

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

DEFENDANT BRADLEY J. EDWARDS'S STATEMENT OF UNDISPUTED FACTS

Epstein v. Edwards, et al.

Case No.: 50 2009 CA 040800XXXXMBAG

ATTACHMENT 22

IN THE CIRCUIT COURT OF THE FIFTEENTH JUDICIAL
CIRCUIT IN AND FOR PALM BEACH COUNTY, FLORIDA
CASE NO. 50 2009CA040800XXXMB 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, 2010
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

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1 that we're going to work out that these records are
 2 to be used within the confines of this litigation
 3 and not to be spread to the press or anyone else,
 4 because they do contain confidential information as
 5 to who may have been on the plane and other records
 6 of Mr. Rogers, which but for the subpoena would
 7 have been only available to the FAA or some other
 8 law enforcement agencies.
 9 MR. EDWARDS: Okay. Is that all you want to
 10 put on?
 11 MR. CRITTON: Yes.
 12 MR. EDWARDS: I'm not saying I necessarily
 13 agree or disagree with you. That's something that
 14 we'll deal with some other day.
 15 MR. CRITTON: Bruce, you'd better produce
 16 these records, but there has to be some sort of
 17 understanding before --
 18 MR. REINHART: Correct.
 19 MR. EDWARDS: I won't do anything until you
 20 file whatever you -- until we work whatever it is
 21 out in court. I'll say that on the record, that
 22 I'm not doing anything with the records outside of
 23 my office until some judge deals with it.
 24 MR. REINHART: And for the record, I'll adopt
 25 what Mr. Critton said on this one limited occasion.

6

1 MR. EDWARDS: All right.
 2 Thereupon,
 3 (LARRY VISOSKI)
 4 having been first duly sworn or affirmed, was examined
 5 and testified as follows:
 6 THE WITNESS: Yes, I do.
 7 DIRECT EXAMINATION
 8 BY MR. EDWARDS:
 9 Q. Can you tell us your name for the record.
 10 A. Lawrence Visoski, Jr.
 11 Q. And Mr. Visoski, have you ever had your
 12 deposition taken before?
 13 A. No.
 14 Q. Okay. Here's the process: I'm going to ask
 15 you questions. You're going to give us answers. Try to
 16 give us answers that we all understand and that the
 17 court reporter can take down, such as yes, no, or some
 18 other verbal answer that we can understand. It's easy
 19 when we get in a casual conversation to nod or shake
 20 your head, and the court reporter is not writing
 21 pictures or anything else.
 22 A. I understand.
 23 Q. The other thing is, and I've been accused of
 24 this in other depositions -- I don't know if it's true
 25 or not -- but I need to wait until you finish answering

7

1 the question and you need to wait until I finish asking
 2 the question.
 3 A. So you're not allowed to interrupt me?
 4 Q. And you're not allowed to interrupt me.
 5 A. Like I just did?
 6 Q. Right.
 7 MR. CRITTON: Cara just snickered when you
 8 said you've been accused because she recognizes
 9 it's true.
 10 MR. EDWARDS: I don't know what the meaning of
 11 her snickering was.
 12 BY MR. EDWARDS:
 13 Q. But for what it's worth, if you don't
 14 understand the question or I've asked a bad question, I
 15 don't want you to guess. Give me the best answer to the
 16 best of your knowledge and if you need me to rephrase
 17 it, I will.
 18 A. Okay.
 19 Q. Okay. Tell me your current address.
 20 A. 1131 Pine Point Road, Riviera Beach, Florida
 21 33404.
 22 Q. How long have you lived there?
 23 A. Approximately nine years.
 24 Q. Okay. Who do you live there with?
 25 A. My wife and one child at this time.

