21st day of March, 2010.



Janet L. McKinney, RPR, FPR, C.L.N.R.
Registered Professional Reporter
Florida Professional Reporter
Certified LiveNote Reporter



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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
■ 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
10:37 - 6:51 p.m.

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

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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. 502008CA028058XXXXMB AD

E.W.,

Plaintiff,

-vs- VOLUME I OF ■
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 ■
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

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(Via telephone)

Appearances continued...

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ALSO PRESENT:

Jessica Cadwell, Paralegal

Burman, Critton, Luttier & Coleman, P.A.

Joseph Kozak, Videographer

Prose Court Reporting Services

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EXAMINATION DIRECT CROSS REDIRECT

SARAH KELLEN

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EXHIBITS

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PASSENGER MANIFEST

PLAINTIFFS EX. 3 HYPERION AIR, INC.,

PASSENGER MANIFEST

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PLAINTIFFS EX. 4 PHONE MESSAGE PADS

PLAINTIFFS EX. 5 CELLPHONE RECORDS

PLAINTIFFS EX. 13 PHOTO 144

PROCEEDINGS

THE VIDEOGRAPHER: We are now on video record. This is Media No. 1 in the videotaped deposition of Sarah Kellen in the matter of Jane Doe versus Jeffrey Epstein, et al. Today is Wednesday, March 24th, 2010. It is 10:36 a.m. We are here in Prose Court Reporting, 250 South Australian Avenue, West Palm Beach, Florida.

My name is Joe Kozak. I'm the videographer. The reporter is Cindy Hopkins from Prose Court Reporting Agency.

Would counsel please introduce yourselves, and then the court reporter will swear in the witness.

MR. KUVIN: Good morning. Spencer Kuvin on behalf of one of the Plaintiffs.

MR. HOROWITZ: Adam Horowitz on behalf of Jane Does 2 through 8. And just for the record purposes, the deposition is also being taken in the federal cases, I believe, case being Jane Doe 2 versus Jeffrey Epstein.

MR. WEISSING: Matt Weissing on behalf of 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 Rheinhart on behalf
8 of the witness, Sarah Kellen.

9 MR. KUVIN: Kathy, your turn.

10 MS. EZELL: Okay. Kathy Ezell and Amy
11 Ederi ■■■ behalf of Plaintiff, Jane Doe 103.
12 Thereupon,

13 (SARAH KELLEN)

14 Having been first duly sworn or affirmed, was
15 examined and testified ■ follows:

16 DIRECT EXAMINATION

17 BY MR. KUVIN:

18 Q. Good morning.

19 A. Morning.

20 Q. Could you give ■ your full name, please.

21 A. Sarah Kellen.

22 Q. Do you have ■ middle name?

23 A. Lynelle.

24 Q. Would you spell that for us?

25 A. L-y-n-n-e-l-l-e.

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 ■■■ likely going to be
8 answers similar to that throughout this
9 deposition. I have agreed to a procedure that
10 we ■■ do ■ 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 ■■■ instruction in the future to the
21 extent that it's relevant, and I think that if
22 ■■■ 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 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 ■
9 being the answer that is played to the jury.
10 So either you guys can agree that it gets out
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 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 ■■ counsel
16 of record in the civil cases.

17 MR. KUVIN: Okay. Okay.

18 MR. RHEINHART: If we have ■ stipulation,
19 what's the problem? Are you --

20 MR. KUVIN: There is none.

21 MR. RHEINHART: -- worried about ■ 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. Rheinhart, with respect to
8 how you want to handle it, I think we have
9 agreement.

10 MR. RHEINHART: I'm satisfied that we have
11 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 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 it 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 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. 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 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'm going to show you a
14 photograph we've marked 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
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, ■■■
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 ■■■ 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 ■ 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 ■ 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 ■■■ facts not before the witness. It is ■
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 ■ 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 ■■■ that when you
21 first were hired by Jeffrey Epstein ■ his personal
22 assistant, you ■■■ 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 [REDACTED] based on her Fifth Amendment
 25 privilege.

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 [REDACTED] 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 [REDACTED] times?
 24 MR. RHEINHART: Object to the form. It
 25 assumes facts that are not present for the

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 assumes facts that [REDACTED] not established [REDACTED] 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 [REDACTED] 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 [REDACTED]
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 [REDACTED] listed [REDACTED] 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 [REDACTED] based [REDACTED] 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 [REDACTED] 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 ■ that the two girls
3 that ■ listed ■ 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 ■ 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 ■ of
5 that?

6 MR. RHEINHART: Object ■ 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 ■ I just recently mentioned where you
7 invoked your Fifth Amendment, ■ 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 ■ legal conclusion. It
12 is compound. It calls for her to speculate.
13 There is no basis for her to be able to give ■
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 ■ 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 ■ 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 to what "wholly funded" means, and

1 BY MR. KUVIN:

2 Q. Would you agree with ■ 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 (Plaintiffs 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. Rheinhart 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 ■ 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, ■ 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 ■ ambiguous as to this and what ■
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 ■ 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 ■ ■
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 ■ 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 ■
14 Exhibit 3, in the past?

15 MR. RHEINHART: I'll instruct the witness
16 not to answer based ■ 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 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 ■ 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 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 ■ 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 ■ her Fifth Amendment privilege.

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. Do you also agree with ■ on that flight
3 of June 20th, 2005, was ■ unidentified female,
4 according to the passenger manifest?

5 MR. RHEINHART: Object to the form --
6 excuse ■ -- 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 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 ■ 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 ■ 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 ■
15 compound and calling for speculation, and
16 instruct the witness not to answer based ■ 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 ■ the
24 flight of June 30, 2005, ■ 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 ■ occasions where there were girls on the
19 plane under the age of 16?

20 MR. RHEINHART: Object to the form ■
21 compound and ambiguous ■ 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 ■
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 ■ the
22 previous question, ■ 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 ■ that you have
3 flown on Jeffrey Epstein's plane from Teterboro, New
4 Jersey ■ 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 ■ 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 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 ■
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 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 ■ the plane with Jeffrey Epstein, that
17 there were girls under the age of 16 that
18 Jeffrey Epstein ■ having sexual contact with on
19 that plane?

20 MR. RHEINHART: Same objections as
21 previously stated. It's compound, ambiguous,
22 and ■ facts that she has ■ 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 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 ■ 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 ■ 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 ■ plane with
15 Jeffrey Epstein ever in your entire life?

16 MR. RHEINHART: Instruct the witness not
17 to answer based ■ 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 ■ 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 ■■■ with girls under the age of
7 14 on his plane?

8 MR. RHEINHART: Objection to the form. It
9 ■■■ 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 ■■■ that you've ■■■
18 Jeffrey Epstein have sex with girls ■■■ 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 ■■■
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 ■■■ that the word
24 "sex" means both vaginal intercourse ■■■ 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, ■■■ 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 ■■■ 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 ■■■

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 ■■■ 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 [REDACTED]
9 based on the Fifth Amendment privilege, because
10 to do [REDACTED] 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 [REDACTED] 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 [REDACTED] 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 [REDACTED] 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 [REDACTED] I'm going to
9 show it to the [REDACTED] real briefly, if I could.
10 Okay.

11 MR. RHEINHART: Let me see it. Thank you.

12 (Plaintiff's Exhibit No. [REDACTED] 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 [REDACTED] 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 [REDACTED] the left in that photograph that
8 we marked [REDACTED] 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 [REDACTED] 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 [REDACTED] 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 ■ 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 ■
9 compound and also ■ 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 ■ that you directed
18 Haley Robson ■ 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 ■ 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 ■ based ■ her
25 Fifth Amendment privilege.

1 shown in Exhibit 7 is Haley Robson?

2 MR. RHEINHART: Instruct the witness not
3 to answer based ■ 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 ■ 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 ■ 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. ■ 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 1 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 ■ 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 ■ Fifth
2 Amendment objection. So ■ 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 ■
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 ■ 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 ■ 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 ■ 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 ■ 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 ■ kept by Jeffrey Epstein in his home?

4 MR. RHEINHART: Objection to the form ■
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 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 ■
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 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, ■ 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 ■ 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 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 ■ the
15 previous question as well ■ that question is
16 now free to ■ this witness has any
17 knowledge at all of Jeffrey Epstein or
18 Jeffrey Epstein having abused any underage
19 women or girls ■ 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 ■■■ sexually attracted to girls
4 under the age of 18?

5 MR. RHEINHART: Once again, the question
6 ■■■ this witness knows anything ■ all
7 about Jeffrey Epstein, underage women, sexual
8 abuse of underage women, and she's not going to
9 answer any questions that ■■■ 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 ■ the
20 previous question. The question as stated
21 assumes this witness has some knowledge of
22 Jeffrey Epstein. And since it ■■■ 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, ■ 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 ■ 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 ■ aware, ■ you not, that

David Copperfield and Jeffrey Epstein used to share for sexual -- for sex, girls under the age of 16?

MR. RHEINHART: Same objection ■ previously stated to the last I don't know how many questions. This question again assumes this witness knows Jeffrey Epstein, has any knowledge of Jeffrey Epstein's life. And because it assumes that fact, there is an underlying predicate it is ambiguous and compound. I would instruct her not to answer.

THE WITNESS: On the instruction of my lawyer, I must invoke my Fifth Amendment privilege.

BY MR. KUVIN:

Q. From the time you met Mr. Epstein, isn't it true that he would arrange for underage girls, girls under the age of 18, to have sex with every single day?

MR. RHEINHART: Let me try this again. Objection to the form. Any question you're going to ask her that assumes she knows Jeffrey Epstein, she's ever met Jeffrey Epstein, she's ever seen Jeffrey Epstein, knows where he lives, knows what he does, if it assumes that as part of the question, I will

deem the question to be ambiguous and compound, because you're asking her to admit as ■ predicate that she knows Mr. Epstein. As to any question like that, I ■ going to instruct her to take the Fifth Amendment ■ that basis. So I would again instruct her to take the Fifth Amendment ■ to that question.

THE WITNESS: On the instruction of my lawyer, I must invoke my Fifth Amendment privilege.

MR. KUVIN: If you want ■ short circuit that, anytime I mention Jeffrey Epstein you can have ■ standing objection on that issue. I have ■ problem.

MR. RHEINHART: Great.

BY MR. KUVIN:

Q. Can you explain, if you would, to a jury how Mr. Epstein would access underage minor females for sex every day?

MR. RHEINHART: The question is compound in that it asks about Mr. Epstein every day, underage females, and involves multiple questions in the ■ question, and also based ■ the standing objection, I would instruct her not to answer based on her Fifth Amendment

privilege.

THE WITNESS: On the instruction of my lawyer, I must invoke my Fifth Amendment privilege.

BY MR. KUVIN:

Q. How many people did Jeffrey Epstein use to help him bring minor females to his house in Palm Beach for sex?

MR. RHEINHART: Same objection as the previous question and I instruct her not to answer.

THE WITNESS: On the instruction of my lawyer, I must invoke my Fifth Amendment privilege.

BY MR. KUVIN:

Q. Do you agree that Jeffrey Epstein is ■ child molester?

MR. RHEINHART: That question is solely intended to harass the witness and it's ambiguous as to what a child molester means, and you're asking for ■ legal conclusion and instruct her not to answer.

BY MR. KUVIN:

Q. In your own opinion.

MR. RHEINHART: I will again instruct her

not to answer based on her Fifth Amendment privilege as well as the question having ■ legitimate basis and will not lead to discoverable evidence.

THE WITNESS: On the instruction of my lawyer, I must invoke my Fifth Amendment privilege.

BY MR. KUVIN:

Q. Would you agree that Jeffrey Epstein is obsessed with underage females?

MR. RHEINHART: Objection to the form. It's ambiguous ■ to what you mean by "obsessed." I'll instruct the witness not to answer based on her Fifth Amendment privilege, because the question assumes knowledge of Jeffrey Epstein.

THE WITNESS: On the instruction of my lawyer, I must invoke my Fifth Amendment privilege.

BY MR. KUVIN:

Q. How would you define the word "obsessed"?

MR. RHEINHART: You can answer that.

THE WITNESS: I don't know. You like it a lot. I don't know.

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 BY MR. KUVIN:

2 Q. Do you know who owns the home at 358
3 El Brillo Way?

4 MR. RHEINHART: Same instructions 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 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 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 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 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
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 [REDACTED]
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 [REDACTED] to
7 that question. You can move on.

8 BY MR. KUVIN:

9 Q. Ma'am, [REDACTED] 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 [REDACTED] move along or we [REDACTED]
17 leave.

18 MR. KUVIN: I am just clarifying the
19 question, and I appreciate it. And you [REDACTED]
20 object. I just want to make [REDACTED] 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 [REDACTED] 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 ■ 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 ■ 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 ■ spoken to anyone?

1 Q. Yes, ma'am, personally have you ever had
2 any conversations with anyone ■ 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, ■ you sit here today,
8 whether or not you ■ 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 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 ■ 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 ■ 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 ■ 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 ■ in for an interview at any time in
25 the last five years?

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 ■
8 attorney? What date did you first retain a — I
9 mean, let ■ clarify. What date did you first
10 retain ■ 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 ■ 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 ■ 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 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 ■■■■■ 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 ■■■■ that there is ■
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 ■■■■ to that she is going to
24 invoke her Fifth Amendment privilege. The
25 question is compound and therefore ambiguous.

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 ■■■■ that
6 Ghislaine Maxwell provides underage girls to
7 Mr. Epstein for sex?

8 ■■■■ MR. RHEINHART: Objection to the form. It
9 ■■■■ she knows anything at all about
10 Ghislaine Maxwell and asks her to ■■■■ 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 ■■■■ 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 [REDACTED] 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 (Plaintiff's Exhibit No. 11 was marked for
2 identification.)

3 BY MR. KUVIN:

4 Q. Let [REDACTED] 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 [REDACTED] recruited by Ghislaine
19 Maxwell to, for sexual activity with
20 Jeffrey Epstein?

21 MR. RHEINHART: Objection to the form. It
22 [REDACTED] she knows who the person is in Exhibit
23 11, and [REDACTED] she knows who Ghislaine Maxwell
24 is, and assumes she knows who Jeffrey Epstein
25 is, and is therefore compound.

1 You're asking the witness three
2 questions at the [REDACTED] 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 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 ■ 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 ■ 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 MR. RHEINHART: Also requires speculation
2 ■ 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 ■ 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 ■ have ■ 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 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 ■ 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 ■ 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 ■
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: 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 ■
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 ■ code that
19 explains the ■ So that way you would be
20 asked if you recognize the name not ■ 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 ■ 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 ■
19 question. ■ 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 ■ look at the front page, the

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 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 ■■■■ is at the bottom of the paper, and
24 therefore, it's compound and ambiguous, and
25 instruct her not to answer.

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 ■ far as the civil ■■■■
11 context will cover all of those.

12 MR. RHEINHART: Just figured I'd make the
13 record clear in case ■ ever have ■ issue, or
14 in ■■■■ you want to correct it based on what I
15 believe to be the improper form, I will give
16 you ■ 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 ■ look at that. Is that
20 your handwriting?

21 MR. RHEINHART: Instruct the witness not
22 to answer based ■ 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, ■ 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 ■ 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 ■ 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 ■ 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: 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 ■ the Fifth Amendment privilege.
 24 MR. KUVIN: Before we do that, would you
 25 consult with her?

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 ■
 7 problem, but I just want to clear it up.
 8 MR. RHEINHART: Thank you, Mr. Kuvin.
 9 I'll let her ■ 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 ■
 19 little different. Is this your handwriting?
 20 MR. RHEINHART: Let ■ 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 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 ■ 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 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 [REDACTED]
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 [REDACTED] 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 [REDACTED] 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 [REDACTED] that we [REDACTED] 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.

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 ■ the handwriting
13 of Johanna Sjoberg? And it can be ■ 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 ■ different question. But I think you
23 need to ask it first otherwise this question is
24 ambiguous.

25 MR. KUVIN: All right.

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 ■ 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 ■ 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 appear to be directed -- well, let me, let ■ back
2 up.

3 Page 11 of Exhibit 4 appears to be ■
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 ■ 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 ■ 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 ■ 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 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 ■
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, [redacted] 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 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 Fifth Amendment right.
 2 BY MR. KUVIN:
 3 Q. Are you [redacted] 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 [redacted] 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 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 [redacted] 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 [redacted] 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

bring the whole paper up closer.

MR. KUVIN: Towards you?

THE VIDEOGRAPHER: Yes, towards the lens.

MR. KUVIN: Just pass that up so we can get a good shot of the bottom message.

THE VIDEOGRAPHER: Up a little higher, please. Let it focus. That's good. Go out. Okay.

MR. KUVIN: All right. Thank you very much.

BY MR. KUVIN:

Q. The message appears to read: 9/1/2005 to Jeffrey, 8:08, Jean-Luc, telephone. He has a teacher for you to teach you how to speak Russian. She is two times eight years old, not blonde. Lessons are free and you have first today if you call. Do you know what that message is referring to?

MR. RHEINHART: Instruct the witness not to answer the question. Object to the form of the question because in that it presumes she has knowledge of either Jeffrey or Jean-Luc or that phone number.

THE WITNESS: On the advice of counsel, I wish to invoke my Fifth Amendment right.

BY MR. KUVIN:

Q. Would you agree with me that this message is a message from Jean-Luc, that he's providing a 16-year-old girl to Jeffrey Epstein?

MR. RHEINHART: Object to the form in that it calls for speculation and also assumes facts as to Mr. Jean-Luc and Mr. Epstein; therefore, I instruct her to invoke her Fifth Amendment privilege.

THE WITNESS: On the instruction from my lawyer, I must invoke my Fifth Amendment privilege.

BY MR. KUVIN:

Q. Skip the next page if you would, and the following page will be Page 19 of Exhibit 4. It should be two messages.

MR. RHEINHART: Show me what you're looking at.

MR. KUVIN: And the top left one says, "Friday."

MR. RHEINHART: Thank you.

BY MR. KUVIN:

Q. The message on the left-hand side that appears to be, have a date of 4/8/05 and a number 7 written on it. It says: Haley, 11:00 a.m.

Do you -- first of all, do you that in front of you? Are we talking about the thing here?

A. Yes.

Q. Okay. Do you know who "Haley" is referring to in this note?

MR. RHEINHART: Instruct the witness not to answer based on her Fifth Amendment privilege.

THE WITNESS: On the instruction of my lawyer, I must invoke my Fifth Amendment privilege.

BY MR. KUVIN:

Q. Does your handwriting appear anywhere on Page 19 here --

A. On the --

Q. -- either note?

A. On the advice of my lawyer, I must invoke my Fifth Amendment privilege.

Q. Is that your handwriting on the left in the note that I just read that says: Haley, 11:00 a.m.?

MR. RHEINHART: Same instruction.

THE WITNESS: On the instruction of my lawyer, I must invoke my Fifth Amendment

privilege.

BY MR. KUVIN:

Q. All right. Let's take a look at the next page which is Page 20. Is that your handwriting this paper?

MR. RHEINHART: Let me talk to her.

THE WITNESS: On the advice of my lawyer, I wish to invoke my Fifth Amendment privilege.

BY MR. KUVIN:

Q. Is this a list of girls that were being provided to Jeffrey Epstein for sex?

MR. RHEINHART: Objection to the form, the standing objection previously stated. I will instruct the witness not to answer that question.

THE WITNESS: On the instruction of my lawyer, I must invoke my Fifth Amendment privilege.

BY MR. KUVIN:

Q. Did Jeffrey Epstein not like girls that had tattoos?

MR. RHEINHART: Objection to the form based on the standing objection and the same instruction.

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 [REDACTED] 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 [REDACTED] 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 [REDACTED] 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 [REDACTED] 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 [REDACTED] of L.M.
4 MR. RHEINHART: Okay. Based on our
5 conversation, she can [REDACTED] 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 [REDACTED]
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 [REDACTED] 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 ■ exhibit.

2 MR. RHEINHART: Agreed.

3 MR. KUVIN: Okay.

4 (Plaintiffs 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 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 ■
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 ■ 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 in Exhibit 13 ■ to Mr. Epstein's home when she
2 was only 15 years old?

3 MR. RHEINHART: Objection to the form
4 based ■ the standing objection, also
5 speculation ■ 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 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 ■ 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 ■ 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 ■ 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 ■ 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 ■
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., ■ 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 ■ 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 ■ that B.B. was given
18 to Mr. Epstein to perform ■ 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 ■ 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 ■ 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 ■
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 ■ that when B.B. was
24 brought to Mr. Epstein's bathroom, that he walked
25 out of the shower wearing ■ 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 ■ 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 ■ that Mr. Epstein had
19 ■ plan -- let me rephrase that.

20 Do you agree with me that Mr. Epstein
21 had an enterprise, ■ sexual enterprise, established
22 by which young girls would be brought to his home,
23 introduced to you, where you would then set up ■
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 ■ 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 ■
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?

■ MR. RHEINHART: Objection to the form of
10 the question. It assumes knowledge of
11 Mr. Epstein. It ■■■■■ 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 ■ 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 ■■■ is directly relevant to the issues in
25 this case. If they can describe it, then

1 obviously it's important because they ■ 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 ■ 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 ■ compound
4 and assumes the existence of Mr. Epstein which,
5 again, we ■ not acknowledging, and therefore
6 ■ 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 ■ 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 ■ that B.B. ■
25 emotionally traumatized ■ ■ 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 ■ 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 ■ 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 ■ to ambiguity ■ to what you ■ 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 ■ from that
15 are part of MC Squared Modeling Agency?

16 MR. RHEINHART: Objection to the form. It
17 assumes knowledge of ■ 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 ■ 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 ■
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 ■ 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 ■ 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 ■ well ■ ambiguous ■
24 to "nearby," and "all of his properties," so I
25 instruct the witness not to answer.

1 MR. RHEINHART: By he, you ■
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 ■ 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 ■ Palm Beach, you were aware
2 that they ■ brought so that Mr. Epstein could
3 molest them, correct?

4 MR. RHEINHART: Objection to the form ■
5 to knowledge of Mr. Epstein, ■ 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 ■
16 to knowledge of Mr. Epstein, and also ambiguous
17 ■ 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 ■ —

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 ■ 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: — ■ evaluate your
3 question.

4 MR. KUVIN: I want to know if she has her
5 own definition of what the phrase ■ word
6 "rape" means, so that we ■ 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 ■ 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 ■ what you ■ 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 ■ definition, so I would like to
22 use her definition of the word.

23 MR. RHEINHART: Right. She's not going to
24 ■ it, so you can either move on ■
25 stop.

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 ■
17 sexual contact with ■ 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 ■ ■ whatever
22 definition you like, but you need to tell me
23 what it is.

24 MR. KUVIN: Let's ■ the definition of
25 "rape" as defined by Florida law as oral, anal

1 ■ 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 ■ 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, ■ you
24 sit here today, that Jeffrey Epstein has raped
25 underage girls?

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 ■ 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 ■ aware, ■ you not, ■ 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 ■ 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 ■ 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 ■
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 ■ 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 ■ numerous facts
7 mixed in ■ 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 ■ 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 ■

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 — 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 —
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. 502008CA028031XXXXMB 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

B.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

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(Via telephone)

Appearances continued...

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ALSO PRESENT:

Jessica Cadwell, Paralegal

Burman, Critton, Luttier & Coleman, P.A.

Joseph Kozak, Videographer

Prose Court Reporting Services

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PROCEEDINGS

* * * * *

THE VIDEOGRAPHER: We're now back on the record. It is 2:19 p.m. Starting Media Unit No. 2.

CONTINUED DIRECT EXAMINATION
BY MR. KUVIN:

Q. All right. Did Jeffrey Epstein talk to you about whether or not he was going to be going to jail after he ■■■ arrested?

MR. RHEINHART: Objection to the form, standing objection. Instruct the witness not to answer.

THE WITNESS: On the instruction of my lawyer, I must invoke my Fifth Amendment right.
BY MR. KUVIN:

Q. How did you first learn of the criminal investigation with respect to Mr. Epstein?

MR. RHEINHART: Objection to the form, standing objection. Instruct the witness not to answer.

THE WITNESS: On the instruction of my lawyer, I must exercise my Fifth Amendment right.

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 ■
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 ■ 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 ■■■
22 instruction ■ 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 ■ 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 ■ request for ■ 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 ■
18 go.

19 All right. There's ■ 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 ■ May 1, 2006?

5 MR. RHEINHART: Hang ■ ■ 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 ■■■ the question, if you
17 can.

18 THE WITNESS: No.

19 BY MR. KUVIN:

20 Q. Have you ■ the request for ■ warrant
21 with the attached probable ■ 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, ■
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 ■ 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 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 ■
10 to compound, and assuming knowledge ■ 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 ■■■■ 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 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 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 ■■■■ 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 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, ■■■ 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 Standing objection ■ to knowledge of
2 Mr. Epstein. Instruct the witness not to
3 answer based ■ 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 ■ attempt to
9 give ■ \$90,000 donation was ■ 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 ■ 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 ■ second. Almost
17 done.

18 BY MR. KUVIN:

19 Q. ■ 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 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 ■ 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 ■ 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 ■■■ from Sarah Bonk
19 to Sarah Kellen?

20 MR. RHEINHART: Objection to the form and
21 it assumes ■ 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 ■ 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 ■
5 foundation of what I'm about to ask you.

6 Have you ever ■ anything called Peach
7 Flavored Joy Jelly ever anywhere, first of all?
8 Have you ever ■ 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 ■ Twin Torpedo which,
19 according to Detective Recarey during his deposition
20 ■ ■ 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 ■ Ivan Robles?

15 A. No.

16 Q. Have you ■ a gentleman by the name of
17 Alan Dershowitz ■ 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 ■ her Fifth Amendment privilege
13 because the question ■ 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 ■ 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 ■
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 ■ assumes knowledge of Jeffrey Epstein.
16 Standing objection ■ 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 ■ 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, ■ 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?

■ 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 ■ 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.

■ 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 ■ 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 ■ 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 ■
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 ■ telephone
16 call wherein you were told that ■ 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 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, ■
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 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 ■ previously stated, and
10 the ■ 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 ■
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 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 ■ basis as the prior question, and the ■
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 ■ the
19 previous question, ■ 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 ■ -- did, did Jeffrey Epstein
24 tell you that he sexually abused Jane Doe No. 2 when
25 she was a child?

MR. RHEINHART: Objection to the form. Standing objection relating to Jeffrey Epstein or any knowledge of Jeffrey Epstein. Also ■ to Jane Doe No. 2, ■ instruction to the witness.

THE WITNESS: On the instruction of my lawyer, I must invoke my Fifth Amendment right.
BY MR. HOROWITZ:

Q. Did Jeffrey Epstein instruct you to take Jane Doe No. 2's name and telephone number for the purpose of calling her to come to his house for more sexual activity?

MR. RHEINHART: Objection to the form. Standing objection, same objection to the previous question, ■ instruction.

THE WITNESS: On the instruction of my lawyer, I must invoke my Fifth Amendment right.
BY MR. HOROWITZ:

Q. Did Jeffrey Epstein instruct you to put Jane Doe No. 2's name and telephone number into a master journal or log in which you and he archived the names and contact information of teenage girls?

MR. RHEINHART: Objection to the form, standing objection, otherwise compound and instruct the witness not to answer.

answer that. You can move on.

MR. HOROWITZ: You're, you're directing her not to answer that?

MR. RHEINHART: I'm directing her not to answer that question because there are, there are legal bases for the objections that underlie the Fifth Amendment invocation, and at ■ point presumably ■ judge will rule ■ those before the jury ever hears this.

BY MR. HOROWITZ:

Q. Ms. Kellen, did you know a girl named Jane Doe No. 3 when she was still a child?

MR. RHEINHART: Objection to the form ■ to what you mean by when you say ■ child and also ■ knowledge of a person, ■ I instruct the witness not to answer.

THE WITNESS: On the instruction of my lawyer, I must invoke my Fifth Amendment right.
BY MR. HOROWITZ:

Q. Did, did Jeffrey Epstein instruct you to communicate by telephone with Haley Robson for the purpose of arranging for underage girls to ■ to his house so that he, Jeffrey Epstein, could engage in sexual activity?

MR. RHEINHART: Objection to the form.

THE WITNESS: On the instruction of my lawyer, I must invoke my Fifth Amendment right.
BY MR. HOROWITZ:

Q. Did you, in fact, place Jane Doe No. 2's name and telephone number into a master journal or log in which you and Jeffrey Epstein archived the ■ and contact information for teenage girls?

MR. RHEINHART: Objection to the form, ■ ■ the previous question, ambiguous and compound, and I instruct the witness not to answer.

THE WITNESS: On the instruction of my lawyer, I must invoke my Fifth Amendment right.
BY MR. HOROWITZ:

Q. You have asserted ■ Fifth Amendment objection as to ■ number of my questions relating to Jane Doe No. 2. Is there any reason in your mind ■ jury should not infer from your responses today that you did, in fact, assist Mr. Epstein in procuring minors for sexual activity?

MR. RHEINHART: Right. Objection to the form. We're not going to answer that. That calls for a legal conclusion, and for her to speculate on legal objections that have been made by her counsel, and we're not going to

Standing objection, compound and ambiguous. Instruct the witness not to answer on Fifth Amendment grounds.

THE WITNESS: On the instruction of my lawyer, I must invoke my Fifth Amendment right.
BY MR. HOROWITZ:

Q. Did Jeffrey Epstein instruct you to communicate by telephone to arrange for Jane Doe No. 3 to give him a massage?

MR. RHEINHART: Same objection ■ stated to the previous question, and standing objection, and instruct the witness not to answer.

THE WITNESS: On the instruction of my lawyer, I must invoke my Fifth Amendment right.
BY MR. HOROWITZ:

Q. Did Jeffrey Epstein inform you that the massage Jane Doe No. 3 was to give him would be sexual in nature?

MR. RHEINHART: Same standing objection previously stated, and I instruct the witness not to answer.

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

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, 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 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 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 ■ to the other client. There
16 have been legal objections lodged to the
17 questions. If a judge rules ■ 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 ■ girl named Jane
5 Doe No. ■ 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 ■ 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 ■ 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 BY MR. HOROWITZ:

2 Q. Did Jeffrey Epstein tell you it was his
3 intent during the [REDACTED] 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 [REDACTED] younger than 18 when she [REDACTED] to
24 Jeffrey Epstein's home in 2003 and 2004?

25 MR. RHEINHART: Objection to the form.

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 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 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 [REDACTED] 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 [REDACTED]

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 ■■■■■ 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 ■■■■■ 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 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 ■■■■■
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 Amendment objection or privilege ■■■ 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 ■■■■ still ■ child under the

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. ■ 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 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, 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
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.

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 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 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 [REDACTED] and telephone number down so
20 you can call Jane Doe No. 7 to [REDACTED] 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 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 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 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 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 [REDACTED] 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. 7 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. 7 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 ■■■
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. ■ 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. ■ 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. ■ to come to his home
21 to give him ■ 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. ■ 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 ■ privilege ■ 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 ■ 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 ■ 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 ■ 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 ■ 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 ■
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 ■ 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 ■ break.

3 BY MR. HOROWITZ:

4 Q. Okay. Have you had enough of ■ 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 ■ 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 ■ 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

County, ■ instruct her not to answer the question.

THE WITNESS: Upon the instruction of my lawyer, I choose to assert my Fifth Amendment right.

MR. HOROWITZ: No other questions.

MR. RHEINHART: Thank you. Who is next up?

MR. KUVIN: Next? Do you want to go next?

MS. EZELL: Do you have a trial date? You may want to go because you have a trial date.

MR. WEISSING: I do.

MR. KUVIN: Yeah, you do. Whenever you're ready. Go ahead. After you.

MR. RHEINHART: Whenever you're ready. Is our videographer ready.

THE VIDEOGRAPHER: Oh, yeah. We're all good.

MR. RHEINHART: We're all good?

THE VIDEOGRAPHER: We never went off the record.

CROSS (SARAH KELLEN)

BY MR. WEISSING:

Q. Ms. Kellen, Matt Weissing here. Do you know E.W.?

compound and ■ facts not within the knowledge of this witness. Instruct the witness not to answer based on the Fifth Amendment.

THE WITNESS: Upon the instruction of my lawyer, I must invoke my Fifth Amendment right.
BY MR. WEISSING:

Q. Beginning in August of 2002, are you aware that E.W. was coerced by Jeffrey Epstein into sexual conduct?

MR. RHEINHART: Objection to form, leading. Well, it's compound. Instruct the witness not to answer based ■ the Fifth Amendment. The question is also ambiguous ■ to coercion.

THE WITNESS: Upon the instruction of my lawyer, I must assert my Fifth Amendment right.

MR. WEISSING: Are you aware that between August 2002 and September of 2005, E.W. had sexual conduct with Jeffrey Epstein?

MR. RHEINHART: Object to the form, standing objection. Instruct the witness not to answer.

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

MR. RHEINHART: Instruct the witness not to answer the question based on Fifth Amendment.

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

BY MR. WEISSING:

Q. Have you ever met E.W.?

MR. RHEINHART: Object to the form. I believe that's been asked and answered several times. Well, not answered several times. But I'll instruct her once again not to answer the question.

BY MR. WEISSING:

Q. Are you aware that E.W. was 14 years of age when she first came to Jeffrey Epstein's mansion in 2002?

MR. RHEINHART: Object to the form. Instruct the witness not to answer.

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

BY MR. WEISSING:

Q. Are you aware that at all times that — from 2002 to 2005, when E.W. came to his mansion, she was ■ minor child?

MR. RHEINHART: Object to the form. It's

BY MR. WEISSING:

Q. Okay. Are you aware that between August 2002 and September of 2005, Jeffrey Epstein engaged in fondling and inappropriate illegal sexual touching of E.W.?

MR. RHEINHART: Objection to the form, standing objection and ambiguous ■ to terminology. Instruct the witness not to answer.

THE WITNESS: Upon the instruction of my lawyer, I must invoke my Fifth Amendment right.
BY MR. WEISSING:

Q. Are you aware that during that same period, that Jeffrey Epstein engaged in oral sex or other sexual misconduct with E.W.?

MR. RHEINHART: Same objection as the previous question and ■ instruction to the witness.

THE WITNESS: On the instruction of my lawyer, I must invoke my Fifth Amendment right.
BY MR. WEISSING:

Q. Are you ■ that in that ■ time period that Jeffrey Epstein masturbated in the presence of E.W.?

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 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 [REDACTED] 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 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 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. [REDACTED]
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 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 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 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 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 ■■■ 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 ■■ 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 MR. RHEINHART: Objection to the form in
2 that assumes knowledge of Jeffrey Epstein or
3 where his mansion is or what goes ■■ 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 ■■ 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 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 ■■■ 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 ■■■ 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 BY MR. WEISSING:

2 Q. Did you know during that period of time
3 that Jeffrey Epstein ■■■ 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 ■■■ 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 ■ 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 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 ■ 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 ■■■ 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 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. ■■■ 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," ■■■
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 ■■■
8 adult with ■ minor child?

9 MR. WEISSING: Yes.

10 MR. RHEINHART: Okay. Hold on one second.
11 I'm going to object. It calls for ■ 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 ■ legal
17 conclusion. It's not ■ 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 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 ■■■ 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 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 in front of L.M. while she was ■ 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 ■ 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 massage 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 ■ 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 massage 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 ■ specific date, or ■ you
11 asking ■ general practice and policy?

12 MR. WEISSING: General.

13 MR. RHEINHART: Object to the question ■
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 ■ 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 ■ Jeffrey Epstein. You can ask
9 her if Jeffrey Epstein went to the moon; she's
10 not going to ■ 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 ■ 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 ■■■ 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 ■■■ 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 ■ compound
22 question ■ 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 THE WITNESS: On the instruction of my
2 lawyer, I must invoke my Fifth Amendment right.
3 BY MR. WEISSING:

4 Q. Are you ■■■ 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 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 ■■■
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 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 ■■■
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 ■■■ 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 ■ 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 ■■■■ 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. ■
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 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 ■
5 to ■ 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 ■ question that calls
24 for ■ legal conclusion. It doesn't in any way
25 lead to any discoverable evidence, and I am

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 ■ 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 ■■■■ that Jane Doe ■■■■ injured as
14 ■ result of sex trafficking committed against her?

15 MR. RHEINHART: Objection to form. Uses
16 legal terminology like "sex trafficking," and
17 presumes ■ 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 ■ 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 lawyer, I must invoke my Fifth Amendment right.
2 BY MR. WEISSING:

3 Q. Are you ■■■■ 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 ■■■■ 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 ■ narrow
25 down "other girls" and who we are talking

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 ■ compound question that assumes she did
18 scheduling, ■ 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 ■ 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 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 ■
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 ■ particular interest
12 in girls under the ■ of 14?

13 MR. RHEINHART: Objection to the form. It
14 assumes she did scheduling for Jeffrey Epstein.
15 In order to ■ 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 implicitly ■ that she procured girls for
2 Jeffrey Epstein, which she has not admitted to
3 or is not admitting to, ■ 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 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 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 [REDACTED] 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 [REDACTED] 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 now getting pointless, and we're terminating
2 the deposition at 5:00. So I suggest you pick
3 up the pace.

4 You [REDACTED] 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 minutes 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 [REDACTED] 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 [REDACTED]
21 question over and over and over again that it's
22 clear is a compound question that asks her to
23 [REDACTED] 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 ■ the specific questions
2 that she can answer or from which you can draw
3 ■ 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 ■ 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 ■ 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, ■ you aware that Jeffrey Epstein has ■
21 apartment located at 301 East 66th Street, Apartment
22 14G through ■ in New York?

23 MR. RHEINHART: That question ■ 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 [REDACTED] 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 [REDACTED] 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 [REDACTED] 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 [REDACTED] 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 instruct the witness not to answer the
2 question.

3 BY MR. WEISSING:

4 Q. Have you ever gone by the [REDACTED]
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 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 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 [REDACTED] 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 [REDACTED] 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 ■■■ 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 ■ message"?

17 A. Well, I heard what ■ 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 ■
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 ■ 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 ■ 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 ■ privilege ■ to whether she recognizes ■
5 voice or not. If you ■■ 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 ■■ law that
7 supports that question as subject to ■ 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, ■■■
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 ■
15 object to whether or not she has ■ 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 ■ 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 ■ 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 ■ 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 ■ 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 ■ ask you, do you, do you deny that
4 you solicited ■ minor by the ■ 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 fiancée, 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 — 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
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, fiancée, 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 ■■■ 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 ■ 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 ■■■ 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 ■ 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 ■■■ that other
19 than if it involves discussions, private
20 discussions you had with your lawyers.

21 THE WITNESS: ■ 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 ■■ 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. Rheinhardt claims that Jane Doe
19 No. II consented to and was ■ 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 ■■ 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 ■■ 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 ■ 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 ■ 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 ■■ going to instruct
21 her not to answer based ■ 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 ■ 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 ■
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 MR. GARCIA: -- the Fifth Amendment
2 privilege?

3 MR. RHEINHART: 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 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 ■ relationship, if you can
19 call it that, with Mr. Epstein, did you have
20 counsel? Did you have ■ 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 ■ person named Mr. Epstein. She's
25 not going to answer the question based on the

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 ■ she said she
16 was 18 years or older at the time," end quote. I
17 ■ 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 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 ■ particular witness. If
13 identifying ■ 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 ■
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 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 ■■■■■ 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 ■ each of these dates

1 for the purposes of providing Jeffrey Epstein with
2 sexual massages and/or services.

3 MR. RHEINHART: Objection to form. It's ■
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 ■ 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 ■ 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 ■■y

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 [REDACTED] 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 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 [REDACTED] by Dr. Bard. So, once
25 again, we assert a Fifth Amendment privilege.

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 [REDACTED] 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 [REDACTED] 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 [REDACTED] the name of the doctor that
25 provided the cosmetic dental services?

1 MR. RHEINHART: You ■■■ answer. Sorry,
2 wait ■ 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 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 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 BY MR. GARCIA:
2 Q. Did you ever meet Lewis ■ 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 ■ person she knows to have
9 that ■■■ 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 -- 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 a second. No. You --
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 -- 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 ■
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 ■ the entity that issued you ■
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 ■ 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 ■ 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 ■ ambiguous and standing objection ■
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 ■ 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 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 ■ building in New York where
19 you exit from ■ different building's parking garage;
20 in other words, do you exit — strike that.

21 Do you use ■ 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 lawyer, I invoke my Fifth Amendment right.

2 BY MR. GARCIA:

3 Q. Do you own ■ 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 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 ■ 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

lawyer, I must invoke my Fifth Amendment right.

MR. GARCIA: I'm just asking what it is.

MR. RHEINHART: Understood.

BY MR. GARCIA:

Q. Well, let me not waste any time. Do you know what it is, yes or no?

MR. RHEINHART: Instruct the witness not to answer based on the Fifth Amendment.

THE WITNESS: At the instruction of my lawyer, I invoke my Fifth Amendment right.

BY MR. GARCIA:

Q. Has Jeffrey Epstein ever told you that he is a government witness, otherwise known as a snitch, or confidential informant?

MR. RHEINHART: Objection to the form in that it [REDACTED] knowledge of Mr. Epstein. Instruct the witness not to answer.

THE WITNESS: On the instruction of my lawyer, I invoke my Fifth Amendment right.

BY MR. GARCIA:

Q. Has he ever told you that he is involved in a case involving, providing information concerning money laundering?

MR. RHEINHART: Same objection and same instruction.

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

MR. GARCIA: That's all I have. Thank you.

MR. RHEINHART: Great. Should we take a break? I know you need to change the tape as well.

THE VIDEOGRAPHER: Yes. We're now going off the record. It is 5:18 p.m.

(A brief recess was held.)

* * * * *

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

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. 502008CA028058XXXMB 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

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. 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
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Suite 1500
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1 APPEARANCES:

2 On behalf of the Plaintiff, B.B.:

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7 On behalf of the Plaintiffs, L.M., E.W. and
Jane Doe:

9 MATTHEW WEISSING, ESQUIRE

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18 On behalf of the Plaintiffs, 101, 102 and 103:

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Miami, Florida 33130

Phone: 305.358.2800

(Via telephone)

1 Appearances continued...

2 On behalf of the Plaintiff, Jane Doe II:

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7 On behalf of the Defendant:

8 JACK ALAN GOLDBERGER, ESQUIRE

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Phone: 561.659.8300

13 On behalf of the Witness:

14 BRUCE E. REINHART, ESQUIRE

LAW OFFICE OF BRUCE E. REINHART

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20 ALSO PRESENT:

21 Jessica Cadwell, Paralegal

Burman, Critton, Luttier & Coleman, P.A.