8

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

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

<p style="text-align: center;">13</p> <p>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 on a 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 we talk 12 about cars. I mean, does that make you a personal 13 friends? 14 BY MR. EDWARDS: 15 Q. Have you ever gone to his house to 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.</p>	<p style="text-align: center;">15</p> <p>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 be weather, flight 14 planning, time and distance to and from a location, any 15 logistics involved in running an operation that has 16 aircraft. 17 Q. In addition to the 180,000, does he 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 the most he's ever paid you? 24 A. No. 25 Q. All right. Were you making -- when was the</p>
<p style="text-align: center;">14</p> <p>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 a regular basis, you know, for a 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 over the last 18 years, is 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,</p>	<p style="text-align: center;">16</p> <p>1 last time that you were 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. It might have 7 been 2008, last year. It was last Christmas we all took 8 a 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 an 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 is 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</p>

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

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

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 aware
 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 all read about
 15 that you picked up luggage at, right?
 16 A. Yes, sir.
 17 MR. 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 it is?
 8 A. Yes, sir.
 9 Q. Do you know of anybody else 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 are.
 6 Q. That you have landed --
 7 A. That I have.
 8 Q. -- his airplane?
 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 it in your words what
 10 this ranch that we are talking about looks like. And
 11 I've heard it 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 all 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 on 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?

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

33

1 Q. Okay. But that's on the Zorro Ranch?
 2 A. Yes.
 3 Q. So in addition to the 50 or so times you've
 4 been to the Zorro Ranch, you've been to your property
 5 that's on the Zorro Ranch?
 6 A. Yes, which over the years, it's once-a-year
 7 visits. So I mean, it is included in the 50 times that
 8 I've been there.
 9 Q. Okay. And did you have a conversation with
 10 him that led to him giving you or gifting you 40-acres
 11 of land?
 12 A. We talked about it because he knew I was
 13 looking for a home out there.
 14 Q. Okay. In gifting you that land, did you
 15 consider yourself at that point in time to be more than
 16 just his pilot, as more of a friend?
 17 A. No. You're using the word "gifting." I paid
 18 for the land. I don't recall what it was. But you use
 19 the word "friend." I don't know that a -- sure, he was
 20 a friend. I mean...
 21 Q. Well, did he give Dave Rogers any land out on
 22 the New Mexico ranch?
 23 A. No.
 24 Q. Okay. When you say you paid for it, I thought
 25 that I asked that question, "Did you pay for the

34

1 40-acres?" I thought your answer was, "I don't know,
 2 I'd have to go back and look."
 3 Are you saying now that you did pay for that
 4 land?
 5 A. I don't remember. If there was a sum of
 6 money, it was just for, you know, the legal purpose of a
 7 transfer of ownership of the land.
 8 Q. Okay. If it was a substantial amount of
 9 money, that's something that you would have remembered?
 10 A. Oh, exactly. No, it was not a substantial
 11 amount.
 12 Q. Okay. Do you remember approximately how much
 13 money you had to give Jeffrey Epstein for that land?
 14 A. I would only be guessing. It might have been
 15 five dollars. To my knowledge, I don't remember.
 16 Q. Okay. So when I'm saying he gave you the
 17 land, he may have actually given you the land?
 18 A. Sure.
 19 Q. Okay. And to the best of your knowledge, he's
 20 never given anyone else land out there?
 21 A. Not to my knowledge.
 22 MR. CRITTON: Form.
 23 BY MR. EDWARDS:
 24 Q. All right. How big is this house that you
 25 built on the ranch?

35

1 A. 1800 square feet.
 2 Q. Were you ever at that house at the same time
 3 when he's at his house that's on that Zorro Ranch?
 4 A. Yes.
 5 Q. All right. We started back in 1991 with you
 6 making around \$55,000 a year and that has progressed
 7 over time to a point where in 2007 you were making
 8 \$200,000 a year. I don't want to go through every
 9 single year; that would take a really long time. But
 10 the progression, was that on a yearly basis normally or
 11 after two years or three years?
 12 A. Yearly basis.
 13 Q. Okay. And would that normally be in
 14 increments of?
 15 A. \$5,000.
 16 Q. Okay. You've talked about a couple other
 17 gifts that have been given to you from Jeffrey Epstein
 18 over the years; one is a pool heater in 1995 and now
 19 some 40 acres of land on his New Mexico ranch. Any
 20 other gifts you can think about?
 21 A. No other gifts.
 22 Q. Okay. I don't want to split hairs with you.
 23 You obviously thought about that answer before giving
 24 it. What other items are you thinking about that he's
 25 given to you or cut you a discount on or otherwise that

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1 you feel was compensation for you working for him?
 2 A. I drive a company car. I mean...
 3 Q. Okay. What kind of car?
 4 A. A Hummer.
 5 Q. You say "a company car." That's owned by NES,
 6 LLC?
 7 A. No, I think the registration has Zorro
 8 Development on it.
 9 Q. What is Zorro Development?
 10 A. I believe that's the ranch, or at least it has
 11 the name of the ranch. I don't know what the entity is.
 12 Q. And it's your understanding that that's a
 13 company vehicle?
 14 A. Yes.
 15 Q. And where is that vehicle primarily garaged?
 16 A. At my home.
 17 Q. In West Palm Beach or in the Zorro Ranch?
 18 A. No, here in West Palm Beach.
 19 Q. All right. And is there only one company
 20 vehicle that you're issued?
 21 A. Yes, sir.
 22 Q. And is that something that was -- that you did
 23 not have to pay for?
 24 A. No, it's just something I drive. I mean, it's
 25 not titled to me or anything like that. It's just a car