23 Joseph Kozak, Videographer

Prose Court Reporting Services

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1 PROCEEDINGS

3 THE VIDEOGRAPHER: We ■■■ 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 ■■■ that have not already been covered
15 so we can actually get out of here tonight, because
16 at ■■■ point ■■■ 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 ■■■
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 [REDACTED] 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 [REDACTED] specific? Are we talking
10 about ten minutes for a day or ten minutes in a week or
11 [REDACTED] month?

12 A. Maybe [REDACTED] 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 Josephsberg 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 [REDACTED] fast as
23 we can.

24 Why did you take down your Facebook page?

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

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
9 to whether a person has a driver's license is
10 ridiculous. It is ridiculous.

11 MR. REINHART: You 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 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
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.

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 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 Haliwa, 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 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 --
18 signature -- 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 -- 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 ■ island?

2 MR. REINHART: Objection, it's been asked
3 before, and I'll instruct her not to ■ 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 it, on occasion.

2 Q. And have you ■ -- 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 ■ 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. 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, ■ facts that she has not
11 acknowledged, so there is ■ 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 ■ 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 ■ 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 BY MS. EZELL:

2 Q. Are you ■ 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 ■ 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 ■
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 ■ ■ daily
8 basis with Jeffrey Epstein?

9 MR. REINHART: Objection to form. There is ■ ■
10 foundation, because she hasn't acknowledged going
11 to ■ office in this building.

12 Also objection ■ ■ 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 ■
18 company called the Florida Science Foundation?

19 MR. REINHART: Instruct the witness not to
20 answer based ■ 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 Q. L-y-n-e-l-l-e?

2 MR. REINHART: It's been asked and answered
3 twice. You ■ ■ it again.

4 THE WITNESS: L-y-n-e-l-l-e.

5 BY MS. EZELL:

6 Q. Thank you.

7 Where do you, of what state are you ■
8 resident?

9 MR. REINHART: Instruct the witness not to
10 ■ based ■ 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 ■ again, or to answer
22 it, to respond to it, ■ 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. Do you consider yourself a citizen of the
3 United States?

4 MR. REINHART: You ■ 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 ■ legal
23 residency or where she actually lives residency?

24 MS. EZELL: Well, let's do both.

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 ■ 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 ■ state.

23 BY MS. EZELL:

24 Q. Well, if you move from ■ state to another,
25 you might change your voter's registration. Have you

1 done that?

2 MR. REINHART: You ■■■ 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 ■■■ 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 ■ yes or no question. You
23 can ■■■ that.

24 THE WITNESS: No.
25

1 BY MS. EZELL:

2 Q. Is that ■ 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 ■ 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 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 ■
12 entity by the name of MC Squared which the witness
13 has not acknowledged or have any knowledge of, ■
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 ■ bottom or with something draped across

1 part of a body, but not all parts of her body.

2 THE WITNESS: My boyfriend took pictures of ■
3 ■■■ 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 ■ second.

10 Instruct the witness not to ■■■ based ■
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 ■ 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 ■ 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 ■ 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 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 ■ social event
 9 that's held annually in New York restricted to
 10 billionaires?
 11 A. I've never heard of such ■ 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, ■ I don't know.
 16 Q. Have you never ■ 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 millionaires, excuse ■
 24 MR. REINHART: Objection to the form. There
 25 is a lack of foundation for the question.

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 ■ 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 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 ■ 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 ■ 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 ■ 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 ■ El Brillo Way?
 19 MR. REINHART: Objection to form, it's
 20 compound and assumes knowledge of Mr. Epstein and
 21 of a location ■ 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 BY MS. EZELL:
 2 Q. Did you have on ■ computer at ■ Brillo Way ■
 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 ■ 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 ■ 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 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 ■ 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 ■ 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 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 ■ 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 Q. Were you sometimes designated or requested by
 2 Mr. Epstein to buy gifts for the young [REDACTED] 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 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. Were you [REDACTED] 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 [REDACTED] 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 [REDACTED] met a young [REDACTED] named M.D.?
 18 A. At the instruction of my lawyer, I must invoke
 19 my Fifth Amendment right.
 20 Q. Were you [REDACTED] 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 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 must invoke the Fifth Amendment right.
 2 BY MS. EZELL:
 3 Q. Is that the [REDACTED] 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 ■
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 ■ to the house,
25 Mr. Epstein's house on El Brillo Way to provide

1 is ■ 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 ■ 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 ■ 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 ■ 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 ■ massage up a
22 stairway that is behind ■ 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 ■ 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 ■ 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 ■ 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 ■
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 ■ to form and
18 lack of foundation ■ to any basis to question this
19 witness on anything having to do with ■ 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 photographs ■ removed?

2 MR. REINHART: Objection to the form, lack of
3 foundation, ■ 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 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 ■ 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 ■ with the financing of
24 her college, of her education?

25 MR. REINHART: Same objection stated to the

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 ■ 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 ■ 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 ■ 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 [REDACTED] 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 times over about a year and a half?

2 MR. REINHART: Object to the form for [REDACTED]
3 previously stated [REDACTED] 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 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 [REDACTED] 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 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 [REDACTED] to any knowledge of a person named
8 Johanna Sjoberg. Lack of knowledge [REDACTED] to any, lack
9 of foundation [REDACTED] 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 [REDACTED] 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, ■■■ you repeat?

8 BY MS. EZELL:

9 Q. Do you know ■ 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 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 ■■■■■

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 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 ■■■ 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 ■
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 ■ 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 ■■■ 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 ■ to what sexual trafficking is.
13 Instruct her not to ■■■■■

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 ■■■■■
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 ■■■ foundation for her having any knowledge of
13 anything having to do with ■ person by the ■■■■■ 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 of those massages?

2 MR. REINHART: Same objection and ■■■■■
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 ■ 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 ■■■■■ 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 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 ■■■■■ 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 ■■■ 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 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 ■■■ 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
24 the question at all. Move on.
25

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 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, the
23 instruction the last question.

24 THE WITNESS: At the instruction of my lawyer,
25 I must invoke my Fifth Amendment privilege.

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 the 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
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 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 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
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, 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 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 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.)

1 CERTIFICATE
2 THE STATE OF FLORIDA
3 COUNTY OF PALM BEACH

4 I, Rachel W. Bridge, Registered Professional
5 Reporter, Florida Professional Reporter and Notary
6 Public in and for the State of Florida at large, do
7 hereby certify that I was authorized to and did report
8 said deposition in stenotype; and that the foregoing
9 pages are a true and correct transcription of my
10 shorthand notes of said deposition.

11 I further certify that said deposition was
12 taken at the time and place hereinabove set forth and
13 that the taking of said deposition was commenced and
14 completed as hereinabove set out.

15 I further certify that I am not attorney or
16 counsel of any of the parties, nor am I a relative or
17 employee of any attorney or counsel of party connected
18 with the action, nor am I financially interested in the
19 action.

20 The foregoing certification of this transcript
21 does not apply to any reproduction of the same by any
22 person unless under the direct control and/or direction
23 of the certifying reporter.

24 Dated this 9th day of April, 2000

25 
Rachel W. Bridge, RMR, CRR, FPR

ATTACHMENT 13

0001

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

0002

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.
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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

0003

I N D E X

WITNESS

EXAMINATION

PAGE

Page 1

DEPO. EPSTEIN

JEFFREY EPSTEIN

Direct by Mr. Garcia 4

QUESTIONS MARKED FOR CERTIFICATION
(Identified with ■ asterisk on the following
pages.)

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49	21
50	13
54	1
56	11, 20, 25
57	4
69	22
77	17

0004

0005

Deposition of JEFFREY EPSTEIN, ■ 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

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 ■ 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 ■ second.

MR. GARCIA: Let's put it on the record — ■ can go off, I guess. Go ahead.

(Whereupon there is a discussion off the record.) ■

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

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 ■ ask on the record. Can we have ■ 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

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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 ■ 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 ■ 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 ■
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 ■ 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

record, since he is reading from the script I'm entitled to have a copy of what he's reading from and make it a deposition exhibit so I'd like to make that document, at some point, exhibit 1. I see handwriting in it also, I don't know if you claim that to be an attorney client communication, I just want a copy of the script he's reading from.

MR. GOLDBERGER: The whole document is attorney client privilege and we're not giving it to you. If you want to file a motion, we'll have a hearing on it.

MR. GARCIA: I will.

DIRECT BY MR. GARCIA: (CONT'D)

Q What is your present age?

A 56.

Q What is your date of birth?

A January 20, 1953.

Q Did you know the age of Dainya Nida when she came to your house in the Town of Palm Beach?

A Can you repeat the question?

Q Did you know the age of Dainya Nida when she came to your house in the Town of Palm Beach?

A As I've said in response to your other questions, 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 representation. Accordingly, I assert my federal constitutional rights as guaranteed by the 5th, 6th and 14th amendment of the United States Constitution.

Q Did you ever pay Daiyna Nida any money for any services that she rendered to you?

A As I've said in response to your other questions, 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 representation. Accordingly, I assert my federal constitutional rights as guaranteed by the 5th, 6th and 14th amendment of the United States Constitution.

Q In the answer in affirmative defenses that were filed on your behalf in the case of Jane Doe, II vs. Jeffrey Epstein and Sarah Kellen, case number 502008CA20614XXXXMBAB pending before Judge Hafele you claim as your second affirmative defense the following, quote, "As to all counts alleged, plaintiff consented to and participated in conduct similar and/or identical to the acts alleged with other persons which was the sole and contributing cause of plaintiff's alleged damages." What evidence if any do you have plaintiff consented to or participated in conduct similar and/or identical to the acts alleged with other persons and who are the other persons?

A Can you repeat that question?

MR. GARCIA: Before you read it back, let

22 ■ 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 ■ 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 ■ 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 ■ 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

questions, 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 representation. Accordingly, I assert my federal constitutional rights as guaranteed by the 5th, 6th and 14th

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amendment of the United States Constitution.

Q Are you currently residing in the Palm Beach County Jail?

A Yes.

Q Are you scheduled to be released at [REDACTED] future date from the Palm Beach County Jail?

A Yes.

Q Do you know when that date is?

A No.

Q Are you on [REDACTED] sort of furlough or home release program, I don't know what it's called exactly, where you get to leave the Palm Beach County Jail every morning and return at night?

MR. GOLDBERGER: You have to rephrase the question. If you're asking if he's on house arrest the answer is no.

Q I don't know what it's called --

MR. GOLDBERGER: -- ask him if he's on work release.

Q Are you on work release?

A Yes.

Q What time do you leave the Palm Beach County Jail each morning?

A [REDACTED] a.m.

Q What time are you required to be back?

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A [REDACTED] p.m.

Q Where do you work during these hours?

A As I've said in response to your other questions, 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 representation. Accordingly, I assert my federal constitutional rights as guaranteed by the 5th, 6th and 14th amendment of the United States Constitution.

Can we take a restroom break?

Q Sure.

(Whereupon a break is taken.)

DIRECT BY MR. GARCIA: (CONT'D)

Q Can you tell me what days you are participating in this work release program, whether Monday through Friday or is it every day of the week?

A Monday through Saturday.

Q Do you have [REDACTED] office somewhere for your business that is separate from your home?

A As I've said in response to your other questions, I intend to respond to all relevant

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questions regarding this lawsuit, however, at the present time my attorneys have counseled me I cannot

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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
13

14 questions regarding this lawsuit, however, at the
 15 present time my attorneys have counseled ■ 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 ■ grand jury.

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1 Q Did the grand jury, if you know, consider
 2 any other charges?

3 A ■ 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 ■ 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 ■ misdemeanor or ■
 23 felony level criminal offense in any court in the
 24 United States or abroad besides the one you've

25 already discussed?

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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 ■ 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 ■ 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.

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1 Q Are you ■ 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 ■ 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 ■ 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

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 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 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 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 --

MR. GARCIA: -- he's a party of the agreement, his understanding of what the agreement is is crucial to whether or not there is an agreement and what the agreement and terms are.

DIRECT BY MR. GARCIA: (CONT'D)

Q Unless they instruct you not to answer, you have to answer the question and that question does not violate anybody's privilege against self-incrimination.

MR. GOLDBERGER: Go ahead and answer.

A Repeat the question.

Q Sure. What is your understanding of the agreement made with the U.S. Attorneys Office?

A That if I abide by all the terms and conditions of the agreement I will not be prosecuted.

Q All right. Did you sign that agreement?

A Yes.

Q Did you have a opportunity to reflect on the terms of the agreement before you signed it?

A Yes.

Q Did you have advice of counsel before you signed it?

A Yes.

Q All right. Was the agreement ever modified?

A Yes.

Q Why was it modified, if you know?

A (Nodding).

Q You don't know? You're shaking your head, but I don't know what that means.

MR. GOLDBERGER: I think that would call for Mr. Epstein to kind of reveal attorney client privilege so I'll advise him not to answer the question.

MR. GARCIA: All right.

Q Who is Gerald Lefcourt, L-E-F-C-O-U-R-T?

MR. GOLDBERGER: It would involve attorney client privilege. He's not answering that question.

MR. GARCIA: I just want to know who he is.

MR. GOLDBERGER: He's a lawyer.

Q Did he represent you in these negotiations?

THE WITNESS: How does he have a copy of that agreement?

MR. GOLDBERGER: I don't know.

MR. GARCIA: Is he not going to answer who Gerald Lefcourt is?

MR. GOLDBERGER: Correct.

Q Who is Lilliann Sanchez?

MR. GOLDBERGER: He's not going to answer

any questions that would involve revealing attorney client privilege.

THE WITNESS: Can I have a second with you?

MR. GARCIA: Just to save some time, I

signed the nondisclosure agreement that's why I have this, if that's what his question is.

MR. GOLDBERGER: What nondisclosure agreement?

MR. GARCIA: Apparently there is something the U.S. Attorney requires before turning over this document, you have to sign some sort of agreement not to disclose, if that's his concern.

MR. GOLDBERGER: It is of concern so let me clarify this. You signed some sort of nondisclosure agreement with the U.S. Attorney?

MR. GARCIA: Yes.

MR. GOLDBERGER: What U.S. Attorney?

MR. GARCIA: Whoever is handling this case.

MR. GOLDBERGER: Who would that be?

MR. GARCIA: I believe it's -- she's the one who signed the agreement. There is some sort of protective order, if I understand, that

was entered by Judge Mara requiring any party who is given this agreement to sign the agreement not to disclose it to anyone, Marie Veafona (phonetic).

MR. GOLDBERGER: So you contacted Ms. Veafona and she had you sign a nondisclosure agreement?

MR. GARCIA: That's why I don't want to make it an exhibit to this deposition because I don't want the court reporter to see it. I want to show it to the witness so he can identify it for me --

MR. GOLDBERGER: -- let me see what you're going to show him?

(Handing)

MR. GARCIA: Its got the addendum, too.

MR. GOLDBERGER: So what's your question?

MR. GARCIA: My question is did he sign the original agreement, did he sign the addendum to it and what dates did he sign those. I believe they're dated.

MR. GOLDBERGER: I don't know how you can ask questions about a document that is not to be produced and make it part of a deposition without violating the non --

MR. GARCIA: -- well, I assume it can be produced to him and to his lawyers.

MR. GOLDBERGER: By acknowledging the existence of a agreement it violates the terms of the secrecy of the document, correct?

MR. GARCIA: I don't think so.

MR. GOLDBERGER: I think it does.

MR. GARCIA: I think it restricts disclosures to third parties.

MR. GOLDBERGER: I'm going to instruct him not to answer any questions about the agreement. If you want to see the judge on this, we can. If you're right, you're right; if you're not, you're not. Out of an abundance of caution I'm not going to have him answer any questions about it right now.

BY MR. GARCIA: (CONT'D)

Q Can you give me an exemplar of how you sign your name?

A (No response).

MR. GARCIA: Come on, that doesn't incriminate him.

MR. GOLDBERGER: Yes --

MR. GARCIA: -- for a crime, his signature?

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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 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 Do you have a preference for [REDACTED] under the age of 18?

A As I've said in response to all questions previously asked of me, 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 representation. Accordingly, I assert my federal constitutional rights as guaranteed by the 5th, 6th and 14th amendment of the United States Constitution.

Q Have you ever been married?

A No.

Q Have you ever been engaged?

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MR. BURMAN: Go ahead and answer it.

A No.

Q Do you have any employees?

A Excuse me?

Q Do you have any employees?

A Employees?

Q Yes.

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 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 Do you have a company that is incorporated anywhere?

MR. GOLDBERGER: That's kind of a vague question.

Q Do you own -- are you involved in any business, any type of enterprise where your business is incorporated in any state?

A As I've said in response to all questions previously asked of me, I intend to respond to all

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relevant questions regarding this lawsuit, however,

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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

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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?

A As I've said in response to all questions previously asked of me, 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 representation. Accordingly, I assert my federal constitutional rights as guaranteed by the 5th, 6th and 14th amendment of the United States Constitution.

Q Have you --

A -- one second -- can you grab my iPhone?

Q Have you discussed with Ms. Kellen providing, at your expense, legal representation for any claims made against her?

MR. GOLDBERGER: Go ahead.

A As I've said in response to all questions previously asked of me, 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 representation. Accordingly, I assert my federal constitutional rights as guaranteed by the 5th, 6th and 14th amendment of the United States Constitution.

Q Did you hire David Spicer at one time to represent you in this case?

MR. GOLDBERGER: You can answer that.

A Yes.

Q Is he --

A -- what was the question again, sorry?

(Whereupon there is a ringing sound.)

THE WITNESS: I have to take this outside.

(Whereupon a break is taken.)

DIRECT BY MR. GARCIA: (CONT'D)

Q David Spicer, I think I was asking you about him, is he representing you now?

A No, he's not.

Q Do you know why he represented you at least for a brief time in this case?

A I considered hiring him and decided not to.

Q Did you hire him for any other case besides this case?

A This case meaning what?

Q The case that we're here on today Dainya Nida.

MR. GOLDBERGER: I think during the discussions there would have been an attorney client relationship.

MR. GARCIA: No -- let me ask it this way.

Q Did he file an appearance in any other case other than this case involving Dainya Nida?

A I don't know.

Q But he's no longer representing you?

A Correct.

Q Were you ever interviewed by the Town of Palm Beach Police Department concerning any alleged

24 criminal wrongdoing on your part?

25 A (No response).

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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.

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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

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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

rights ■ guaranteed by the 5th, 6th and 14th amendment of the United States Constitution.

Q When do you intend to answer these questions?

A I intend to respond to all relevant questions regarding this lawsuit, however, at the present time my attorneys have counseled ■ 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 representation. Accordingly, I assert my federal constitutional rights as guaranteed by the 5th, 6th and 14th amendment of the United States Constitution.

Q Did you ever tell Dainya Nida that she should be a model?

A I intend to respond to all relevant questions regarding this lawsuit, however, at the

present time my attorneys have counseled me ■ cannot provide answers to 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 Did you ever offer Dainya Nida help in becoming ■ model?

MR. GARCIA: For the record, the witness has been shaking his head and smiling in response to the last few questions.

MR. GOLDBERGER: I disagree with that assertion that that is what is happening, but you can say what you want for the record.

MR. BURMAN: I didn't see it.

A I intend to respond to all relevant questions regarding this lawsuit, however, at the present time my attorneys have counseled ■ I cannot provide answers to any questions relevant to this lawsuit. ■ 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 Did you ever tell Dainya Nida you could not wait until she was 18 so you could fly her to Paris?

A As I've said in response to some of the questions previously asked of me, 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 representation. Accordingly, I assert my federal constitutional rights as guaranteed by the 5th, 6th and 14th amendment of the United States Constitution.

Q Did you always pay the same amount for sexual services for Dainya Nida?

MR. GOLDBERGER: Form.

A I intend to respond to all relevant questions regarding this lawsuit, however, at the

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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 representation. Accordingly, I assert my federal constitutional rights as guaranteed by the 5th, 6th and 14th

amendment of the United States Constitution.

Q Did you ever offer Dainya Nida additional monies if she had sexual intercourse with you?

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 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.

Let ■ explain and put ■ the record this is about

MR. GARCIA: Let me explain and put on the record that this is about the second conference during the deposition. In a civil case if a witness confers during a deposition with his counsel I'm entitled to find out what that discussion was about.

Q *I'm going to go ahead and ask what did you just discuss with your counsel?

MR. BURMAN: I disagree with that, it's attorney client privilege and I instruct him not to answer that.

MR. GARCIA: Okay. Certify that question

and print it up right away.

Q Did you ever give Dainya Nida any gifts besides cash?

MR. GOLDBERGER: Object to the form.

Q You can answer.

A As I've said in response to some of your other questions previously asked of me, 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 representation. Accordingly, I assert my federal constitutional rights as guaranteed by the 5th, 6th and 14th amendment of the United States Constitution.

Q Do you know a Detective Silvestri?

A No.

■ Do you know any officer with the Town of Palm Beach either through a traffic citation they may have written for you or maybe you called them out for some issue at your home?

A Not that I recall.

Q Has the Town of Palm Beach Police ever been to your home on Brillo Way?

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. ■ 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. May we take ■ break?

Q Absolutely. I want to put on the record that any discussion had with counsel during a break in the deposition --

A -- he's not coming with me.

Q Okay.

MR. GOLDBERGER: I'm going to check my messages, you want to send a monitor with me?

MR. GARCIA: No.
(Whereupon ■ break is taken.)

DIRECT BY MR. GARCIA: (CONT'D)

Q Do you have any escort from the Palm Beach County Sheriff's Office when you go on your work release program?

A I don't understand the question.

Q Does anybody from the Sheriff's Office

transport you when you're on work release?

A No.

Q No. So you travel on your own?

A No.

Q How do you get to wherever you go when you're released for work?

A As I've said in response to many of your questions asked of me, I intend to respond to all relevant questions regarding this lawsuit, however, at the present time my attorneys have counseled ■ ■ cannot provide answers to 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 Are you housed at the Palm Beach County stockade or at the main jail ■ Gun Club Road?

A Housed, stockade.

Q *Are you with the general population?

MR. GOLDBERGER: I'm just not going to answer any more questions about where he's living at the Palm Beach County stockade, it's got zero relevance. I respect your rights to

ask the questions, if you want a judge to tell us he's got to answer them I'd be happy to but honestly, Mr. Garcia, it's irrelevant to anything you're doing.

MR. GARCIA: All right, certify the question.

MR. GOLDBERGER: Okay.

MR. GARCIA: Your basis is relevance?

MR. GOLDBERGER: No, it's — the purpose of this is to embarrass Mr. Epstein and to humiliate him.

DIRECT BY MR. GARCIA: (CONT'D)

Q *Do you have a written agreement concerning your work release program in terms of where you can go, what time you get to leave, what

16 time you get to ■■■ 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 ■ 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. ■ 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

calls and --

A -- I have not received any phone calls.

Q Or messages.

A No, I haven't received anything.

Q You haven't received anything during the deposition?

A No, Sir.

Q Are you allowed to have -- is it a telephone?

A Yes.

Q All right. Are you allowed to have this telephone during your work release hours?

A I've been using it as a clock, Sir.

Q Okay. I want to know if you -- if you're allowed to have a telephone during work release hours?

A Yes.

Q Is this a telephone, is it a smart phone?

A I'm sorry, I don't know what that means.

Q Is it a Blackberry?

A I'm not very familiar with these things.

Sorry.

Q What's the brand of it?

MR. GOLDBERGER: Don't answer this.

THE WITNESS: Okay.

Q *Do you have access to the internet on that phone?

MR. GOLDBERGER: Don't answer.

MR. GARCIA: On what grounds?

MR. GOLDBERGER: On grounds that it's none of your business.

MR. GARCIA: You can't do that in a civil case, you can't say it's none of your business, it's not a legal objection.

MR. BURMAN: He's correct. I'm telling him not to answer on the grounds it's a privacy privilege.

MR. GARCIA: Certify the question.

DIRECT BY MR. GARCIA: (CONT'D)

Q Are you allowed to have this device, whatever it may be, in jail?

A No.

MR. BURMAN: Same objection. Don't answer, it's privacy privilege.

MR. GARCIA: Okay.

Q Are you able to receive email transmissions on the phone?

MR. BURMAN: Same objection. Don't answer it, privilege, privacy.

Q Have you received any email communications

from Sarah Kellen in the past -- let me ask this, when were you first incarcerated at the Palm Beach County Jail, when was --

A -- June 30.

Q June 30 of what year?

A This year, sorry, 08.

Q Have you received any email transmissions from Sarah Kellen since June 30 of 2008?

MR. BURMAN: Same objection. Don't answer on the basis of privilege of privacy he has under the Florida Constitution.

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 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 Who is your service provider for that phone?

MR. BURMAN: Same objection, privacy, privilege. Don't answer it.

MR. GOLDBERGER: Also form.

0057

Q All right. You can answer.

MR. BURMAN: Could I just inquire for the record, is there some allegation that Mr. Epstein has tried to make contact with your client?

MR. GARCIA: No.

MR. BURMAN: Okay. Thank you.

BY MR. GARCIA: (CONT'D)

Q You can answer the question.

A I don't know.

Q *You don't know who your service provider is?

MR. GOLDBERGER: You just invoked privacy --

MR. GARCIA: -- he didn't instruct him not to answer.

MR. BURMAN: I'm telling him now. Thanks for reminding me.

MR. GARCIA: Certify the question.

Q *What's the phone number associated with this particular phone?

MR. BURMAN: Same objection, privacy privilege. Don't answer.

MR. GARCIA: Certify the question.

Q *How long have you had this particular phone?

0058

MR. BURMAN: Same objection, privilege of privacy. Don't answer.

Q *How long have you had this particular phone number?

MR. BURMAN: Same objection, privacy, privilege. Don't answer.

MR. GARCIA: Certify all those questions as well.

Q Did you ever tell Dainya Nida that you wanted the encounter with her to be like a, quote, "a porn video," end quote?

MR. GOLDBERGER: Object to the form.

A As I have previously responded to many of your other questions, 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 representation. Accordingly, I assert my federal 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 ■ 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 ■ guaranteed by the
10 5th, 6th and 14th amendment of the United States
11 Constitution.

12 ■ Have you been involved in any other
13 personal litigation where you are a party to ■
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 ■
22 contractor suing you for building ■ 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 ■ 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
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 ■ 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 ■ I'm not referring to any particular case.
24 I'm asking you to tell ■ what kind of suit was
25 brought against you. In other words, at some point
0062 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 ■ 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 ■ 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 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 ■ 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 ■ 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 ■ 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 ■
23 deposition in any of these cases?

24 MR. GOLDBERGER: What cases?

25 MR. GARCIA: You want ■ 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 ■ 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 ■
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

1 to give you a specific case. He can answer the
2 question.

3 MR. GOLDBERGER: Under the circumstances,
4 I need you to invoke your privileges.

5 A I intend to respond to all relevant
6 questions regarding this lawsuit, however, at the
7 present time my attorneys have counseled ■ 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. Have you given a deposition in
15 the past two years?

16 A Yes.

17 Q In what case?

18 MR. GOLDBERGER: You can answer that.

19 A E.W.

20 Q E.W?

21 A Yes.

22 Q What are the allegations in that case
23 against you?

24 A ■ don't know.

25 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 ■ 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 ■ 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 ■ 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 ■ 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 ■ 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

made public, one of the main reasons why it was not to be made public is so that the names are not revealed and you are violating the spirit of the non-disclosure agreement by asking questions that come off the document that you have for very limited purposes. You can ask, go ahead, but I caution you that you very, very well may be violating the nondisclosure provision of the agreement and I note when you showed ■ the agreement you had received earlier from the U.S. Attorney there's an email

attachment to that that very, very carefully cautions you that it's a privileged document and for your use only and not to be published anywhere.

MR. GARCIA: Okay.

DIRECT BY MR. GARCIA: (CONT'D)

Q Answer my question, Sir.

A ■ intend to respond to all relevant questions regarding this lawsuit, however, at the present time my attorneys have counseled ■ 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 representation. Accordingly, I assert my federal constitutional rights as guaranteed by the 5th, 6th and 14th amendment of the United States Constitution.

Q Have you ever asked Sarah Kellen, Adriana Ross, Leslie Groff or Nadia Marcinkova to find and solicit on your behalf young women to provide prostitution services for you?

MR. BURMAN: Object to the form.

Q You can answer.

A As I've said in response to some of your other questions, I intend to respond to all relevant questions regarding this lawsuit, however, at the

present time my attorneys have counseled ■ I cannot provide answers to any questions relevant to this lawsuit. ■ 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 I may have asked you this already, I apologize if I'm being a little bit repetitive, has Sarah Kellen, Adriana Ross, Leslie Groff or Nadia Marcinkova ever been employed by you or any other business entity you own or control?

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 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.

■ *For the record, this is the second conference you've had with counsel which I can't hear so I'm going to ask you again the last two conferences during this period of questioning tell

0071

me what you discussed with counsel.

MR. BURMAN: Object, attorney client privilege also work product privilege and instruct him not to answer.

MR. GARCIA: Certify those questions.

MR. GOLDBERGER: And I have no obligation to tell you based on those privileges being invoked.

MR. GARCIA: You're wrong. I can tell you there's case law right on point and I'd be happy to show it to you.

MR. GOLDBERGER: We can deal with that at another time but if you really must know the concern is that you continue to violate the nondisclosure provisions of the non-prosecution agreement in direct contravention of what the agreement was as to what use you can make of it.

MR. GARCIA: He's not a third party, he's an actual party to the agreement and my client is a third party beneficiary to the agreement and I have not provided the agreement to any third party in accordance with my agreement with the U.S. Attorney's Office.

Let me have a couple of minutes, I'm

0072

almost wrapped up. I just have to find something, it will be a couple of minutes.

(Whereupon a break is taken.)

DIRECT BY MR. GARCIA: (CONT'D)

Q Did you ever solicit or have someone solicit on your behalf a young woman named Britt to perform sexual services for you at your home on Brillo Way in Palm Beach?

MR. GOLDBERGER: Object to form.

A As I've said in response to some of your other questions, 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 representation. Accordingly, I assert my federal constitutional rights as guaranteed by the 5th, 6th and 14th amendment of the United States Constitution.

Q Did you ever solicit or have someone solicit on your behalf a young woman whose first name is Alexis for the purposes of performing prostitution services for you in your home on Brillo Way in Palm Beach?

MR. BURMAN: Object to the form.

0073

A As I've said in response to some of your other questions, 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 representation. Accordingly, I assert my federal constitutional rights as guaranteed by the 5th, 6th and 14th amendment of the United States Constitution.

Q All right. Did you ever solicit or have someone solicit on your behalf a young woman by the name of Rhianin (phonetic) to perform prostitution services for you in your home on Brillo Way in Palm Beach?

MR. BURMAN: Object to the form.

A As I've said in response to other questions of ■ similar nature, 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 representation. Accordingly, ■ assert my federal constitutional rights as guaranteed by the

5th, 6th and 14th amendment of the United States Constitution.

MR. GARCIA: I'll just note for the record Mr. Epstein just passed a note that he wrote while answering the question to his defense counsel which again I consider to be communications during the deposition, I would ask you to tell ■ what y■ wrote in that note.

MR. GOLDBERGER: Will we be able to have lunch at 1:00.

MR. GARCIA: Okay.

DIRECT BY MR. GARCIA: (CONT'D)

■ I was up to Rhianin, let ■ move on to Sherry. Did you ever solicit or have someone solicit on your behalf a young woman by the name of Sherry, spelled with an S, to provide prostitution services for you at your home on Brillo Way in Palm Beach?

MR. BURMAN: Object to the form.

MR. GOLDBERGER: Object to the form and for clarification purposes do you have ■ last name?

MR. GARCIA: No.

A I intend to respond to all relevant questions regarding this lawsuit, however, at the

present time my attorneys have counseled ■ 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 representation. Accordingly, I assert my federal constitutional rights as guaranteed by the 5th, 6th and 14th amendment of the United States Constitution.

Q I'm going to assume, and you tell ■ if I'm wrong, your answers would be the same for Nicole, Hailey and Joanna if I asked you the same question?

MR. BURMAN: I would object to the form, if you specified each person, because you're not giving us last names, object to form and I think you can probably stipulate his answer would be the same.

MR. GOLDBERGER: That's correct. Is that okay with you?

MR. GARCIA: Yes.

DIRECT BY MR. GARCIA: (CONT'D)

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
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 a 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?

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

0079

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

0080

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.)
13
14
15
16
17

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 ■ and was duly sworn.
7

8 WITNESS my hand and official seal this
9 12th day of May, 2009.
10
11
12
13

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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0082
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2
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

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

18 The foregoing certification of this
19 transcript does not apply to any reproduction of the
20 same by any means unless under the direct control
21 and/or direction of the certifying reporter.

22 IN WITNESS WHEREOF, ■ have hereunto set my
23 hand this 12th day of May, 2009.
24

25 JULIE ANDOLPHO, COURT REPORTER
Notary Public in and for the STATE OF FLORIDA
My Commission Expires:12/14/09, ■ DD499509

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ATTACHMENT 12

1 IN ■■■■ CIRCUIT COURT OF THE FIFTEENTH
2 JUDICIAL CIRCUIT, IN AND FOR
3 PALM BEACH COUNTY, FLORIDA

4 E.W.,)

5 Plaintiff,)

6 vs.)

No. 502008CA028058XXXXMBAD

7 JEFFREY EPSTEIN and SARAH)
8 KELLEN,)

9 Defendants.)

COPY

10 West Palm Beach, Florida

11 April 30th, 2009

12 10:08 o'clock A.M.

13
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15
16
17 -----
18 VIDEOTAPED DEPOSITION

19 OF

20 JEFFREY EPSTEIN
21 -----
22
23
24
25

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 [REDACTED] 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 [REDACTED] 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 [REDACTED] set in
14 the case of E.W., not L.M.

15 [REDACTED] Oh.

16 [REDACTED] 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 [REDACTED] BERGER: And I'm William J. Berger,
21 for the plaintiff, also.

22 MR. [REDACTED] Jack Goldberger on behalf
23 of Jeffrey Epstein.

24 MR. [REDACTED] Michael Burman on behalf of
25 Jeffrey Epstein.

1 **THEREUPON,**

2 **JEFFREY EPSTEIN,**

3 Being ■ witness in the notice heretofore
4 filed, being of lawful age, and being first duly
5 sworn in the above cause, testified ■ his oath as
6 follows:

7 ■ **WITNESS:** Yes, I do.

8 **DIRECT ■■■■■■■■■■**

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 ■ 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. [REDACTED] 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 [REDACTED] 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 [REDACTED] 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. [REDACTED] 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. [REDACTED] Okay.

11 MR. GOLDBERGER: [REDACTED] 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 [REDACTED] 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 [REDACTED] And, excuse me, and your
7 Fifth Amendment privileges.

8 [REDACTED] Yes.

9 Accordingly, I, excuse me, I assert my
10 Federal Constitutional rights [REDACTED] 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. [REDACTED] 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 [REDACTED] 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 [REDACTED] 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 [REDACTED] You can answer, but --

18 THE COURT: No.

19 Q. (By Mr. Edwards) You were currently, you
20 were initially sentenced to 18 months in jail, is
21 that correct?

22 [REDACTED] Go ahead.

23 THE COURT: 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 ■ 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 ■ guaranteed by the Fifth,
20 Sixth, and Fourteenth Amendment of the constitution.

21 Q. Mr. Epstein, I have ■ 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 ■ 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 ■ that I
3 cannot provide answers to any questions relevant to
4 this lawsuit, and ■ 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 ■ 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, ■ can you please inform the
13 jury as to your current schedule ■ it is exists
14 today?

15 MR. ■■■■■ Let me hold off on that.

16 Okay.

17 ■■■ WITNESS: I don't understand the
18 schedule, the question.

19 MR. ■■■■■ 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 ■ 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 ■ 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 ■
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. [REDACTED] Objection.

16 [REDACTED] 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 [REDACTED] 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. [REDACTED] 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 [REDACTED] 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 [REDACTED] that I
16 cannot provide [REDACTED] 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 ■
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 ■■■■■■■■■■ Is A.W. a state or federal
11 case?

12 MR. EDWARDS: State.

13 MR. ■■■■■■■■■■ Okay. I ■■ 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 ■ financial-type
18 question and, therefore, we object on those
19 grounds, ■ well.

20 MR. ■■■■■■■■■■ 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 [REDACTED] Yes.

9 Q. (By Mr. Edwards) When you're released
10 from jail, do you intend to serve one year community
11 control [REDACTED] 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. [REDACTED] 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 [REDACTED] 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 [REDACTED] 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 [REDACTED] Umm, okay.

13 [REDACTED] WITNESS: Yes.

14 Q. (By Mr. Edwards) And that is 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 ■ 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 ■
18 just hold off a second.

19 (Thereupon, a discussion was had off
20 the record.)

21 ■ ■ ■ ■ ■ You can answer the
22 question.

23 ■ 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 ■ 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, ■ 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 ■ guaranteed by the
22 Fifth, Sixth, and Fourteenth Amendment to the United
23 States Constitution.

24 ■ ■ ■ We further object on the
25 ground that E.W.'s name has not been disclosed

1 and you've objected to that.

2 [REDACTED] 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 [REDACTED] 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 [REDACTED] 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 [REDACTED] WITNESS: Excuse [REDACTED] one second.

21 (Thereupon, [REDACTED] discussion was had off
22 the record.)

23 [REDACTED] 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 ■ 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 ■ 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 ■ 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 ■ 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 ■ 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 ■ 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 ■ 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 ■ 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 ■ 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 ■ RICO count in
17 E.W.'s case?

18 MR. ■■■■■: Yes.

19 MR. ■■■■■: Okay. These other girls, are
20 any of them your clients, ■ well?

21 ■■■■■: Some may be.

22 ■■■■■: Okay. Thank you.

23 MR. EDWARDS: Some are not.

24 MR. ■■■■■: 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 ■ 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 ■ 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 ■ 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 ■ 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 ■ 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 ■ break for, ■
7 bathroom break, is that okay?

8 **THE VIDEOGRAPHER:** We're off the record at
9 10:39.

10 (Thereupon, a discussion ■■ 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 ■ 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 [REDACTED] Can I see you ■ second,
4 Mike?

5 MR. [REDACTED] Sure..

6 THE [REDACTED] We're off the record at
7 10:45.

8 (Thereupon, ■ brief break was taken.)

9 THE [REDACTED] 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. [REDACTED] Object to form, form vague
15 and indefinite. Last name, please.

16 MR. [REDACTED] You can answer the question.

17 [REDACTED] 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 ■■■■■ You can answer.

9 THE ■■■■■ I intend to respond to all
10 relevant questions regarding this lawsuit.
11 However, at the present time my attorneys have
12 counseled ■■ 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 ■■■■■ Object to form, vague and
24 indefinite. Last name, please.

25 ■■■ EDWARDS: You may answer.

1 **WITNESS:** I intend to respond to all
2 relevant questions regarding this lawsuit.
3 However, at the present time my attorneys have
4 counseled ■ 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 ■ 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 **BURMAN:** Object to the form, vague and
16 indefinite. Last name, please.

17 ■ You can answer if --

18 **THE ■** 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. ~~EDWARDS~~ Object to form, vague and
8 indefinite. Last name, please.

9 MR. ~~EDWARDS~~ You can answer, if you know.

10 ~~VIM WATILAN~~ 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. ~~EDWARDS~~ Object to form, vague and
25 indefinite. Last name, please.

1 [REDACTED] You can answer.

2 [REDACTED] 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. [REDACTED] Object to form, vague and
17 indefinite. Last name, please.

18 [REDACTED] You can answer.

19 [REDACTED] WITNESS: I intend to respond to all
20 relevant questions regarding this lawsuit.
21 However, at the present time my attorneys have
22 counseled [REDACTED] 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 ■■ 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 ■■■ ■■■■■■ Object to form, vague and
10 indefinite. Last name, please.

11 ■■■ ■■■■■■ You can answer.

12 ■■■ BURMAN: Or flavor.

13 ■■■ ■■■■■■ I intend to respond to all
14 relevant questions regarding this lawsuit.
15 However, at the present time my attorneys have
16 counseled ■■ 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 ■■ 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 ■ minor

1 female named Tamika (phonetic)?

2 MR. [REDACTED] Object to form, vague and
3 indefinite. Last name, please.

4 [REDACTED] [REDACTED] You can answer.

5 THE [REDACTED] I intend to respond to all
6 relevant questions regarding this lawsuit.
7 However, at the present time my attorneys have
8 counseled [REDACTED] 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 [REDACTED] WITNESS: Sorry?

14 [REDACTED] [REDACTED] I didn't realize you weren't
15 finished.

16 [REDACTED] [REDACTED] Accordingly, I assert my
17 Federal Constitutional right [REDACTED] 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. [REDACTED] 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 ■ minor
14 female named Alisha (phonetic)?

15 ■ ■ ■ ■ ■ Object to form, vague and
16 indefinite. Last name, please.

17 **MR.** ■ ■ ■ ■ ■ You can answer.

18 ■ ■ ■ **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 ■ 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 ■ minor
6 female named Cara (phonetic)?

7 MR. ■ Object to form, vague and
8 indefinite. Last name, please.

9 ■ WITNESS: I intend to respond to all
10 relevant questions regarding this lawsuit.
11 However, at the present time my attorneys have
12 counseled ■ 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 ■ BURMAN: Object to form, vague and
25 indefinite. Last name, please.

1 MR. [REDACTED] You can answer.

2 THE [REDACTED] 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. [REDACTED] Object to form, vague and
17 indefinite. Last name, please.

18 MR. EDWARDS: You may answer.

19 [REDACTED] 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 ■ 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 ■ minor
7 female named Ashley (phonetic)?

8 ■ BORMAN: Object to form, vague and
9 indefinite. Last name, please.

10 MR. EDWARDS: You can answer.

11 ■ WITNESS: I intend to respond to all
12 relevant questions regarding this lawsuit.
13 However, at the present time my attorneys have
14 counseled ■ 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. ■ One moment.

23 (Thereupon, ■ discussion was had off
24 the record.)

25 (Thereupon, Attorney Adler entered

1 the deposition room.)

2 MR. [REDACTED] We're back on.

3 Q. (By Mr. Edwards) Between 2001 and 2005
4 did you engage in sex or sex acts with ■ minor
5 female named Sherry (phonetic)?

6 MR. [REDACTED] Object to form, vague and
7 indefinite. Last name, please.

8 MR. EDWARDS: You can answer.

9 THE [REDACTED] 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 ■ minor
22 female named Colleen (phonetic)?

23 MR. [REDACTED] Object to form, vague and
24 indefinite. Last name, please.

25 MR. EDWARDS: You may answer.

1 **THE DEFENDANT:** 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 **BURMAN:** Object to form, vague and
16 indefinite. Last name, please.

17 **MR. [REDACTED]:** You may answer.

18 **THE DEFENDANT:** I intend to respond to all
19 relevant questions regarding this lawsuit.
20 However, at the present time my attorneys have
21 counseled ■ 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 ■ 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 ■ minor
6 female named Vanessa (phonetic)?

7 ■■■■■■■■■■ Object to the form, vague and
8 indefinite. Last name, please.

9 MR. ■■■■■■■■■■ You can answer.

10 ■■■■■■■■■■ I intend to respond to all
11 relevant questions regarding this lawsuit.
12 However, at the present time my attorneys have
13 counseled ■ 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 ■ minor
23 female named April (phonetic)?

24 MR. ■■■■■■■■■■ Object to form, vague and
25 indefinite. Last name, please.

1 [REDACTED] You can answer.

2 [REDACTED] 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 [REDACTED] or [REDACTED] acts with a minor
15 female named Alexandra (phonetic)?

16 [REDACTED] BURMAN: Object to form, vague and
17 indefinite. And last name, please?

18 MR. [REDACTED] Is that Alexander or
19 Alexandra?

20 MR. EDWARDS: -- dra.

21 [REDACTED] 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 ■■■■ or sex acts with ■ minor
9 female named Michelle (phonetic)?

10 MR. ■■■■ Object to form, vague and
11 indefinite. Last name, please.

12 ■■■■ You can answer.

13 THE ■■■■ 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 ■ minor

1 female named Yolanda (phonetic)?

2 MR. [REDACTED] Object to form, vague and
3 indefinite. Last name, please.

4 MR. [REDACTED] You can answer.

5 [REDACTED] 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 [REDACTED] or sex acts with [REDACTED] minor
18 female named Angelique (phonetic)?

19 MR. [REDACTED] Object to form, vague and
20 indefinite. Last name, please.

21 MR. [REDACTED] You can answer.

22 [REDACTED] 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 ■■ 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 ■■■ or sex acts with a minor
10 female named Faith (phonetic)?

11 MR. ■■■■■ Object to form, vague and
12 indefinite. Last name, please.

13 ■■■ ■■■■■ 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 ■ minor
2 female named Molly (phonetic)?

3 ■■■■■ Object to form, vague and
4 indefinite. Last name, please.

5 ■■■■■ You can answer.

6 ■■■ 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 ■ minor
19 female named Felicia (phonetic)?

20 ■■■ BURMAN: Object to form, vague and
21 indefinite. Last name, please.

22 ■■■ EDWARDS: You can answer.

23 ■■■ 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) 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 ■■■ ■■■■■■ Object to form, vague and
13 indefinite. Last name, please.

14 ■■■ ■■■■■■ You can answer.

15 THE ■■■■■■ 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 ■■ 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 ■■■ acts with each of
3 the people ■ have just discussed, you knew they
4 were minors?

5 MR. ■■■■■ Object to form.

6 ■■■■■ 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. ■■■■■ Object to form, vague and
21 indefinite.

22 ■■■■■ 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 [REDACTED] You've identified that
22 Courtney [REDACTED] Courtney Wild, correct?

23 [REDACTED] 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 [REDACTED] 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. [REDACTED] 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 [REDACTED] 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 [REDACTED] Object to form, vague and
15 indefinite, to the extent last names of the
16 girls have not been identified.

17 [REDACTED] 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, ■■■ greeted at
5 the door by one of your employees at your mansion,
6 isn't that correct?

7 ■■■ ■■■■■ Object to form, vague and
8 indefinite. No description of last names of
9 the alleged minor girls.

10 ■■■ ■■■■■ 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 ■■■ BURMAN: Object to the form, vague and
25 indefinite.

1 ■■■ WITNESS: I intend to respond to all
2 relevant questions regarding this lawsuit.
3 However, at the present time my attorneys have
4 counseled ■■ 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 ■ question.

14 ■■■ BURMAN: Sure.

15 ■■■ ■■■■■■■■■■ Going off the record at
16 11:11.

17 (Thereupon, a brief break was taken.)

18 ■■■ ■■■■■■■■■■ 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. ■■■■■■ Object to the form, vague and
25 indefinite. Last names weren't provided for

1 most of them.

2 ■■■ 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 ■■■ BURMAN: Object to form, vague and
18 indefinite, last names of the alleged minor
19 girls weren't provided.

20 ■■■ ■■■■■ 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 ■■■ 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 ■■■ ■■■ You can answer.

14 ■■■ ■■■ I intend to respond to all
15 relevant questions regarding this lawsuit.
16 However, at the present time my attorneys have
17 counseled ■■ 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 ■■ 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. [REDACTED]: Object to the form, vague and
4 indefinite with regard to the alleged minor
5 girls, their last [REDACTED] weren't provided.

6 THE [REDACTED]: 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 [REDACTED] 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. [REDACTED]: Object to the form, vague and
22 indefinite with regard to the alleged minor
23 girls, the last names weren't provided.

24 THE [REDACTED]: 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 ■ BURMAN: Object to form, vague and
14 indefinite with regard to the alleged minor
15 girls, last names weren't provided.

16 ■ ■ ■ 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 ■ 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 [REDACTED] Object to form, vague and
6 indefinite with regard to the alleged minor
7 girls, last names weren't provided.

8 [REDACTED] I intend to respond to all
9 relevant questions regarding this lawsuit.
10 However, at the present time my attorneys have
11 counseled [REDACTED] 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 [REDACTED] 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 [REDACTED] BURMAN: Object to form of the
23 question, vague and indefinite with regard to
24 the alleged minor girls, last [REDACTED] weren't
25 provided.

1 [REDACTED] I intend to respond to all
2 relevant questions regarding this lawsuit.
3 However, at the present time my attorneys have
4 counseled [REDACTED] that I cannot provide answers to
5 any questions relevant to this lawsuit, and [REDACTED]
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. [REDACTED] 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. [REDACTED] You can answer.

20 [REDACTED] 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 ■ 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. ■■■■■■■■■■ Don't answer that.

12 Q. (By Mr. Edwards) Did you think the
13 question was funny?

14 ■■■■■■■■■■ Object to form.

15 ■■■■■■■■■■ You can answer.

16 ■■■■■■■■■■ 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 ■ that ■
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 ■ 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. ■■■■■ 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 ■■■ WITNESS: I intend to respond to all
14 relevant questions regarding this lawsuit.
15 However, at the present time my attorneys have
16 counseled ■ 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 [REDACTED] 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 [REDACTED] 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 [REDACTED] I intend to respond to all
23 relevant questions regarding this lawsuit.
24 However, at the present time my attorneys have
25 counseled [REDACTED] 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 ■■■ acts with?

12 ■■■ BURMAN: Object to the form, vague and
13 indefinite. Last names of many of the alleged
14 minor girls weren't provided.

15 ■■■ 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 ■■■ 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 [REDACTED] 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 [REDACTED] 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. [REDACTED] 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 [REDACTED] 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 [REDACTED] Same objection.

11 [REDACTED] I intend to respond to all
12 relevant questions regarding this lawsuit.
13 However, at the present time my attorneys have
14 counseled [REDACTED] 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 [REDACTED] 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. [REDACTED] Are you referring to the 49
2 alleged minors that you just identified, or is
3 this a generic question?

4 MR. [REDACTED] Yes, the 49, that --

5 [REDACTED] Can you repeat the question
6 please?

7 MR. EDWARDS: -- are known to us.

8 MR. [REDACTED] Okay. Object to the form,
9 vague and indefinite with regard to the alleged
10 minors, last names weren't provided.

11 THE [REDACTED] 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 [REDACTED] Once again, are you referring
2 to the 49 you identified, or just generic?

3 [REDACTED] General question.

4 MR. BURMAN: General question?

5 MR. [REDACTED] Right.

6 [REDACTED] 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 ■ 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. [REDACTED] Object to the form, vague and
23 indefinite.

24 [REDACTED] Could you repeat it again?

25 MR. [REDACTED] Sure, I'll clean it up.

1 Q. (By Mr. Edwards) Isn't it true that you
2 had employees working for you with ■ 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 ■ ■ ■ I intend to respond to all
8 relevant questions regarding this lawsuit.
9 However, at the present time my attorneys have
10 counseled ■ 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 ■ ■ ■ Objection, vague and
22 indefinite.

23 ■ ■ ■ WITNESS: I intend to respond to all
24 relevant questions regarding this lawsuit.
25 However, at this present time my attorney has

1 counseled ■ 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 ■ 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 ■ ■ ■ GOLDBERGER: Let me object on the
16 form. Are you asking, are you suggesting that
17 there is ■ criminal investigation that went on
18 between 2001 and 2006? Is that the question?

19 MR. ■ ■ ■ ■ ■ Well, at some time, at ■ ■ ■
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. ■ ■ ■ ■ ■ 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 ■ 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 ■ 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 ■ 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 [REDACTED] 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 [REDACTED] Hang on. Yeah, he can --
16 that's fine.

17 [REDACTED] 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. [REDACTED] If you know.

4 [REDACTED] 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 ■ 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 [REDACTED] Object to the form.

2 [REDACTED] 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. [REDACTED] You can answer that.

16 [REDACTED] 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 ■ 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 ■ 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 ■ 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. ■■■■■■■■■■ Object to the form,
17 assumes facts not in evidence.

18 ■ 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 ■■■ 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 ■■ 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 ■■ 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 ■ 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 ■■■■■ 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 ■■■
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 ■ 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 ■ BORMAN: Object, also on the, on the
12 grounds that the punitive damages haven't been
13 allowed yet. Not relevant.

14 ■ 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 ■ 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 ■ 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 ■ 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. [REDACTED] 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 ~~THE WITNESS:~~ 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 ~~THE WITNESS:~~ 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, ■ 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 ■ 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 ■ 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 ■ guaranteed by the Fifth,
18 Sixth, and Fourteenth Amendment to the United States
19 Constitution.

20 THE REPORTER: Can I take ■ pee break?

21 THE VERIFICATION: We're off the record at
22 11:50. This will be the end of tape one.

23 (Thereupon, ■ brief break was taken.)

24 THE VERIFICATION: 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 ■ 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 ■ 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 ■ guaranteed by the Fifth,
13 Sixth, and Fourteenth Amendment to the United States
14 Constitution.

15 Q. Does the body form of ■ 12 to 16 year old
16 girl sexually appeal to you?

17 ■■■■■■■■■■ 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 ■ 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 ■ that I
2 cannot provide ■ 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 ■■■■■■■■■■ Excuse me ■ second.

15 (Thereupon, ■ discussion ■ had off
16 the record.)

17 ■■■■■■■■■■ Umm, let ■ object to the
18 form ■ 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. ■■■■■■■■■■ Through attorneys.

22 MR. ■■■■■■■■■■ 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. [REDACTED] Can you identify a
7 specific statement made by a specific attorney?

8 [REDACTED] 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. [REDACTED] To the media, are you
15 talking about?

16 Q. (By Mr. Edwards) Yourself or through
17 anyone else to anyone else.

18 MR. [REDACTED] 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 ■ 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 ■ 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 ■ 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 ■ 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 ■■■ BURMAN: Object to form of the
25 question, vague and indefinite to the extent

1 that the alleged minor girls' last [REDACTED]
2 weren't provided.

3 [REDACTED] 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 [REDACTED] 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 [REDACTED] 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 [REDACTED] [REDACTED] Palm Beach mansion.

25 [REDACTED] [REDACTED] 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 ■■■ 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 ■■■ ■■■■■ I intend to respond to all
12 relevant questions regarding this lawsuit.
13 However, at the present time my attorneys have
14 counseled ■■■ 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, ■ 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 **THE WITNESS:** 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 ■■■■■■■■■■ Are you referring to the
4 previous 49?

5 ■■■■■■■■■■ Yes.

6 MR. ■■■■■■■■■■ Okay. Object to form of the
7 question, vague and indefinite to the extent
8 that the names, the last ■■■■■ of many of the
9 alleged minor girls weren't provided.

10 ■■■■■ WITNESS: I intend to respond to all
11 relevant questions regarding this lawsuit.
12 However, at the present time my attorneys have
13 counseled ■■■ 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. [REDACTED] Are you talking about the 49?

2 MR. [REDACTED] No.

3 MR. [REDACTED] No.

4 Q. (By Mr. Edwards) Did any minor girls that
5 engaged in [REDACTED] 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 [REDACTED] Object to the form.

10 [REDACTED] I intend to respond to all
11 relevant questions regarding this lawsuit.
12 However, at the present time my attorneys have
13 counseled [REDACTED] 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 [REDACTED] guaranteed by the
19 Fifth, Sixth, and Fourteenth Amendment to the
20 constitution.

21 [REDACTED] Okay. What time do you want
22 to break for lunch?

23 [REDACTED] 1:00.

24 THE WITNESS: 1:15?

25 MR. [REDACTED] Yeah, 1:15. Is that

1 okay?

2 [REDACTED] Yeah, that's fine with me.

3 What time do we have now?

4 [REDACTED] 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. [REDACTED] 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 [REDACTED] 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 [REDACTED] that you
25 preferred pure, young girls for sex?

1 ■■■■■ Object to the form.

2 ■■■■■ 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. ■■■■■ 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 ■■■ 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. [REDACTED] 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. [REDACTED] 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 ■ 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 ■■■ or engage in sex acts with
10 black girls?

11 MR. ■■■■■ Object to the form.

12 ■■■ ■■■■■ I intend to respond to all
13 relevant questions regarding this lawsuit.
14 However, at the present time my attorneys have
15 counseled ■ 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 ■ 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 [REDACTED] Object to the form.

2 [REDACTED] 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 [REDACTED] 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 [REDACTED] Object to the form.

17 [REDACTED] 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 [REDACTED] 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. [REDACTED] Object to the form.

7 THE [REDACTED] 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 ■ 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 [REDACTED] Object to the form.

24 THE [REDACTED] I intend to respond to all
25 relevant questions regarding this lawsuit.

1 However, at the present time my attorneys have
2 counseled ■ 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 ■ ■■■■■■ Object to the form. Are you
14 back on the 49, or is this generic?

15 ■ ■■■■■■ No, generic.

16 ■ ■■■■■■ 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 ■ ■■■■■■ Object to the form.

22 THE ■■■■■■ I intend to respond to all
23 relevant questions regarding this lawsuit.
24 However, at the present time my attorneys have
25 counseled ■ 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 [REDACTED] BURMAN: Object to the form.

11 [REDACTED] 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 [REDACTED] 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. [REDACTED] 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 ■ 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 ■ 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 ■ ■ ■ ■ ■ Object to the form.

14 ■ ■ ■ ■ ■ I intend to respond to all
15 relevant questions regarding this lawsuit.
16 However, at the present time my attorneys have
17 counseled ■ 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 ■ 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 ■■■■■ Object to the form.

4 ■■■ WITNESS: I intend to respond to all
5 relevant questions regarding this lawsuit.
6 However, at the present time my attorneys have
7 counseled ■■ 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 ■■ 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 ■ professional masseuse give you ■
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 ■ 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. ■■■■■ Object to the form.

9 THE ■■■■■ I intend to respond to all
10 relevant questions regarding this lawsuit.
11 However, at the present time my attorneys have
12 counseled ■ that I cannot provide ■ to
13 any questions relevant to this lawsuit, and ■
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 ■ 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. ■■■■■ Object to the form.

24 ■ 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. [REDACTED] Are you asking him if
7 that's a statement that was made?

8 MR. [REDACTED] 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 ■ 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 ■ 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 ■■■■■ I intend to respond to all
2 relevant questions regarding this lawsuit.
3 However, at the present time my attorneys have
4 counseled ■■■ 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 ■■■ escort service in Palm Beach County for a
18 professional escort to ■■■ to your house for sex,
19 did you?

20 A. You never ordered?

21 ■■■ WITNESS: Do I answer the question?

22 MR. ■■■■ 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 ■ that I
5 cannot provide ■■■■■ 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 ■■■■■. Object to the form.

17 ■■■■■ 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 [REDACTED] Object to the form.

6 [REDACTED] 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 ■ 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 ■ 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 ■■■■■ 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 [REDACTED] Object to the form.

9 THE [REDACTED] I intend to respond to all
10 relevant questions regarding this lawsuit.
11 However, at the present time my attorneys have
12 counseled [REDACTED] that I cannot provide [REDACTED] 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 [REDACTED] 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 ■ 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 ■ 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 ■ 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 ■ 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 ■ 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 ■ minor girl to bring back to your house for sex?

10 THE [REDACTED] Object to form, no?

11 MR. BURMAN: Object to form.

12 [REDACTED] I intend to respond to all
13 relevant questions regarding —

14 [REDACTED] 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 [REDACTED] I thought he objected to the
20 form, that's why I was --

21 [REDACTED] GOLDBERGER: He asked -- I'm not --
22 Brad, he asked his lawyer ■ 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 ■ 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 ■■ ■■■■■ 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 [REDACTED] Object to the form.

4 [REDACTED] 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 [REDACTED] Object to the form.

18 [REDACTED] 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 ■ 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 ■ ■ ■ I intend to respond to all
9 relevant questions regarding this lawsuit.
10 However, at the present time my attorneys have
11 counseled ■ 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 ■ 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 ■ 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 ■■■ WITNESS: I intend to respond to all
16 relevant questions regarding this lawsuit.
17 However, at the present time my attorneys have
18 counseled ■ 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, ■ 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. [REDACTED] Object to the form.

6 [REDACTED] 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 [REDACTED] Are we generic, or are we
22 going with the 49?

23 [REDACTED] Generic.

24 [REDACTED] 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 **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. BURMAN:** 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. [REDACTED] Can you define
5 enterprise, so we can determine whether we need
6 to answer the question.

7 [REDACTED] I'm talking about persons
8 involved with a common goal. We have defined
9 this earlier.

10 MR. [REDACTED] I'm sorry, I was out of
11 the room did you define it?

12 MR. [REDACTED] You were out of the room.

13 MR. [REDACTED] Okay.

14 MR. [REDACTED] 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 [REDACTED] I intend to respond to all
20 relevant questions regarding this lawsuit.
21 However, at the present time my attorneys have
22 counseled [REDACTED] 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 ■ take ■ break again?
6 Bathroom break.

7 MR. ■■■■■ Let's just break for lunch
8 then.

9 MR. ■■■■■ I can't, because I've
10 got — there's a reason why, I've got ■
11 commitment at 1:15, so —

12 THE ■■■■■ Off the record at
13 12:40.

14 (Thereupon, a discussion was had off
15 the record.)

16 (Thereupon, a brief break ■ taken.)

17 THE ■■■■■ 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 [REDACTED] Objection. That goes to
10 punitive damages, and I object.

11 [REDACTED] 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 [REDACTED] 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 ■ billionaire?

3 ■ 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, ■ well.

9 ■ ■■■■■ 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 ■ ■■■■■ 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 [REDACTED] I intend to respond to all
4 relevant questions regarding this lawsuit.
5 However, at the present time my attorneys have
6 counseled [REDACTED] that [REDACTED] 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 [REDACTED] 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 [REDACTED] 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 [REDACTED] 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 [REDACTED]
23 extremely wealthy between 2001 and 2005?

24 MR. [REDACTED] 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 ■ 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 ■ ■ ■ 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 ■ 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 [REDACTED] Object to the form.

6 THE [REDACTED] 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 [REDACTED] Object to the form.

22 [REDACTED] 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 ■ 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 ■ slave?

10 ■ ■■■■■ Object to the form.

11 ■ ■■■■■ 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 [REDACTED] I intend to respond to all
2 relevant questions regarding this lawsuit.
3 However, at the present time my attorneys have
4 counseled [REDACTED] 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 [REDACTED] 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 [REDACTED] effort to
14 gain sexual access to minor girls?

15 [REDACTED] Object to the form.

16 THE [REDACTED] 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. [REDACTED] Object to the form.

7 THE [REDACTED] I intend to respond to all
8 relevant questions regarding this lawsuit.
9 However, at the present time my attorneys have
10 counseled [REDACTED] 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 [REDACTED] Object to the form.

23 THE [REDACTED] 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 [REDACTED] Object to the form.

13 [REDACTED] I intend to respond to all
14 relevant questions regarding this lawsuit.
15 However, at the present time my attorneys have
16 counseled [REDACTED] 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. [REDACTED] Object to the form.

4 THE [REDACTED] 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 ■ 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 [REDACTED] Object to the form.

18 [REDACTED] I intend to respond to all
19 relevant questions regarding this lawsuit.
20 However, at the present time my attorneys have
21 counseled ■ 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 ■ 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 ■ the
8 telephone?

9 ■ Object to the form.

10 THE ■ 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. ■ Object to the form.

17 THE ■ 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 ■ 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 ■ 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 [REDACTED] 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. [REDACTED] 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 [REDACTED] 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 [REDACTED] 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 [REDACTED] 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 [REDACTED] 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 [REDACTED] 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 ■ 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 ■ way so that they would not come in
8 contact with ■■ another?

9 ■ ■■■■■■ Object to form.

10 ■ ■■■■■■ 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. ■■■■■■ Ready to break?

23 MR. ■■■■■■ He wants to eat.

24 ■■■ VIDEOGRAPHER: We're off the record at

25 1:12.

(Thereupon, a lunch break was taken
from 1:12 to 2:32 p.m.)

██████████ We're back on record at
2:32.

██████████ Ready?

██████████ Sure.

Q. (By Mr. Edwards) Mr. Epstein, did you
ever care about any of the feelings of the minor
girls that you were engaging in sex with?

MR. ██████████ Object to the form.

██████████ I intend to respond to all
relevant questions regarding this lawsuit.
However, at the present time my attorneys have
counseled me that I cannot provide answers to
any questions relevant to this lawsuit at this
time, so I must accept their advice or I lose
potential — I risk losing my Sixth Amendment
right to effective representation.

And accordingly, I have to assert my
Federal Constitutional rights as guaranteed by
the Fifth, Sixth and Fourteenth Amendment to
the United States Constitution.

Q. (By Mr. Edwards) Did it ever occur to you
that any of these girls were somebody's daughter --

██████████ Object to the form.

1 Q. (By Mr. Edwards) -- when you were
2 engaging in sex with them?

3 [REDACTED] Object to the form of the
4 question.

5 THE [REDACTED] 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 [REDACTED] You can continue.

15 THE [REDACTED] 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 [REDACTED] Object to the form of the
24 question.

25 [REDACTED] I intend to respond to all

1 relevant questions regarding this lawsuit.
2 However, at the present time my attorneys have
3 counseled ■ 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 ■■■■■ 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 ■ guaranteed by
24 the Fifth, Sixth, and Fourteenth Amendment to
25 the United States Constitution.

1 your own sexual gratification?

2 MR. BURMAN: The deposition is over.

3 THE COURT: Conclude at 2:37, end
4 of tape 2 of 2.

5 MR. BURMAN: We're going to order instant
6 copy, and we want the tape, also,
7 Mr. Videographer.

8 MR. BURMAN: We want this ■ 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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1 CERTIFICATE OF [REDACTED]

2 STATE OF FLORIDA)
3 : SS
4 COUNTY OF PALM BEACH)

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

8 WITNESS my hand and official seal this
9 [REDACTED] day of [REDACTED], 2009.

10
11
12 _____
LINDA P. AUKAMP, RPR

13 Commission No.: DD 499271

14 Notary Public - State of Florida

15 My Commission Expires: 12-26-09
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17
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1 **REPORTER'S DEPOSITION CERTIFICATE**

2
3 STATE OF FLORIDA)
4 : SS
COUNTY OF PALM BEACH)

5 I, LINDA P. AUKAMP, a Registered
6 Professional Reporter, certify that I was authorized
7 to and did stenographically report the deposition of
8 ~~Witness: A. P. [REDACTED]~~; that a review of the
9 transcript was requested; and that the transcript is
10 a true and complete record of my stenographic notes.

11 I FURTHER CERTIFY that on the ~~15th~~ day of
12 ~~months: [REDACTED]~~, 2009, I notified
13 ~~letter recipient: [REDACTED]~~ that the deposition
14 of ~~witness: [REDACTED]~~ was ready for reading and
15 signing by the witness.

16 I further certify that I am not a
17 relative, employee, attorney, or counsel of any of
18 the parties, nor am I a relative or employee of any
19 of the parties' attorney or counsel connected with
20 the action, nor am I financially interested in the
21 action.

22 Dated this ~~15th~~ day of ~~months: [REDACTED]~~,
23 2009.

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 ■ and
was duly sworn.

WITNESS my hand and official seal this 1st
day of May, 2009.

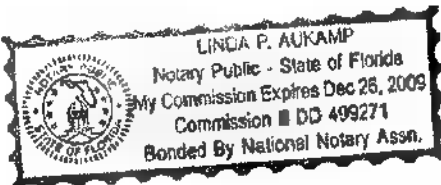
Linda P. Aukamp

LINDA P. AUKAMP, RPR

Commission No.: DD 499271

Notary Public - State of Florida

My Commission Expires: 12-26-09



1 REPORTER'S DEPOSITION [REDACTED]

2
3 STATE OF FLORIDA)
4 : SS
COUNTY OF PALM BEACH)

5 I, LINDA P. AUKAMP, ■ Registered
6 Professional Reporter, certify that I was authorized
7 to and did stenographically report the deposition of
8 JEFFREY EPSTEIN; that ■ review of the transcript was
9 requested; and that the transcript is a true and
10 complete record of my stenographic notes.

11 I FURTHER CERTIFY that ■ the 1st day of
12 May, 2009, I notified JOHN MICHAEL BURMAN, ESQUIRE
13 that the deposition of JEFFREY EPSTEIN was ready for
14 reading and signing by the witness.

15 I further certify that I ■ not a
16 relative, employee, attorney, or counsel of any of
17 the parties, nor am I ■ relative or employee of any
18 of the parties' attorney or counsel connected with
19 the action, nor am I financially interested in the
20 action.

21 Dated this 1st day of May, 2009.

22
23 

24 LINDA P. AUKAMP, RPR
25

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 ■ 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 ■ 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. 502008CA037319XXXMB 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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WITNESS: DIRECT CROSS REDIRECT RECROSS
JEFFREY EPSTEIN
BY MR. KUVIN 21

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APPEARANCES:

On behalf of the Plaintiff:

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LEOPOLD KUVIN, P.A.

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Phone: 561.935.4801

On behalf of L.M. and E.W. and Jane Doe in Case No. 80893:

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Phone: 954.522.3456

On behalf of Plaintiff Jane Doe in Case No. 80591 and 80556 via telephone:

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PODHURST ORSECK, P.A.

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Phone: 305.358.2800

On behalf of the Defendant:

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STORY KOWLES, PARALEGAL

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Phone: 561.659.8300

MICHAEL J. PIKE, ESQUIRE

BURMAN, CRITTON, LUTHER & COLEMAN, P.A.

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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 the video record. This is the 8th day of October, 2009, and the time is 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, ■ 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 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 ■ 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 A. Correct.
 2 Q. Mr. Epstein, on January 30th of 2008, isn't it
 3 true that you pled guilty to procuring ■ 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 ■ 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 ■ taken.)
 25 THE VIDEOGRAPHER: We're back ■ the record at

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 ■ 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 ■ 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 ■ Exhibit 1 the
 21 Florida Department of Law Enforcement Sexual
 22 Offender/Predator Flyer.
 23 MR. KUVIN: For the record, let ■ show that
 24 to Mr. — well, let ■ 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 as 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?

MR. GOLDBERGER: You can mark anything you want to mark. Go ahead and mark it, and then we'll go from there.

MR. KUVIN: Okay, sounds good. Thank you very much.

BY MR. KUVIN:

Q. Okay, sir. What I've marked as Exhibit 2, did you prepare that document?

MR. GOLDBERGER: Attorney-client.

THE WITNESS: Attorney-client privilege.

BY MR. KUVIN:

Q. Sir, you are reading from a document, are you not, when I ask you certain questions?

MR. GOLDBERGER: Attorney-client.

BY MR. KUVIN:

Q. The document that you're reading from is Exhibit 2 that's in front of you right now.

MR. GOLDBERGER: Attorney-client.

BY MR. KUVIN:

Q. Why do you feel ■ need to read from ■ document with respect to the issues of whether or not you have ■ 5th Amendment right?

MR. GOLDBERGER: Attorney-client.

BY MR. KUVIN:

Q. Sir, with respect to the last questions I was

A. I fully intend to respond to all relevant questions regarding this lawsuit; however, at the present time, my attorneys have counseled ■ 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 US Constitution.

Q. Sir, do you like having things inserted in your anus for sexual gratification?

MR. PIKE: Objection, argumentative, harassing.

THE WITNESS: I fully 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.

BY MR. KUVIN:

Q. Do you live at 35 --

MR. GOLDBERGER: Hold on.

THE WITNESS: Excuse me, let me finish. Is that fair.

asking you about, the difference between ■ sexual offender and ■ sexual predator, when Mr. Goldberg piped up and said your --

MR. GOLDBERGER: Goldberger. Goldberger.

BY MR. KUVIN:

Q. -- I'm sorry, Mr. Goldberger said your name in order to clue you in to object on 5th Amendment grounds --

MR. GOLDBERGER: Form.

BY MR. KUVIN:

Q. -- did you feel ■ need to respond at that point?

MR. PIKE: Object to the form.

MR. GOLDBERGER: The invocation of 5th Amendment privileges is going to be decided by me, ■ Mr. Epstein's criminal counsel. I will make that decision.

MR. KUVIN: Okay. I would just like to note for the record that that's improper. That's not what the case law says, and we'll take that up --

MR. GOLDBERGER: Fair enough.

MR. KUVIN: -- issue with Judge Hafele?

BY MR. KUVIN:

Q. All right, sir. Do you consider yourself ■ sexual offender or a sexual predator, which one?

BY MR. KUVIN:

Q. Absolutely. I certainly want you to finish.

A. Accordingly, I assert my federal constitutional rights as guaranteed by the 5th, 6th and 14th Amendment to the US Constitution.

Q. Sir, do you live at 358 El Brillo Way, Palm Beach, Florida?

A. I fully 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 right as guaranteed by the 5th, 6th and 14th Amendment to the US Constitution.

Q. I noticed that Mr. Goldberger shook his head when I asked you where you lived. Do you have a problem letting us know where you live?

I'm trying to understand why that issue is protected by the 5th Amendment, given the fact that you're required to live at that address pursuant to the sexual offender flyer and pursuant to the Court's order convicting you based on your guilty plea.

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 ■ 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 ■ nice
23 photo of your home.

24 (Plaintiff's Exhibit No. 3 was marked for
25 identification.)

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 ■ 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 ■■■■ 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 purple item retrieved from your trash at 358 El Brillo
2 Way that appeared to be ■ device known ■ 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 ■ sexual toy similar —
20 similar to ■ cyclone vibrator possibly used for rectal
21 gratification.

22 Do you know what ■ cyclone vibrator is?

23 A. No.

24 MR. PIKE: Form, harassing.

25 THE WITNESS: No, but I do know that that —

1 MR. PIKE: Same objections.

2 THE WITNESS: -- broken purple object turned
3 out to be, later on, described ■ ■ 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 ■ broken salad
10 fork, correct.

11 Q. So the 3-inch purple finger-sized object was ■
12 salad fork?

13 A. Was a broken handle of ■ 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,

5 (Pages 32 to 35)

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 was from your home or from --
 4 whether you bought it or where it came from just so
 5 he -- just so he can accurately answer the
 6 question should he choose to want to answer it.
 7 MR. KUVIN: Well, he -- 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)

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 ■■■ 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 ■ 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. 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 ■■■ I cannot
 11 provide an answer to any questions relevant to this
 12 lawsuit. ■ must accept this advice or risk losing my
 13 6th Amendment right to effective representation.
 14 Accordingly, I assert my federal constitutional rights
 15 ■ guaranteed by the 5th, 6th and 14th Amendment to the
 16 US Constitution.
 17 Q. You agree with me that Joy Jelly is ■ sexual
 18 lubricant that's used on sexual devices like vibrators
 19 and anal jelly wands?
 20 MR. PIKE: Same objections.
 21 THE WITNESS: ■ have no knowledge of that.
 22 BY MR. KUVIN:
 23 Q. Do you agree that Joy Jelly is ■ sexual
 24 lubricant?
 25 A. I have no knowledge of that.

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 ■ ■ pervert?
 17 MR. PIKE: Same objection, harassing,
 18 argumentative.
 19 BY MR. KUVIN:
 20 Q. You can answer. It's either ■ 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 lawsuit. I must accept this advice ■ risk losing my
 2 6th Amendment right to effective representation.
 3 Accordingly, I must assert my federal constitutional
 4 rights ■ guaranteed by the 5th, 6th and 14th Amendment
 5 of the US Constitution.
 6 Q. Have any mental health counselors diagnosed
 7 you ■ ■ 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 ■ 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. ■ must accept this advice or risk
 24 losing my 6th Amendment right to effective
 25 representation. Accordingly, I assert my federal

1 constitutional rights ■ 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 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 ■ 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 ■ 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 ■ times, "I fully intend to
24 respond," ■ let me rephrase my question.
25 When do you fully intend to respond?

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 ■■■■■
6 BY MR. KUVIN:
7 Q. Okay. So despite the fact that you're reading
8 this canned statement over and over ■ 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 ■ 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 THE WITNESS: Jack?
2 MR. KUVIN: I'm just looking.
3 MR. GOLDBERGER: He can look at ■ 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 ■ 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 ■ 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 -- 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. You agree, do you not, that Sarah Kellen is,
2 or at 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 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 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 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, to do you know Dahlia
23 Weiss.

24 THE WITNESS: No, I do not.
25

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 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 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 ■■■ with ■ woman
 23 by the ■■■ of B.B.?
 24 MR. KUVIN: Right.
 25 MR. GOLDBERGER: That's question one?

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 ■ 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 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 ■ finish
 7 what --
 8 MR. KUVIN: -- and I just wanted to be clear.
 9 MR. GOLDBERGER: Are you -- ■ 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 respond to ■ 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 ■
 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 ■■■■■ that question for ■
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 ■■■ 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 ■■ guaranteed by the 5th, 6th and 14th Amendments to the
21 US Constitution.

22 Q. Isn't it true that you like to have ■■■ with
23 little girls?

24 MR. PIKE: Same objection.
25

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 ■■ 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 ■■■

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 ■■ 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 ■■ 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 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 ■■■
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 ■■ 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 ■■ 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 ■ 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 ■ guaranteed by the 5th, 6th
12 and 14th Amendment to the US Constitution.

13 BY MR. KUVIN:

14 Q. Are you treating with ■ 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 ■
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 ■ I cannot
24 provide answers to any questions relevant to this
25 lawsuit. I must accept this advice or risk losing my

1 6th Amendment right to effective representation.
2 Accordingly, I assert my federal constitutional rights
3 ■ guaranteed by the 5th, 6th and 14th Amendment to the
4 US Constitution.

5 May we take ■ break?

6 MR. GOLDBERGER: Sure.

7 MR. PIKE: In addition to that, it's ■
8 psychotherapist/patient privileged information.

9 THE VIDEOGRAPHER: We're off the record ■
10 10:50.

11 (A brief recess was taken.)

12 THE VIDEOGRAPHER: Back ■ 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 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 MR. PIKE: Same objections.

2 THE WITNESS: I fully intend to respond to all
3 relevant questions regarding this lawsuit; however,
4 ■ 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 Does he, though?

2 MR. KUVIN: I don't know. It's a good
3 question.

4 MS. EZELL: Did you ask him 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 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 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 [REDACTED] 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 [REDACTED] 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 constitutional rights [REDACTED] 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 [REDACTED] 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 [REDACTED] to any questions relevant
25 to this lawsuit. I must accept this advice or risk

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 [REDACTED] if I could get [REDACTED] 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 [REDACTED] 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 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 [REDACTED] 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 ■■■ 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 ■■■ 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 ■■■
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 ■■■ guaranteed by the 5th, 6th
25 and 14th Amendment to the US Constitution.

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 ■■■ 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, ■■■ well as slamming doors in ■■■ office
24 that is not yours.

25 Now, if you continue to disrupt the discovery

process, we will once again terminate this
deposition. I ■■■ giving you a fair opportunity to
continue to use the discovery process in the ■■■
in which it is utilized; however, your
grandstanding, laughing in the background, and
snide comments and remarks are not appropriate
during the discovery process; therefore, this is my
one warning to you, Mr. Kuvin.

MR. KUVIN: I disagree.

MR. PIKE: I'm not asking you for an
agreement. Please proceed.

MR. KUVIN: I'm just making sure that the
record is clear.

And, by the way, you should fix the door,
Jack, because there's no spring on it, so when
somebody touches it, it goes very fast. So I
apologize if it did slam, and that's the only thing
I do agree with.

MR. GOLDBERGER: Okay. I appreciate the
apology.

As long ■■■ we're going to yak here, Spencer,
you made ■■■ comment that I should learn the rules of
civil procedure and learn how to conduct
depositions and so forth. I've been practicing
primarily criminal defense for 33 years, and do you

know what, we don't play these games; we get to the
issues, we ask questions, we don't laugh at
witnesses when they give answers in depositions.
We're not sarcastic. We simply ask the questions
and act professionally, and that's all I'm asking
you to do in this deposition, but apparently you're
incapable of doing that.

So you're creating this environment here,
you're creating this atmosphere. I'm trying to be
polite to you, but it's becoming more and more
difficult. So I'm asking you to just kind of act
professionally and we'll get along, and we'll get
through this, that's all.

MR. KUVIN: I've been acting professionally.
Frankly, I wasn't the one that told the other
attorney to shut up. I mean, those were your
words, not mine. I just wanted to make sure that I
understood what you were saying to me.

MR. GOLDBERGER: It was ■■■ reaction to your --

MR. KUVIN: Sir --

MR. GOLDBERGER: It ■■■ a reaction to your --

MR. KUVIN: -- I would appreciate it if you
would let ■■■ finish.

MR. GOLDBERGER: It ■■■ ■■■ reaction to your
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 --

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 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 ■ 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. Kuvn, 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 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 ■ 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 ■ 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 ■ 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 regarding this lawsuit; however, at the present
2 time, my attorneys have counseled ■ 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 ■ 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. Kuvn, 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 ■ 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 ■ 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 ■
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, ■ the present
24 time, my attorneys have counseled me I cannot
25 provide answers to any questions that may be

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. Kuvn, 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 for girls under the age of 17?

2 MR. PIKE: Same objections.

3 THE WITNESS: I'm going to answer that
4 question the ■ way I've answered most of your
5 other questions here today, Mr. Kuvn, which is, I
6 fully intend to respond to all relevant questions
7 regarding this lawsuit; however, ■ 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 ■ guaranteed by the 5th, 6th and
18 14th Amendment to the US Constitution.

19 Q. I'm sorry, ■ 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 question the ■ 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 ■ 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 ■ 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. Kuvn, 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 ■ 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

rights as guaranteed by the 5th, 6th and 14th Amendment to the US Constitution.

BY MR. KUVIN:

Q. Do you agree that you have a sexual preference for girls under the age of 14?

MR. PIKE: Same objections.

THE WITNESS: I'm going to answer that question the same way I've answered most of your other questions here today, Mr. Kuvin, which is, I fully 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 assert my federal constitutional rights as guaranteed by the 5th, 6th and 14th Amendment to the US Constitution.

BY MR. KUVIN:

Q. Do you agree that you have a sexual preference for girls under the age of 13?

MR. PIKE: Same objection.

THE WITNESS: I'm going to answer that question the same way I've answered most of your other questions today, which is, I fully intend to

Constitution.

BY MR. KUVIN:

Q. Do you agree that you've been treating with a psychologist for your sexual perversions?

MR. PIKE: Objection, vague, harassing, also psychotherapist/patient privilege; in addition, could call for their information resulting from non-testifying consulting expert information.

I'm going to instruct the witness not to answer.

BY MR. KUVIN:

Q. Do you agree that you've been treating with a psychiatrist for your sexual perversions?

MR. PIKE: Same objection.

BY MR. KUVIN:

Q. Do you agree that according to your State Court sentence, you are mandated to obtain mental health counseling or therapy?

MR. PIKE: Same objection.

BY MR. KUVIN:

Q. Who is that therapy with?

MR. PIKE: Let's take a break for one second. We don't have to leave.

I'm going to maintain the same objections and instructions.

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 that may be 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 US Constitution.

BY MR. KUVIN:

Q. Do you agree that you have a sexual preference for girls under the age of 12?

MR. PIKE: Objection, harassing. In addition, vague and indefinite, form.

THE WITNESS: I'm going to answer that question the same way I've answered your other questions here today, 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 US

BY MR. KUVIN:

Q. How often are you going to that mental health counselor?

MR. PIKE: Same objection and instruction.

BY MR. KUVIN:

Q. What do you discuss with the therapist?

MR. PIKE: Definitely same objection and instruction.

BY MR. KUVIN:

Q. Have you violated your probation by not going to a mental health counselor or therapist?

MR. PIKE: Same objection and instruction.

BY MR. KUVIN:

Q. Do you agree that while in Palm Beach you've preyed on girls who are generally troubled, under the age of 17 and economically disadvantaged because you can control them better?

MR. PIKE: Objection, harassing, argumentative, vague and indefinite.

THE WITNESS: I'm going to answer that question the same way I've answered most of your other questions here today, which is, I fully intend to respond to all relevant questions regarding this lawsuit; however, at the present 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 ■ 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 ■ 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 ■ different way and
25 he'll try and ■ it for you.