<p style="text-align: center;">37</p> <p>1 that I drive.</p> <p>2 Q. All right. You've worked for him for 18</p> <p>3 years. I don't even know how long the Hummer would</p> <p>4 last, but presumably, that's not the car you've had over</p> <p>5 the entire 18 years. Have you always had a company car?</p> <p>6 A. No, I haven't, no.</p> <p>7 Q. When did you get the Hummer?</p> <p>8 A. Probably three years ago.</p> <p>9 Q. Do any other members of Mr. Epstein's piloting</p> <p>10 team have company cars?</p> <p>11 A. No.</p> <p>12 Q. Only you?</p> <p>13 A. Yes.</p> <p>14 Q. And do you know how that decision was made to</p> <p>15 get you a company vehicle?</p> <p>16 A. No.</p> <p>17 Q. What do you use that vehicle for?</p> <p>18 A. To and from the airport.</p> <p>19 Q. All right. Do you use it for personal reasons</p> <p>20 also?</p> <p>21 A. I guess, yes.</p> <p>22 Q. I mean, that's your primary vehicle?</p> <p>23 A. Yes, or I drive my wife's car.</p> <p>24 Q. Which is?</p> <p>25 A. Type of car?</p>	<p style="text-align: center;">39</p> <p>1 Q. And which airplane was that?</p> <p>2 A. The Hawker.</p> <p>3 Q. Does he still have the Hawker?</p> <p>4 A. No.</p> <p>5 Q. How long did he have that plane?</p> <p>6 A. Five years, guesstimate; four or five years.</p> <p>7 Q. So sometime in the mid '90s?</p> <p>8 A. Yes.</p> <p>9 Q. Did you keep any type of logs or documentation</p> <p>10 as to who would have been flying on that airplane if you</p> <p>11 transported any individuals?</p> <p>12 A. The same logs as you possess now are the</p> <p>13 flight logs.</p> <p>14 Q. Okay.</p> <p>15 A. That's the standard for the industry.</p> <p>16 Q. So that's something that you kept, or that</p> <p>17 Dave Rogers kept?</p> <p>18 A. Dave Rogers.</p> <p>19 Q. Okay. If there are any documents out there</p> <p>20 with names of passengers on any of the flights involving</p> <p>21 planes owned or controlled by Jeffrey Epstein and/or his</p> <p>22 companies, those would be documents in the possession of</p> <p>23 Dave Rogers and not yourself?</p> <p>24 A. Oh, the corporation actually, they belong to.</p> <p>25 Q. Okay.</p>
<p style="text-align: center;">38</p> <p>1 Q. Yes.</p> <p>2 A. A Mercedes.</p> <p>3 Q. And is that something that was also a gift</p> <p>4 from Mr. Epstein?</p> <p>5 A. No, sir.</p> <p>6 Q. What type of Mercedes is that?</p> <p>7 A. A ML 430, ten years old.</p> <p>8 Q. All right. Are there any other items --</p> <p>9 company car, the land in New Mexico, the pool heater --</p> <p>10 any other items that Mr. Epstein has given you over time</p> <p>11 as compensation or reward or anything else?</p> <p>12 A. No, sir.</p> <p>13 Q. And your only income is from Mr. Epstein or</p> <p>14 his companies?</p> <p>15 A. Correct.</p> <p>16 Q. Okay. And it's been that way since 1991?</p> <p>17 A. Yes.</p> <p>18 Q. How did you meet Mr. Epstein or become</p> <p>19 involved with him in 1991?</p> <p>20 A. We heard at the airport that Mr. Epstein was</p> <p>21 purchasing an airplane when Dave Rogers and myself were</p> <p>22 living in Columbus, and we had the opportunity to</p> <p>23 interview with him, and we did and got the job.</p> <p>24 Q. And this is before he owned the airplane?</p> <p>25 A. Yes.</p>	<p style="text-align: center;">40</p> <p>1 MR. REINHART: That was a compound question.</p> <p>2 You might want to split it in half.</p> <p>3 MR. EDWARDS: Okay.</p> <p>4 BY MR. EDWARDS:</p> <p>5 Q. What documents do you believe exist that</p> <p>6 indicate names of individuals that have been passengers</p> <p>7 on Mr. Epstein's airplanes?</p> <p>8 MR. REINHART: Are we going back all the way</p> <p>9 from '91 to the present?</p> <p>10 MR. EDWARDS: Sure.</p> <p>11 THE WITNESS: You're talking about the Hawker?</p> <p>12 BY MR. EDWARDS:</p> <p>13 Q. Any airplanes. What documents would there be?</p> <p>14 A. There would be the same: Flight logs and</p> <p>15 passenger manifests would exist.</p> <p>16 Q. And are either of those required?</p> <p>17 A. The flight log is required for the aircraft to</p> <p>18 track times and landings.</p> <p>19 Q. And in the flight log, is it required that you</p> <p>20 designate the names of the passengers?</p> <p>21 A. No.</p> <p>22 Q. That's just something that Dave Rogers did on</p> <p>23 his own?</p> <p>24 A. Everybody does that. It's more for Internal</p> <p>25 Revenue.</p>

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1 Q. Okay. If something happens, they know who is
 2 on the plane?
 3 A. Exactly, weight and balance.
 4 Q. Have you ever kept any flight logs that have
 5 names of people on the airplane?
 6 A. When you say "kept," I have filled out flight
 7 logs or the passenger manifest, yes.
 8 Q. By "kept" I meant maintained to where they're
 9 in your possession either on paper or computer?
 10 A. We keep --
 11 MR. REINHART: Can you differentiate a flight
 12 log from the pilot's log that we showed you
 13 earlier?
 14 MR. EDWARDS: Okay.
 15 BY MR. EDWARDS:
 16 Q. I'm talking about -- I don't know that it's
 17 called a flight log, a pilot's log or any kind of log.
 18 A. They are different, yes.
 19 Q. Yeah. I'm asking about, have you kept or do
 20 you have any documentation that would indicate the names
 21 of passengers that have flown on any of Jeffrey
 22 Epstein's planes?
 23 A. No.
 24 Q. Either in the form of paper or on a computer?
 25 A. No.