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 ■ 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 ■ 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 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 ■ a high school,
24 correct?

25 A. Correct.

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 ■ 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 never a trader.

24 Q. I'm sorry. What job did you hold at
25 Bear Stearns?

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 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, well the videographer, but
11 Mr. Kuvin, you stated you wanted to be on the
12 record because you wanted to that everything
13 was on the record that had to deal with this
14 So now we're seeing people coming in and out of
15 doors after they use the restroom, which I really
16 see 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. 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 we
13 don't have to stop.

14 MR. GOLDBERGER: What time do you want to
15 stop, because I've just got 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 ■
19 Bear Stearns is ■ 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 ■ 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 ■
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 ■ 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, ■ 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 ■
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 ■ college degree or any post-secondary degrees?

16 A. You don't need a college degree to get ■ 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 ■ 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 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 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 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 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 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 Q. I apologize for the interruption.

2 A. No problem.

3 I'm going to [REDACTED] 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 [REDACTED] 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 ■ 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, ■ the present time, my attorneys
25 have counseled me I cannot provide answers to any

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 ■ 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. ■ must accept their advice or risk losing my
19 6th Amendment right to effective representation.
20 Accordingly, I assert my federal constitutional rights
21 ■ 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 ■ that question the ■ way
25 I've answered most of your other questions here today,

1 which is, I fully intend to respond ■ all relevant
2 questions regarding this lawsuit; however, at the
3 present time, my attorneys have counseled ■ 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 ■ 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 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 ■ just off the record
12 and talked about taking ■ break, and I hate to
13 inject personal problems into ■ 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 ■ 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 ■ problem for ■ 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 ■ mess with you pretty good, ■ 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 ■ 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 ■ 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 attorneys have counseled ■ 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 ■ professor? ■ 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 ■ 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 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 ■ 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, ■ the present time, my

1 Q. Isn't it true that you own ■ 50,000 square
2 foot home in Manhattan that ■ 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 ■ 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 [REDACTED] 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 [REDACTED]
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, [REDACTED] the present time, my
25 attorneys have counseled [REDACTED] I cannot provide [REDACTED] to

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 [REDACTED] 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 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 [REDACTED] 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 [REDACTED] 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 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 [REDACTED]
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 [REDACTED]
18 agreement in that regard. I think that there's
19 been [REDACTED] motion to seal that had been subsequently
20 filed by, I believe it was, Brad Edwards' office
21 after [REDACTED] 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 ■
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 ■ arrow with ■
14 star to the girl that I'd like you to identify.

15 MR. PIKE: First, I'm going to object to the
16 ■ of this exhibit. It's -- it's not ■ 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 ■ Exhibit 6?

24 A. I'm going to respond to that the ■ 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 ■ 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 ■ guaranteed by the 5th, 6th and 14th Amendment of the
21 United States Constitution.

22 Can we take ■ break for a second?

23 Q. Sure.

24 MR. PIKE: Sure.

25 THE VIDEOGRAPHER: Going off the record ■

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 ■ 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 ■ 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, ■ the present time, my
19 attorneys have counseled ■ 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 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 ■ 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 ■ guaranteed by
24 the 5th, 6th and 14th Amendment to the US
25 Constitution.

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 ■ 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 ■ 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 ■ 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

lawsuit; however, at the present time, my attorneys have counseled ■ I cannot provide answers to any questions that may be 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 ■ guaranteed by the 5th, 6th and 14th Amendment to the US Constitution.

MR. PIKE: Mr. Kuvin, I've been incorporating and asserting the same objections, by saying same objection as before, ■ you okay with that?

MR. KUVIN: Perfectly fine.

MR. PIKE: Okay.

BY MR. KUVIN:

Q. Do you agree that while B.B. was in your home, you asked her to get completely naked?

MR. PIKE: Same objection.

THE WITNESS: I'm going to respond to that question the way I've responded to most of your other questions here today, which is, I intend to respond to all relevant questions regarding this lawsuit; however, ■ 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

you a naked massage while you were naked, that you also touched her vagina?

MR. PIKE: Same objections as before.

THE WITNESS: I'm going to respond to that question the ■ way I've responded to most of your other questions here today, Mr. Kuvin, which is, I fully intend to respond to all relevant questions regarding this lawsuit; however, at the present time, my attorneys have counseled me ■ cannot provide ■ to any questions that may be relevant to this lawsuit. I must accept this 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 Constitution.

BY MR. KUVIN:

Q. Do you agree that during this naked massage with B.B., that you asked her whether she wanted you to stop touching her vagina, and she said yes.

MR. PIKE: Same objections.

THE WITNESS: I'm going to respond to that question the same way I've responded to most of your other questions here today, Mr. Kuvin, which is, I intend to respond to all relevant questions

to effective representation. Accordingly, I assert my federal constitutional rights ■ guaranteed by the 5th, 6th and 14th Amendment to the United States Constitution.

BY MR. KUVIN:

Q. Do you agree that after B.B. got naked in your home, that you asked her to massage you while you were naked?

MR. PIKE: Form, lacks predicate, argumentative, harassing, assumes facts not in evidence.

THE WITNESS: I'm going to respond to that question the ■ way I've responded to most of your other 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 that I cannot provide answers to any questions that may be relevant to this lawsuit. I must accept their advice or risk losing my 6th Amendment right to effective representation. Accordingly, I assert my federal constitutional rights ■ guaranteed by the 5th, 6th and 14th Amendment to the US Constitution.

BY MR. KUVIN:

Q. Do you agree that while B.B. was 15 and giving

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 assert my federal constitutional rights ■ guaranteed by the 5th, 6th and 14th Amendment of the United States Constitution.

BY MR. KUVIN:

Q. Do you agree that regardless of B.B. telling you to stop touching her vagina, you nonetheless disregarded her and touched her there again?

MR. PIKE: Same objections as before.

THE WITNESS: I'm going to respond that question the same way I've responded to most of your other questions here today, which is, I intend to respond to all relevant questions regarding this lawsuit; however, at the present time. My attorneys have counseled me that 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 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 multiple, compound, it's confusing, vague, it lacks
2 proper predicate and foundation.

3 MR. KUVIN: Let ■ 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 ■ 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 ■

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 ■
10 underage, Haley Robson, working to obtain underage
11 girls to ■ 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 ■ 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 ■
25 guaranteed by the 5th, 6th and 14th Amendment 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 ■ 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 ■ 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?

MR. PIKE: Form, argumentative, lacks predicate, improper foundation, argumentative and harassing.

THE WITNESS: I'm going to respond to that question the same way I responded to most of your other questions here today, 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 any answers to question that may be 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 Constitution.

BY MR. KUVIN:

Q. Isn't it true that you had numerous girls under the age of 17 brought to your home by taxi?

MR. PIKE: Form, argumentative, overbroad, lacks appropriate foundation.

BY MR. KUVIN:

Q. And let me clarify. From the years 2004 through 2006.

MR. PIKE: Same objections, minus overbroad.

THE WITNESS: I'm going to have to answer that question the same way I've answered most of your other questions here today, 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 that may be relevant to this lawsuit. I must accept their 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.

BY MR. KUVIN:

Q. Isn't it true that you paid a taxi to have girls, underaged girls like B.B., brought to your home from the years 2004 to 2006?

A. I'm going to respond to that question the way I've responded to most of your other questions here today, which is, I intend to respond to all relevant questions regarding this lawsuit; however, at the present time, my attorneys have counseled me that I cannot — I'm sorry, should I start again? Do you want —

Q. No, please, don't start again.

MR. PIKE: Move to strike counsel's last

statement.

MR. KUVIN: He was asking me a question, that's the only — why I responded. I apologize.

MR. PIKE: Once again, move to strike.

THE WITNESS: 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.

BY MR. KUVIN:

Q. Do you have a massage table in your Palm Beach home?

A. I'm going to — that question, Mr. Kuvn, the same way I've answered most of your other questions here today, which is, I intend to respond to all relevant questions regarding this lawsuit; however, at the present time, my attorneys have counseled me that 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 Constitution.

Q. Did you have a massage table at your home in 2005?

MR. PIKE: Lacks appropriate foundation.

MR. KUVIN: I'm sorry, what's the objection to that one?

MR. PIKE: Lacks appropriate foundation.

MR. KUVIN: Foundation?

MR. PIKE: Yes, it does.

BY MR. KUVIN:

Q. Did you have a home in 2005?

I'm sorry, I'm just trying to lay the foundation, and I apologize for laughing, I just don't understand the objection. I'm trying to understand the foundation question of did you have a massage table at your home in 2005. I want to fix my question, if — if I can.

MR. PIKE: If you can.

MR. KUVIN: All right.

BY MR. KUVIN:

Q. Did you have a home in 2005?

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 ■ 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 ■ 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, ■
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 ■ 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 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 ■ 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 ■
8 massage table is --

9 MR. GOLDBERGER: I have no problem with him
10 answering what ■ table is. Just ask him the
11 question.

12 BY MR. KUVIN:

13 Q. Do you know what ■ table is?

14 A. Yes.

15 Q. Okay. Did you have ■ 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 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 ■ 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 ■ 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 ■ 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 ■
24 question. He said he didn't understand it. Just
25 rephrase the question.

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 ■ 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

question the ■ way I've responded to most of your other questions here today, 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 that may be relevant to the lawsuit. I must accept their advice or risk losing my 6th 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

MR. PIKE: There ■ not a compound.

MR. KUVIN: Okay.

MR. PIKE: The objection was foundation and predicate.

BY MR. KUVIN:

Q. Okay. You can answer.

A. I'm going to answer that question the way I've answered most of your other questions here today. 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 that may be relevant to the lawsuit. I must accept their advice or risk losing my 6th Amendment right to effective representation. Accordingly, I assert my federal constitutional rights ■ guaranteed by the 5th, 6th and 14th Amendment to the United States Constitution.

Q. I'm going to show you ■ clip of ■ deposition that was taken in this case and, first of all, ask you -- this is the deposition of L.M. that had been previously taken in this case.

MR. PIKE: Wait a minute.

MR. KUVIN: You're welcome to watch.

MR. PIKE: I might -- I want it played to the video first.

Constitution.

Q. Did you have ■ massage table in your upstairs bathroom in 2005?

MR. PIKE: Foundation, lacks appropriate predicate.

THE WITNESS: I'm going to respond to that question the same way I've responded to most of your other questions here today, Mr. Kuvn, 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 that may be relevant to the lawsuit. I must accept their 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.

BY MR. KUVIN:

Q. Did you keep various massage oils, lotions, sexual devices and sexual toys in your upstairs bathroom in 2005?

MR. PIKE: Same objection.

MR. KUVIN: Wait a minute, is there a compound in there? Because if so, I'll separate them out.

MR. KUVIN: Okay, I can do that.

MR. PIKE: Okay. So let's play it to the video first and then we'll determine what's next.

MR. KUVIN: Well, I'm going to ask him a couple of questions first before I hit play.

MR. PIKE: I need to see ■ first.

MR. KUVIN: Come around and look. I want him to ■ it ■ the ■ time.

MR. PIKE: That's fine. I want it played to the camera first.

MR. KUVIN: Oh, no. I'm not going to do your order. I'm going to just ask him first --

MR. PIKE: You need to -- you're asking the witness about an exhibit technically that is going to be utilized in this deposition that you have not provided ■ first. So just like you would professionally provide me ■ document first, I'm asking that you provide me the video first, play it to the camera, or you and I can step outside and you ■ play it to me and then you can ask the witness. The witness will remain in here. You and I ■ go into a different room. Then he's not going to answer any questions with regard ■ the video, then I ask that it not -- you're not giving 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 ■■■ document or testimony or anything of
9 the like. This is the exact same testimony of ■
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 ■ your office.

25 MR. PIKE: I have not seen this video.

1 MR. KUVIN: Both attorneys at your office.

2 MR. PIKE: It doesn't matter. It doesn't
3 matter.

4 So ■ long ■ 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 ■ 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 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 ■ 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 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 ■■■ and that's what I have.

7 MR. PIKE: Let me ■ 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, ■ 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 [REDACTED] 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 [REDACTED] an exhibit
24 here, where it starts numerically and where it ends
25 numerically so I can pull it and we can have [REDACTED]

1 exhibit made for purposes of this deposition.

2 MR. KUVIN: Oh, I don't intend to attach it [REDACTED]
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 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 [REDACTED] 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 [REDACTED]
24 I cannot provide answers to any questions that may
25 be relevant to the lawsuit. I must accept their

1 advice or risk losing my 6th Amendment right to
2 effective representation. Accordingly, I assert my
3 federal constitutional rights [REDACTED] 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 [REDACTED]
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 [REDACTED] 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

question in the ■ way I've responded to most of your other questions here today, 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 that may be 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 Constitution.

MR. PIKE: Same objection.

BY MR. KUVIN:

Q. You knew B.B. was 15 years old when she came to your home, didn't you?

MR. PIKE: Form.

THE WITNESS: I'm going to respond to that question the same way I've responded to most of your other questions here today, which is, I intend to respond to all relevant questions regarding this lawsuit; however, ■ 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

and 14th Amendment to the United States Constitution.

THE VIDEOGRAPHER: Spencer, can we take a quick break?

MR. KUVIN: Change tape?

THE VIDEOGRAPHER: No, a problem with your mic. I just want to go off for a second and ■ if we can fix it.

MR. KUVIN: Sure.

THE VIDEOGRAPHER: We're off the record at 1:03 p.m.

(A brief ■ was taken.)

to effective representation. Accordingly, I assert my federal constitutional rights as guaranteed by the 5th, 6th and 14th Amendment to the United States Constitution.

BY MR. KUVIN:

Q. What is the Wexner Children's Trust, the second?

MR. PIKE: Can you restate your question again?

BY MR. KUVIN:

Q. Yes. What is the Wexner's Children's -- I'm sorry, Wexner, singular, Children's Trust II, or the second?

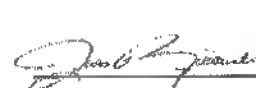
MR. GOLDBERGER: Okay.

THE WITNESS: I'm going to have to respond to that question the same way I've responded to most of your other questions here today, Mr. Kuvín, which is, I intend to respond to all relevant questions regarding this lawsuit; however, at the present time, my attorneys have counseled ■ 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

CERTIFICATE OF OATH
THE STATE OF FLORIDA
COUNTY OF PALM BEACH

I, the undersigned authority, certify that JEFFREY EPSTEIN personally appeared before me and was duly sworn on the 8th day of October, 2009.

Dated this 8th day of October, 2009.


Jeana Ricciuti, RPR, FPR, CLR
Notary Public - State of Florida
My Commission Expires: 2/17/2013
My Commission No.: DD 854778

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 am 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 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 counsel of any of the parties, nor am I a relative or employee of any attorney counsel of party connected with the action, 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 the errata sheet, if one was executed.

Dated this ____ day of _____, 2009.

JEFFREY EPSTEIN

DATE: October 23, 2009
 TO: EPSTEIN
 c/o J. Pike
 BURMAN, CRITTON, LUTTER & COLEMAN, P.A.
 303 Bayan Boulevard
 Suite 100
 West Palm Beach, Florida 33401

IN RE: B.B. v. EPSTEIN

Please take notice that on Thursday, the 8th of October, 2009, you your deposition in the above-referred matter. At that time, you will waive signature. It is 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 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 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

Please forward the original signed sheet to this office so that copies may be distributed all parties.

Under penalty of perjury, I declare that I have read my deposition and that it is and correct subject to any changes in form 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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Phone: 561.842.2820

ALSO PRESENT:
DAN DOSKEY, VIDEOGRAPHER
VISUAL EVIDENCE, INC.

PROCEEDINGS

THE VIDEOGRAPHER: We're back ■ the record ■
1:46.

CONTINUED DIRECT EXAMINATION
BY MR. KUVIN:

Q. Do you personally know John Mack, former CEO at Morgan Stanley?

A. I'll have ■ ■ ■ ■ ■ that the ■ ■ ■ ■ ■ 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 ■ ■ ■ know when you're ready.

1 (Pages 172 to 175)

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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 ■ vagina -- ■ ■ 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 ■ 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 ■
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 ■■■■
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 ■ 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 ■ question.

25 MR. PIKE: The ■■■■ 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 ■
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 ■ 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 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 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 [REDACTED] 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 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 [REDACTED]
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 [REDACTED] 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

lawsuit; however, at the present time, my attorneys have counseled me I cannot provide answers to any questions that may be relevant to that lawsuit. I must accept their advice or risk losing my 6th Amendment right to effective representation. Accordingly, I must assert my federal constitutional right ■ guaranteed by the 5th, 6th and 14th Amendment of the United States Constitution.

BY MR. KUVIN:

Q. One of your houseboys that has been deposed in this case testified that you were ■ rather nice gentleman that used to talk to the staff, and that when Ms. Maxwell came into the picture, that you stopped talking to the staff and the staff had to communicate through Ms. Maxwell. Do you agree or disagree with that?

MR. PIKE: Form, foundation, predicate, argumentative, assumes facts not in evidence.

THE WITNESS: I'm going to answer that the same way I've answered most of your questions here today, which is, I intend to respond to all relevant questions regarding this lawsuit; however, at the present time, my attorneys have counseled me that I cannot provide ■ to any questions that

may be relevant to your lawsuit. I must accept their 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 of the United States Constitution.

BY MR. KUVIN:

Q. He also testified that he felt you were ■ rather normal guy until Ms. Maxwell came into the picture, and that she led you into this life of perversion, sexual perversion. Do you agree with that?

MR. PIKE: Same objections.

THE WITNESS: I'm going to respond to that the ■ way I've responded to 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 ■ I cannot provide answers to any questions relevant to this lawsuit. I must accept their advice or risk losing my 6th Amendment -- ■ me -- I must accept their advice or risk losing my 6th Amendment right to effective representation. Accordingly, I must assert my federal constitutional rights ■ guaranteed by the 5th, 6th and 14th Amendment to the United States

Constitution.

BY MR. KUVIN:

Q. Did Ms. Maxwell procure underaged girls for you to have sexual relationships with?

A. I'm going to answer that question the same way I've answered most of your other questions 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 that lawsuit. Excuse me. I must accept their advice or risk losing my 6th Amendment right to effective representation. Accordingly, I must assert my federal constitutional rights ■ guaranteed -- guaranteed by the 5th, 6th and 14th Amendments to the United States Constitution.

Q. Ms. Maxwell procured ■ particular underaged girl who worked at Donald Trump's Maralago, for you to have ■ sexual relationship with; isn't that true?

MR. PIKE: Form, argumentative, lacks appropriate predicate, foundation, ■ facts not in evidence.

THE WITNESS: I'm going to respond to that the same way I've responded to most of your other 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 that lawsuit. I must accept their advice or risk losing my 6th Amendment right to effective representation. Therefore, I assert my federal constitutional rights ■ guaranteed by the 5th, 6th and 14th Amendments to the United States Constitution.

BY MR. KUVIN:

Q. Do you know where Donald Trump's Maralago estate is?

A. Yes.

Q. Have you been there?

A. Yes.

Q. Who with?

A. I'm going to have to answer that question the same way I've answered most of your other questions here today. I intend ■ 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 that may be relevant to the same lawsuit. I must accept their advice or risk losing my 6th Amendment right to effective representation. 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 ■ 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 ■ 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?

■ 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 ■ 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 ■ 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 ■ 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 ■ 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 ■ 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 [REDACTED] 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 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 -- 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 effective representation. Accordingly, I must assert my

2 federal constitutional rights -- 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, -- the

16 present time, my attorneys have counseled -- 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 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, --

6 the present time, my attorneys have counseled -- 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 -- I cannot

23 provide [REDACTED] 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 ■ 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 ■ 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 ■
25 woman. Who is that woman in that photograph?

1 A. Eula Maxwell (phonetic).

2 Q. Where ■ 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 ■ 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 ■ 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 ■

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. Kuvín, 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 ■ 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. 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 ■ 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 ■
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 ■ 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 ■ show you what we'll mark ■ 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 ■ 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 ■ 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 ■ Exhibit 15.

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 ■ 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 ■ 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 ■ show the camera what we've

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 ■ second.

6 MR. GOLDBERGER: Do you want to discuss it
7 with me?

8 MR. PIKE: Let's take ■ break for one minute.

9 MR. KUVIN: All right.

10 THE VIDEOGRAPHER: Off the record ■ 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 ■ 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 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 ■ document that we'll
8 mark ■ 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 ■ 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 ■ 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 ■ 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 the presence of your attorneys?

2 MR. GOLDBERGER: Is the question, have you
3 ever spoken to ■ 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. 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 ■ day?

7 A. I don't recall specifically.

8 Q. More than ■ 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 ■
22 Exhibit 18.

23 (Plaintiff's Exhibit No. 18 ■ marked for
24 identification.)
25

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 ■ 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 ■ 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 ■■■
 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 ■ used all of
 24 them, so...
 25

1 MR. PIKE: Asked and answered.
 2 THE WITNESS: So should I answer?
 3 MR. PIKE: You ■ 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 ■■■ of those
 10 items, so I would assume ■ 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, ■ 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 ■ look at the items that ■ 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 ■ 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 [REDACTED] question, Spencer.

16 Can we get to something relevant?

17 THE WITNESS: No problem.

18 MR. PIKE: He [REDACTED] 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 [REDACTED]
24 8/21/08, do you have that one?

25 A. Yes.

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 [REDACTED] 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 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 [REDACTED]
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 A. No.

2 Q. Is it your testimony here today that you did
3 not [REDACTED] 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 [REDACTED]
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 [REDACTED] 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 [REDACTED] 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

I cannot provide answers to any questions relevant to this lawsuit. As I've answered most of your question today, Mr. Kuvin, 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 Amendments to the United States Constitution.

BY MR. KUVIN:

Q. Did you pay girls so that they would not testify against you in the civil proceedings that have been filed in both Federal and State Court?

MR. PIKE: Form.

THE WITNESS: Okay. Like most of your other questions here today, Mr. Kuvin, I'm going to respond by saying 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 must assert my federal constitutional rights as guaranteed by the 5th, 6th and 14th Amendments to the United States Constitution.

BY MR. KUVIN:

Q. Did you have ■ with Nadia Marcinkova when she was under the age of 14?

MR. PIKE: Form.

THE WITNESS: I intend to respond to all relevant questions regarding this lawsuit; however, ■ the present time, my attorneys have counseled ■ 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 must assert my federal constitutional rights as guaranteed by the 5th, 6th and 14th Amendment to the Constitution.

BY MR. KUVIN:

Q. Did you tell people that Nadia Marcinkova was your sex slave?

MR. PIKE: Same objection.

THE WITNESS: I intend to respond to all relevant questions regarding this lawsuit; however, at the present time, my attorneys have counseled ■ 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 must assert my federal constitutional rights as guaranteed by the

5th, 6th and 14th Amendment to the United States Constitution. Excuse me.

MR. KUVIN: This is 19.

(Plaintiff's Exhibit No. 19 was marked for identification.)

BY MR. KUVIN:

Q. I have an FAA registry for a Boeing 727, manufacture year 1969, with -- I'm just looking for the tail number here. I'm sorry, I'm just trying to find the tail number.

A. Not a problem.

Q. Let's do this, it's ■ Mode S Code 53106661. I'll show this to your counsel first.

Here it is, I'm sorry, Tail No. N908JE.

There's no question pending just yet.

MR. PIKE: Thank you.

Okay.

BY MR. KUVIN:

Q. Let ■ show you what we marked ■ Exhibit 19. I'll give you ■ minute to take a look at that.

A. Okay.

Q. What is JA - EGE, Inc.?

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 this advice or risk losing my 6th Amendment right to effective representation. Accordingly, ■ I've done with most of your questions, I must assert my federal constitutional rights ■ guaranteed by the 5th, 6th and 14th Amendment to the United States Constitution.

Q. Mr. Epstein, are you aware that after September 11, 2001 that the Federal Government started tracking all flights of all public and private aircraft?

MR. PIKE: Form, relevance.

BY MR. KUVIN:

Q. Are you aware of that?

A. No.

Q. Okay. Are you aware that the FAA keeps track of all flights that are made both within the continental US and from the continental US abroad?

MR. PIKE: Same objection.

THE WITNESS: No.

BY MR. KUVIN:

Q. Do you know whether or not -- let ■ ask it this way: Have you ever seen the flight tracking information for any planes that you may own?

A. I don't believe so.

Q. Is JEGE, Inc. ■ company that is owned by you?

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 way
16 I've answered most of your questions today, Mr. Kuvn,
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 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. Kuvn, I must accept this
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 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 MR. PIKE: Same objections.

2 THE WITNESS: I intend --

3 MR. PIKE: Relevance -- 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 ■ 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 ■ guaranteed by the 5th,
16 6th and 14th Amendments to the United States
17 Constitution.

18 Q. Do you know what ■ sexual device called a Twin
19 Torpedo is?

20 MR. PIKE: Same objections, irrelevant ■
21 worded.

22 THE WITNESS: Would you like to ask me ■ 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 ■ 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 ■ 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 ■ 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 ■ 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 ■ Twin Torpedo, a soap made in the shape of a penis, and
21 ■ soap in the shape of a vagina?

22 A. I'm going to ■ 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 ■ exhibit. It's the
12 Town of Palm Beach Incident Report with respect to
13 Jeffrey Epstein, of which I gave you ■ copy before.
14 And that was referencing, just ■ 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, ■ 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, ■ 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 ■ 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, ■ the present time, my
2 attorneys have counseled ■ 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 ■ 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, ■ the present time, my
16 attorneys have counseled ■ I cannot provide answers to
17 any questions relevant to this lawsuit. I must accept
18 this advice ■ 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 ■ guaranteed by the
3 5th, 6th and 14th Amendments to the United States
4 Constitution.

5 MR. PIKE: In addition, ■ 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 [REDACTED] 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 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 [REDACTED] 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 Marcinkova, Sarah Kellen ■ 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 BY MR. KUVIN:

2 Q. Here, let me move this out of the way.

3 A. You [REDACTED] take your Joy Jelly home now.

4 Q. It's actually [REDACTED] 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 [REDACTED]
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 ■ 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 ■
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 ■
6 clarify.

7 A. Do you want to do compound again?

8 Q. Yeah. Did you or do you currently own ■ 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 ■ 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 ■ 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-BGL?

15 A. I intend to respond to all relevant questions
16 regarding this lawsuit; however, at the present time, my
17 attorneys have counseled ■ 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 ■ 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 ■ 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 ■ 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 [REDACTED] 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 [REDACTED]
17 I cannot provide [REDACTED] 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 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, [REDACTED] 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 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 effective representation. Accordingly, I must assert my
2 federal constitutional rights [REDACTED] guaranteed by the 5th,
3 6th and 14th Amendments to the United States
4 Constitution.

5 Q. Do you have [REDACTED] steam room in your home on Palm
6 Beach Island?

7 MR. PIKE: Same objections.

8 THE WITNESS: I'm going to [REDACTED] that
9 question the [REDACTED] 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 [REDACTED] 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 [REDACTED] 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 ■ 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 ■ 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 ■ 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 ■ guaranteed by the

1 at the present time, my attorneys have counseled ■
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 ■
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, ■ 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 ■ 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 ■ dozen roses to ■
5 young girl under the age of 18 who ■ to your house to
6 give you ■ massage?

7 MR. PIKE: Form, vague, ambiguous, ■
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 ■
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 ■ guaranteed by the
17 5th, 6th and 14th Amendment.

18 BY MR. KUVIN:

19 Q. Did you ever instruct anyone to deliver ■
20 bucket of roses after ■ high school drama performance to
21 an underage girl?

22 MR. PIKE: Same objection. In addition, lacks
23 predicate and foundation. It's overbroad ■ 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 ■ closed
21 proceedings and your client, your client did not
22 ■ 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 ■ notice of it,

1 and I just thought I would listen to it while I was
2 doing ■■■ other work. And I don't know why it
3 would be ■ closed proceeding.

4 MR. PIKE: Discovery proceedings ■ closed if
5 it's ■ pre-trial discovery, ma'am, it's not ■ 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 ■ 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 ■ 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 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.

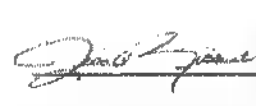
8 (Witness excused.)

9 (Deposition ■ concluded.)

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

5 I, the undersigned authority, certify that
6 JEFFREY EPSTEIN personally appeared before me and was
7 duly sworn on the 8th day of October, 2009.
8

9 Dated this 8th day of October, 2009.
10

11  

12 Jeana Ricciuti, RPR, FPR, CLR
13 Notary Public - State of Florida
14 My Commission Expires: 2/17/2013
15 My Commission No.: DD 854778
16
17
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25

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 ■ 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 ■ 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 ■ 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.

1 
2 Jeana Ricciuti, RPR, FPR, CLR

DATE: October 22, 2009
 TO: JEFFREY EPSTEIN
 c/o Michael J. Pika
 BURMAN, CRITTON, LUTTIER & 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-referenced 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 [redacted] to you through your counsel. [redacted] 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 in 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 [redacted].

If you do [redacted] 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 me.

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.

EPSTEIN

ERRATA SHEET

IN RE: [redacted] 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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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 [redacted] 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

APPEARANCES:

On behalf of the Plaintiffs, Jane Doe 2 through 8:
ADAM HOROWITZ, ESQUIRE
JESSICA D. ARBOUR, ESQUIRE
MERMELSTEIN ■ HOROWITZ, P.A.
18205 Biscayne Boulevard
Suite 2218
Miami, Florida 33160
On behalf of the Plaintiffs, Jane Doe, L.M. and E.W.:
BRAD EDWARDS, ESQUIRE
FARMER, JAFFE, WEISSING,
EDWARDS, FISTOS & LEHRMAN, P.L.
425 North Andrews Avenue
Suite 2
Fort Lauderdale, Florida 33301
On behalf of the Plaintiff, Jane Doe 103:
KATHERINE W. EZELL, ESQUIRE
PODHURST ORSECK
City National Bank Building
25 West Flagler Street
Suite 800
Miami, Florida 33130
On behalf of the Defendant and Witness:
MICHAEL J. PIKE, ESQUIRE
BURMAN, CRITTON, LUTHER & 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 ■ here ■ 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 ■ 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 ■ 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 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 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 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 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 ■ 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 ■ prostitute, correct?
 13 A No, solicitation of prostitution, correct.
 14 Q Okay. And to make ■ 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 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 ■ twelve
 14 months, followed by six months; is that correct?
 15 A I believe so.
 16 Q Uh-huh. And was it ■ -- ■ 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 ■ ■ 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 Okay. Do you register your home address ■
 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 ■ part of your ■ 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 ■ 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, ■ objection.
 22 THE WITNESS: And I ■ going to assert my Fifth
 23 Amendment, Sixth Amendment and Fourteenth Amendment
 24 Rights.
 25 BY MR. HOROWITZ:

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 ■ interest in
 8 ■ 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 ■ a sex
 16 offender?
 17 A I believe I --
 18 MR. PIKE: Form.
 19 THE WITNESS: -- I believe I ■ 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 ■ 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 ■ ■ 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, ■ ■ 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, ■ ■ 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 ■ ■ so.
 22 BY MR. HOROWITZ:
 23 Q Okay. As part of registering as ■ sex
 24 offender, do you have to provide the State of Florida
 25 with your business address?

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 -- ■ ■
 7 sex offender?
 8 THE WITNESS: On advice of counsel, I ■ ■ 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 ■ 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 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, ■ part of your sentence in 2008, you also
 17 had to provide ■ 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 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 ■ Miss Elkins in person?
 18 A At least twice ■ week.
 19 Q Okay. How much time do you spend with Miss
 20 Elkins when you ■ 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 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 -- 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 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 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 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 ■
 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 ■ "office," or would it say ■
 11 address?
 12 A It just might say "office." ■ might say an
 13 address.
 14 Q Okay. What addresses do you provide Miss Sloan
 15 ■ Miss Elkins ■ 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 MR. PIKE: Same objection.
 2 THE WITNESS: I ■ 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 ■
 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 ■ 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 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 ■ 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 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 ■ 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 ■ part of your criminal sentence?
 22 MR. PIKE: Form.
 23 THE WITNESS: I believe that ■ 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 ask the questions, and it will take an hour
 19 later. I'm trying to get you 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 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 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 your concern about what just occurred

1 now, I'm just trying to help you along.
 2 MR. HOROWITZ: I appreciate that.
 3 MR. GOLDBERGER: That's the only 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 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 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 Mr. Epstein to waive his Fifth
 9 Amendment Right, along with his Sixth and his
 10 Fourteenth which 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, could do that as
 20 well, but it -- 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 ■■■
 18 contact with ■■■ 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 ■■■ contact with ■■■ a result of your criminal
 25 ■■■ 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 ■■■ of the ■■■ 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 ■■■
 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 ■■■ 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 ■■■ 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 ■■■
 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 ■■■ assert my Fifth Amendment, Sixth
 9 Amendment and Fourteenth Amendment Right.
 10 BY MR. HOROWITZ:
 11 Q Have you at any time known the ■■■ 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 ■■■ 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
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 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 --
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 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 [redacted] 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 in 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 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 Amendment
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 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 [redacted] 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 ■■■ 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, ■ a result of ■ criminal case
 18 against you, you've been ordered to have ■ 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 ■ some point when he gets --
 13 potentially gets his license back. But, though I
 14 would like to answer your questions in ■ detail,
 15 on advice of counsel, I ■ 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 ■■■ 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 ■ 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 ■ 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 ■ attorney who's been
 24 disbarred?
 25 MR. PIKE: Same objection.

1 THE WITNESS: It's not ■ 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 ■ 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 ■ 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 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 because Jeffrey Herman was involved in the
2 representation of S.G., that her allegations of abuse by
3 you ■ 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, ■ 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 Amendment
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 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, ■ advice of counsel, I
13 believe, this question, I have to assert my Fifth
14 Amendment, Fourteenth Amendment and Sixth Amendment
15 Rights under the U.S. Constitution.

16 BY MR. HOROWITZ:

17 Q Okay. And -- ■ 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 [REDACTED] 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, [REDACTED] I've
19 answered most of your other questions, which is
20 unfortunately today, I cannot [REDACTED] 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 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 [REDACTED] 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 [REDACTED] have [REDACTED] court order in which
25 Mr. Epstein was required to provide [REDACTED] the names of

1 his doctors and [REDACTED] 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 [REDACTED] 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 [REDACTED] 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 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 [REDACTED] 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 a
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 is: If you have some of those orders, which a
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 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 a person 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 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 -- 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 ■■■ 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 ■■■ 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 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, ■■■ 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 ■■■ girl named
25 Jane Doe 3 was bringing a girl named Jane Doe 2 to your

1 home?

2 MR. PIKE: Form.

3 THE WITNESS: Can you tell ■■■ 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 you denying
9 that those girls ■■■ 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 ■■■ 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 MR. PIKE: Form.

2 THE WITNESS: I'd like to answer that question,
3 but unfortunately, today, ■■■ least, I ■■■ going to
4 have to ■■■ that like I've answered many of your
5 other questions. Unfortunately, I have to ■■■
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 ■■■ again?

20 BY MR. HOROWITZ:

21 Q This is about the fifth time I mentioned her
22 ■■■ Her ■■■ 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 [REDACTED] 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 [REDACTED] 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, [REDACTED] I'm just going to ask that you
13 keep that [REDACTED] 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 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 [REDACTED]
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 [REDACTED] 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 have to respond the same way I've responded to most
2 of your other questions here today, which is [REDACTED]
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, [REDACTED] I would like to answer most of
16 your other questions here today. However, [REDACTED]
17 advice of my counsel, I cannot answer those
18 questions today, so I [REDACTED] 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 [REDACTED] 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 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, [REDACTED] I would like to answer most of
6 your other questions here today, on advice of
7 counsel, I [REDACTED] not going to be able to answer those
8 questions here today. They've advised [REDACTED] I must
9 assert my Fourth -- [REDACTED] me -- Fifth -- excuse me
10 -- Sixth and Fourteenth Amendment Rights [REDACTED]
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, 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, I
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 Amendment
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, 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
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
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 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 respond -- 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 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, my 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 advised me -- 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, -- 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 -- 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 [REDACTED] 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, [REDACTED]
11 advice of my counsel today, they've advised [REDACTED] 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 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 [REDACTED] 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 [REDACTED] 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 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 [REDACTED] 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 [REDACTED] each one of your
23 questions, on the advice of my counsel, I [REDACTED] going
24 to have to assert my Sixth Amendment, Fifth
25 Amendment and Fourteenth Amendment Rights not to

1 THE WITNESS: Excuse me?

2 MR. PIKE: Go ahead.

3 THE WITNESS: I'm sorry. I would like to
4 [REDACTED] every [REDACTED] of your questions today, every
5 one. However, on advice of my counsel, I cannot
6 [REDACTED] 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 [REDACTED] 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 ■ 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 ■ 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, ■ well as all
17 the other questions you've asked ■ 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 because they told ■ 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 ■ 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 ■ 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 ■ two friends here supposedly?

19 MR. HOROWITZ: I'm not allowed to answer.

20 THE WITNESS: Oh, you can't, sorry. I guess
21 ■ 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 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, ■ 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 ■ provided by the
22 Constitutions because my counsel has told ■ 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 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 ■ 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 ■ 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, ■ 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 ■
19 partner of yours who's been disbarred, constant —
20 after, in fact, he brought the lawsuit, well — the
21 jury, I have ■ strange feeling will — sorry — the
22 jury, I believe, will understand that my taking the
23 Fifth Amendment is only as ■ 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 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 ■ 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 ■
16 sexual nature against people like ■ and others.
17 Though I would like to answer every one of your
18 questions, every single one, my counsel has advised
19 ■ 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 ■ that
23 question, as well ■ every other question you've
24 asked here today, I ■ going to have to assert
25 those rights, or lose — risk losing their

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 ■ Jane Doe Number 3. I just want you to
6 keep her ■ 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 ■ 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 ■ 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 ■ 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 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 ■ 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 ■ 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 -- 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, -- 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 -- disbarred, but -- advice of counsel here
25 today, Mr. Horowitz, I'm going to have to assert my

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 -- 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 -- 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 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, -- 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 -- 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 --
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: -- ■ shaking of the head.
 6 MR. PIKE: I'm sorry. Correct, but he's not
 7 going to ■■■■ 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 ■ 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 ■ today.

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 ■
 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 they've advised that I must assert my Sixth
 2 Amendment Rights, my Fourteenth Amendment Rights
 3 and my Fifth Amendment rights ■ 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 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 ■ massage?

8 MR. PIKE: Form.

9 THE WITNESS: I'd like to answer that question
 10 Mr. Horowitz, ■ 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' firm, his partner sits
 22 in the jail accused of -- of the largest fraud in
 23 South Florida's history, I would like nothing ■
 24 than to answer that question, but I must follow the
 25 advice of counsel, or they've told ■ 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 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 -- ■■■ of the girls' parents because he
25 brought ■ lawsuit -- ■■■ -- some craziness -- I

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 ■■■
7 sued by 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 -- ■■■ you suggesting that he ■■■
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 ■
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 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 ■ 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 ■■■ 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 ■ criminal
9 enterprise, I'd like to answer each one of your
10 questions; however, my counsel has advised ■■ 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 ■■■ 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 ■■ that I cannot
25 answer any questions that may be relevant to any

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 ■■ 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 ■■ attorney who

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 ■■■ every
5 ■■ 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, ■■ 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 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, ■■ 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 ■ 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 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 ■ 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 ■ those questions
24 with great specificity, I cannot under the advice
25 of counsel, so therefore, I'm sorry.

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, ■ 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 ■ going to have to assert my Sixth
19 Amendment, Fourteenth Amendment and Fifth Amendmen
20 Rights ■ 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 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 -- ■ 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 ■ 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 ■
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 ■ sexual nature, fleecing
19 unsuspecting Florida investors and others out of
20 millions of dollars for cases of ■ 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 advice.

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 ■ 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 ■
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 ■■■■ 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 ■ 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 Amendment
24 Rights ■ provided by the U.S. Constitution.
25 Though your firm's partner sits disbarred --

1 Jeffrey Herman is disbarred after he brought this
2 case, Mr. Edwards' partner sits in jail accused by
3 the U.S. 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 ■ 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 fabricating and falsely creating cases of a sexual
2 nature against people like ■ 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 ■ 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 ■ 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 ■ -- 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 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 ■ 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 ■
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 ■■■ of your
3 questions, Mr. Horowitz, but today, ■■■ 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 ■■■ -- they've required ■■■ 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 ■■■ of these questions.

22 However, today, ■■■ 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 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 ■■■
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.

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 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 ■■■ 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 ■■■ 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 ■■■
25 jury should not infer from your assertion of the Fifth

1 Amendment privilege, that you sexually abused Jane Doe 3
2 when she ■■■ 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 ■ 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, ■ 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 ■■■ every ■■■

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 ■ 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 ■ 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 ■ answer that question.

25 A Sorry. I'd like to answer that question. I'd

1 like to answer every question you've posed here today
2 about you -- about these girls you say ■■■ to my
3 house. However, on advice of counsel, I cannot ■■■
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 ■■■ 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 ■ 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 ■ break around 12:30 or 12:45 for

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, ■ 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 ■
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 ■■■ 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 ■■■■ of the — ■
5 previous statement I made regarding your partner
6 that he had been disbarred. I understand he wasn't
7 disbarred, but he ■■■■ 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 ■■■■ 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 ■■■■ your right, his firm's
18 partner who's sitting in jail for fabricating cases
19 of ■■■■ sexual nature against people like ■■■■ 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 ■■■■ 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 ■■■■ 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 ■■■■
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 ■■■■ 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 ■■■■ here today, but I am
4 going to have to respond ■■■■ I've done with most of
5 your questions here today, Mr. Horowitz, which is
6 that upon advice of counsel, I ■■■■ 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 ■■■■ sexual nature, so, though
14 I'd like to answer that question ■■■■ your other
15 questions today with specificity, my counsel has
16 advised ■■■■ 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 ■■■■ against people like
9 ■■■■ 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 ■■■■ that I cannot. And they've advised ■■■■ 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 ■■■■

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 ■■■■ 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 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
19 moment with my attorney?

20 MR. HOROWITZ: Yes.

21 THE VIDEOGRAPHER: Time off the record 1:20.
22 (Thereupon, a short break was taken.)

23 THE VIDEOGRAPHER: Time on the record 1:23.

24 BY MR. HOROWITZ:

25 Q Mr. Epstein, you had a moment to speak with

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 ■■■■ 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 ■ of your
10 questions, but ■ 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 ■
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 ■ note to you. Is -- was that truthful
24 testimony? You acknowledge that she did write such a
25 note?

1 MR. PIKE: Form.

2 THE WITNESS: Mr. Horowitz, I'd like to answer
3 each and every ■ 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 ■ 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 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 ■ 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 must assert my Sixth Amendment, Fourteenth
2 Amendment and Fifth Amendment Rights. So then ■
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 ■ 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 ■ a particular time to receive ■
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 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 is 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, 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 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 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 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 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, I'd like to
22 answer all your other questions, I have to answer
23 it the 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 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 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 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 Amendment
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 -- 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 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 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 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 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 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, 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 may 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.
9 (Thereupon, a short break was taken.)

10 THE VIDEOGRAPHER: Time on the record 2:00.

11 BY MR. HOROWITZ:

12 Q Prior to June 2005 you instructed Jane Doe 4 to
13 call you at your Palm Beach home to confirm the specific
14 dates and times you wanted her to come over for sexual
15 activity, correct?

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, but I'm going to have to
20 respond the same way I've responded to most of your
21 questions, Mr. Horowitz, which is on advice of
22 counsel, I'm going to have to assert the Sixth
23 Amendment, Fourteenth Amendment and Fifth Amendment
24 Rights. Though I'd like to answer that question,
25 all your other questions, I'm informed that if I

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 [REDACTED] 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 [REDACTED] 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 [REDACTED] you asking [REDACTED] --
 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 [REDACTED] 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 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 -- 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 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, 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 -- 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 ■
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 ■■■■■ 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 ■■■■ 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 ■■■■ 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 ■■■■ that I cannot today,
24 and they've instructed ■■■■ 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, ■■■■ 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 ■■■■ 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 ■■■■ of your
6 questions posed here today, Mr. Horowitz. However,
7 on advice of counsel, they've instructed ■■■■ 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: ■■■■ would give me great pleasure
17 to be able to answer that question to you, ■■■■ it --
18 as all the other questions you've asked about these
19 girls here today. My counsel has told ■■■■ that I
20 cannot answer those questions ■■■■ 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 ■■■■ what the difference is -- or
24 Mr. Edwards' partner who sits in ■■■■ 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 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 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 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 ■■■■■ 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 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 ■■■■■ that I risk waiving my rights and losing
24 their representations, if I choose to do so.

25 BY MR. HOROWITZ:

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 ■■■■■ 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 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 Amendment
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 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 and 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 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 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 that and 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 Fifteenth -- 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 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 risk 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 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 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 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 report said deposition in
11 stenotype; and that the foregoing pages are a and
12 correct transcription of my shorthand notes of said
13 deposition.

14 I further certify that the said deposition
15 taken at the time and place hereinabove 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, 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 by any
25 means unless under the direct control and/or direction
26 of the certifying reporter.

IN WITNESS WHEREOF, I have hereunto set my hand
this 22nd day of March, 2010.

27
28 Vicki L. Lima, Court Reporter
29 Notary Public - State of Florida
30 Commission No: DD 882608
31 Expiration Date: May 26, 2013
32 Job #92076-A

1 UNIVERSAL LEGAL REPORTING
2 808 EAST LAS OLAS BOULEVARD, 308
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 vs. 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-referenced matter. At
15 that time, you did 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 errors sheet. As
21 you read your deposition, any changes or corrections
22 that you wish to make should be noted on errors
23 sheet, citing and line number of said change. DO
24 NOT write on the transcript itself. Once you have read
25 the transcript noted any changes, be sure to sign
26 and date the errors sheet and return these pages to us
27 at the address listed above. You need not return the
28 entire transcript.

29 If you do not read and sign the deposition
30 within thirty (30) days, the original, which has already
31 been forwarded to the ordering attorney, may be filed
32 with the Clerk of the Court. If you wish to waive your
33 signature, sign your name in the blank at the bottom of
34 this letter and return it to us.

35 Very truly yours,
Universal Legal Reporting.

36 Vicki L. Lima
37 Court Reporter - Notary Public

38 I do hereby waive my signature.

1 ERRATA SHEET
2 IN RE: Jane Doe N# 2 vs. Jeffrey Edward Epstein
3 DEPOSITION OF: Jeffrey Edward Epstein, Volume 1
4 TAKEN: March 8, 2010
5 DO NOT WRITE ON TRANSCRIPT - ENTER CHANGES HERE
6 PAGE # LINE # CHANGE REASON

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21 Please forward ☐ original signed ☐ sheet to this
22 office so that no ☐ 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
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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 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 ■■■ 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 ■■■ 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 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 ■ question obviously
13 designed to try to embarrass me. It -- what -- I'd
14 like to ■■■ 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 ■■■
19 claim the Fifth Amendment, and should claim the
20 Fifth Amendment who ■■■ innocent. I respectfully
21 decline to answer, based ■■■ 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 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 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 ■■■ 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 [REDACTED] 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, [REDACTED] all your other questions here today,
24 my attorneys have instructed [REDACTED] 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 [REDACTED] of these sexually charged
6 questions, questions similar to the [REDACTED] you've
7 asked before. I have [REDACTED] respond in a similar way,
8 which unfortunately, my counsel has advised [REDACTED] 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 [REDACTED]
15 girl named E.W. in which she told she [REDACTED] 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 [REDACTED] 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, [REDACTED] least a
9 federal jail for the rest of his life for
10 fabricating cases of [REDACTED] 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 [REDACTED] 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 arrangement
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 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 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 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 [REDACTED] 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 attorneys have advised [REDACTED] 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 [REDACTED] to
8 Mr. Edwards' partner who sits in [REDACTED] 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 [REDACTED] 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 [REDACTED] 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 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 [REDACTED] 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 [REDACTED] 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 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 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 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 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 ■ 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 ■ 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, ■ 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 ■ tell Mr. Edwards' partners, but he's in
3 jail with now -- I guess most of his other -- many
4 of his other partners ■ 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 ■ 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: ■ would give ■ great pleasure
5 to answer each question and claim of Jane Doe 6 and
6 your client. However -- excuse ■ -- 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 ■■■ suspended by the Florida Bar, ■ Mr. Edwards'
2 partner who sits in jail. But though I'd like to
3 answer those questions, my counsel has advised ■ 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 ■
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 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 ■ 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 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 ■
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 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 ■ break -- we're going to take ■ break
14 now. That is not the way that I interpreted the
15 response. The response was that she made ■ --
16 she's ■ admitted prostitute, and that she was ■
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 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, I 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 ■
21 admitted prostitute, E.W. These claims are made by
22 admitted prostitutes. They filed claims under ■
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 -- 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 ■
■ break, but --

9 MR. PIKE: No, I -- I -- I don't want to take a
10 -- you just moved to strike something that ■ 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 ■ a bit, and you've mentioned ■ like
19 Jeffrey Herman and Scott Rothstein. Are you suggesting
20 that in any way her allegations of sexual abuse ■
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 lawsuits of ■ 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 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 -- 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 Amendm

1 privilege -- 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 -- 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 (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 -- well. So if you
8 -- either write that name down or keep it in your mind
9 so we're -- the same page -- to who -- who we're talking
10 about, I would appreciate it, okay?

11 A (Witness complying).

12 Q Isn't it true that -- girl named Jane Doe 7 --
13 to your home -- 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 -- Mr. Horowitz, but today
18 my attorney has counseled -- 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 -- girl named H.R. advising you that she was
24 bringing Jane Doe 7 to your home to give you -- 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 [REDACTED]
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 [REDACTED] 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 [REDACTED]
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 advice of my counsel,
21 they've asked [REDACTED] 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 [REDACTED] that today [REDACTED] 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 [REDACTED] 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 [REDACTED] 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 --
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 was at 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, ■ 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 ■■■■■
23 each one of your questions posed here today, but I
24 ■■■ going to have to respond ■ I've done to most of
25 your questions here today, the ■■■■ exact way,

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 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: ■ 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: ■ would give ■■ 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 ■■
24 great pleasure to, in fact, ■■■ the questions
25 posed by Mr. Edwards' partner, Scott Rothstein, who

1 sits in jail.

2 His other partner is on the way to jail for
3 fabricating cases of ■ 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 ■■ 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 ■■ fuse 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 ■■■ 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 ■■■ 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 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 ■■■ 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, ■■■ 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 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 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 ■■■ where he told
5 people that he had settled cases against ■■■ 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 ■■■ 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 ■■■swer 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 ■ least today, I may
4 not answer any questions relevant to this lawsuit
5 ■ 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 ■ 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 BY MR. HOROWITZ:

2 Q When Jane Doe 7 was still ■ 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 ■ -- I would like
7 to answer those questions and claims of Jane Doe
8 7. However, today, my attorneys have counseled ■
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 ■ 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 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 ■ 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 ■ 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 ■ 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 Do you deny that when she was still ■ child --

3 A Can I -- I need to hear the question again,
4 sorry.

5 Q Oh, I thought you said your hearing ■ 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 ■ 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 ■ 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 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 ■ sexual
11 nature that you and your firm have lodged against
12 me, it would give me great pleasure to specifically
13 ■ 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 ■ 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 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 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 ■ 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 ■ 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 ■ 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 ■ 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 ■ sexual nature. So,

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 ■ 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 ■ right that the Supreme Court
11 says protects the innocent, Mr. Horowitz, the
12 innocent. It's ■ 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 ■ 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 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 ■ 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 Rothstein, ■ 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 ■ attorney?

23 MR. PIKE: Form.

24 THE WITNESS: Jeffrey Herman went -- was
25 suspended after he filed ■ 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 ■■■ 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 ■ girl named
 17 Jane Doe ■ 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 ■
 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 those rights.
 2 BY MR. HOROWITZ:
 3 Q Did you receive ■ phone call from ■ 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 ■ massage?
 6 A I would very much like to ■■■ any question
 7 regarding C.M.A., I believe, ■ 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 ■ — or my — and/or my —
 16 waiving my rights.
 17 Q Did you instruct S.K. to place ■ 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 ■ Jane Doe
 24 8, but my attorneys have advised ■ ■ least today,
 25 I must assert my rights under the Fifth, Fourteenth

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 THE VIDEOGRAPHER: Time off the record 4:35.
 2 (Thereupon, ■ 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 ■ Jane Doe ■ — 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 ■ either ■ prostitute or drug user
2 diminishes the credibility of Jane Doe 8's sexual abuse
3 claim against you, ■ 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 ■■■■■ 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 ■

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 ■ was to give you would be sexual
17 in nature?

18 MR. PIKE: Form.

19 THE WITNESS: I'd like to answer every ■ 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 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 ■■ 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 ■ criminal
12 enterprise. And I'm -- so I'm sorry I can't ■■■■■
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 ■

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 ■ partner.

5 Q Okay. And you're not suggesting to anyone that
6 Jeffrey Herman was suspended after Jane Doe ■ decided to
7 file a lawsuit, are you?

8 MR. PIKE: Form.

9 THE WITNESS: I do not know when Jane Doe ■
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 ■ massage?

18 MR. PIKE: Form.

19 THE WITNESS: I'd like to respond to every
20 question regarding Jane Doe ■ and her claims;
21 however, my attorney has counseled ■ 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 ■ 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 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 ■ -- 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 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 ■ 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 ■ -- your Jane
9 Doe ■ claim, my attorneys have counseled -- said to
10 ■ 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. 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 ■
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 ■ when she
9 was still ■ 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 ■
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 ■ that I may
10 not.

11 BY MR. HOROWITZ:

12 Q When Jane Doe 8 ■ 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 ■ 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 ■ -- your Jane Doe ■ claim. However, today, my
21 attorneys have counseled ■ 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 ■ 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 ■ 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 ■ those questions, especially
8 the questions of a sexually charged nature, similar
9 to the ■ 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 ■ 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 ■ question ■ much ■ -- 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
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 ■ was still ■ 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 ■ 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 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 ■ was still ■ 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 ■ I may not and must assert my rights under the
25 Sixth, Fifth and Fourteenth Amendment. So though I

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 ■ was at your home
6 and ■ still ■ 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 jail for the rest of his life -- it appears the
2 rest of his life. Many of Mr. Edwards' partners
3 are ■ the way to jail for the rest of their life
4 for crafting ■ of ■ 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 ■ 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 ■ during the ■ 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 [REDACTED] every [REDACTED] of
 22 your questions, but unfortunately I [REDACTED] going to
 23 have to answer the [REDACTED] 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 [REDACTED] 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 [REDACTED] 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 ■ and your other
6 women, however, on advice of counsel today, I
7 cannot. And I ■ 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, ■ 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 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 ■ -- 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 ■ to ■ 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 ■
15 claims, of her relationship with C.M.A. However,
16 my attorneys have counseled ■ 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 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 ■ -- many of them ■ in jail, many ■
19 ■ the way to jail. Though -- though -- so though
20 I would like to answer the questions regarding
21 questions of ■ 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 Isn't it true, sir, that you are asserting your
3 Fifth Amendment privilege today with regard to questions
4 about Jane Doe ■ because you did in fact sexually abuse
5 Jane Doe ■ 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 ■ sexual nature, called by the
14 U.S. Attorney the largest fraud in South Florida's
15 history, his firm of 70 partners considered ■
16 criminal enterprise for basically fabricating case
17 -- cases of ■ 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 ■ when she was a child
3 given that you've been asserting ■ 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 ■ -- for fabricating ■ 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 ■ 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 ■ 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 ■ 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 ■ 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 ■ 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 ■ 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 ■ 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 ■ 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 ■ 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 -- ■ I saying
12 this right, Strumwasser?

13 A Yes, sir.

14 Q What is his ■ of specialty?

15 A Psychology.

16 Q Does he have ■ 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 ■ each and every ■ 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 ■ 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 ■ 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 ■ of those questions.
24 However, my counsel has told ■ I may not today. I
25 wish I could answer those questions with ■ --

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 ■ 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 ■ 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 ■ 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 ■ 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 ■ 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 ■ 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 ■ that
7 question the ■ way I've answered most of your
8 other questions here today, Mr. Horowitz, which is
9 ■ 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 ■ waiving my rights.

15 BY MR. HOROWITZ:

16 Q Between 2001 and 2006, ■ 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 ■ 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 -- 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 girls ■■■ 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 ■■■ 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 ■■■
24 that I must assert my rights under the Fourteenth,
25 Sixth and Fifth Amendment to any question that may

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 ■■■ 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 ■
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 ■ 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 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 ■ 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 ■ 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 ■ not a trained masseuse,
7 correct?

8 MR. PIKE: Form.

9 THE WITNESS: I would like to answer each ■
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 ■ 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 Q Okay. With regard to all of the underage girls
2 who came to your home between 2001 and 2006, you knew
3 each of 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 ■ 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 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 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 ■ 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 ■ 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 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 ■ 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, ■
25 he's got to assert the Fifth. He can -- he can

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 advice 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 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 ■ 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 ■ 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 ■ each one
21 with specificity, my counsel has advised me that I must
22 invoke my -- ■ -- my Sixth Amendment Right, my
23 Fifth Amendment Right and Fourteenth Amendment Right, so
24 ■ 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 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 -- 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 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 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 -- -- 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, I've answered all your other questions
13 with respect to these issues, which is I'm going
14 to have to invoke my Fifth Amendment, Sixth
15 Amendment and Fourteenth Amendment Right.

16 BY MR. HOROWITZ:

17 Q Sir, I'm 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 take a
22 look at it for a moment with your -- you and counsel.
23 My question is simply going to be: Is this accurate
24 list of the vehicles and vessels that you own 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 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 [REDACTED] 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 MR. PIKE: Form.

2 THE WITNESS: I would like to answer that
3 question, but I am going to have to answer the [REDACTED]
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 [REDACTED]
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 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 [REDACTED] in either the
23 interior or exterior of your home [REDACTED] -- [REDACTED] 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 ■■■ of your questions regarding your
5 claims with great specificity, however, my counsel
6 has advised ■■■ 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 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 ■■■
11 years?

12 MR. PIKE: Form.

13 THE WITNESS: Mr. Horowitz, I'm going to answer
14 that question the ■■■ 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 ■■■ 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 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 ■ 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 ■■■ 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 ■■■ 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 ■ protected -- under the Constitution 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 -- ■
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
23 (Thereupon, ■ short break was taken.)

24 MR. HOROWITZ: All right. Let me just --

25 THE VIDEOGRAPHER: Time on the record 6:11.

1 MR. HOROWITZ: All right. Let ■ 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 ■
6 much material ■ I can, I simply cannot finish
7 today, number one, because we've already been
8 working ■ 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 ■ 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 ■
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 ■ 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 ■ 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 ■ has been -- this deposition has been set for
2 ■ 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 ■ 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 ■
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 ■
17 that we receive ■ 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 -- ■■■ is not closed down, so if you'd like to
3 go forth with the deposition, ■■■ 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 ■ 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.
13
14
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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-B
22
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24
25

1 Mr. Horowitz?

2 MR. HOROWITZ: Yes.

3 MS. EZELL: We'll take ■ copy.

4 MR. PIKE: We'll take a copy.

5 MR. EDWARDS: Copy, please.

6 (Proceedings were concluded.)
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1 CERTIFICATE

2
3 STATE OF FLORIDA)
4 COUNTY OF BROWARD)
5

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 ■ 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 any shorthand notes of said
13 deposition.
14

15 I further certify that the said deposition was
16 taken at the time and place hereinabove set forth and
17 that the taking of said deposition ■■ commenced and
18 completed ■■ hereinabove set out.
19

20 I further certify that I am not an attorney or
21 counsel of any of the parties, nor ■■ I a relative or
22 employee of any attorney or counsel of any party
23 connected with this action, nor am I interested in the
24 action.
25

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.

IN WITNESS WHEREOF, I have hereunto set my hand
this 22nd day of March, 2010.

21 Vicki L. Lima, Court Reporter
22 Notary Public - State of Florida
23 Commission No: DD 882608
24 Expiration Date: May 26, 2013
25 Job #92076-B

UNIVERSAL LEGAL REPORTING
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 (954) 712-2600

March 22, 2010 Job #92076-B Volume II

Jeffrey Edward Epstein, witness

Michael J. Pike, Esquire

■ ■ ■ ■ ■ Banyan Boulevard, Suite 400

West Palm Beach, Florida 33401

■ ■ ■ ■ ■ Jane Doe No. 2 vs. Jeffrey Epstein

CASE NO: 08-CV-30119-MAPRA/JOHNSON

Dear Mr. Epstein:

Please take notice that on March 8, 2008, you gave your deposition in the above-referenced matter. At that time, you did not waive your signature. If necessary, 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

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

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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

1 A I take the Fifth.

2 Q I represent ■ lady named, ■ 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 ■ with
7 E.W., didn't he?

8 MR. YAREMA: Object to the form.

9 A The Fifth.

10 ■ 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 ■ Back to my original question: And I'll
16 ask you this way: Do you consider yourself
17 heterosexual, bi-sexual, or can you ■■■■■ 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 ■ of Jeffrey

ATTACHMENT 8

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

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JANE DOE NO. 2, CASE NO: 08-CV-80119
Plaintiff,
Vs.
JEFFREY EPSTEIN,
Defendant.

JANE DOE NO. 3, CASE NO: 08-CV-80232

Plaintiff,
Vs.

CONDENSED

JEFFREY EPSTEIN,
Defendant.

JANE DOE NO. 4, CASE NO: 08-CV-80380

Plaintiff,
Vs.

JEFFREY EPSTEIN,
Defendant.

JANE DOE NO. 5, CASE NO: 08-CV-80381

Plaintiff,
Vs

JEFFREY EPSTEIN,
Defendant.

1 [REDACTED] DOE NO. 6, [REDACTED] NO: 08-CV-80994
 2 Plaintiff,
 3 Vs.
 4 JEFFREY EPSTEIN,
 5 Defendant.

6 JANE DOE NO. 7, [REDACTED] NO: [REDACTED]
 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.

17 JANE DOE, CASE NO: 08-CV-80893
 18 Plaintiff,
 19 Vs.
 20 JEFFREY EPSTEIN,
 21 Defendant.

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1 JANE DOE NO. II, [REDACTED] NO: 08-CV-80469
 2 Plaintiff,
 3 Vs.
 4 JEFFREY EPSTEIN,
 5 Defendant.

6 JANE DOE NO. [REDACTED] NO: 08-CV-80591
 7 Plaintiff,
 8 Vs.
 9 JEFFREY EPSTEIN,
 10 Defendant.

11 JANE DOE NO. 102, [REDACTED] NO: 08-CV-80656
 12 Plaintiff,
 13 Vs.
 14 JEFFREY EPSTEIN,
 15 Defendant.

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1 THE CIRCUIT COURT OF THE 15TH
 2 JUDICIAL CIRCUIT IN AND [REDACTED]
 3 PALM [REDACTED] COUNTY, [REDACTED]
 4 CASE NO. 502008CA037319XXXXMB [REDACTED]

B.B.,

5 Plaintiff,
 6 Vs.
 7 JEFFREY EPSTEIN.
 8 Defendant.

9

10
 11
 12 1031 Ives Dairy Road
 13 Suite [REDACTED]
 14 North Miami, Florida
 15 August 7, [REDACTED]
 16 1:15 p.m. [REDACTED] 5:30 p.m.

17 CONTINUED
 18 VIDEOTAPED
 19 DEPOSITION
 20 of
 21 ALFREDO RODRIGUEZ

22 taken on behalf of [REDACTED] Plaintiffs pursuant
 23 [REDACTED] Re-Notice of Taking Continued Videotaped
 24 Deposition (Duces Tecum)
 25 ---

1 APPEARANCES:

2
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 9 6, and 7.

10 ROTHSTEIN ROSENFELD [REDACTED]
 11 BY: [REDACTED] J. EDWARDS, ESQ., and
 12 CARA HOLMES, ESQ.
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 18 And L.M.

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 Attorney for B.B.

APPEARANCES:

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Attorney for C.M.A.
Appeared via telephone.

BURMAN, CRITTON, LUTTIER &
COLEMAN, LLP

BY: CRITTON, ESQ.
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West Palm Beach, Florida 33401
Attorney for Jeffrey Epstein.

ALSO PRESENT:

JOE LANGSAM, VIDEOGRAPHER

CONTINUED INDEX OF

WITNESS	DIRECT	REDIRECT	RECROSS
ALFREDO			
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(By Mr. Willits)		453,	
(By Mr. Critton)	338	464	
(By Mr. Edwards)		419, 454,	
(By Mr. Langino)	452		

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9 Report	446
(Exhibits 4, 5, 6, 7, and 8 retained by Ms. Ezell.)	

Deposition taken before MICHELLE PAYNE, Court Reporter and Notary Public and for the State of Florida Large, in the above cause.

THE VIDEOGRAPHER: This a continuation of the deposition of Alfredo Rodriguez. Today is Friday, August the 7th, the year 2009, starting time approximately 1:15 p.m. the court reporter please swear in the witness?

Thereupon,

ALFREDO RODRIGUEZ, having been first duly sworn affirmed, was examined and testified as follows:

MR. CRITTON: Before get started just with regard Ms. Ezell represents Jane Doe 101 and 102, the alleged time of her incidents of least have been plead in the complaint for 101 is '99 -- I'm sorry, '98 through 2002, with Jane Doe 102 the Spring of -- Spring/Summer of 2003. Mr. Rodriguez even began employment until '04 and '05. I think her questioning I think -- I can't say she doesn't have standing based on the court order, but I would say it's

completely irrelevant and immaterial and has probative value with regard this particular witness based upon the two clients least that are in suit at this point in time.

MS. EZELL: As Mr. Critton well knows I represent number of other clients whose cases have not been filed and I believe we do have standing to ask questions, and I do intend to do that today.

EXAMINATION

BY MS. EZELL:

Q. Mr. Rodriguez, you stated last time that there guests at the house, frequent guests, friends from Harvard.

Do you remember that testimony?

A. Yes, ma'am.

Q. And there a lawyer from Harvard named Alan Dershowitz?

A. Yes, ma'am.

Q. And you familiar with the fact that he's a famous author and famous lawyer?

A. Yes, ma'am.

Q. How often during the six months or 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 ■ a
 6 lawyer — acting ■ a lawyer or whether he ■
 7 there ■ a friend?
 8 A. I believe as a friend.
 9 Q. Were there also young ladies in the house
 10 at the time he ■ 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 ■ that

1 Q. Can you tell ■ where those were?
 2 A. One in the kitchen, and the ■ in the
 3 formal — the main entrance. And there ■ one
 4 more added later on, but there is two when I was
 5 working there.
 6 Q. Could you just give ■ a rough sketch of
 7 the house of where the main entrance ■ and where
 8 the kitchen was?
 9 A. I'm not ■ architect but it's something
 10 like this. This ■ the kitchen, this is the main
 11 entrance.
 12 Q. Will you mark the kitchen with ■ 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 ■ a balcony
 19 here.
 20 Q. And where were the staircases?
 21 A. This is one, the kitchen, ■ 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 ■ 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 ■ second.
 18 (Thereupon, ■ 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, ■ rehabilitated this, you know,
 4 but you asked me how many stairs there were, to
 5 answer your question there ■ three.
 6 Q. Three. So where ■ the third one?
 7 A. The pool, this leads to the pool.
 8 ■ Through the outside master bedroom you could ■
 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

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 ■■■ 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 ■ in the newspaper.
 18 MR. CRITTON: He read your press release.
 19 MR. EDWARDS: Long before I ■ 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:

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 ■ 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 ■ -- 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

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 ■
 7 what it actually means, when I read this I
 8 interpreted that as because they ■ talking
 9 about masseuses I interpreted that ■ the number
 10 of girls of the Palm Beach ■ that came over and
 11 you labeled ■ 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 ■ 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

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 ■ investigator with Mr.

1 Epstein's investigators that you felt there was
 2 more going ■ 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 ■ anything else, and I told them
 7 exactly what I knew and what I was doing.
 8 BY MR. EDWARDS:
 9 Q. Okay. You ■ 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 ■
 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 ■ it.
 24 Q. You called the investigators?
 25 A. Yes. ■ declined, I don't need an

1 attorney.
 2 Q. If we want to know the exact names of the
 3 investigators that you met ■ 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 ■
 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 ■

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 ■ doing,
 10 they were taken out of the closet wherever they
 11 belong and they would leave there. So Louella and
 12 myself, ■ 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 ■ that also lead you to believe
 25 that there is something more going on here than

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 ■ 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 ■ obvious to you?
 24 A. Yes.
 25 MR. CRITTON: Form.

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 there were any other toys or
 22 vibrators or I believe you used the term dildo
 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?

1 MR. CRITTON: Form.
 2 THE WITNESS: Louella told me I did this,
 3 I 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 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

1 underwear she brought it to the laundry and
 2 used to label it.
 3 Q. Just so that the record is clear 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 away, a vibrator.
 10 Q. Did she describe the vibrator for you
 11 that you knew which 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.

1 Q. And can you explain to us why 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
 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 her job to
 10 clean the room. When she was busy she will
 11 ask me, Alfredo, 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 details, but it
 20 was her job to be in the 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 ■■■ make any comments about how
 6 young the girls were that ■■■ 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. ■ 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 ■ too young, and I said -- ■ just wonder,
 21 you know, but we comment each other.
 22 Q. Did it ever -- as ■ father did ■ 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 ■ and how old he

1 is?
 2 MR. CRITTON: Form.
 3 THE WITNESS: Yes.
 4 BY MR. EDWARDS:
 5 Q. Is that something that ■ ■ 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 ■ ■ 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 a lack of respect. So, you know, she ■
 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 ■ and she told me ■ occasion
 9 that she was crying because the picture of
 10 the Pope ■ next to ■ naked girl.
 11 MR. WILLITS: Okay.
 12 BY MR. EDWARDS:
 13 Q. Okay. Besides Louella did you ■ have
 14 ■ 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 ■ 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 ■
 25 ■ paragraph, Epstein ordered Rodriguez to go to

1 the Dollar Rent ■ Car and rent ■ 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 ■ minimal.
 22 Q. And these are girls that you're talking
 23 to that ■ roughly the same age ■ 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 Jeffrey
 9 Epstein complaint. 35
 10
 11 2 Document, Nonprosecution Agreement. 135
 12

CERTIFIED QUESTIONS

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14	123	20
15	146	14
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18	159	13
19	162	3

3

1 The videotaped deposition of JEFFREY
 2 EPSTEIN in the above-entitled and numbered cause,
 3 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,
 17 EDWARDS, FISTOS & LEHRMAN, P.L.
 18 Attorneys for Plaintiff
 19 425 North Andrews Avenue, Suite 2
 20 Fort Lauderdale, Florida 33301
 21 Tel: (954) 524-2820
 22 BY: BRADLEY J. EDWARDS
 23 STEVEN R. JAFFE, ESQ.

24 BURMAN, CRITTON, LUTTIER & COLEMAN
 25 Attorneys for Defendant
 303 Banyon Boulevard, Suite 400
 West Palm Beach, Florida 33401
 Tel: (561) 842-2820
 BY: MICHAEL PIKE, ESQ.

ALSO PRESENT:
 JOE ROVNER, Videographer
 (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 me your name?
 9 A Jeffrey Epstein.
 10 Q Mr. Epstein, you made a comment when you
 11 were 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 what
 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, 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 me 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	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 me 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, me the Court has ruled on several 25 matters, Mr. Epstein's medical history is
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 me explanation for 5 what relevance that soliloquy of yours has to, 6 whether me 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 me 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,	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 me 5 a minor? 6 A Again? 7 Q Were you sexually abused, me 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 me 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, ■ this time
 7 in response to your question, my attorneys have
 8 advised ■ 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 ■ Amendment
 15 rights ■ each of these questions because you
 16 know your ■ will incriminate you and you
 17 ■ it will result ■ you being prosecuted for
 18 your crimes; isn't that right?

19 MR. PIKE: Objection, argumentative,
 20 harassing. Calls for ■ legal conclusion.

21 Q You ■ ■

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 ■ various females that
 4 ■ under age when you engaged ■ 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, ■ you know, however, ■ 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, ■ I know that
 21 you're telling ■ you're going ■ respond ■
 22 some time in the future; but the time is ■
 23 Would you like this opportunity ■ explain why
 24 you engaged in sexual activity with L.M.
 25 beginning when she was 13 years ■ and you ■

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 ■ didn't happen, ■
 2 you're saying ■ did happen, explain to the jury
 3 why you ■ it. That's all I want to hear. I'm
 4 being respectful about this.

5 MR. PIKE: In an effort to keep ■ 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 ■
 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 ■ you ■ to high school there?

19 A Yes, sir.

20 Q Where?

21 A Lafayette High School.

22 Q After high school ■ 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 ■■■ 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 ■■■ you study?

11 A Physics.

12 Q Why ■■■ 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 ■■■ guaranteed by the

19 Fifth, Sixth and Fourteenth Amendment.

20 Q Are you invoking your ■■■ Amendment

21 rights as to why you left college, is it safe

22 then to presume that that ■■■ 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 ■■■ assume you're invoking your ■■■

19 Amendment rights as to why you left college

20 early, that that ■■■ 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 ■■■ I must take the Fifth, Sixth and

5 Fourteenth Amendment right under the U.S.

6 Constitution.

7 Q After college where ■■■ 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 ■■■ a teacher ■■

15 the Dalton School in New York after college?

16 A Again, I would like to respond to ■■

17 your questions; however, my attorneys have

18 counseled ■■■ that I cannot provide answers to any

19 questions today regarding to this lawsuit ■■ 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 ■■■ with any

17

1 underage students while teaching at the Dalton

2 School?

3 A Could you repeat that?

4 Q Yes. ■■■ you have sex with any underage

5 students ■■■ teaching ■■ 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 ■■■ 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 ■ speaking of, ■ 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	20 1 MR. PIKE: Mr. Edwards, as you know 2 there ■ 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 ■ 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 ■ Bear 16 Stearns you ■ already engaging in ■ with 17 underage minor females? 18 A As your firm has been described by the 19 U.S. Attorney, ■ 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.
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 ■ 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 ■ Bear Stearns you were already engaging 13 in ■ 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.	21 1 Q At some point in time while at Bear 2 Stearns you ■ and managed the money for ■ 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 ■ fact, I read ■ 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 ■ sexual 20 relationship with Leslie Wexler ■ point in 21 time; is that true? 22 A No. 23 Q ■ you have ■ business relationship 24 with Mr. Wexler? 25 A I intend to respond to all relevant

■ (Pages 18 to 21)

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 ■ 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 ■ be ■ criminal 14 enterprise ■ somebody ■ running a criminal 15 enterprise out of that law firm, that is the 16 ■ why you ■ not going to answer ■ 17 questions today? You ■ together ■ 18 that ■ I just want to ■ sure I'm 19 understanding ■ 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.	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
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 ■ 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 ■ 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.	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 ■ taking part in one of 8 the largest frauds in Florida's history. ■ 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, ■ 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 ■ 2 a criminal enterprise, and is part of the largest 3 fraud in Florida's history fabricating sexual 4 ■ 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 ■ you ■ 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 ■ 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?	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 ■ a home in New Mexico? 11 A I intend to respond to all relevant 12 questions regarding this lawsuit and ■ 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 ■ 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
27 1 A Mr. Edwards, your firm has fabricated 2 multiple cases of sexual harassment claims and 3 other types of sexual cases against ■ 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 ■ 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 ■ 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 ■ 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	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 Gallitsea 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 ■ name? 20 A No. Could you spell it? 21 Q (Witness shrugs.) 22 A Okay. 23 Q ■ your sexual obsession with underage 24 minor females grow at ■ point in time to allow 25 you ■ to these underage minors every single

30

1 day for sex?

2 MR. PIKE: Overbroad. Speculation,

3 argumentative, compound, harassing and

4 confusing ■ 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 ■ engage in sexual

8 conduct with underage minors ■ an every day

9 basis?

10 MR. PIKE: Speculation. Argumentative.

11 A As your firm has been described as ■

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 ■

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 ■ 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 ■ 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 ■

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 ■ 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 ■ represented by ■

8 Josephberg's firm, ■ nothing to ■

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 ■ like the

14 State --

15 A Can you spell it for me, please?

16 Q ■

17 A What's the last name, how is it

18 spelled?

19 Q ■ 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 ■ guaranteed

3 by the Fifth, Sixth and Fourteenth Amendment to

4 the Constitution.

5 Q Just for the record, I ■ only spell it

6 the way it ■ 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 ■

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 ■ 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 I 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 I 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 I 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 I believe 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

38 1 Amendment right. 2 Q Isn't it true that you and Ghislaine 3 Maxwell celebrated her 16th birthday with her and 4 had ■■■ with her ■■■ that day? 5 MR. PIKE: Form. Compound, confusing, 6 argumentative, harassing. 7 A Mr. Edwards, I would like to ■■■■ 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 ■ 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, ■■■ false? 23 MR. PIKE: Form. Misinterprets the 24 witness's testimony. 25 Q Or saying it is true?	40 1 ■■■ complaint filed by V.R. against you, isn't it 2 true, sir, that ■ friend of yours sent you three, 3 12-year old females for you to sexually abuse on 4 ■■■ 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 ■■■ of the defendant Epstein's 12 birthdays, a friend of defendant Epstein sent him 13 three, 12-year ■■■ girls from France who spoke ■■■ 14 English for defendant ■■■ sexually exploit and 15 abuse? After doing ■■■ they ■■■■ 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 ■■■ 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
39 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 ■■■ criminal enterprise perpetrating ■■■ 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	41 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, ■■■ 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 ■■■ you forced V.R. ■■■ 15 15-year ■■■ girl to have ■■■ 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 ■■■ well, ■■■ 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 ■ 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 ■
 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 ■ 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, ■ 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 ■ 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 ■ for me, please?

15 Q I don't need to spell his name. ■ 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 ■
 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 ■ 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 ■ 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 ■
 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 ■
 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 ■ 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 ■ 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 ■ with underage minors in
9 the past; ■ 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 ■ somebody who has
14 been caught engaging in ■ with minors in the
15 past; ■ 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 ■ a criminal
25 enterprise and part of ■ of the largest frauds

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 ■ involved in a modeling business
11 with ■ called M.C. Squared; ■ correct?

12 A Again?

13 Q You were involved ■ 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 ■ 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 that I cannot provide ■ 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. ■ in Australia, is ■
8 true that you made a personal telephone call to
9 her telling her not ■ come forward with any of
10 the information she knew?

11 MR. PIKE: Form.

12 A Again?

13 Q Putting ■ time frame ■ it, the time
14 frame where you ■ being criminally
15 investigated --

16 A What time frame is that?

17 Q In her complaint it ■ not specific,
18 but, let's just make it whenever. At ■ point
19 in time did you place ■ telephone call to V.R. in
20 Australia warning her ■ to come forward with
21 any information about you engaging ■ 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 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 ■ respect to underage females, isn't
7 it true that you have made the statement, ■
8 quotes, "the younger the better"?

9 MR. PIKE: Form.

10 A Again, ■ your firm has been described
11 by the current U.S. Attorney ■ 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 ■ your current employees?

24 MR. PIKE: Form.

25 A Say that again.

50 1 Q Who ■■■ 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 ■ 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, ■ 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.	52 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 ■ chance to 15 elaborate on it, that's it. 16 Q Isn't ■ true that when underage females 17 would ■■■ 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.
51 1 Unfortunately ■ this time, though, I 2 would like ■ 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 ■■■ 8 brought to you, you would engage in ■■ with them 9 and ■■ 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 ■ 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 ■ is clear 23 that ■ nod of the head or shake of the head 24 is not understood by the record, so 25 therefore Mr. Epstein was clearly not	53 1 The fact that your firm has been 2 described as ■ 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 ■ 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 ■ addition to paying these underage 12 females for sexual activity, you also paid them 13 ■ bring their underage friends to you, to also 14 engage ■ 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 ■ 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 ■ 25 ■■■ for engaging in sexual activity with you or

1 for procuring another underage female to engage
2 ■ 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 ■ 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 ■ that
9 I cannot provide answers to any questions that
10 may be relevant to this lawsuit, and I must
11 accept their advice ■ 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 ■ coerce these underage minors to bring
19 you as many other underage minors, as ■
20 ■ for you ■ engage ■ 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 ■ devised to coerce underage girls into

1 Attorney, and as part of the largest fraud in
2 South Florida's history, and ■ 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 ■
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 ■ ■ 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 ■ ■ every

1 bringing as many other underage girls to you, ■
2 ■ 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 ■ 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 ■ bring you other underage minors, you
20 ■ able to engage in ■ 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 ■ 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 ■ criminal enterprise
5 engaged in ■ 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 ■ ■ question ■
24 just read? If you ■ going ■ 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 ■■■ 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 ■■■ going ■■■

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 ■■■ 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 ■■■ phone numbers ■■■ 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 ■■■ 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

60

1 answer each one of your questions today, Mr.

2 Edwards, my attorneys have advised ■■■ 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, ■■■ 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 ■■■ contact underage minor females and make them

18 appointments to be ■■■ 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 ■■■ be a

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 ■■■

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

62

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 ■

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 ■ 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 ■ true that you demanded numerous

15 underage minor females to have ■ 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, ■ a criminal enterprise

2 involved in mail fraud, wire fraud, money

3 laundering and, in fact, fabricating multiple

4 cases of ■ 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 ■ 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?

65

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, ■ 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 ■
2 guaranteed by the Fifth Amendment, Sixth
3 Amendment and Fourteenth Amendment.

4 Q You would then roll over ■ continue
5 with masturbating; ■ 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, ■ 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 ■ each and every ■ 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 ■ underage minor
25 female's vagina and/or insert your fingers into

1 her vagina; is ■ 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 ■ 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 ■ 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 ■ 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 ■ 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

70

1 pled guilty to?

2 A Solicitation of prostitutes, not

3 underage prostitutes but simply prostitutes.

4 Solicitation of prostitutes and ■■■ count of

5 procuring a minor for underage sex.

6 Q You have taken the ■■■ ■■ questions

7 related to many of these underage minors, but the

8 underage minors ■■■ ■■■ victims ■■ 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 ■ legal

13 conclusion?

14 A Again.

15 Q What was the ■■■ of the any of ■■

16 underage minors that ■■■ the subject of the

17 criminal charges ■ which you pled guilty?

18 A I don't know.

19 Q So, ■■■ 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 ■■ 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, ■■■ me what those ■■■ ■■■

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 ■■ 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 ■■ 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 ■■■ one of these females ■■■ 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 ■■■ A.H. is somebody that

17 alleges ■■■ ■■ your house on more than ■■

18 occasions; is that true?

19 MR. PIKE: Form.

20 A Can you repeat the question, sir?

21 Q Are you ■■■ that A.H. ■■ a female that

22 alleges that when she ■■■ underage, she ■■■ at

23 your house on ■■■ 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 ■■ my attorneys, ■■ therefore I must assert

7 those rights.

8 Q You understand that her complaint ■■■

9 that Epstein turned H. on ■■ her stomach ■■ the

10 massage bed and inserted his penis in to her

11 vagina, H. Stated Epstein began to pump ■■ penis

12 ■■ her vagina and, she became upset over this.

13 ■■■ said her head was being ■■■ against the bed

14 forcibly ■■ he continued ■■ pump inside of her

15 while she screamed "no."

16 Are you ■■■ of those allegations?

17 MR. PIKE: Form, predicate.

18 A I'm sorry, did you say there is ■■

19 complaint?

20 Q In the incident report that ■■ to a

21 charging document, that ■■ to ■■ charge that you

22 have pled guilty to. Are you ■■■ of that

23 information coming from A.H.?

24 MR. PIKE: I'm sorry, Mr. Edwards; what

25 ■■■ 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 ■■■ of the victims he pled guilty
 8 to.

9 MR. PIKE: Is that the ■■■■ 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 ■■■■ 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 ■■■ you to explain to the jury, in your
 4 words, ■■ your version of the story, what ■■■
 5 your interaction with A.H. at your house when she
 6 ■■■ 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 ■■■ she ■■■ ripped and torn ■■ her vagina ■■■
 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, ■■■ you aware A.H.?
 4 A A.H.