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1 Q. Makes that easy.
 2 A. Okay.
 3 Q. In 1991, were you the chief pilot?
 4 A. No.
 5 Q. Somebody else was the chief pilot?
 6 A. Yes.
 7 Q. Who's that?
 8 A. Dave Rogers.
 9 Q. All right. At what point in time did you
 10 become chief pilot and switched with Dave Rogers?
 11 A. Six years ago; five, six years ago.
 12 Q. Why?
 13 A. Professionalism, technique.
 14 Q. What do you mean by that?
 15 A. The way Dave would operate an aircraft,
 16 Jeffrey knew the difference when I was flying and when
 17 Dave was flying.
 18 Q. How do you know he knew the difference?
 19 A. Just --
 20 Q. He told you?
 21 A. Yes. He knew the difference that if he never
 22 came up front, he knew who was flying, who landed.
 23 Q. And what was the conversation that he had with
 24 you that resulted in you becoming chief pilot, switching
 25 positions with Dave Rogers?

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1 A. Jeffrey would always critique Dave's flying
 2 capabilities, and I tried to help Dave and explain to
 3 him what Jeffrey likes and doesn't like. And Jeffrey's
 4 also conveyed these likes and dislikes. And Dave
 5 maintained continuing with certain piloting techniques
 6 that were just not comfortable to passengers. And this
 7 went on through the years, and Jeffrey just got tired of
 8 it one day.
 9 Q. What specifically were Jeffrey Epstein's likes
 10 and dislikes with respect to the flight of the plane?
 11 MR. CRITTON: Let me put in a form here. But
 12 I don't know what this has to do with anything in
 13 this case.
 14 MR. EDWARDS: I understand that, Bob.
 15 MR. CRITTON: I want to use this for some
 16 other depositions where we -- we've gone beyond the
 17 scope.
 18 THE WITNESS: The case in point, the last
 19 straw was there was a technique called quiet flying
 20 where you would retard the throttles well short of
 21 the runway and pretty much glide the airplane in.
 22 Well, if you don't do that correctly, you have to
 23 spool the engines up just prior to touching down
 24 that -- because you're losing air speed and it's an
 25 uncomfortable sound and feeling for the passengers

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1 thinking that you're not going to make the runway.
 2 And it was a continuous practice of Dave doing that
 3 to be neighbor friendly as opposed to being
 4 passenger-comfort friendly.
 5 BY MR. EDWARDS:
 6 Q. Okay.
 7 A. Hence, the transfer of power.
 8 Q. Has he ever discussed with you where he wants
 9 you to be, whether that is "stay in the cockpit when I
 10 have people on the airplane," or don't intermingle with
 11 the passengers or anything else?
 12 A. He's never stated that to us.
 13 MR. REINHART: Could you clarify which "he"
 14 you're talking about?
 15 MR. EDWARDS: I'm talking about Jeffrey
 16 Epstein.
 17 MR. REINHART: Okay.
 18 BY MR. EDWARDS:
 19 Q. You understood that?
 20 A. Yes.
 21 Q. It's my understanding that in the -- well,
 22 tell me other than the Hawker, what other airplanes have
 23 you flown for Jeffrey Epstein?
 24 A. A Gulfstream.
 25 Q. Does he still have that plane?

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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 are
 9 company-owned --
 10 Q. Jeffrey Epstein or his companies.
 11 A. A Boeing 727.
 12 Q. Well, I know that's a very large airplane. I
 13 think that's been described by other people, so I'm not
 14 going to have you do that. But there's partitions in
 15 that airplane -- in the back rooms of that airplane,
 16 right?
 17 A. Yes.
 18 Q. Several different partitions to where if the
 19 pilot comes out of the cockpit, you don't necessarily
 20 see 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 can