5 The current U.S. Attorney, since he has
 6 described your firm as ■■ criminal enterprise and
 7 part of ■■■ of the largest frauds in Florida's
 8 history by fabricating, fabricating, malicious
 9 ■■■ 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 ■■■
 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, ■■■
 25 do you know a ■■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 ■■■■
 18 That's somebody that your attorneys took her
 19 deposition about ■■ year and ■■ half ago. Does
 20 that help to refresh your recollection as ■■ who
 21 S.G. is?

22 A I would like to ■■■■ 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 ■■■ accept their advice ■ 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 ■■■ of the females at
8 your house and you pled guilty ■ the
9 solicitation of.

10 I would like to ■■■ 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 ■■■
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 Q With each ■■■ 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, ■ with
13 each charge that leads to a conviction, there ■■■
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 and Fourteenth Amendment rights to the U.S.
2 Constitution ■ risk losing effective
3 representation. Accordingly, I must assert my
4 rights ■ guaranteed by the Constitution.

5 Q Just so you ■■ clear, since your
6 attorney made ■ an objection that ■ was
7 unclear, then you invoked your Fifth Amendment
8 rights —

9 A Sorry.

10 Q I'm talking about ■■■ ■■■ where you
11 already pled guilty and you can't ■ charged
12 again. What were the facts and circumstances
13 that ■ up to you pleading guilty ■ 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, ■■■ procured by your
24 method of having underage minor females locate
25 other underage minor females and bring them to

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. ■■ 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 ■ well ■ motion to strike.

13 A I don't understand -- I'm sorry, I don't
14 understand the question.

15 Q Isn't ■ true that you used underage
16 minor females to bring other underage minor
17 females ■ 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 ■ 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; ■ 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 ■ a hotel.

23 These were girls that you solicited ■ be

24 prostitutes ■ your house in ■ Beach,

25 correct?

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1 MR. PIKE: Objection, relevance,

2 argumentative. Calls for speculation ■

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 ■ crimes that occurred here ■

16 ■ 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, ■ you saying today

7 that those females that you interacted with

8 sexually, ■ prostitutes prior ■ 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, ■ 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 ■ for your

2 actions —

3 MR. PIKE: Form.

4 Q — against these victims that ■ 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 ■ that the subjects of

11 that, which were called victims, ■ not

12 underage when you engaged in ■ with them?

13 MR. PIKE: Form, argumentative,

14 speculation, ■ facts not in evidence,

15 ■ well ■ 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 ■
 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 ■ me. Who ■ that minor?
 8 A I don't know.
 9 Q You were ■ 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 ■ jail,
 15 without ■ 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 ■ 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 ■ the minor?
 7 A I don't know.
 8 Q You were never told the name ■ 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, ■
 13 method of paying underage minor females to bring
 14 you other underage minor females for sex, is
 15 something that you do ■ 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 ■ 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 ■ I cannot and they've advised ■ 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 ■ 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 ■ schedule ■
 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 ■ me
 16 there is not ■
 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 ■ 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 ■ 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 ■
 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, ■ 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 ■ the computers that ■ removed from
17 your home just prior ■ the execution of ■
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 question, Mr. Edwards, like most of your other
2 questions here today... and hopefully will get to
3 do ■ ■ 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 ■ part of that organization you
10 developed code terms such as "Work" ■ "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 ■ give you ■ massage or work for you,
21 rather than asking them to do what ■ going to
22 be done, which ■ 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 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 ■■■ 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 ■ 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 ■ and
18 Ghislaine Maxwell and Nadia Marcinkova operated
19 ■ ■ organized criminal enterprise designed ■
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 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 ■ 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 ■ within your
13 organization when someone, ■ underage minor
14 female ■ 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 ■ to you was going to happen when an underage
19 minor female would either call to work or Sarah
20 Keilen would tell you this person was coming to
21 work for you ■ a specific time?

22 MR. PIKE: Objection, vague,
23 speculative, assumes facts not in evidence.

24 A I would like to answer that question, ■
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 my questions are
 7 ludicrous right but you're aware that there
 8 are trash pulls from your home where there were
 9 message pads, messages taken by various employees
 10 of yours, where these terms, "Message," "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, it's
 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 the
 25 "trash pull"? I'm sorry.

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1 Q Are you aware of -- I'll ask you of you
 2 this way: When Sarah Kellen would take a phone
 3 message for you, what would 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 on 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 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 have them commonly in your home or
 16 at 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 and 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 be a foregone conclusion that
 10 you and I would be on the same page at least
 11 about this document, --
 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 at 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?

98 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 ■ 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 Keilen ■ 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 Keilen, I 21 don't know what you would call her, assistant, 22 would answer the phone, and take a message for 23 you ■ that you would know who called, what would 24 they typically write down the message on so that 25 you would have it?	100 1 Q Between the years ■ and 2005, who was 2 your house manager? 3 A (No response.) 4 Q If there is ■ than one, tell us 5 that. 6 A The question is unclear. I'm sorry. 7 Q Okay, let ■ start with between ■ and 8 2005, ■ you employ ■ 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
99 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 ■ down ■ ■ 12 piece of paper and give it ■ you? 13 A I didn't say that. 14 Q Have you ever been given ■ message that 15 is ripped out of a message pad that has ■ 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 ■ these questions, accordingly 24 I must assert those rights or I risk losing my 25 representation here today.	101 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. ■ a female that ■ born in July 6 of 1988. 7 A Is that ■ question? 8 Q Not yet. When is the first time ■ 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 ■ 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 sucky candies, please
3 Thank you.

4 MR. EDWARDS: (Handing candy.)

5 THE WITNESS: Appreciate it.

6 Q Isn't ■ true you met L.M. for the first
7 time ■ July ■ 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 ■ bogus
18 schemes contrived by your firm.

19 I would like to ■ every ■ of your
20 questions here today; however, my attorneys have
21 counseled ■ 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 representation.

2 Q Isn't it true L.M. as ■ 13 or 14-year
3 old girl ■ taken ■ 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 ■ 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 ■
24 those alleged in L.M. ■ Jeffrey Epstein ■
25 C.M.A. versus Jeffrey Epstein.

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. ■ Carolyn
12 Andriano, you sat there for a while thinking hard
13 about whether ■ not you knew them. Do you
14 remember either L.M. ■ 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 ■ 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 ■ ■

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 ■ L.M., isn't ■ true
17 that she ■ just about ■ begin her ninth grade
18 year ■ 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.

1 A You asked the question when I met her, I
2 think, if I met her.

3 Q You have ■ recollection ■ 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 ■ ■
11 statement that she gave; ■ 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 ■
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 ■ to
22 what question is on the table now.

23 MR. EDWARDS: Okay.

24 Q Independent of anything you've ■
25 read —

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 ■ 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 ■ 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.

1 Q ■ you first came into the room today,
2 didn't you look ■ and say "I ■ 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 ■ that you believe you did say
7 referencing L.M. when you ■ down ■ that ■
8 prior to ■ cameras rolling?

9 MR. PIKE: Form. Counsel, I ■ 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 ■ your testimony right ■ that
16 you did not say ■ me "I like L.M."?

17 A That's --

18 MR. PIKE: Objection.

19 A -- that's correct.

20 Q Do you ■ L.M.?

21 MR. PIKE: Form, predicate, and
22 relevance.

23 A I would like to answer all your
24 questions here ■ I've... tried to do my best,
25 however, my attorneys have advised me that I must

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 ■ true
5 that you knew she ■ an economically
6 disadvantaged girl that needed money?

7 MR. PIKE: Objection, speculation,
8 assumes facts not in evidence, and it is
9 argumentative ■ 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 ■ 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 ■ who you...

24 Q When L.M. ■ a 14-year old girl, she
25 was taken up ■ your bedroom and you ordered her

110 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 [REDACTED] begin [REDACTED] give you a massage while she 17 [REDACTED] naked [REDACTED] you [REDACTED] naked; isn't [REDACTED] true? 18 MR. PIKE: Same objections. 19 A Sorry, you have to repeat the question 20 for me. 21 Q When L.M. [REDACTED] 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	112 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 [REDACTED] the video 6 record 2:04 p.m. 7 Q Mr. Epstein, when L.M. [REDACTED] a 14-year [REDACTED] 8 girl, isn't it true [REDACTED] while you were naked [REDACTED] 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 [REDACTED] left off, 14 that's why. 15 MR. PIKE: Form, argumentative, 16 speculation. It is compound and [REDACTED] 17 facts not in evidence and has been asked and 18 answered. But [REDACTED] 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
111 1 question. Now I understood it. 2 Q When L.M. was a 14-year old girl, wasn't 3 it true [REDACTED] you received a massage from her 4 while she was naked and you [REDACTED] 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.	113 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, [REDACTED] 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, [REDACTED] 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 ■■■ 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 ■■■

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 ■■■
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, ■■■
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, ■■■ therefore, I will assert those
19 rights.

20 Q Isn't ■ true that the ritual ■■■ I'm
21 describing occurred with L.M., approximately 100
22 times when she was between ■■■ ages of 13 and 16?

23 MR. PIKE: Same objections, with the
24 additional objection of vague and
25 confusing.

1 masturbating you inserted your fingers into her
2 14-year old vagina?

3 MR. PIKE: Objection, argumentative.
4 Speculation. It is harassing. It ■■■
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 ■ 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 ■ going to have to assert my rights.

22 Q Isn't ■ true also that while L.M. ■■■
23 14-year old female, you masturbated ■ the point
24 of ejaculating while inserting your fingers into
25 L.M.'s vagina?

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 ■■■ 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

118 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 ■ 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 ■ you ■ 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 ■ question? 21 A No. 22 Q You made reference ■ — in response to 23 my questions about what you did sexually to 24 L.M. — 25 A Yes, sir?	120 1 described ■ 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. ■ otherwise fondled her sexually, you paid 7 her \$200; ■ that correct? 8 MR. PIKE: Objection, argumentative, 9 speculative, harassing. It ■ 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 ■ 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
119 1 Q — you have responded with these fraud 2 allegations against ■ firm of Rothstein, 3 Rosenfeld, Adler. I want you ■ tell the jury 4 which allegations that L.M. ■ making against you 5 ■ you disputing at ■ time or calling ■ fraud 6 ■ 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 ■ 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 ■ 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	121 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 ■ 7 rephrasing it for you at ■ 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 ■ 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 ■ sexual 25 nature, in order to fleece investors, so though I

122 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 ■ 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 ■ 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 ■ some point to all of your questions, 15 but today my attorneys have advised ■ I must 16 invoke my Sixth Amendment, Fifth Amendment and 17 Fourteenth Amendment right under the U.S. 18 Constitution. 19 Q Over the ■ of relatively a roughly 20 three years, isn't it true that you touched or 21 fondled L.M. in a sexual ■ than ■ 22 occasions? 23 MR. PIKE: Objection, argumentative. 24 Calls for speculation. It is overbroad, 25 confusing and vague, and it assumes facts	124 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 ■ I've ■ you or 9 that I've asked you about, you touching her while 10 she ■ underage, you paying her for sexual 11 conduct, those ■ 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, ■ is
123 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 ■ when you ■ engaging ■ sexual conduct 6 with L.M., isn't it true that that conduct took 7 place on more than ■ 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 ■ not going to 21 incriminate you if the ■ "no," ■ is only 22 if the ■ is "yes" that it will incriminate 23 you, ■ 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?	125 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 ■ 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 ■ 16 ■ 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 ■■■■ 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 ■■■■ 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 Q Isn't ■ 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 ■ longer interacted with her
15 sexually but still demanded that she bring you
16 other underage minor females for you ■ 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 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 ■ 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 ■ 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 ■■ those questions; however, ■
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. ■■ a pregnant 16 year-old
25 she brought you at least ten underage minor

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 ■ 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 ■■ 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 ■ 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 ■ not
22 limited to just saying "form." I'm able to
23 assert the basis ■ to why, ■ I don't waive
24 that basis.

25 MR. EDWARDS: ■ is just ■■ of this

130 1 obstructionist — 2 MR. PIKE: It's not obstructionist, it 3 is objecting to form. What is 4 obstructionist is what we ■■ 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 ■■■■■■ 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? ■■ 14 you hire L.M. ■■ attorney ■■ 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 ■■ 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 ■■■■ paid for an attorney to represent L.M.? 23 A (Witness shakes head.)... On advice of 24 my counsel, I would like to ■■■■ that question, 25 but on advice of counsel I'm going to have to	132 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 ■■ 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 ■■ some point to —
131 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 ■■■■ paid for by 5 you, informed L.M. that if she ■■■■ ■■ the 6 FBI exactly what happened ■■ your house, that her 7 son could be taken from her. You're ■■■■ 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 ■■ bunch of money and your 13 firm has represented ■■ 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 ■■ 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.	133 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 ■■ 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 ■■ fact, you deliberately and 8 intentionally caused ■■■■ 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 ■■■■ that with specificity, I must 23 follow my attorney's advice. 24 Q Will you admit for the jury that you 25 ■■■■ investigated federally for your illegal

1 activities with underage minors?

2 MR. PIKE: Same objections.

3 A I would like to answer that question, ■
4 well ■ all the other questions you've asked ■
5 here today, especially since your firm has been
6 accused by the federal, I guess, the federal
7 government,... being considered ■ criminal — you
8 firm has been considered and investigated ■
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, ■ ■ result of ■
17 investigation, you, as ■ ■ ■ United States
18 Attorney's Office entered into what has ■ ■ 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 ■ criminal
25 investigation into your activities with minor

1 females, you reached a resolution with the United
2 States Attorney's Office, in what has now been
3 described ■ 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, ■ 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 ■ 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 Graff ■ Nadia Marcinkova." Can you explain to
2 the jury what each of those four individuals ■
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 ■ 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, ■ well
12 as the co-conspirators, operated as ■ 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 ■
25 criminal enterprise involved in defrauding

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 ■ you ■ 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 ■ 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 ■■■ 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 ■■■ engaging ■■■
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 ■■■
11 many underage females as possible, for ■■■
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 ■■■ interacting with
20 these underage females in a sexual manner, ■■■
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 ■■■ 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 ■■■ 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 ■■■ engaging in ■■■ 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 ■■■ that
6 question as well ■■■ 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 ■■■ engaging ■■■ sexual
15 activity with these underage minors, including
16 L.M., you knew that this conduct ■■■ illegal,
17 didn't you?

18 MR. PIKE: Same objections. Form.

19 A I would like to answer that question, as
20 well ■■■ 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 ■ 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 ■ forward with information about your sexual
14 interactions with them have been investigated,
15 harassed, humiliated ■ an effort for you to
16 intimidate them ■ 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 ■ 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, ■ give you a chance here
16 since you keep bringing up her statement to the
17 ■ as opposed to her ■ testimony for 13
18 hours under oath in this case. Are you saying
19 that the sworn testimony to the ■ 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 ■ 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 ■ you saying is the truthful
10 testimony, her statement ■ the FBI or ■
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 ■ that question. I
21 would like ■ 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 ■ spend as much money ■ you ■ 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

146 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	148 1 Q -- But -- 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, what evidence you're using 8 to support your lawsuit against L.M., so that the 9 jury can evaluate 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 -- 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
147 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: -- 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, as 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.	149 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 is what 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, 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 [REDACTED] 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 [REDACTED]

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 answer" is narrative?

2 MR. PIKE: What do you [REDACTED] by "clarify
3 your answer?

4 MR. EDWARDS: I didn't hear what he
5 said. Say it again so I [REDACTED] 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 [REDACTED] 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 [REDACTED] what the
24 claims are?

25 Q Yes, we've gone through it. She went to

1 your house when she [REDACTED] 13, 14, 15, [REDACTED] 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 [REDACTED] 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 [REDACTED] "I didn't do it," "I did it, but it didn't
15 hurt her," we [REDACTED] trying to understand [REDACTED] we know
16 how to provide this case to the jury, what [REDACTED]
17 your defenses to these allegations?

18 MR. PIKE: I'm going to object to this
19 line of questioning. It is compound; [REDACTED]
20 worded it could call for disclosure of
21 attorney/client information [REDACTED] well [REDACTED] 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 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 [REDACTED] in your case? [REDACTED] you
7 were [REDACTED] 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 [REDACTED] 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 [REDACTED] that I cannot respond. They've asked [REDACTED] 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 won't 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 Did you tell George Rush these
 22 underage minors were victims 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 your
 10 testimony that despite the disparity in age you
 11 did 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 will 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 few 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 was for you?
 14 A Yes.
 15 Q Are you aware that the 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 I 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 [REDACTED] 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 [REDACTED] Friedman, is that somebody who [REDACTED]
 15 contacted you within the last six months?
 16 A ... No.
 17 Q In taking a break and thinking about
 18 [REDACTED] 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 [REDACTED]
 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 [REDACTED] the jury who the various
 3 people [REDACTED] 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 [REDACTED] 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 [REDACTED]
 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 [REDACTED]
 9 [REDACTED] you what I'm talking about, Lowellia Rabuyo;
 10 you know who that is, right?
 11 A Yes.
 12 Q She is [REDACTED] 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 [REDACTED] assert my Sixth Amendment, Fourteenth
 19 and Fifth.
 20 Q That somebody who has informed [REDACTED] that
 21 you paid for and obtained [REDACTED] attorney by the [REDACTED]
 22 of Bruce Reinhart [REDACTED] 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 [REDACTED] attorney to
 4 represent them [REDACTED] 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 [REDACTED] 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 [REDACTED] 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 [REDACTED] that list that you have not paid for [REDACTED]
 21 retained attorneys for?
 22 MR. PIKE: Same objection.
 23 A Same answer.
 24 Q You're invoking your [REDACTED] Amendment,
 25 right?

1 A And Sixth Amendment and Fourteenth
2 Amendment... and Fifth Amendment.
3 Q ** Is it a company or ■ it you,
4 personally, that is paying for the attorneys'
5 fees related ■ 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, ■ 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 ■ whether it is coming from ■ of the other
22 corporations that we've discovered during
23 discovery ■ it ■ 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 ■ other
5 witnesses who have had attorneys retained for
6 them, ■ it also your response to invoke your
7 ■ Amendment rights, rather than to provide me
8 with an answer, as to who ■ 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 ■ 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 ■ 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 ■
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 ■ 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 ■
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 ■ 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, ■
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

166 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 ■■■■ rights as before. 8 Q That's the Fifth, Sixth and Fourteenth 9 amendments, just ■ 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	168 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 ■
167 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 ■■■■ 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, ■■ 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	169 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 ■■ 23 jury which of these allegations, if any, being 24 made by L.M., ■■ false ■■ 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 ■■■ allegations
 9 now, we've gone through them, L.M.'s allegations
 10 and assertion of facts ■■ to what happened
 11 between you and her when she ■■■ 13, 14 and ■■
 12 years ■■ and you were 50, 51, 52 years old.
 13 Several times you responded saying something
 14 about Rothstein, Rosenfeld ■■ Adler, something
 15 about her ■■■ statement, what have you; I want to
 16 give you ■■ chance to ■■ the jury, which of her
 17 allegations, if any, ■■■ you believe ■■■ 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, ■■ 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 ■■ ■■ true ■■■ 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 ■■ 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 ■■ 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 ■■ number ■■ should
 10 be you invoking your ■■■ Amendment rights.
 11 Seemed ■■■ 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 your

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 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 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 counsel or risk losing their representation.

2 Q Am I correct in my understanding that
3 you have invoked your Amendment rights
4 because your would incriminate you and
5 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 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 18 19 20 21 22 23 24 25	180 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 Notary Public, State of Florida. 17 My commission No. 18 Expires March 13, 2011. 19 20 21 22 23 24 25
179 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 TERRI BECKER, Registered 22 Professional Reporter and 23 Notary Public, State of Florida 24 at Large. My Commission expires 25 March 13, 2011.	181 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

■ DO NOT WRITE ON TRANSCRIPT
 ■ ENTER CHANGES HERE:

■ PAGE LINE CHANGE REASON
 ■

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JEFFREY EPSTEIN

16

17

18

19 THE STATE OF FLORIDA)

20 COUNTY OF PALM BEACH)

21 I DO HEREBY CERTIFY THAT JEFFREY EPSTEIN

appeared before me and stated that he has read

22 his deposition; further, that this Errata Sheet

■ signed in my presence on this _____ day

23 of _____ 2010.

24

25

■ U.S. LEGAL SUPPORT
 ■ Registered Professional Reporters
 ■ 444 West Railroad Avenue
 ■ Suite 300
 3 West Palm Beach, Florida 33401
 (561) 835-0220

February 22, 2010

6 BURMAN, CRITTON, LUTTIER & COLEMAN
 303 Banyan 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

13 Dear Mr. Pike:

14 Since counsel have agreed that you may
 have the witness read ■ sign your copy of the
 deposition, for your convenience, enclosed
 15 herewith you will find an Errata Sheet for the
 witness' use in entering any changes to the
 deposition.

16 Thank you for your prompt attention.

17 Cordially yours,
 18 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

24 CC: Bradley Edwards, Esq.

25

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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.

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

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1	The continued videotaped deposition of	
2	JEFFREY EPSTEIN in the above-entitled and	
3	numbered cause, ■ taken before me, TERRI	
4	BECKER, ■ 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 ■ follows:	
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15	BY: MICHAEL PIKE, ESQ.	
16	ALSO PRESENT:	
17	JOE ROVNER, Videographer	
18	(U.S. Legal)	
19		
20		
21		
22		
23		
24		
25		

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1	THEREUPON,	
2	JEFFREY EPSTEIN	
3	being by Terri Becker first duly sworn to tell	
4	the whole truth, ■ hereinafter certified,	
5	testified as follows:	
6	CONTINUED DIRECT EXAMINATION	
7	BY MR. HOROWITZ:	
8	Q Mr. Epstein, you understand we ■	
9	continuing your deposition from Part One which	
10	■ taken ■ March 8, 2010?	
11	A Yes.	
12	Q When we were together ■ March 8th, you	
13	told ■ at that time that you were ■ 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 ■ us that you're	
23	restricted from possessing pornographic	
24	material. Is that still the case?	
25	A Yes.	

1 Q At that time you told us you ■■■ a
2 registered sex offender in ■■■ State of Florida.
3 Is that still the case?
4 A Yes.
5 Q At that time you told us you ■■■ ■■■
6 358 Ed Brillo Way. Is ■■■ still the case?
7 A On advice of counsel, sir, I'm going ■■■
8 have to invoke my Sixth, Fifth and Fourteenth
9 Amendment rights.
10 Q I'm going ■■■ hand you a document which
11 ■■■ will mark as Exhibit 2. We had marked Exhibit
12 1 at ■■■ first session.
13 (Multi-page document ■■■ marked as
14 Plaintiff's Exhibit number 2 for
15 identification, ■■■ of this date.)
16 Q (Handling.)
17 I'm going to ■■■ you to please ■■■ ■■■
18 ■■■ 6. Turn to where it says "Affirmative
19 Defenses." Do you see where ■■■ are?
20 A Yes.
21 Q Paragraph one, under the words
22 "Affirmative Defenses" says "As to ■■■ counts,
23 plaintiff actually consented to and ■■■ a willing
24 participant in the acts alleged, and therefore
25 her claims are barred ■■■ her damages are required

1 to be reduced accordingly." This I'll tell you
2 ■■■ ■■■ 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 ■■■ willing
9 participant in the acts alleged; ■■■ that ■■■ 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 ■■■ 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

1 Fifth Amendment.
2 Q Isn't ■■■ try neither you ■■■ anyone you
3 know has facts ■■■ support your contention that
4 M.L. consented ■■■ 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 ■■■ 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 ■■■ conduct similar and/or identical
16 to the acts alleged ■■■ other persons, which
17 ■■■ the sole or contributing ■■■ of
18 plaintiff's alleged damages."
19 My question for you is, what facts ■■■
20 you ■■■ of ■■■ 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 ■■■

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 ■■■ or participated
7 ■■■ conduct similar to the acts alleged in ■■■
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, ■■■ I would like to answer all of your
23 questions, at least today my counsel has advised
24 ■■■ 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 ■ you see ■ says "As ■ counts
8 plaintiff impliedly consented to the ■ 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 ■ acts
13 alleged by not objecting?
14 MR. PIKE: Form. And all of these
15 questions call for a legal conclusion, ■
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 ■ true, sir, that you're not
23 ■ 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 ■ true you're not ■ of any
4 facts to support this contention that M.L.
5 consented ■ 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 ■ of
12 anyone who has facts to support the contention
13 that M.L. consented to ■ 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 ■ 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 know that M.L.

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1 was not 18 years old at the time of ■ alleged
2 acts?
3 MR. PIKE: Form.
4 A Though I would like to answer that
5 question, ■ I would like to answer every
6 ■ 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 ■ of
11 to support your contention that M.L. had attained
12 ■ 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 ■ 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 ■
22 believe that M.L. ■ 18 ■ older ■ 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, ■ says: "As
6 to all counts, plaintiff's claims are barred, ■
7 she said she ■ 18 years or older at the time."
8 Now, Mr. Epstein, that's not a true
9 statement, ■ 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 ■ 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,

1 which were filed on your behalf ■ this lawsuit.
2 Do you have any facts ■ 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, ■ 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 ■ Exhibit 3.

12 (Multi-page document was marked ■
13 Plaintiff's Exhibit number 3 for
14 identification, ■ of this date.)

15 Q I'm going ■ hand you and your
16 attorney --

17 MR. HOROWITZ: I have extras.
18 ■ -- 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 ■ ask you to turn to page 6,

1 the page numbers ■ at the top, and do you see
2 ■ words "Affirmative Defenses"?

3 A Yes, sir.

4 Q Paragraph ■ 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 ■ my
15 form objections?

16 MR. HOROWITZ: Well, I need to ask the
17 questions ■ 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 ■ Jane Doe 3, do you see in

1 paragraph ■ it says, "As ■ all counts,
2 plaintiff actually consented to and was a willing
3 participant in the acts alleged." Do you ■
4 that portion of paragraph one?

5 A Yes, sir.

6 Q The statement here that the plaintiff,
7 Jane Doe number ■ consented to and ■ a willing
8 participant in the acts alleged; that's not ■
9 true statement, ■ 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 ■ a number of cases, as you're aware.

16 Off the record for a second.)

17 THE VIDEOGRAPHER: Off the video record
18 ■ 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 ■ Amended Answer and
24 Affirmative Defenses filed in response ■ Jane
25 Doe 3's lawsuit?

1 A Yes, sir.

2 Q We marked that ■ Exhibit 3. Turning ■
3 affirmative defense paragraph number one, do you
4 ■ where it says "Plaintiff actually consented
5 ■ and ■ a willing participant in the acts
6 alleged" in paragraph one; do you ■ that?

7 MR. PIKE: Form. The document speaks
8 for itself.

9 Q Do you ■ where I'm pointing you to? I
10 want to make sure we ■ on the same page.

11 A Yes, I do.

12 Q The statement that Jane Doe number 3,
13 Y.L., consented to and ■ 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 ■ support the ■ that Y.L. actually
23 consented to and was a willing participant in the
24 facts alleged?

25 MR. PIKE: Form.

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 ■ 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 ■ of
9 anyone who has facts to support ■ 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, ■ says:
19 "Plaintiff, Y.L., actually consented ■ and
20 participated to conduct similar and/or identical
21 ■ acts alleged with other persons, which ■
22 the sole ■ contributing cause of plaintiff's
23 alleged damages." Sir, that's not a true
24 statement, is it?

25 MR. PIKE: Form.

1 A I would like to answer every question
2 about Y.L. today, Mr. Horowitz, however, ■
3 advice of counsel, they've instructed ■ 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 ■ 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

1 question you have here today, Mr. Horowitz,
2 regarding your client, Y.L., on advise of my
3 counsel, ■ 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 ■ alleged by not
8 objecting." ■ you see that?

9 A Yes.

10 Q The ■ 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 ■
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.

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 ■ of
5 anyone who has facts to support your statement
6 that Y.L. impliedly consented ■ 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 ■ paragraph four of your
15 Affirmative Defenses, Mr. Epstein, it says "As to
16 ■ counts, defendant reasonably believed ■
17 ■ 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, ■ 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 ■ true, sir, isn't it ■ that
2 you knew that Y.L. ■ under the age of 18 when
3 she came ■ 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 ■ I must assert my rights under the
8 Sixth, Fifth and Fourteenth Amendment.
9 Q Isn't ■ true, sir, that you ■ no
10 reason ■ believe ■ Y.L. ■ under 18?
11 MR. PIKE: Form.
12 A Can you repeat that question?
13 Q ■ you asked. Isn't it true, sir, you
14 ■ no reason to believe that Y.L. ■ 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 ■ 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 ■ 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 ■ true, sir, Y.L. ■ told you
3 she ■ 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 ■ barred as ■ said she was
12 ■ years or older at the time.
13 Sir, that's not ■ true statement, ■
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 ■
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 ■ hand ■ you the answer and
3 Affirmative Defenses, Amended Answer and
4 Affirmative Defenses ■ you filed in the
5 lawsuit ■ 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 ■ 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, ■ of this date.)
16 THE WITNESS: Can we take a two-second
17 break??
18 MR. HOROWITZ: Sure.
19 THE VIDEOGRAPHER: Off the video ■
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 ■ you filed in the
2 V.Z. case, correct?
3 A That's correct.
4 Q Paragraph ■ includes ■ following
5 statement: "As to ■ counts, plaintiff V.Z.
6 actually consented to and ■ ■ 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 ■
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 ■ 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?

7 (Pages 357 to 360)

361 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 ■■■■ when you said 9 "V.Z.'s testimony speaks to ■■■■ 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 ■ What facts do you know of ■ support ■ 20 statement that V.Z. actually consented ■ 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	363 1 however, with respect to my own issues today, I 2 ■ going to have to assert my rights ■ 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 ■ contributing ■■■■ 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 ■ 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 ■ advice 20 of counsel. 21 Q Sir, isn't ■ true you're not aware of 22 any facts to support your contention in this 23 answer ■ the amended complaint that V.Z. 24 consented to and participated in conduct similar 25 and/or identical to the acts alleged with other
362 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 ■ a willing participant in the acts alleged 9 with you? 10 A That's not what I said. 11 Q Why don't you ■ ■ 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 ■■■■ of anyone who has facts that support the 20 statement that V.Z. consented to and ■ 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,	364 1 persons? 2 MR. PIKE: Form? 3 A I believe her deposition in her own 4 words speaks ■ 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

■ (Pages 361 to 364)

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1 question?

2 (Discussion off the record.)

3 Q Are you suggesting to ■ 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 ■ ■ 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 ■ all counts, defendant

24 reasonably believed or ■ 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 ■ where I am? Do you ■ 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 ■ all counts defendant reasonably

14 believed ■ ■ told the plaintiff had attained

15 the age of ■ 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 ■ implied

20 potential waiver, did you read it correctly,

21 is it correct?

22 Q ■ I accurately read the statement ■

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 ■ true, sir, that you

3 knew, you knew, that V.Z. ■ 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 ■ true, sir, you had no ■ to

12 believe up until May 2005 that V.Z. ■ ■ year

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. ■ ■ you she was ■ 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 ■■■ 18 years ■■■ older at the time."
 8 Sir, you know that's not true. That
 9 ■■■ 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 ■■■
 18 marked as Exhibit 5, Defendant Epstein's First
 19 Amended Answer ■■■ the Affirmative Defenses ■■■
 20 Plaintiff's Second Amended Complaint in the
 21 lawsuit filed by A.C.

22 (Handing.)

23 (Multi-page document ■■■ marked as
 24 Plaintiff's Exhibit number ■■■ for
 25 identification, ■■■ of this date.)

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1 Q I'm going to ask you again ■■■ turn to
 2 ■■■ ■■■ where ■■■ says "Affirmative Defenses."
 3 Do you ■■■ 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 ■■■ the
 9 acts alleged, and therefore her claims are barred
 10 ■■■ her damages ■■■ required to be reduced
 11 accordingly."

12 Sir, this statement that A.C. consented
 13 to and ■■■ a willing participant ■■■ the acts
 14 alleged; that's not true, ■■■ 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 ■■■ you agree with A.C.'s statements with
 23 regard to her activity ■■■ your home ■■■ 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 ■■■
 10 was a willing participant ■■■ 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 -- ■■■ 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 ■■■ 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 ■■■ 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 ■■■ all counts alleged
 14 plaintiff actually consented ■■■ and participated
 15 in conduct similar and/or identical to the acts
 16 alleged with other persons which were the sole ■■■
 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 ■ 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 ■

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1 information you have about A.C.'s testimony ■
 2 from your lawyers, or ■ you hear here it from
 3 ■ other source?
 4 MR. PIKE: Form.
 5 I'm going to instruct you not ■ answer
 6 that question.
 7 Q Have you heard from any ■ 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 ■ acts
 15 alleged by not objecting." Do you see that?
 16 A Yes, sir.
 17 Q Sir, you know that's ■ 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 ■ true you're not ■ 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 ■ years, was under 18
 22 years ■ when she came ■ 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 ■
 5 reason ■ believe that A.C. ■ 18 years or older
 6 when ■ 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 ■ true, sir, A.C. ■ told you
 14 she ■ years old or older?
 15 MR. PIKE: Form.
 16 A Though I would ■ to answer that
 17 question regarding what Ms. A.C. told me, my
 18 counsel has advised ■ 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 ■ 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 ■ 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 ■
 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 ■ to make
 12 his First Amended Complaint in ■ Jane Doe
 13 number 6 case, and I'll hand you ■ copy of that
 14 and represent ■ you that Jane Doe ■ is V.A.,
 15 okay? I ask you to turn to page ■ - 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 ■ that V.A. consented
 20 to and was ■ willing participant ■ 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 ■ 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 ■ true, sir, there ■ facts
 4 that you're ■ of to support ■ statement
 5 that V.A. consented to and was ■ willing
 6 participant in the acts alleged?
 7 MR. PIKE: Form.
 8 A Though, the question of whether she was
 9 ■ 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 ■
 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 ■ participated in similar or identical acts
 3 with other persons; isn't ■ 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 ■ 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 ■ 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 ■ 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 ■ 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 ■ 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, ■ says
 3 "As to ■ counts" -- strike that.

4 Isn't it true, sir, that you knew when
 5 V.A. ■ at your home that she ■ 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 ■
 15 believe that V.A. was 18 years of age ■ 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 ■ 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 ■ 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 ■ 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, ■ 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 ■ 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 ■ hand you what ■ will

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1 mark as Exhibit 7. It is Defendant Epstein's
 2 First Amended Answer and Affirmative Defenses ■
 3 Plaintiff's ■ Amended Complaint in Jane Doe 7
 4 ■ by F.P.

5 (Multi-page document ■ marked ■
 6 Plaintiff's Exhibit number 7 for
 7 identification, ■ of this date.)

8 Q I ask you to take ■ look ■ that,
 9 please, ■ turn ■ page 6, of ■ Affirmative
 10 Defenses.

11 THE WITNESS: Take ■ 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 ■ ■ 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 ■ ■ ■
 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 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 is 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 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 that 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 that 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 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 that 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 ■ 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 ■ mind that F.P. ■ years ■ 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. ■ 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. ■ 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 ■ older; isn't ■ 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 ■ told you that
 4 F.P. ■ 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, ■ least today my counsel advised me
 10 that I may not. They've advised ■ that I must
 11 assert my rights under the Sixth, Fifth and
 12 Fourteenth Amendment.

13 (Multi-page document was marked ■
 14 Plaintiff's Exhibit number ■ for
 15 identification, ■ of this date.)

16 **Q** Sir, I've just handed you defendant
 17 Jeffrey Epstein's Answer and Affirmative Defense
 18 ■ plaintiff's Amended Complaints ■ Jane
 19 Does number 8 lawsuit, ■ 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 ■ 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 ■ every question regarding J.M.

10 **Q** Sir, what facts do you know of to
 11 support the statement that J.M. consented to ■
 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 ■ 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

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, ■■■ this assertion
16 that J.M. consented to and participated ■
17 similar or identical acts with other persons;
18 that's not ■ 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 ■ I must assert my
24 rights under the Sixth, Fifth and Fourteenth
25 Amendment.

1 Q Isn't it true, sir, you're not ■■■ 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 ■ 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 ■■■ of
21 anyone who has facts to support your assertion
22 that J.M. consented ■ the facts alleged by ■
23 objecting?

24 MR. PIKE: Form.

25 A I would very much like to answer every

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, ■ is on ■ following ■
7 ■ you ■ to follow along; what facts do you
8 have ■ support your contention that you believed
9 J.M. attained the ■ of 18 ■ 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 ■ 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.

1 Q Isn't it true, sir, you had no ■■■ to
2 believe that J.M. ■ ■ years old or older ■
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. ■■■ told you
11 she ■ ■ 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 ■ true, sir, no ■■■ told you
19 that J.M. was ■ 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

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1 Fourteenth Amendment.

2 Q Sir, did you ever pay for a telephone

3 number (407) 665-3144, pay the phone bill?

4 A I would have to assert my rights under

5 the Sixth, Fifth and Fourteenth Amendment, sir.

6 Q Between 2001 and 2006, did you use the

7 telephone number (407) 655-3144, to get kids to

8 ■■■■ to your home for your sexual pleasure?

9 MR. PIKE: Form.

10 A Though I would like to answer all these

11 questions regarding phone numbers, I'm sorry but

12 I may not on advice of counsel, so I must assert

13 my rights under the Sixth, Fifth and Fourteenth

14 Amendment.

15 Q Did you direct ■■■■ or ■■■■ people ■■■■

16 the telephone number (407) 655-3144 in order to

17 get kids, girls, to come to your home for your

18 sexual pleasure?

19 MR. PIKE: Form.

20 A Though I would like to answer every one

21 of your questions today regarding phone numbers,

22 on advice of counsel, I may not, because it may

23 be relevant to other lawsuits or this lawsuit,

24 and they've instructed me that I must assert my

25 rights under the Sixth, Fifth and Fourteenth

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1 Amendment.

2 Q Have you ever either paid or had

3 registered to you the telephone number (561)

4 373-2262?

5 MR. PIKE: Form.

6 A I would like to answer every question

7 regarding phone numbers, Mr. Horowitz. My

8 attorneys have asked me to respond to most of

9 your questions here today by asserting my rights

10 under the Sixth, Fifth and Fourteenth Amendment I

11 will have to do ■■■■ with respect to that question.

12 Q Between the years 2001 and 2006, did you

13 ■■■■ telephone number (561) 373-2262, in order

14 ■■■■ arrange for girls under the age of ■■■■ to ■■■■

15 to your home for your sexual pleasure?

16 MR. PIKE: Form.

17 A I would like to answer every one of your

18 questions regarding phone numbers here today, Mr.

19 Horowitz. However, on advice of counsel, at

20 least today, they've instructed me that I must

21 assert my rights under the Sixth, Fifth and

22 Fourteenth Amendment.

23 Q Between 2001 and 2006, did you direct

24 ■■■■ or ■■■■ people to ■■■■ the telephone number

25 (561) 373-2262, in order to get girls under the

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1 age of ■■■■ to come to your home for your sexual

2 pleasure?

3 MR. PIKE: Form.

4 A I would like to answer every one of your

5 questions regarding these phone numbers and

6 allegations. However, today, my counsel has

7 advised me that I may not and must assert my

8 rights under the Sixth, Fifth and Fourteenth

9 Amendment.

10 Q Have you ever paid the telephone ■■■■ or

11 had registered in your name the phone number

12 (561) 655-4590?

13 MR. PIKE: Form.

14 A Mr. Horowitz, I would like to answer

15 each ■■■■ of your questions regarding phone

16 numbers here today, but on advice of counsel

17 they've told ■■■■ I must assert my rights under the

18 Sixth, Fifth and Fourteenth Amendment.

19 Q Is (561) 655-4590 a telephone number you

20 used between 2001 and ■■■■ to get girls under the

21 age of ■■■■ to come to your home for your sexual

22 pleasure?

23 MR. PIKE: Form.

24 A Though I would like to answer every one

25 of your questions regarding telephone numbers, my

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1 counsel has advised me that at least today I may

2 not, because it may be relevant to this lawsuit

3 or another lawsuit, and they've instructed ■■■■

4 that I must assert my rights under the Sixth,

5 Fifth and Fourteenth Amendment.

6 Q Is (561) 655-4950 ■■■■ telephone number

7 that you directed to other people ■■■■ in order

8 to get kids to ■■■■ to your home for your sexual

9 pleasure?

10 MR. PIKE: Form.

11 A I would like to answer every ■■■■ of your

12 questions regarding phone numbers allegedly used

13 for these types of purposes. However, my counsel

14 today has advised me I may not and have

15 instructed me I must assert my rights under the

16 Sixth, Fifth and Fourteenth Amendment.

17 Q Sir, have you ■■■■ paid the phone bill

18 or had registered in your ■■■■ the phone number

19 (561) 762-2741?

20 MR. PIKE: Form.

21 A Though I would like to answer that

22 question as I would like to answer every one of

23 your questions here today, my counsel has advised

24 me that ■■■■ least today, I must assert my rights

25 under the Sixth, Fifth and Fourteenth Amendment,

401 1 sir. 2 Q ■ the telephone number (561) 762-2741, 3 a telephone number you used between 2001 and ■ 4 ■ order ■ get girls under ■ age of 18 to ■ 5 ■ your home for your sexual pleasure? 6 MR. PIKE: Form. 7 A I would like to answer every ■ of your 8 questions with respect to these telephone 9 numbers. However, my counsel today has advised 10 ■ that I must assert, at least today, my rights 11 under the Fifth, Sixth and Fourteenth Amendment. 12 Q Sir, is (561) 762-2741 ■ telephone 13 number that you directed other people to ■ in 14 order to get girls under the ■ of ■ 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 ■ registered in your 24 name or paid ■ phone ■ for telephone number 25 (561) 655-7629?	403 1 phone numbers. However, upon advice of my 2 counsel, they've instructed ■ that I must assert 3 my rights under the Sixth, Fifth and Fourteenth 4 Amendment. 5 Q Sir, have you ever paid the phone ■ 6 ■ 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 ■ that at least today I must 13 assert my rights under the Sixth, Fifth and 14 Fourteenth Amendment. 15 Q Sir, ■ the telephone number (561) 16 820-8790 a telephone number you used between 2001 17 and 2006 ■ 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.
402 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 ■ 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 ■ telephone number you 9 used between 2001 and 2006 to get girls under ■ 10 ■ of ■ 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 ■ telephone number you 20 directed other people to use in order to get 21 girls under the ■ of 18 to ■ 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	404 1 Q Sir, is the telephone number (561) 2 820-8790 ■ telephone number you directed others 3 to use in order ■ get underage girls ■ come to 4 your home for your sexual pleasure? 5 MR. PIKE: Form. 6 A I would like to answer every ■ 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 ■ in order to get ■ to come ■ 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**
 7 **in order to get underage girls to 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
 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**
 17 **registered in your name 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 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 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 in order to get underage girls to**
 17 **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, (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 for**
 13 **telephone number (561) 388-0282?**

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) 388-0282 a**
 21 **telephone number you directed other people to use**
 22 **in order to bring girls under the age of 18**
 23 **your home for your sexual pleasure?**

24 MR. PIKE: Form.

25 A I have to answer that question I've

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**
6 **for telephone number (561) 655-4870?**

7 MR. PIKE: Form.

8 A You've asked many telephone numbers
9 here today, Mr. Horowitz. I'm going to have to
10 respond to that telephone number 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 of your questions.