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1 hear you.
 2 THE WITNESS: Oh.
 3 MR. REINHART: And so Mr. Willits can 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 one -- 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 was the three passengers, to the best of my
 8 knowledge.
 9 Q. And it's my understanding that little
 10 St. James is an 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 an 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 was there, how did that come about?
 25 A. We flew into St. Thomas and then we flew to

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1 Little St. James in a helicopter.
 2 Q. And do you fly the helicopter as well?
 3 A. Yes.
 4 Q. How many helicopters are owned or 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

<p style="text-align: center;">49</p> <p>1 lunch. The passengers showed up and we came back. 2 Q. Have you ever stayed at the home that is on 3 Little St. James? 4 A. No. 5 Q. Have you known Jeffrey Epstein to stay at that 6 home? 7 A. I don't know that for a fact. 8 Q. Okay. Do you believe that he is the owner or 9 controller or has some interest in the home or the 10 island of Little St. James? 11 MR. CRITTON: Form. 12 THE WITNESS: I have no knowledge of that 13 being a fact. 14 BY MR. EDWARDS: 15 Q. And you have no belief that that is a fact? 16 A. Exactly. 17 Q. When you say you've been there when he was 18 there, how many times has that occurred? 19 A. Estimating, a hundred times. 20 Q. Okay. 21 A. Trying to give an honest answer. 22 Q. Okay. And in the approximate -- I'm not going 23 to hold you to a hundred times, but in the approximately 24 hundred times -- 25 A. Sure.</p>	<p style="text-align: center;">51</p> <p>1 to his island?" We never landed on his island. We 2 landed in St. Thomas. 3 Q. Got it. 4 A. I was just trying to be exact. 5 Q. Thank you. 6 A. It's a small island. 7 Q. Okay. So how is it that when Mr. Epstein 8 wants to go to Little St. James, what is the path that 9 you take to get actually to the island of Little 10 St. James? 11 A. I don't understand the question. 12 Q. Well, you just told me you fly the airplane to 13 St. Thomas? 14 A. Right. 15 Q. And then what? 16 A. Then sometimes I would go get the helicopter 17 or he could also take a boat to the island. But 18 normally the helicopter's located on St. Thomas. I'd 19 fire up the helicopter, come pick him up, drop him at 20 the island and I come back to St. Thomas. 21 Q. And when he stays on St. James, you drop him 22 off on St. James. I suppose you're going to tell me you 23 don't know if he stays there or not? 24 A. Exactly. 25 Q. But do you stay --</p>
<p style="text-align: center;">50</p> <p>1 Q. -- for what period of time are we talking 2 about? 3 A. During what period of time? 4 Q. Right. 5 A. Let's see, when did all this happen? What, 6 2007? So eight years prior to whenever he stopped 7 flying. So... 8 Q. '98/'99? 9 A. Yeah, I guess, yes. 10 Q. I mean, that sounds like a right -- 11 A. Sounds about right, yeah. Don't hold me to it 12 again. 13 Q. All right. 14 A. You're going back a long way. 15 Q. So from approximately the '98/'99 time frame 16 when Jeffrey Epstein would fly to Little St. James, 17 would you be the pilot? 18 A. Yes. 19 Q. Okay. And you say that you've been there -- I 20 thought that you just told me that you've been there the 21 same time he was there, but then I thought the 22 subsequent question was well, were you on the flight 23 with him, and I thought your answer was no. Maybe I 24 misunderstood that. 25 A. No, you said the question "Have you ever flown</p>	<p style="text-align: center;">52</p> <p>1 A. I don't. I mean -- 2 Q. Well, he either stays there or someone else 3 picks him up in a helicopter or he swims away? 4 A. Correct. 5 Q. Okay. You stay on St. Thomas? 6 A. Yes. 7 Q. Okay. Is there a place that you've stayed on 8 St. James, ever? 9 A. No, I've never. 10 Q. So in the hundred or more times that you've 11 been to the island, is it my understanding that each of 12 those times you've been there to drop off Jeffrey 13 Epstein and/or any passengers and you've immediately 14 left and gone to St. Thomas? 15 A. Yes, sir. 16 Q. You never been inside that home that's located 17 on St. James? 18 A. Yes, I've been inside the home. 19 Q. How many times have you been inside the home? 20 A. I mean, ten, fifteen times. 21 Q. And for what occasion? 22 A. I've set up the theater system that's in the 23 living room. 24 Q. Okay. 25 A. So it would be there to work to hook up a TV</p>