17 **Q Is the number (561) 655-4870, a**
18 **telephone number that you directed other people**
19 **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

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 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 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

1 the Sixth, Fifth and Fourteenth Amendment.

2 **Q Sir, have you owned 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 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 had a**
11 **beneficial interest 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**

1 instructed 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 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 been an

10 owner/shareholder or director of 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 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 ownership

15 beneficial interest in a business entity known as

16 JECE?

17 A I'm going to have to respond to that

18 question. 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

24 beneficial interest even as 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 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 employee of Florida Science

16 Foundation?

17 A Yes.

18 Q What do you your role as

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 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

417 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 ■■■ 7 of your questions here today, my counsel has 8 advised me that ■■■ least today I must assert my 9 rights under the Sixth, Fifth and Fourteenth 10 Amendment. 11 Q Who else, ■■■ 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 ■■■■ 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 ■■■ 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	419 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 ■■■ you review any materials, such ■■■ 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, ■■■ 15 those notes that you have made or reviewed in 16 preparation for your continuation of ■■■ 17 deposition here today? 18 A No. 19 Q In ■■■ past you've told ■■■■ 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 ■■■■ specific, and hopefully ■■■ 25 jog your memory, do you remember telling me you
418 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 ■■■ 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 ■■■■ against 23 you and she ■■■■ of ■■■■ representative 24 plaintiffs here today. ■■■■ you do anything to 25 prepare for your deposition today?	420 1 like L.M., but don't like my other two, ■■■■ 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 ■■■■ 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 ■■■■ you sexually molest Jane Doe when 15 she ■■■■ 14 and ■■■■ years old? 16 MR. PIKE: Form. 17 A I would like to answer all of your 18 19 20 21 22 23 24 25

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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.
 5 MR. EDWARDS: Move to strike ■
 6 nonresponsive.
 7 Q When you say you would ■ to ■
 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?
 12 MR. PIKE: I instruct you not to answer
 13 that question.
 14 MR. EDWARDS: On what ground?
 15 MR. PIKE: I don't need to give you
 16 grounds.
 17 MR. EDWARDS: It is not a privilege,
 18 just something you're instructing him not to
 19 answer?
 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 ■ ■ result of his advice
 24 of counsel. Your question elicits
 25 attorney/client communications ■ well as

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1 work product.
 2 Q So, attorney/client work product ■ the
 3 basis for your objection? I understand.
 4 MR. PIKE: Yeah.
 5 Q Mr. Epstein, ■ you going to follow
 6 your advice of counsel and invoke your ■
 7 Amendment right against self-incrimination and
 8 not ■ that question?
 9 A I'm going to follow my advice of
 10 counsel.
 11 Q Mr. Epstein, ■ you familiar with the
 12 laws in Florida ■ lewd and lascivious
 13 molestation?
 14 MR. PIKE: Form.
 15 A On advice of counsel I have to assert my
 16 rights with the Sixth, Fifth and Fourteenth
 17 Amendment.
 18 Q Do you understand my question in that
 19 I'm not asking you whether you committed any
 20 crimes related ■ the statute, only whether ■
 21 not you ■ familiar with the Florida statute on
 22 lewd and lascivious molestation; do you
 23 understand that question?
 24 MR. PIKE: Form.
 25 A What does "familiar" mean.

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1 Q Have you read the statute ■ been
 2 instructed upon the Florida statute related ■
 3 lewd and lascivious molestation?
 4 MR. PIKE: Form, instruct you not to
 5 answer that question, attorney/client work
 6 product, as worded.
 7 Q Other than your attorney telling you
 8 about ■ statute, or reading ■ ■ to
 9 you, I certainly do ■ ■ and ■ 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?
 16 MR. PIKE: Form.
 17 A Though I would like ■ ■ 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.
 22 Q Lewd and lascivious molestation ■
 23 defined in Florida ■ ■ a person who intentionally
 24 touches ■ ■ lewd ■ lascivious ■ the
 25 breasts, genitals, general area, ■ buttocks, or

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1 the clothing covering them, of ■ a person less than
 2 16 years of age, ■ forces or entices ■ person
 3 under ■ years of age to so touch the
 4 perpetrator."
 5 Having read that, isn't that a statute
 6 that you violated ■ numerous occasions against
 7 Jane Doe when she ■ ■ a minor?
 8 MR. PIKE: Form.
 9 A I would -- have to assert my rights
 10 under the Sixth, Fifth and Fourteenth Amendment
 11 upon advice of counsel, Mr. Edwards.
 12 Q Subchapter six of that statute involves
 13 ■ crime of lewd and lascivious conduct that in
 14 Florida ■ ■ a person who intentionally
 15 touches a person under 16 years of age in a lewd
 16 and lascivious manner, or ■ person who
 17 intentionally masturbates in the presence of a
 18 victim under 16 years of age." Those ■ also
 19 sections of that Florida statute that you
 20 violated against the then minor, Jane Doe; is
 21 that true?
 22 MR. PIKE: Form.
 23 A I would like ■ answer all of your
 24 questions with respect to Jane Doe, Mr. Edwards.
 25 However, today my counsel has advised me that I

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 [REDACTED] 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

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 [REDACTED] 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 [REDACTED] that you would like to answer
25 questions about whether or not you violated

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 [REDACTED] 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? [REDACTED] 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 [REDACTED] Scott
23 Rothstein did, affects your [REDACTED] to my question
24 as to whether or not you molested Jane Doe back
25 in 2003 and 2004?

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 [REDACTED] wait for the next deposition and again there
12 is assertion of a [REDACTED] Amendment right. Is
13 there [REDACTED] going [REDACTED] a day where you do [REDACTED]
14 the questions?

15 MR. PIKE: Form. Move to strike.

16 A On advice of counsel, [REDACTED] 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 [REDACTED] most of the [REDACTED] were brought by [REDACTED] or my
25 former partner, Scott Rothstein. My

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1 understanding is that there were more than ■
 2 ■ brought against you alleging you sexually
 3 abused minors, and I have personally only ■
 4 three. How many are you aware of in addition to
 5 the three that Scott Rothstein filed, or brought,
 6 ■ 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, ■
 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 ■ of Jane Doe
 21 against Jeffrey Epstein is ■ 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 ■ 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, ■
 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 ■ close friend of
 21 yours today; ■ that right?
 22 MR. PIKE: Form.
 23 A Though I would like to ■ 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 ■ 12 years
 8 ■ for you to illegally engage in sex with?
 9 MR. PIKE: Form.
 10 A I'm going ■ 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 ■ I must assert my rights
 15 under the Sixth, Fifth and Fourteenth Amendment.
 16 Q ■ fact, you know ■ ■ served Mr.
 17 Brunel for deposition in this case. Are you
 18 ■ 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 ■ house guest at your house

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1 on ■ 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. ■ has
 12 been ■ house guest of yours during the year 2010,
 13 and you're choosing to invoke your ■
 14 Amendment right against self-incrimination and
 15 basing ■ ■ your counsel's advice.
 16 Does your counsel know that you made
 17 that representation ■ 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.

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 ■ way: Have you indicated to your
 6 Probation Officer ■ 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, ■ 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 ■ Mr. Brunel tell you ■ Tama Kudman
 20 was ■ attorney that ■ ■ represent him
 21 in ■ 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

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 ■ entity that you ■
 6 or control pay for the services of Tama Kudman to
 7 represent Jean Luc Brunel, ■ 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 ■
 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 ■ is "No," and I just want to make sure
 18 ■ are all on the same page, that that was not
 19 your indication and ■ we can ignore those
 20 types of body movements, as Mr. Pike instructed
 21 ■ that ■ the case ■ 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" --

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 ■ 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 ■ matter of fact, and as
 14 you know, since you tried several cases,
 15 there is ■ 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 -- ■ I would make sure -- we are a
 24 little inconsistent obviously as to what the
 25 jury should be observing, what they ■,

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 ■ "no" or is the ■ that you ■
 7 invoking your Fifth Amendment right to remain
 8 silent?
 9 MR. PIKE: Form.
 10 A With respect to that question, ■ 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

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 ■■■ a
10 smile that I would characterize ■ ■ smirk, prior
11 to that answer, and I would like to understand,
12 ■■■ 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 ■■■ play the video for
18 whether or not it is harassing.

19 MR. PIKE: You can play the video, but
20 if someone raises ■■ eyebrow, blinks, does
21 something, it is... it is... for you to
22 follow up with ■ harassing question is not
23 only improper, but it is ■ waste of time, of
24 attorney resources as well ■ judicial
25 resources. I'm going to let you proceed, I

1 mean, but... — come on.

2 MR. EDWARDS: With all due respect, I'm
3 interpreting it as ■■ 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 ■ jury could make
10 that ■■■ inference, ■ 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

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 ■ 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.

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 ■
11 ■■■ 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 ■■ 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

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, ■
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 ■ the last answer which I have been
18 told ■ responsive.

19 THE COURT REPORTER: Certainly.

20 (The record was read.)

21 Q Mr. Epstein, why is it that you would
22 like ■ ■ 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

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 I
4 I don't do so, I risk losing that representation.

5 Q What is special about the question of
6 you molesting children ■ ■ daily basis for the
7 better part of two decades, that you would
8 especially ■ ■ ■ 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 ■■■
16 day basis. And I'm asking now, what ■ 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 ■ well as your other questions here
22 today, Mr. Edwards, upon advice of counsel,
23 they've told ■ I must assert my rights under the
24 Sixth, Fifth and Fourteenth Amendment, or risk
25 losing my representation.

1 witness's testimony.

2 A I would like to answer that question, as
3 well ■ 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 ■ ■ daily basis?

23 MR. PIKE: Form.

24 A I would like to answer every one of your
25 questions here today, Mr. Edwards, especially

1 Q Is ■ true that you have intentionally
2 preyed on vulnerable children ■ young ■ 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, ■■■ of ■ 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 ■ ■ 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

445 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 that part of the plan to 25 access young girls between 12 and 17 years old in	447 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 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
446 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 the 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.	448 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 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 at 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 ■ 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, ■ 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 ■ 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 ■ 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 ■ 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 ■ 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, ■ 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 ■ 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, ■ 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 ■ that your attorneys will no

7 longer represent you ■ 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 ■ 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, ■
 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 ■■■ 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," ■■■ 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, ■■■ 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 ■■■ you
 23 home and you sexually molest her, she will then
 24 be paid cash; ■■■ 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 ■■■ made ■■■ each
 8 underage minor female as well. That is, if she
 9 brings you other underage minor females ■■■
 10 you can sexually abuse, then you would pay a
 11 finder's fee for each underage minor female
 12 brought to you; ■■■ that correct?
 13 MR. PIKE: Form.
 14 A I would like to answer every ■■■ of the
 15 questions you've posed here today, Mr. Edwards.
 16 However, today at least, upon advice of counsel,
 17 they have instructed ■■■ I must assert my rights
 18 under the Sixth, Fifth and Fourteenth Amendment.
 19 Q Haley Robson ■■■ 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. ■■■ an underage minor female that
 4 you first abused when she ■■■ 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. ■■■ 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 ■■■ age 14; is that correct?
 24 MR. PIKE: Form.
 25 A I would like to answer the questions

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 ■ ■ operative complaint in
6 Jane Doe ■ ■ Jeffrey Epstein ■ ■ 80893,
7 referring to the plaintiff Jane Doe, first
8 indicates this ■ ■ 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 ■ ■ punish
12 you for the conduct you committed against Jane
13 Doe?

14 MR. PIKE: Form.

15 A I would like to ■ ■ that question. I
16 would like to answer all of your other questions
17 that you've posed here today, Mr. Edwards.
18 However, ■ ■ least today, on advice of counsel
19 they've instructed me that I may not and have
20 instructed ■ ■ that I must assert my rights under
21 the Sixth, Fifth and Fourteenth Amendment.

22 Q One of the allegations Jane Doe makes ■ ■
23 that Jeffrey Epstein demonstrated sexual
24 preference and obsession for minor girls. ■ ■ it
25 true that you have ■ ■ sexual preference and

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 ■ ■ that defendant
9 Epstein's planned scheme and enterprise included
10 an elaborate system wherein the then minor
11 plaintiff and other minor girls ■ ■ contacted by
12 telephone by Epstein, Sarah Kellen ■ ■ other
13 unknown employees ■ ■ 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 ■ ■ count
25 that no longer exists?

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 ■ ■ evidence that is going to
6 defeat such assertion. So I'm simply asking
7 your client..

8 Q ■ ■ 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 ■ ■ 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 ■ ■ least ■ ■ 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 ■ ■ 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 ■ ■ the time when you contacted Jane

1 Doe, ■ ■ the purpose to have her come to your
2 house and interact ■ ■ 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 ■ ■ 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 ■ ■
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 ■ ■

461 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, ■ 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 ■ have her come ■ your house for 23 you to sexually molest her? 24 MR. PIKE: Form. 25 A Though I would like to answer every	463 1 of your private airplane ■ 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 ■ 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, ■ well as every other question 17 you've posed here today. However, at least today 18 upon advice of counsel they've instructed me ■ 19 assert my Sixth, Fifth and Fourteenth Amendmen 20 right. 21 Q Isn't it true that your sexual 22 interaction with Jane Doe occurred specifically 23 during the time period, February ■ through 24 June 2005? 25 MR. PIKE: Form.
462 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 ■ time when 8 Jane Doe was ■ 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 ■ 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, ■ well ■ 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	464 1 A I'm going to have to respond to that, 2 Mr. Edwards, ■ 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 ■ 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, ■ 11 well ■ 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 ■ 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 ■ 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.

465 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 ■ 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 ■ 16 continuation, okay? He's sitting here 17 waiting for your questions but not waiting 18 to be harassed. 19 Q There ■ 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.	467 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 ■ 8 privilege asserted or it is just going to be 9 ■ 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 ■ strike. It has 18 nothing do with that. It has to do with a 19 significant fact, that on ■ 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 ■■■■■. I'm not going to let him answer 25 a harassing question, so you can then get an
466 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 ■ question, ask 12 the witness ■ question. 13 Q Why ■ you roll your eyes when I asked 14 you if you digitally penetrated Jane Doe when she 15 ■■ 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 ■ 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	468 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 ■ also true that you 5 used ■ 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 ■ also true when Jane Doe ■■ ■ 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 ■■ that I may not, and have 20 instructed me to assert my rights under the 21 Sixth, Fifth and Fourteenth Amendment. 22 Q ■ 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?

469 1 MR. PIKE: Asked and answered within 2 this deposition. 3 A Yes. 4 Q And ■■■ 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 ■ also true that you 11 entered into ■ 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 ■■ you enter into an agreement with the 20 federal government that ■ entitled 21 "Nonprosecution Agreement"? 22 A Yes. 23 Q And that Nonprosecution Agreement ■ 24 paragraph 7 indicates that "The United States 25 shall provide Epstein's attorneys with a list of	471 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 ■■■ portion of 8 ■■ document? 9 A I'm not sure what you ■■■■ by "familiar 10 with," sir. 11 Q Have you read it? 12 A Yes. 13 Q So, if Jane Doe were to bring ■ claim 14 exclusively under ■ 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.
470 1 individuals whom it has identified ■ victims, as 2 defined in 18 USC 2255, after Epstein has signed 3 this agreement, and been sentenced." Have you 4 seen ■■■■ 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 ■■ on 13 that list of victims ■■ supplied to you by 14 ■■ 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 ■■ 21 United States Attorney's Office, it indicates, 22 "If any of the individuals, referred ■■ 23 paragraph 7," referring to the list of victims, 24 "elects to file ■ lawsuit pursuant to ■ USC 25 2255, Epstein waives his right to contest	472 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, ■ 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, ■■ you knowingly and 22 willfully conspire with others ■ travel 23 interstate for the purpose of engaging in illicit 24 sexual conduct with minors, including Jane Doe? 25 MR. PIKE: Form.

1 A Though I would like to ■■■■ 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 ■■■ a telephone ■
9 knowingly persuade, induce or entice minor
10 females, including Jane Doe, to engage ■
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, ■■■ you travel, interstate
19 commerce for the purpose of engaging ■ ■■■
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 ■ the other questions you've
25 posed here today, Mr. Edwards, I'm afraid that my

1 counsel has instructed me that I must assert my
2 rights under the Sixth, Fifth and Fourteenth
3 Amendment.

4 Q Isn't ■ 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 ■ the preceding, four
8 paragraphs, that you would admit liability unto
9 her as ■ 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 ■ in paragraph 7 elects to
15 ■ 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 ■ amount ■
18 agreed to between the identified individual and
19 Epstein, so long ■ the identified individual
20 elects ■ proceed exclusively under 18 USC
21 2255."

22 That's the provision. ■ ask you then
23 the question: Didn't you agree with the federal
24 government that ■ Jane Doe, an identified
25 victim, proceeds in a ■■ against you,

1 exclusively under 18 USC 2255, ■■■ 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, ■ well ■ 410?

8 A Though I would like to ■■■■ 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 ■ your behalf, a statement is made,
13 "Epstein ■■■ using ■ facility ■ means of
14 interstate commerce, knowingly persuaded, induced
15 or enticed Jane Doe when she was under the age of
16 ■ years, to engage in prostitution ■ sexual
17 activity for which any person ■ be charged with
18 a criminal offense ■ attempted to do so." That
19 is a ■■■ statement, true?

20 MR. PIKE: Form.

21 A Though I would like to answer that
22 question, ■ advice of counsel I have been
23 instructed to assert my rights under the Sixth,
24 Fifth and Fourteenth Amendment.

25 Q The ■■■■ ■■■ also made on your

1 behalf, "Epstein ■■■■ attempted to ■ conspired
2 to knowingly transport Jane Doe in interstate ■
3 foreign commerce ■ in any Commonwealth territory
4 ■ possession of ■ United States, with intent
5 that Jane Doe engage in prostitution or in any
6 sexual activity for which any person ■ be
7 charged with a criminal offense."

8 That ■ 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 ■■■ 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.

1 Q And then would you adopt her deposition
2 testimony ■ true and ■ 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 ■ relates to whether
8 ■ 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 ■ ■ conspired to travel in interstate ■
16 or travel into the United States ■ travel in
17 foreign ■ for the purpose of engaging in
18 illicit sexual conduct with Jane Doe," ■ also ■
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 ■ that
24 I must assert my Fifth, Sixth and Fourteenth
25 Amendment right.

1 ■ The statement that Epstein ■
2 attempted ■ ■ conspired to travel in foreign
3 ■ and engage ■ 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 ■
8 the other questions posed today, Mr. Edwards.
9 However, on the advice of counsel they've
10 instructed ■ to assert my Sixth, Fifth and
11 Fourteenth Amendment right.

12 Q In fact, you ■ contact Jane Doe when
13 she was a minor child ■ well as conspired to ■
14 a telephone ■ contact Jane Doe when she ■ ■
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 ■ you intentionally touch Jane Doe ■
25 her person and against her will or without her

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 ■ order to ■ that question, I need
7 to explain ■ you what legal consent means?

8 A Yes, sir.

9 Q Let's start with this question --

10 A Can you explain ■ to me?

11 Q Do you believe that ■ 14-year old child
12 can legally consent ■ sexual interaction with ■
13 ■ like you that was over the age of 50?

14 MR. PIKE: Form.

15 THE WITNESS: Asking for ■ 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

1 he could properly interpret your question
2 and attempt to answer it.

3 Q I'm understanding that, based ■ 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 ■ people regularly do ■ 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 ■ ■ why you're having trouble
25 answering the question and I'll clarify the

1 question for you ■ 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 ■■■■ of her body when she ■■■ 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 ■ 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 ■■■■ of her body, including her vagina,
23 her breasts, and her buttocks ■ dozens of
24 occasions between February 2003 and June ■■■?

25 MR. PIKE: Form.

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, ■■■ both extreme and
10 outrageous?

11 MR. PIKE: Form.

12 A I would like to ■■■ 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 ■■■ a minor
20 child ■■■ outrageous and so extreme in degree
21 that ■ should not be tolerated in ■ 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.

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, ■ a
5 danger ■ the middle school and high school
6 children ■ the Palm Beach community?

7 MR. PIKE: Form.

8 A Though I would like to answer that
9 question, ■ 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, ■ it your intent ■
16 ■■■ her ■■■ 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 ■ 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, ■ 14, 15,
25 16 and 17, would you agree that you showed

1 reckless disregard with the high probability of
2 causing ■■■ 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, ■ 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 ■■■ Jane Doe into
13 prostitution?

14 A Can you tell me what you mean by
15 "coerce," please?

16 Q Tell me, how ■■■ you —

17 A I've asked you a simple question. Can
18 you tell ■■■ what "coerce" means, please?

19 Q The definition of the word "coerce" will
20 allow to you ■■■ 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.

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 be in State court, under the Florida
24 State statutes or under federal statutes
25 under 2255. I think that any sort of

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 ask 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?

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 ask 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 a simple one 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 less than twice
23 during your deposition --

24 MR. EDWARDS: I'll agree with that.

25 MR. PIKE: -- relative to Jane Doe and

1 I'll object to the form.

2 A I would like to ask 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 Did you interact 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.

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 [REDACTED] time you were
8 molesting Jane Doe, didn't you [REDACTED] her that you
9 [REDACTED] 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.

1 Q Did you talk [REDACTED] George Rush in the year
2 2009 about the allegations of improper sexual
3 conduct between you [REDACTED] 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 [REDACTED] 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 [REDACTED] from The New York Daily News in 2009, did [REDACTED]
24 [REDACTED] you [REDACTED] recording your statements to
25 him?

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 [REDACTED]
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 [REDACTED] 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 [REDACTED]
23 appropriate penakty for you, for the acts that
24 you committed against Jane Doe.

25 MR. PIKE: Form.

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 [REDACTED] 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 [REDACTED]
17 I must assert my rights under the Sixth, Fifth
18 and Fourteenth Amendment.

19 Q At [REDACTED] point in time you're [REDACTED] least
20 admitting that there was [REDACTED] 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 Q Two answers ago I believe that you just
2 told us that you would like to tell the jury
3 about the evidence that exists, that shows that
4 Jane Doe consented to and was a willing
5 participant in the acts alleged. So, is there
6 any evidence that you're aware of in existence in
7 the world that shows that Jane Doe consented to
8 the acts she alleged against you?

9 MR. PIKE: Form. Also calls for work
10 product information?

11 A Unfortunately today I have to respond by
12 asserting my rights of Sixth, Fifth and
13 Fourteenth Amendment.

14 THE VIDEOGRAPHER: Counsel?

15 MR. EDWARDS: Okay.

16 THE VIDEOGRAPHER: Going off the video
17 record 2:34 p.m.
18 (Pause in the proceedings.)
19 (The deposition of Jeffrey Epstein is
20 continued in Volume IV.)
21
22
23
24
25

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1 UNITED STATES DISTRICT COURT
2 SOUTHERN DISTRICT OF FLORIDA
3
4 CASE NO. 08-CV-80893-CIV-MARRAJOHNSON
5
6 JANE DOE,
7 Plaintiff,
8 vs.
9 JEFFREY EPSTEIN, et al.,
10 Defendants.
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12
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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 IV
CONTINUED VIDEOTAPED DEPOSITION OF
JEFFREY EPSTEIN TAKEN ON BEHALF OF THE PLAINTIFF

DATB: April 14, 2010

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1 THE VIDEOGRAPHER: Back on the video
2 record 2:30 p.m.
3 CROSS EXAMINATION (CONTINUED)
4 BY MR. EDWARDS:
5 Q Mr. Epstein, are you ready?
6 A Yes.
7 Q The second affirmative defense indicates
8 or says that Jane Doe "actually consented to and
9 participated in conduct similar and/or identical
10 to the acts alleged with other persons, which
11 was the sole or contributing cause of Jane Doe's
12 alleged damages."
13 What facts or information do you have to
14 support that affirmative defense?
15 MR. PIKE: Form. May also call for work
16 product information.
17 A Though I would like to answer all your
18 questions, Mr. Edwards, at least today counsel
19 advised me I must assert my rights under the
20 Sixth, Fifth and Fourteenth Amendment.
21 Q And when you say that an affirmative
22 defense Jane Doe consented to and participated in
23 conduct similar and/or identical to the acts
24 alleged, are you saying that at some other time
25 Jane Doe was sexually molested by somebody of

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1 similar or identical age to yourself?
2 MR. PIKE: Form.
3 A I would like to answer all of your
4 questions with respect to Jane Doe and her
5 complaints. However, at least today my counsel
6 has advised me I must assert my rights under the
7 Sixth, Fifth and Fourteenth Amendment.
8 Q The second part of that affirmative
9 defense indicates that that similar to identical
10 conduct that Jane Doe allegedly participated in,
11 was the sole or contributing cause of Jane Doe's
12 alleged damages.
13 Are you acknowledging that that conduct
14 is likely to cause damages to a minor such
15 as Jane Doe?
16 MR. PIKE: Form.
17 A I would like to answer all of your
18 questions with respect to Jane Doe and her
19 complaints... complaint. However, at least today
20 my counsel has advised me I must assert my rights
21 under the Sixth, Fifth and Fourteenth Amendment.
22 Q Are you taking the position that Jane
23 Doe's alleged damages were actually caused by a
24 separate or other child molester?
25 MR. PIKE: One second... object to the

1 form. I think you need to reword the
2 question.

3 MR. EDWARDS: Okay. I'll ask it again.

4 Q Is ■ your position, or do you have
5 facts ■ information that Jane Doe was molested
6 by ■ separate ■ 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, ■ least today
11 under advice of counsel, I have been instructed ■
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 to 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 ■ —

1 MR. PIKE: May also call for work
2 product information. Sorry.

3 Q ■ you ■ 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 ■ conduct?

8 MR. PIKE: Form.

9 A What's the question?

10 Q ■ 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

1 believed or ■ told that the plaintiff, Jane
2 Doe, had attained the age of ■ years old at ■
3 time of the alleged acts." That is ■ 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, ■ 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 ■ you when you asked
22 her ■ that she ■ ■ years old?

23 MR. PIKE: Form.

24 A I would like to answer that question
25 because I've answered most of your other

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 ■ you
6 were told that Jane Doe attained the age of 18.

7 Tell the jury, who ■ you that Jane
8 Doe had attained the age of 18 years old when you
9 engaged ■ sexual conduct with her?

10 MR. PIKE: Form.

11 A Though I would like very much to answer
12 that question, ■ 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 ■ years old, you would not
18 have engaged ■ 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, ■ least today, my counsel advised ■
24 that I must assert my rights under the Sixth,
25 Fifth and Fourteenth Amendment.

1 Q ■ 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 ■
4 and you turned them away, ■ 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 ■ 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, ■ well ■ 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

1 today at least, they've instructed ■ 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 ■
5 slave when she ■ between ■ ages of 15 and ■
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 ■ the sex
19 slave for Gislaine Maxwell ■ the same time or
20 about the same time that V.R. ■ 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.

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, ■ young ■
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 ■ 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 ■ 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 ■ 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

1 against you under the pseudonym Jane Doe ■
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. ■ somebody that ■ a lawsuit
7 against you under the pseudonym Jane ■ 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 ■ a friend of Jeffrey Epstein sent him
16 three 12-year ■ girls from France, who spoke ■
17 English, for defendant Epstein to sexually
18 exploit and abuse. After doing so, they were
19 sent back ■ 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, ■ least today, my counsel
24 has advised ■ that I must assert my rights under
25 the Sixth, Fifth and Fourteenth Amendment.

505 1 Q In the complaint filed ■■ behalf of Jane 2 Doe number 102 also known ■■ V.R., was ■■ 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 ■■ few questions 14 back about your sexual interaction and 15 intercourse with 12-year old girls and derived 16 that from this complaint, your ■■■■■ -- into 17 your ■■■■■ injected ■■■■ response related to 18 Scott Rothstein, and ■■ my question is, what do 19 you believe, if anything, Scott Rothstein ■■■ 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.	507 1 Amendment right. 2 MR. EDWARDS: Mark this. 3 (Order form from Amazon.com, listing 4 three books, ■■■ marked ■■ 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 ■■■■ 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 ■■■■ order form, Exhibit number 9? 18 A No. 19 Q Do you know why it is, can you explain 20 how that document came ■■ exist? 21 A No. 22 Q Do you know where that document that 23 you're holding marked as Exhibit number 9 ■■■■ 24 from? 25 A No.
506 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 ■■ least one 6 sex slave at all times. Is that true? 7 MR. PIKE: Form. 8 A I would like ■■ 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 ■■ 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 ■■ 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	508 1 Q Would you be surprised if ■■ 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 ■■■■ 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 ■■ 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 ■■■■

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1 obtained from a trash pull ■ your house?

2 A You're asking ■ a hypothetical

3 question. I have no idea.

4 Q What is the ■ 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 ■ that document you cannot ■

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?

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1 A Correct.

2 Q Can I see the document?

3 A (Handing to counsel.)

4 Q Mr. Epstein, the person whose deposition

5 ■ 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 ■ 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 ■ ordered to your house, the

24 shipping address and billing address both being

25 ■ 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 ■ 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 ■ question.

9 MR. EDWARDS: ■ is just placed on the

10 table. I'm waiting for ■ answer.

11 MR. PIKE: I'm not being smarter. I'm

12 just saying, ■ 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 ■ question and

16 many waiting for an answer.

17 MR. PIKE: Seriously, I'm not trying to

18 be rude or smart. You put ■ 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, ■ 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 ■

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 ■ -- that were taken from your

14 home ■ 358 ■ 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 ■ 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 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 she 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?

516

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

1 to give [REDACTED] 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 [REDACTED] message for Ashley to confirm for 11:00
 11 o'clock [REDACTED] Vanessa for 4:30"?
 12 A I don't recall.
 13 Q And when a message such as that is left,
 14 [REDACTED] that indicating Ashley is going to [REDACTED] to
 15 your house for you to molest her [REDACTED] 11:00 and
 16 Vanessa will come for you to molest her [REDACTED] 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 [REDACTED] least,

1 they've advised me I must assert my right under
 2 the Sixth, Fifth and Fourteenth Amendment.
 3 Q [REDACTED] you [REDACTED] employ any underage minor
 4 females for any legitimate purpose at your home,
 5 358 [REDACTED] 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, [REDACTED] each
 13 underage minor female that contacted -- that
 14 called your home [REDACTED] called from your home,
 15 [REDACTED] called for the purposes of coming to your
 16 house [REDACTED] 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 [REDACTED]
 21 way, which is although I would like to [REDACTED]
 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.

1 Q In a newspaper article dated October 30,
 2 2006 entitled, "The Return Of A," [REDACTED] 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 [REDACTED] erotic life and
 8 his escape isn't alcohol [REDACTED] drugs, [REDACTED] 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, [REDACTED] it is a true statement that your
 14 life is about making money and living [REDACTED] erotic
 15 [REDACTED] and your escape is not alcohol [REDACTED] 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

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 [REDACTED] 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 [REDACTED] a genius, I wouldn't be
 11 sitting here, [REDACTED] guy with [REDACTED] issues;" do you
 12 remember saying that?
 13 MR. PIKE: Form.
 14 Q -- [REDACTED] 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 ■ 3:15 p.m.
 18 Q ■ 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 ■ ■ ■ ■ ■ talking to
 4 ■ ■ ■ and said, 'What can I say? I like young
 5 girls.'" Is that ■ comment or statement that you
 6 made ■ Michael Wolff?
 7 MR. PIKE: Form.
 8 A Unfortunately I have to respond to that
 9 question ■ 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 ■
 14 one of your attorneys, Jack Goldberger, has made
 15 the statement "Jeffrey Epstein ■ ■ ■ ■ ■ denied
 16 that the girls came ■ 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 ■ attorney's statement?
 22 Q Right, Jack Goldberger's statement.
 23 A So what's the question?
 24 MR. PIKE: You can't — hold ■ 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 ■ 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 ■ ■ ■ related to
 13 the criminal investigation of you.
 14 Do you admit that the girls,
 15 specifically Jane Doe, ■ ■ ■ 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 ■ I must assert my rights under the
 20 Sixth, Fifth and Fourteenth Amendment.
 21 Q Mr. Epstein, can you ■ ■ ■ 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 ■ ■ ■ 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 ■ ■ ■ you paid her to have
 16 underage minor females brought ■ your house, at
 17 specific times, ■ 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, ■ she
 24 ■ ■ ■ in the Nonprosecution Agreement, is
 25 Lesley Groff. What role ■ she play or what did

1 she conspire with you ■ 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 ■ 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 ■ 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 ■ 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 ■■■■■ 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 ■ ■ 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 ■■■■ 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 Gialaine 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 ■ advice of counsel by invoking my
4 rights under the Sixth, Fifth and Fourteenth
5 Amendment.

6 Q ■ you have any ■■■■■ 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 ■ 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 ■ the Virgin Islands while you
23 have been ■ house arrest?

24 MR. PIKE: Form.

25 A Mr. Edwards, though I would like to

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 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

1 MS. EZELL: Okay. I will 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 I will continue to answer
18 advice of counsel, I believe, all 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"?

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 your 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 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?

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 Jane Doe 103 was 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 I will 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

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1 ■ relevant ■ this lawsuit."

2 If you were asked that ■ question

3 today, would your ■ 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 ■ 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 ■ your questions, any of your

23 questions that may be relevant ■ this lawsuit."

24 MR. PIKE: Form.

25 Q What would your ■ be today to that

534

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 ■ 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 ■ 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," ■ you said,

23 "I ■ these questions -- I would like ■

24 answer every ■ of those questions. However, my

25 counsel has told ■ I may not today. I wish I

535

1 could ■ 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 ■ asked —

8 THE WITNESS: Can we go off the record

9 for ■ 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 ■ 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 ■ the video

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1 record 3:33 p.m.

2 Q Later ■ that ■ deposition, Mr.

3 Horowitz asked "Did you have surveillance ■

4 in either the interior or exterior of your ■

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 ■ 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 ■

12 that I may not today, and therefore have to

13 invoke my Fourteenth Amendment rights, my Sixth

14 Amendment rights and my ■ Amendment rights as

15 provided by the U.S. Constitution."

16 So what about today? Can you ■

17 ■ question for ■ 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.

537 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.	539 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 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.
538 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 answer that question.	540 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 -- risk of 24 incriminating yourself with such a document. Do 25 you still maintain the objection?

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, ■■■ 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, ■■ 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 ■■■ questions
18 regarding the plan or scheme. ■■ try ■■ to,
19 that have already been covered today. To the
20 extent that they didn't just apply to ■■ one
21 plaintiff, in most instances, I believe ■■ Mr.
22 Edwards said, "young women" or "young girls like
23 ■■ including Jane Doe," but there were a few
24 additional questions ■■ that ■■ I wanted to
25 ask.

1 Within that arrangement whereby girls
2 would ■■■ 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 ■■■ ■■ 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 ■■
12 to assert my rights as protected by the Sixth,
13 Fifth and Fourteenth Amendment.

14 Q Also, within that ■■■ scheme, ■■■
15 these girls sometimes transported to ■■ from your
16 house by the current houseman employed by you ■■
17 ■■ time?

18 MR. PIKE: Form.

19 A Though I would like to answer all your
20 questions, Ms. Ezell, that question as well ■■
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 ■■
25 discussed previously, ■■■ these ■■■ young ■■■

1 who ■■■ to your home ■■ provide massages and
2 other sexual gratification for you, ■■■ 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 ■■ 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 ■■ ■■
15 sort of a ritual that was followed ■■ regard to
16 how they ■■■ treated, what they ■■■ asked ■■ 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 ■■ question.

21 THE WITNESS: What's the question?

22 MR. PIKE: What is the question?

23 Q From ■■ first visit ■■ girl might make
24 to your home, ■■■ there ■■ ritual ■■ routine that
25 was followed with regard ■■ what happened during

1 that visit?

2 MR. PIKE: Form.

3 A Ms. Ezell, I would like to 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 ■■■ area, would Ms. Kellen ■■
12 ■■ 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 ■■ 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 ■■
23 girl would ■■■ for ■■ first time, that she
24 would be accompanied to the massage ■■■ by
25 another ■■■ or girl?

MR. PIKE: Form.

A Ms. Ezell, I have to answer that question as I answered most of your other questions today, which is on advice of counsel, I have to assert my rights as protected by the Sixth, Fifth and Fourteenth Amendment.

Q Did it occur quite often that Sarah Kellen would lead the girl up and introduce you to her and then quietly leave?

MR. PIKE: Form.

A Ma'am, I'm going to respectfully have to decline to answer that question today on advice of counsel. They've asked me to assert my rights as protected by the Sixth, Fifth and Fourteenth Amendment. I would like to answer each and every one of your questions.

Q Did [redacted] also occur sometime that the girl would [redacted] accompanied by [redacted] girl who brought her, and the girl who brought her would go [redacted] to your bedroom and massage [redacted] with her, [redacted] her initial visit?

MR. PIKE: Form.

A Again? Can you -- what's the question?

Q I'm asking about whether [redacted] not there [redacted] sort of routine that [redacted] followed when the

respectfully decline to answer that question, on advice of counsel, they've asked me to assert my rights as protected by the Sixth, Fifth and Fourteenth Amendment.

Q Did either Ms. Kellen, or you, [redacted] the girl who perhaps [redacted] been there before instruct the [redacted] girl [redacted] begin by massaging the back of your legs and your back?

MR. PIKE: Form.

A I would like to respond to all your questions, but unfortunately at least today, my counsel has advised me I must assert my rights as protected by the Sixth, Fifth and Fourteenth Amendment.

Q And [redacted] you [redacted] Ms. Kellen generally ask the girls or instruct the girls [redacted] their clothing?

MR. PIKE: Form.

A Unfortunately, Ms. Ezell I have to respectfully decline to answer that question today. On advice of counsel, they've asked me to assert my Sixth Amendment, Fifth Amendment and Fourteenth Amendment right.

Q After having the back of your legs -- the feet, the back of your legs and your back

girls would [redacted] to your home to provide the massages and other sexual gratification for you. I'm asking whether or not part of that routine [redacted] that they would be accompanied by the girl who brought them?

MR. PIKE: Form.

A I'm going to have to, on advice of counsel, answer that question by asserting my rights as protected by the Sixth, Fifth and Fourteenth Amendment.

Q If they were accompanied by the girl who brought them, would it be your usual practice to allow them to start the massage and then [redacted] the girl who had brought the second girl for her first visit?

MR. PIKE: Form.

A I'm going to do my best to respond to these questions, but my counsel has advised me that I must assert my rights as protected by the Sixth, Fifth and Fourteenth Amendment, Ms. Ezell, so I respectfully must decline.

Q [redacted] you have a routine way that you [redacted] massage itself to be conducted?

MR. PIKE: Form.

A Ms. Ezell, I'm going to have to

massaged, would you then typically turn over, exposing yourself, laying [redacted] your back?

MR. PIKE: Form.

A Ms. Ezell, I'm going to respectfully have to decline to answer that question today, because my counsel has asked [redacted] to assert my Sixth Amendment, Fifth Amendment and Fourteenth Amendment right, though I would like to answer every one of your questions.

Q Would it be your practice at [redacted] point, depending on [redacted] skittishness of the girl [redacted] begin trying [redacted] fondle her breasts or rub her vagina?

MR. PIKE: Form.

A Ma'am, I respectfully have to decline to [redacted] that today, though I would like to [redacted] each [redacted] of these questions. My counsel has instructed me [redacted] assert my Sixth Amendment, Fifth Amendment and Fourteenth Amendment right.

Q Assuming the girl was ill at ease, would [redacted] be your practice to then talk with her to try [redacted] elicit from her, her interests, her goals, [redacted] things that [redacted] important to her [redacted] her life?

MR. PIKE: Form.

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 ■ skittish, to perhaps wait until the
9 second visit ■ 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 ■ nothing
20 wrong with what ■ 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 ■
8 train is going by.

9 A Ms. Ezell, unfortunately I have to
10 respond to that question ■ 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 ■ new girl
16 \$200 for ■ massage, either by telling her that
17 the money ■ on the counter ■ 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, ■ it your practice to pay the
2 procuring girl at least ■ 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 ■ every time they brought ■ 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, ■ you keep that promise
20 ■ either pay them directly ■ have Ms. Kellen
21 pay the procurer \$200 for each new girl ■ 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 ■ protected by the Sixth, Fifth and
4 Fourteenth Amendment.

5 THE WITNESS: Can we take ■ 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 ■ 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 ■ 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 ■ pattern or scheme or

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 ■■■■ 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 ■■■■ so there is no
 10 confusion here?
 11 Q A.H. Is "A.H.," She ■ Jane Doe 103.
 12 A I'm going to have to respond to that
 13 question, ■ I responded to all your other
 14 questions, Ms. Ezell, respectfully, and on advice
 15 of counsel I have to assert my rights ■
 16 protected by the Sixth, Fifth and Fourteenth
 17 Amendment.
 18 Q And when she did refuse to do that, ■
 19 you begin ■ try to touch her and paw at her and
 20 ■■■■ of her clothing?
 21 MR. PIKE: Form.
 22 A Ma'am, I would respectfully -- I would
 23 like to answer that question, ■ I would like to
 24 answer most of the questions you've posed here
 25 today. Respectfully, I'm going to have to

1 decline on advice of counsel and invoke my Sixth
 2 Amendment, Fifth Amendment and Fourteenth
 3 Amendment right.
 4 Q Over ■ approximately 17 months that
 5 A.H. came to your home, did you or your agents
 6 frequently call her at her home number ■ 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 ■ day?
 11 MR. PIKE: Form.
 12 Q Let's break ■ up.
 13 During the 17 months that she ■■■■ to
 14 your home, did ■ frequently happen that you or
 15 one of your agents would call ahead of time to
 16 tell her that you would be coming ■ 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

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 ■ 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 ■ 4:05 o'clock, p.m., sine die.)
 17
 18
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 25

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 continued 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
 ■ Large. My Commission expires
 March 13, 2011.

557

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.

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15 Notary Public, State of Florida.
16 My commission No.
17 Expires March 13, 2011.

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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
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 his deposition, he signed the _____
19 in the presence of the undersigned authority on
20 the _____ day of _____ 2010.

21
22
23
24
25

559

1 ERRATA SHEET
2 In Re: JANE DOE V. EPSTEIN
3 DO NOT WRITE ON TRANSCRIPT
4 ENTER CHANGES HERE:

5
6
7
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9
10
11
12
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14
15

16 JEFFREY EPSTEIN

17
18

19 THE STATE OF FLORIDA)
20 COUNTY OF PALM BEACH)
21 I DO HEREBY CERTIFY THAT JEFFREY EPSTEIN
22 appeared before _____ and stated that he has read
23 his deposition; further, that this Errata Sheet
24 _____ signed in my presence on this _____ day
25 of _____ 2010.

560

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 April 19, 2010

8 BURMAN, CRITTON, LUTHER & COLEMAN
9 303 Banyon Boulevard
10 Suite 100
11 West Palm Beach, Florida 33401

12 ATTENTION: MICHAEL PIKE, ESQ.

13 In Re: JANE DOE V. EPSTEIN

14 Deposition of: JEFFREY EPSTEIN

15
16 Dear Mr. Pike:

17 Since counsel have agreed that you may
18 have the witness read and sign your copy of the
19 deposition, for your convenience, enclosed
20 herewith you will find an Errata Sheet for the
21 witness' use in entering any changes to the
22 deposition.

23 Thank you for your prompt attention.
24 Cordially yours,
25 U.S. LEGAL SUPPORT

TERRI BECKER, Registered
Professional Reporter, Notary
Public, State of Florida
Large. My commission expires
March 13, 2011.

CC: Adam Horowitz, Esq.
Bradley Edwards, Esq.
Katherine Ezell, Esq.

ATTACHMENT 5

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

VIDEO-CONFERENCED 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

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 MR. LUTTIER:

25 Q. Did it cause you to have fear?

1 A. Yeah.

2 Q. Fear of him, I would [REDACTED]

3 A. Yeah.

4 Q. Has -- up to that point in time, how [REDACTED]
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 [REDACTED] 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?

1 MR. HOROWITZ: Object to the form.

2 THE WITNESS: What is [REDACTED] 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 [REDACTED] 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.

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 ■■■ 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 ■■■ 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 I was the middle of my sophomore
16 year. I ■■■ 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 ■■■ 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 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 ■
5 note somewhere, you noted ■ on ■ 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 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 ■■■ 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 Haley Robson about going ■■■ 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 ■■■ 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 ■■■ 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 ■ month beforehand, two months
25 beforehand, six months beforehand?

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, 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 a 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

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?

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 --
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 I 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

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. -- 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. 502008CA028058XXXXMB AD

E.W.

Plaintiff,

-vs-

JEFFREY EPSTEIN,

Defendant.

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 ■ 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.

Q. Okay. And did you tell her?
 A. Yes.
 Q. And what was her -- what did you tell her
 happened those five or ten times?
 A. I told her that I --
 Q. Before -- let me -- let me just withdraw that
 question.
 Before --
 A. You're not done?
 Q. Before you asked Melissa to go to
 Mr. Epstein's home, if I understand it correctly, you
 may have been at Mr. Epstein's home five, ten times; is
 that correct?
 A. To the best of my knowledge.
 Q. All right. And you would tell Melissa what
 went ■ at Mr. Epstein's home?
 A. Yes.
 Q. Okay.
 A. When I asked her to go, I told her it's -- you
 know, pretty plain and obvious that I would tell her
 why.
 Q. And did you -- when you told her what had gone
 on at Mr. Epstein's home and you asked her if she wanted
 to go, what did you tell her?
 A. I told her that, you know, he would pay me

1 \$200 and her \$200 for ■ 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 ■ 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 ■ 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 ■ 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 ■ 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 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 ■ 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 -- the least I took to his house.

Q. Did you consider yourself to be a pimp?

A. No.

MR. EDWARDS: Form.

Q. So she was acting as a pimp for you?

MR. EDWARDS: Form.

THE WITNESS: Right.

BY MR. CRITTON:

Q. True?

A. True.

Q. Because she made money off taking you there?

A. Correct.

Q. Okay. Did you consider yourself a prostitute?

Have you ever considered yourself to be a prostitute?

A. With Jeffrey Epstein, yes.

Q. With anyone else?

A. No.

Q. So you considered yourself to be a prostitute with Mr. Epstein and you knew what you were doing --

A. Was wrong.

Q. -- was wrong?

A. Yes.

Q. And so you participated, and I know your view, but you participated in whatever wrongful activity was occurring at the same time, true?

A. True, as a 15-year-old juvenile, true, 14-year-old, 15-year-old juvenile, true.

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.

When you knew Jane Doe, before she went to Mr. Epstein's, were you -- were you aware of -- well, I think you said you were aware that she would smoke pot, she would drink with you, true?

A. True.

Q. Were you aware of boyfriends that she had before she went to Mr. Epstein's home; that is, what her relationship history was?

A. No, I really didn't know much about her other than she was Melissa's friend.

Q. And you -- you said you had met Batu (phonetic), correct?

A. Correct.

Q. When did you say the last time was that you spoke with Jane Doe?

A. When she had her baby.

Q. Do you know what year that was?

A. No, I don't.

Q. If I was to suggest it was in '08, would that meet with your recollection?

A. I was going to say somewhere around there.

Q. Did you tell Jane Doe that you had filed a lawsuit against Mr. Epstein?

A. Yes, I did.

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 ■ 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 ■ 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 ■ going to hurt me.

Q. He was ■ violent with you, ■ he?

MR. EDWARDS: Form.

THE WITNESS: I guess -- what do you consider violent ■ I can answer this --

BY MR. CRITTON:

Q. Physically violent with you.

MR. EDWARDS: Form.

THE WITNESS: Physically violent, ■ 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 ■ 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, ■ that every time you ■ there?

A. Of course.

Q. Did he ever try to restrain you in any way?

A. Yes.

Q. In what way?

A. There was times where he's put -- inserted his fingers in my vagina and I didn't want him to. After it ■ done and I tried pulling away, and he did not release his fingers from my vagina. So that's being a little bit physical with somebody.

Q. Let me ask you this: When L.M. told you that she had been going to Mr. Epstein's house, what did she tell you? I mean, other -- she told you that you could make \$200 if you go to his house, or if you bring another girl you could make \$200, correct?

A. Yes. L.M. really wasn't up front with me. She didn't tell ■ that he ■ going to masturbate in front of me. She told ■ it ■ a massage for \$200, and basically that you did have to -- you could get undressed or you didn't have to get undressed and massage him for \$200.

Q. Prior to the time that -- well, let me strike that.

When L.M. told you about Mr. Epstein, did she ask you if you wanted to go?

A. Excuse me?

Q. When L.M. told you about Mr. Epstein, did she tell you -- or ask you if you wanted to go?

A. Not right away, no.

Q. She just told you about him?

A. Yes.

Q. At some point, did she ask you if you wanted to go?

A. Yes.

Q. And did you say, sure?

A. Yes, after she told me that all ■ would have to do is massage him and I didn't have to take my clothes off, I had the choice to take my clothes off if I -- I didn't have to, and you know that -- yeah, he had ■ great mansion and he had a chef and we could go there and, you know, get food cooked for us and hang out in a wonderful house and get paid \$200 for just giving somebody a massage, you know, yeah.

Q. Had you ■ -- had you ever given someone a massage before?

A. No.

Q. Did -- did you tell her that you had never given anyone ■ massage, her meaning L.M.?

A. Well, no, I never -- no, I didn't say L.M., I never gave anybody a massage, no.

Q. So basically, she --

A. I mean, besides -- I mean, actually me and L.M. would, like, massage each other, but we were girlfriends, you know. So no, I never laid out ■

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

all that you said I don't want to do this and Jeff said you had to do it anyway?

A. Yeah. I told him that at times I did not want to bring girls, and he says, yes, I want you to do it anyway; you need to do it anyway.

Q. And did you tell all the girls that you brought that Jeffrey would respect their wishes, and if they were uncomfortable doing anything, that they should just tell him that, and he wouldn't ask them to do anything that they weren't comfortable doing?

A. Yes, because I ■■■ scared.

Q. And that's, in fact, how he treated you, right?

A. Yes.

Q. You previously earned ■ degree as an esthetician; is that right?

A. Yes.

Q. And you now earned a degree since going to Mr. Epstein in massage therapy, correct?

A. Yes.

Q. And you earned both of those from the same school located on Northlake Boulevard?

A. Yes.

Q. And you could pursue a profession as ■ esthetician, a massage therapist if you so chose,

you didn't want to do?

A. At ■ 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

could you not?

A. No, not as ■ massage therapist.

Q. Why not?

A. Because I've told you once before I need to take the nationals.

Q. But no one has prevented you from taking test, right?

A. I have to wait to take the test. It only happens twice a year.

Q. And has -- did you pass the first opportunity you had?

A. No.

Q. Okay. So, when's, when's the test coming up?

A. In a few months.

Q. And are you going to take it?

A. Yes.

Q. And you could have been working as an esthetician ever since you went to Jeffrey Epstein's?

A. And I did work as an esthetician.

Q. No one has prevented you from doing that, correct?

A. No.

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, ■ 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 ■ anything wrong
16 with it, right?

17 A. Oh, I knew there ■ 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 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 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 ■ 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 Everything would be taken care of. Don't worry. It's ■
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 ■ ■ best as you ■ 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 ■ 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 ■ 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 ■ male?

4 A. Excuse me. Yes.

5 Q. When ■ 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 ■ 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 ■ 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 ■ organism 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 ■
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 ■

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 ■
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 -- 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. ■ 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 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 ■ 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 times you went to Mr. Epstein's home?

2 A. I don't know. Like 17.

3 Q. And I think you testified you ■ 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 ■ if I'm
15 wrong, please, is that when you went to
16 Mr. Epstein's home L.M. was the ■ who took you,
17 correct?

18 A. Yes.

19 Q. And it ■ your testimony that when you,
20 at ■ 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. 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 ■ 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 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 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

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 it and

15 see if I can see that far.

16 (A portion of the transcript 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 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 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 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 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
25 there, true?

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 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 use 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.

ATTACHMENT 1

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

CERTIFIED QUESTIONS

Page	Line
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153	1
159	13
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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 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 me your
 9 A Jeffrey Epstein.
 10 Q Mr. Epstein, you made a comment when you
 11 came to the [redacted] that you [redacted] appreciative of me
 12 being respectful [redacted] 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, [redacted] this
 16 point we've gone through [redacted] 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 [redacted] your
 21 house and engage [redacted] varying degrees of sexual
 22 activity, [redacted] of the girls [redacted] young [redacted] 12, [redacted]
 23 of them [redacted] old as seventeen or so, most in
 24 between, but as of yet you haven't provided [redacted]
 25 explanation.

5

1 I want to provide you an opportunity to
 2 tell [redacted] 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 [redacted] that
 7 question, frankly. However, at this time, my
 8 attorneys have told [redacted] 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 [redacted] 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 [REDACTED] 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 [REDACTED]

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 [REDACTED] 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 [REDACTED] explanation for

5 what relevance that soliloquy of yours has to,

6 whether [REDACTED] not you engaged in [REDACTED] acts with L.M.

7 When she [REDACTED] 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 [REDACTED] 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 [REDACTED] been

10 diagnosed with [REDACTED] sex addiction to minors by a

11 psychologist [REDACTED] 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 [REDACTED] 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 [REDACTED]

5 a minor?

6 A Again?

7 Q Were you sexually abused, [REDACTED] 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 [REDACTED] true that you have engaged [REDACTED]

20 [REDACTED] sexual interaction with hundreds of underage

21 minor females in the last ten years of your

22 life? Is [REDACTED] true?

23 MR. PIKE: Objection, relevance.

24 A Mr. Edwards, the current U.S. Attorney

25 has described your law firm as [REDACTED] 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 ■■■■■ 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 ■■■■■ 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 ■ legal conclusion.

21 Q You ■■■■■

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 ■■■ jury that
2 you didn't commit the crimes that have been
3 alleged against you by ■■■ various females that
4 were under age when you engaged ■ 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, ■■■ 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 ■■■ video that will be played to the jury in
19 L.M.'s trial against you and L.M. wants ■■■■■
20 The jury is going to want answers, so I know ■■■
21 you're telling ■■■ that you're going to respond at
22 ■■■■ time in ■■■ future; but the time is now.
23 Would you ■■■ this opportunity ■ explain why
24 you engaged in sexual activity ■■■ 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 ■ jury
8 is a question of fact, and it will be
9 determined by ■ judge pursuant to ■ 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 ■■■ 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 ■ didn't happen, if
2 you're saying it did happen, explain to the jury
3 why you ■■■ it. That's all I want to hear. I'm
4 being respectful about this.

5 MR. PIKE: In ■ effort to keep ■ clean
6 record be respectful to the to the court
7 reporter rather than having ■ 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 ■■■ 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 in 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 Fourth 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 in 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 you tell me you're invoking your Fourth
 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 any contact with any

1 underage students while teaching at the Dalton
 2 School?
 3 A Could you repeat that?
 4 Q Yes. Did you have any contact 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

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, ■ you've done several times before.

22 Q After leaving the Dalton School, is ■
23 true that you began working as a money manager at
24 Bear Stearns?

25 A I intend to respond to all your

1 questions regarding this lawsuit ■ ■ ■ 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 ■ part of
7 the largest fraud in Florida's history, I ■
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.

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 ■ ■ ■ already engaging in ■ ■ ■ with
17 underage minor females?

18 A As your firm has been described by the
19 U.S. Attorney, as ■ criminal enterprise, using
20 ■ ■ ■ 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.

1 Q At ■ ■ ■ point in time while at Bear
2 Stearns you met and managed ■ ■ ■ 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 ■ ■ ■ 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 ■ sexual
20 relationship with Leslie Wexler at ■ ■ ■ point ■
21 time; ■ ■ ■ 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 ■ ■ ■
16 ■ ■ ■ why you are not going to ■ ■ ■ 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 ■ you invoking your Fifth
6 Amendment rights today, if you ■ ■ ■ 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 ■ you ■ 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 ■ 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 ■ 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, ■ you know, I would really
18 like to answer these questions, but ■ this
19 moment, although ■ 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, ■ 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 ■ 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 ■ you and Ghislaine Maxwell sexually
10 assault Annie Farmer ■ Leslie Wexler's house?

11 A I intend ■ 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 ■ 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 ■
23 you for sex; isn't that correct?

24 MR. PIKE: Form, argumentative,
25 harassing?

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 ■ 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 ■ 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 ■ 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 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 ■ 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 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 ■ against ■ 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 Gallitsea
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 ■ your sexual obsession with underage
24 minor females grow at ■ point in time to allow
25 you ■ these underage minors every single

1 day for sex?

2 MR. PIKE: Overbroad. Speculation,
3 argumentative, compound, harassing and
4 confusing ■ well; ■ worded. Do you want
5 ■ break it down, Mr. Edwards?

6 Q Isn't ■ true that for the past ■
7 years you have found a way to engage ■ sexual
8 conduct with underage minors on ■ every day
9 basis?

10 MR. PIKE: Speculation. Argumentative.

11 A As your firm has been described ■ ■
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 ■ engage
24 in sexual conduct with you over the past ten
25 years?

1 A Again, ■ 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 ■ 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 ■ 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 ■ about Jane Doe 102, Jane Doe
7 102, V.R., who ■ represented by Bob
8 Josephberg's firm, had nothing to do with
9 Rothstein, Rosenfeld, Adler. ■ you know V.R.?

10 A Who?

11 Q V.R.

12 A Can you spell it?

13 Q Common spelling, ■ like the
14 State —

15 A Can you spell it for me, please?

16 Q ■

17 A What's the last name, how is it
18 spelled?

19 ■ 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 ■
6 ■ way ■ ■ spelled ■ 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 ■

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 ■ 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 ■ with another narrative and
24 there wasn't a question posed, ■ the floor.

25 Q You would agree you interacted with V.R.

1 every day ■ sexual way, when she ■ 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 ■ when she ■ 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 ■ - advised ■ 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 ■ point in time. It will be Exhibit 1,
25 as I'm going to go through some of the facts

1 ■ 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 ■
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 ■ question?

3 MR. PIKE: Sure. Can we take a break
4 for ■ second?

5 MR. EDWARDS: Again?

6 THE WITNESS: Just ■ question.

7 MR. PIKE: He wants to speak with me for
8 ■ second.

9 THE VIDEOGRAPHER: Off the video record
10 12:01 p.m.

11 (Pause in the proceedings.)

12 THE VIDEOGRAPHER: We ■ 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. ■ have sex with
16 you ■ 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 ■
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 ■ 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 ■ true that V.R. was yours ■
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 ■ fabricating multiple cases
20 against people like ■ and others, of ■ 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 ■■■ you and Ghislaine
 3 Maxwell celebrated her ■■■ birthday with her and
 4 had sex with her ■■ 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 ■■■
 22 complaint, ■■ 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 ■■ 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 ■■■ then? Would you like to tell ■■ 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 ■■■ by V.R. against you, isn't it
 2 true, sir, that ■ 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 ■■■ him
 13 three, 12-year old girls from France who spoke no
 14 English for defendant to sexually exploit and
 15 abuse? After doing ■■ they ■■■ 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 ■ 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 ■■■ of sexual
 7 harassment ■■■ 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. ■■
 15 15-year old girl to have sex with numerous
 16 friends of yours?
 17 A Are you kidding?
 18 Q Reading from ■ 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 ■ 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 ■
14 ultimately ■ ■ 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 ■ 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 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 ■ was at your house last week, does
7 ■ 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 ■ Do you
16 knew 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 ■
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 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 ■
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, ■
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 in court and ■ 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 ■ 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 ■ 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 ■ as somebody who ■ been
8 caught engaging in sex with underage minors ■
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 ■ a criminal
25 enterprise and part of one of the largest frauds

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 ■ 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" ■ what, what do you
18 mean?

19 Q You tell the jury your involvement with
20 the modelling agency. You ■ 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 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, ■ ■
8 true that you made a personal telephone call to
9 her telling her not to ■ 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 ■ 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 ■ whenever. At some point
19 in time ■ you place a telephone call ■ V.R. in
20 Australia warning her not to ■ forward with
21 any information about you engaging ■ sex with
22 her while she was ■ minor?

23 MR. PIKE: Form.

24 A I intend to respond to all relevant
25 questions regarding this lawsuit; however, ■ the

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 ■ 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 ■
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 ■ that I must assert my Fifth, Sixth
21 and Fourteenth Amendment right or they will
22 resign.

23 Q Who ■ 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 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 to
6 my attorneys.

7 **Q Isn't it true when underage females were**
8 **brought to you, you would engage them 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 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 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 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 [REDACTED] 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 [REDACTED]
18 devised to coerce these underage minors to bring
19 you as many other underage minors, [REDACTED] 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 [REDACTED] your scheme
25 was devised to coerce underage girls into

1 bringing as many other underage girls [REDACTED] you, [REDACTED]
2 [REDACTED] 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 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 [REDACTED] 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 [REDACTED]
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 [REDACTED] every

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 [REDACTED] 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 [REDACTED] all these underage
17 minors, you stored their [REDACTED] telephone
18 numbers [REDACTED] your home computer; isn't [REDACTED]
19 correct?

20 MR. PIKE: Form, argumentative,
21 speculation.

22 A Again? Sorry.

23 Q Are you going to [REDACTED] question or
24 just read? If you are going to [REDACTED] the
25 question, of course, I'll keep reading it [REDACTED] 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 [REDACTED] answer, we [REDACTED]
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 [REDACTED] 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 [REDACTED] 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 [REDACTED] 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 [REDACTED] and phone numbers [REDACTED] your home
14 computer?

15 A Thank you. I've heard the question
16 now. [REDACTED] didn't surprise -- again, I've now heard
17 the question and the fact that your firm has been
18 described [REDACTED] 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 [REDACTED] 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 [REDACTED] 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 [REDACTED] 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 [REDACTED] 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 ■■■ you brought her to
23 this country when she was underage and made her
24 your ■■■ slave, and you've bragged about this?

25 MR. PIKE: Form, argumentative,

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 ■■■■■ is fine.

13 A Okay.

14 Q Is it true that you demanded numerous
15 underage minor females ■■■ have ■■■ 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 ■■■ with
22 Nadia Marcinkova ■■■ your home while you watched,
23 masturbating?

24 MR. PIKE: Same objections.

25 A The current U.S. Attorney has described

1 your firm, Mr. Edwards, ■■■ 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 ■■■ 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 ■■■ 15-year old would be
24 led into your bedroom, you would appear from the
25 shower first, usually naked; ■■■ that correct?

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 ■■■ that I cannot
7 provide answers ■■■ 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 ■
5 disrobe; isn't ■ 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, ■ order
15 her to begin providing you ■ 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 ■
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 ■ criminal
11 enterprise, yours and Mr. Jaffe's firm, ■ ■
12 criminal enterprise and part of the largest fraud
13 in Florida's history, fabricating malicious cases
14 of ■ 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 ■ 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 ■ sexual
15 nature against people like me and others.

16 Q With many of these underage minors you
17 would use vibrators ■ them; ■ 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 ■ 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 ■ you pled guilty ■ ■
18 couple of felonies, right?

19 MR. PIKE: Form, vague and confusing.

20 A Again?

21 Q In June of 2008, you pled guilty ■ 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 ■ Fifth ■ 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, ■ 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 ■ of the any of ■
16 underage minors ■ 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 ■ allegations of ■ charges?

21 MR. PIKE: Form.

22 A Solicitation of prostitution, not
23 underage prostitution... Prostitution.

24 Q Were the victims or ■ prostitutes, as
25 you would say, ■ they minors?

1 MR. PIKE: Form.

2 A I pled guilty to solicitation of
3 prostitution.

4 Q Okay, so ■ me what those cases ■
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 ■ the underlying facts? What ■ you do,
18 ■ you pull up in ■ car, talk ■ the person, did
19 they ■ over ■ your house, how ■ you get
20 them, these kinds of things. Tell the jury what
21 were the underlying facts about ■ 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 ■ that ■ of these females ■ A.H. Do you
7 know who that is?

8 A I intend to respond to all relevant
9 questions in this lawsuit. However, ■ 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 ■ A.H. ■ somebody that
17 alleges she was at your house ■ more than 100
18 occasions; ■ that true?

19 MR. PIKE: Form.

20 A Can you repeat the question, sir?

21 Q Are you aware that A.H. is ■ female that
22 alleges that when she was underage, she ■ at
23 your house ■ than ■ 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, ■ therefore I must assert
7 those rights.

8 Q You understand that her complaint ■
9 that Epstein turned H. ■ to her stomach ■ 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 ■ against ■ bed
14 forcibly ■ 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 ■
19 complain?

20 Q In the incident report that led to a
21 charging document, that ■ 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 ■ 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, ■ your version of the story, what ■
5 your interaction with A.H. at your house when she
6 ■ a minor?

7 MR. PIKE: Object to the form ■
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 ■ that A.H. advised police
21 that she ■ ripped and torn in her vagina ■
22 and had difficulty walking ■ ■ 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 ■ of ■ 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 ■ 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 ■
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 ■ 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 ■ ■ spell S.G.'s ■
18 That's somebody that your attorneys took her
19 deposition about a year and ■ half ago. Does
20 that help to refresh your recollection ■ 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 ■
7 A.D., that ■ listed ■ one of the females at
8 your house and you pled guilty to ■
9 solicitation of.

10 I would like ■ ask you ■ 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 ■ 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 ■ 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 Q With each case ■ 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, ■ 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 ■
14 facts and circumstances ■ lead up to that plea
15 of guilty.

16 MR. PIKE: Form.

17 Q What ■ the facts and circumstances
18 that ■ 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 and Fourteenth Amendment rights to the U.S.
2 Constitution ■ risk losing effective
3 representation. Accordingly, I must assert my
4 rights ■ guaranteed by the Constitution.

5 Q Just ■ you are clear, since your
6 attorney made it an objection that ■ was
7 unclear, then you invoked your ■ 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 ■ jury understands, these
22 three females that were the subject of the guilty
23 pleas in State Court, ■ procured by your
24 method of having underage minor females locate
25 other underage minor females and bring ■ to

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. ■ people
7 that were, at ■ time you engaged in sexual
8 activity with them, were underage ■
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 ■ 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 ■ progression.

25 MR. PIKE: You can answer, but ■ is

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 ■ 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 ■ 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 ■ your guilty plea
 17 occurred at your Palm Beach house; ■ that
 18 correct?

19 MR. PIKE: Form.

20 A Again, sorry.

21 Q If you ■ soliciting prostitutes, it
 22 wasn't out ■ the street, it wasn't ■ a hotel.
 23 These ■ girls that you solicited to be
 24 prostitutes at your house in Palm Beach,
 25 correct?

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 ■ 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 ■
 13 these felony offenses?

14 A Palm Beach County.

15 Q These were crimes that occurred here ■
 16 ■ 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 ■ calendar
 21 ■ schedule —

22 THE VIDEOGRAPHER: I have to change the
 23 tape.

24 MR. EDWARDS: Change it.

25 THE VIDEOGRAPHER: Off the video record

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, ■ it relates to the
 6 charges you pled guilty to, ■ 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 ■ 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.

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 ■ 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 ■ minor for the purposes of
 23 prostitution.

24 A That's correct.

25 Q So a minor is somebody under the age of

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 [REDACTED] 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 [REDACTED] 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 [REDACTED] has anything to do with any
21 conversations with your attorney, I don't want to
22 know. I'm just going off of [REDACTED] plea colloquy
23 between you and the Judge, where you understood
24 [REDACTED] charges and have been advised and apprised of
25 [REDACTED] charges and you still willingly, willfully

1 pled guilty [REDACTED] the charges. I'm taking [REDACTED] 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 [REDACTED] the minor?

7 A I don't know.

8 Q You were [REDACTED] told the [REDACTED] initials
9 of that minor victim by the State Attorney's
10 Office [REDACTED] 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, [REDACTED]
15 something that you do in New York, and New
16 Mexico, Florida, everywhere, not just West Palm
17 Beach; isn't [REDACTED] 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

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 [REDACTED] schedule of
7 your underage [REDACTED] appointments?

8 MR. PIKE: Form, speculation.

9 A You said where is...

10 MR. PIKE: "Again."

11 Q Where is the calendar [REDACTED] 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 [REDACTED]
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

1 computers that [REDACTED] taken from your house prior
2 [REDACTED] the execution of the search warrant?

3 A Again. Am I still...?

4 Q Are you still in possession of the
5 computers that [REDACTED] removed from your house just
6 prior to the execution of the search warrant?

7 A I intend [REDACTED] respond to all relevant
8 questions regarding this lawsuit. However, [REDACTED]
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 [REDACTED] removed those computers
18 from your house prior to the execution of [REDACTED]
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 [REDACTED]
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 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 give you a massage or work for you,
21 rather than asking them to do what they were 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 are guaranteed by those
11 amendments.

12 **Q** What did it mean within your
13 organization when someone, an 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 when 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 ■■■
7 ludicrous right ■■■ but you're aware that there
8 ■■■ trash pulls from your home where there were
9 message pads, messages taken by various employees
10 of yours, where these terms, "Message," "Work"
11 ■■■ 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 ■■■ 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 ■■■ of a trash pull? What's ■
25 "trash pull"? I'm sorry.

1 Q Are you aware of -- ■■■ ask it of you
2 ■■■ way: When Sarah Kellen would take a phone
3 message for you, what did she write ■ down
4 with?

5 MR. PIKE: Form.

6 A The question makes ■ sense to me,
7 sorry.

8 Q If another employee of yours ■■■ to
9 answer the telephone, ■ it your housekeeper,
10 housemanager, would answer the phone, take a
11 message for you and write ■ down ■ that you
12 could read ■ later, what would that message ■
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 ■ carbon copy
17 sheet to ■ back?

18 A No.

19 Q You're unfamiliar with the documents
20 that I'm talking about, that being ■ message pad
21 ■ informs you as to who called, the time they
22 called and ■ 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 ■

2 ■ message at Mr. Epstein's home and --

3 A Do I know what ■ message pad is?

4 Q No. In your home, do you typically have
5 your housekeeper, housemanager, ■ somebody else,
6 when they take a message for you, write ■
7 specific pad that informs you as ■ who is
8 calling, the time they are calling and the
9 purpose for their calling, and there is ■ 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 ■ them commonly in your home or
16 ■ 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 ■ risk losing their representation.

23 ■ Is my question ■ 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 ■ to show you today, but
7 ■ the information and evidence that I have
8 learned through this process is accurate and
9 correct, it would seem ■ foregone conclusion that
10 you and I would be on the ■ 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 ■ "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 ■ can hash out.

17 Here is my question: When a
18 housekeeper/housemanager would take a message for
19 you from any caller, ■ there a specific message
20 pad that has a carbon copy located ■ your
21 telephone, for them to write down the ■ of ■
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 ■ not that you understand the question.
8 You understand my question and ■ electing ■
9 invoke your ■ Amendment rights; ■ 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, ■
21 don't know what you would call her, assistant,
22 would ■ the phone, and take a message for
23 you ■ that you would know who called, what would
24 they typically write down the message on ■ that
25 you would have it?

1 MR. PIKE: Objection. Object to the
2 form, lacks predicate. You have not
3 established anything here today relative to
4 ■ 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 ■ down ■
12 piece of paper and give ■ 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 ■ it?

17 A Oh, I see. Okay. I intend — I would
18 like to ■ 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 Q Between the years 2002 and 2005, who was
2 your house manager?

3 A (No response.)

4 Q If there is ■ 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 ■ 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 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 ■

7 A Is that a question?

8 Q Not yet. When ■ first time ■
9 you ■ 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 ■ 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 ■■■ 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 ■■■ 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 ■■■ 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 representation.

2 Q Isn't ■■■ true L.M. ■■■ 13 ■■■ 14-year
3 old girl ■■■ ■■■■ 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 ■■■ 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 ■■■ L.M. versus Jeffrey Epstein ■■■
25 C.M.A. versus Jeffrey Epstein.

1 A And now the question?

2 Q You know who ■■■ 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 ■■■ there for a while thinking hard
13 about whether or ■■■ 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 ■■■ worded
17 assumes facts certainly not in evidence. It
18 is argumentative, speculates ■■■ 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 ■■■ to

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, ■■■ 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 ■■■ just about ■■■ 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.

1 A You asked the question when I met her, I
2 think, if I met her.
3 Q You have no recollection ■ to when you
4 ■ 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 ■ ■
11 statement that she gave; is ■ 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 ■
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 —

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 ■ 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 ■ few minutes ago when you asked
14 when you met her, you said, "I don't know if I've
15 ever met her," ■ 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 ■ watching this, hopefully.
23 MR. PIKE: Form.
24 Q We will get into that.
25 A Okay.

1 Q When you first came into the ■ today,
2 didn't you look at ■ and say "I ■ 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 ■ 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 ■ your testimony right now ■
16 you ■ not say to me "I ■ L.M."?
17 A That's --
18 MR. PIKE: Objection.
19 A -- that's correct.
20 Q Do you ■ L.M.?
21 MR. PIKE: Form, predicate, and
22 relevance.
23 A I would like to answer all your
24 questions here ■ I've... tried to do my best,
25 however, my attorneys have advised me that I must

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 ■ economically
6 disadvantaged girl that needed money?
7 MR. PIKE: Objection, speculation,
8 ■ facts not in evidence, and it is
9 argumentative ■ 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 ■ guaranteed by the Sixth,
18 Fifth and Fourteenth amendments.
19 Q When she was ■ 14-year ■ girl, she ■
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. ■ 14-year old girl, she
25 ■ taken up to your bedroom and you ordered her

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

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.

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 you 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, 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

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. as
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 -- that you masturbated
5 to the point of ejaculating while you
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 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 as response to my questions, as I would
12 like you to tell the jury at this time which
13 allegation you are 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 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 as 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
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 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 way 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 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 any other way,
13 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 [REDACTED] of relatively a roughly
20 three years, isn't [REDACTED] true that you touched [REDACTED]
21 fondled L.M. in a sexual [REDACTED] [REDACTED] [REDACTED]
22 occasions?

23 MR. PIKE: Objection, argumentative.
24 Calls for speculation. It is overbroad,
25 confusing and vague, and it assumes facts

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 [REDACTED] 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 [REDACTED] not going to
21 incriminate you if the answer is "no," it is only
22 if the [REDACTED] is "yes" that [REDACTED] 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 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 [REDACTED] 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 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 [REDACTED] is?

12 A Repeat the question.

13 Q Every single allegation that L.M. has
14 made and I have [REDACTED] questioned you about in terms
15 of your sexual involvement with L.M., they are
16 all true; isn't that correct? There [REDACTED] 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 ■■■ 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 Q Isn't ■ 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 ■■■ 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 ■■■ responsive --
25 MR. PIKE: Excuse me --

1 MR. EDWARDS: It is not ■ 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 ■■■ move to strike.
10 You ■■■ 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 ■ sworn statement to the FBI,
16 changed dramatically after she decided to file ■
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. ■■■ pregnant 16 year-old,
25 she brought you at least ten underage minor

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 ■ well ■ every other
7 question you've asked ■ 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 ■■■ at 16 years old,
12 and you ■■■ being criminally investigated for
13 ■■■ of the conduct that we've discussed here
14 today; isn't ■ 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 ■■■ 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 ■■ doing now. I

5 will be finished within four seconds. So I

6 ■■ going to object to form, it's

7 argumentative, speculative and it assumes

8 facts not in evidence and ■■ 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. ■■ attorney ■■ point ■■ time?

15 Do you remember that?

16 MR. PIKE: Same objection.

17 A Not to the best of my recollection.

18 Q ■■ 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 ■■ you

22 never paid for ■■ attorney ■■ represent L.M.?

23 A (Witness shakes head.)... On advice of

24 my counsel, I would like to answer that question,

25 but ■■ 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 ■■ paid for by

5 you, informed L.M. that if she ■■ to tell the

6 ■■ exactly what happened ■■ your house, that her

7 son could be taken from her. You're ■■ of

8 that, correct?

9 MR. PIKE: Same objections.

10 A I recognize, I believe she made ■■ 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 ■■ 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 ■■ 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 ■■ the video

6 record 2:50 p.m.

7 Q Isn't ■■ 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 ■■ 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 ■■ fact, you deliberately and

8 intentionally caused ■■ 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 ■■ 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 ■ 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 ■ criminal -- you
8 firm has been considered and investigated ■
9 being ■ 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, ■ a result of that
17 investigation, you, as well ■ the United States
18 Attorney's Office entered into what has ■ been
19 known and referred to ■ 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 females, you reached a resolution with the United
2 States Attorney's Office, in what has ■ been
3 described ■ 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 ■ Exhibit number 2 for
13 identification, ■ 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 ■ jury what those individuals ■ for you
20 related to the crimes that ■ 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 Graff ■ 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 ■ to say that you, as well
12 as the co-conspirators, operated ■ 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 ■ 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 ■
25 criminal enterprise involved in defrauding

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 ■ you care about any of the underage
11 minor females ■ 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 ■ a
19 repetitive question ■ 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
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 up with the Court
13 and we'll get a ruling on it.

14 MR. PIKE: It doesn't matter 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

1 my effective counsel's representation.

2 Q In fact, you told many of these underage
3 minor females ■ to tell anybody what happened
4 with you in the house, ■ 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 ■ 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 ■ forward with information about your sexual
14 interactions with them have been investigated,
15 harassed, humiliated in ■ 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 ■ facts not in evidence.

20 A Can you repeat the question?

21 Q Sure. Any underage minor female ■
22 you engaged in sexual activity with, that has ■
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 ■ an effort to

1 intimidate them and hopefully make them ■ 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 ■ 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 ■ as opposed to her sworn testimony for 13
18 hours under oath in this ■ Are you saying
19 that the sworn testimony to the ■ 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 -- ■ the ■ You watched her
2 deposition when it ■ 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 ■ you saying is the truthful
10 testimony, her statement to the ■ or the
11 videotaped deposition ■ 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 ■ 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 ■ of these
4 civil lawsuits that have been ■ against you,
5 to spend ■ much money ■ you ■ to investigate,
6 and harass these young ■ 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 ■ 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 ■ 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 ■ 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 ■ ■
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 ■ 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 ■ is wholly irrelevant
22 currently, as were it, to this particular
23 lawsuit.

24 MR. EDWARDS: Just so you ■■ rethink
25 that position, the lack of remorse goes to

1 Q ** But ■ ■ relates to, obviously L.M.
2 sued you making the allegations that you sexually
3 molested her from when she was 13 years old ■
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 ■■ be valuate whether that ■ evidence of
10 lack of ■■■■ 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 ■ it your feeling ■■ because you ■■
17 wealthy and these children are poor, that you ■■
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, ■ 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, ■ 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 ■■ 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 ■■■■ 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 ■ year
17 before, or approximately ■ year before Rothstein,
18 Rosenfeld, Adler had any of these cases; you're
19 ■■■■ 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 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 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 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 point in time, please tell the
18 jury what is your defense of the claims being
19 asserted against you in 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 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 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," or trying to understand so you know
16 how to provide 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; it
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 set forth there and the

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 are in your case? If you
7 testify, could you 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 ■■■ telling me if I did so, I will
3 lose risking their representation.

4 Q I know you've invoked your ■■■
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 ■■■ about L.M.'s case as well ■
9 several of ■■■ 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 ■■■ of The New York Daily
16 News and discuss these ■■■ 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, ■
25 therefore, I will do so.

1 Q Why ■■■ that you will ■■■ 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, ■■■ ■■■ 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 ■ all and that
23 regardless of their age, you did not personally
24 consider ■■■ 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. ■■■ 14, and you
9 were interacting with her sexually. Is it your
10 testimony ■■■ despite the disparity in age you
11 do not consider L.M. to be ■ 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 ■■■ I must assert my Sixth Amendment,
21 Fifth Amendment and Fourteenth Amendment rights.

22 Q In the last ten years, what is ■■■
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 ■ 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 ■■■ for you?

14 A Yes.

15 Q Are you ■■■ 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 ■ and say, "I ■■■ 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 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, ■■■■■
 23 worked for you?
 24 MR. PIKE: Form.
 25 A Not that I ■■■ recall, but there ■■■

1 lots of people who work for me, so...
 2 Q Can you ■■■ 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 ■■■ that you invoked your ■■■
 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 ■■■ L.M.'s
 15 case, but the various other lawsuits that have
 16 been ■■■ 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 ■■■ to work 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 ■■■ that
 21 you paid for and obtained ■■■ attorney by the ■■■
 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 ■■■
 3 you retained and paid for ■■■ 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 Vinoski, Larry
 8 Morrison, David Rogers, Igor Zinoview. Have I
 9 missed anybody else that during this litigation
 10 you've paid for ■■■ 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 ■■■ which of those
 20 on that ■■■ you have not paid for ■■■
 21 retained attorneys for?
 22 MR. PIKE: Same objection.
 23 A Same answer.
 24 Q You're invoking your ■■■ Amendment,
 25 right?

1 A And Sixth Amendment and Fourteenth
2 Amendment... and Fifth Amendment.
3 Q ** Is it a company ■ 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 ■ 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 ■ you, personally, or is this
17 one of your corporations ■ companies?
18 MR. PIKE: Form, speculation.
19 A I'm not sure.
20 Q As you sit here today, you're not really
21 ■ whether ■ coming from one of the other
22 corporations that we've discovered during
23 discovery or ■ 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 ■ attorneys retained for
6 them, is it also your response to invoke your
7 Fifth Amendment rights, rather ■ provide me
8 with an answer, ■ who ■ 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 ■ the last year, while ■ 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, ■ 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. ■ 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 ■ addiction that
16 you have with minors?
17 A I would like to answer that question, as
18 well, ■ 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 ■ 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 ■ that question, ■
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 ■ 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, ■ 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 ■ that question
7 before. I assert the same rights as before.

8 **Q** That's the Fifth, ■ 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 ■ 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 ■ 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 ■ right?

12 MR. PIKE: Same objections.

13 **A** I would like to answer that question, ■
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 ■ that question. I
25 would like to answer all of your questions here

1 today; however, my counsel has advised ■ 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. ■ is confusing. It
18 is speculative, vague, lacks predicate and
19 ■ 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 ■ 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 ■
23 jury which of these allegations, if any, being
24 made by L.M., ■ 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 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 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 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 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 18 19 20 21 22 23 24 25	180 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 18 19 20 21 22 23 24 25 Notary Public, State of Florida. My commission No. Expires March 13, 2011.
179 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.	181 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

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15

JEFFREY EPSTEIN

16

17

18

THE STATE OF FLORIDA)

19 COUNTY OF PALM BEACH)

20 I DO HEREBY CERTIFY THAT JEFFREY EPSTEIN

appeared before me and stated that he has read

21 his deposition; further, that this Errata Sheet

was signed in my presence on this _____ day

22 of _____ 2010.

23

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

13 Dear Mr. Pike:

14 Since counsel have agreed that you may
have the witness read and sign your copy of the
deposition, for your convenience, enclosed
15 herewith you will find an Errata Sheet for the
witness' use in entering any changes to the
deposition.16 Thank you for your prompt attention.
17 Cordially yours,
18 U.S. LEGAL SUPPORT

19

20

21 TERRI BECKER, Registered
Professional Reporter, Notary
Public, State of Florida III
22 Large. My commission expires
March 13, 2011.

23 CC: Bradley Edwards, Esq.

24

25