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

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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 it up to its --
 10 it's important that it 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 was on the helicopter?
 15 A. I flew to Miami with Mr. Epstein.
 16 Q. When was that?
 17 A. It was a 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 was 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 was 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 as a passenger with Jeffrey Epstein?
 13 A. Many. I'd have to 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 me 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, as his pilot and the person who
 3 travels with Jeffrey Epstein on the majority of his
 4 flights, who are the people who travel most frequently
 5 with Jeffrey Epstein?
 6 A. I'd have to look at the logs.
 7 MR. REINHART: Can we 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 at the flight logs to give
 12 you an 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 it on.
 11 Q. And do you know where Nadia Marcinkova is
 12 staying these days?
 13 A. No.
 14 Q. Do you know what car she's driving these days?
 15 A. No, I don't.
 16 Q. Okay. Do you know if she's living with
 17 Jeffrey Epstein these days?
 18 A. I don't know that.
 19 Q. Do you know how Nadia Marcinkova met Jeffrey
 20 Epstein?
 21 A. I don't.
 22 Q. Were you on an international flight bringing
 23 her into the country from some other country at any
 24 time?
 25 A. I don't know.

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1 MR. REINHART: Can we clarify? You mean with
 2 Mr. Epstein or --
 3 MR. EDWARDS: No.
 4 BY MR. EDWARDS:
 5 Q. Did you ever bring Nadia Marcinkova from some
 6 foreign country into the United States?
 7 A. I'd have to look at the log books, honestly.
 8 Q. That's not something you remember?
 9 A. No. I mean, she -- I think she's been on
 10 Europe trips with us, and I think she's returned from
 11 Europe with us, but I could not say that honestly.
 12 Q. On this recent helicopter flight with Nadia
 13 Marcinkova and Jeffrey Epstein, did you talk with them
 14 during that flight?
 15 A. No.
 16 Q. Where did the flight go from? And obviously,
 17 it landed in Miami, but where did you leave from?
 18 A. West Palm Beach.
 19 Q. And did Nadia and Jeffrey Epstein arrive
 20 together?
 21 A. You know, I don't remember. I was out at the
 22 helicopter and I think they both started walking up. So
 23 I don't know if they came separately or not. I was
 24 already at the helicopter.
 25 Q. How long is that flight from Palm Beach to

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1 Miami?
 2 A. Twenty-five minutes.
 3 Q. And did they talk to one another during that
 4 flight?
 5 A. No.
 6 Q. They were both completely silent during that
 7 flight?
 8 A. Yes.
 9 Q. Okay. Is that typical when they are on
 10 flights together, especially with the helicopter, where
 11 you're in pretty close quarters, that they would abstain
 12 from speaking to one another?
 13 MR. CRITTON: Form.
 14 THE WITNESS: Yeah, it would be typical. It's
 15 very noisy and communicating in a helicopter is,
 16 you know, not that comfortable.
 17 BY MR. EDWARDS:
 18 Q. Over the last five or six years that you have
 19 known or been familiar with Nadia Marcinkova, have you
 20 heard her and Jeffrey Epstein conversing with one
 21 another?
 22 A. I've heard them conversing, but if you ask me
 23 what they had said, I could say it -- I wouldn't even
 24 know what they had said to each other. I've seen them
 25 talking to each other.

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1 Q. But you don't remember a single specific
 2 conversation between Jeffrey Epstein and Nadia
 3 Marcinkova?
 4 A. An honest answer, no.
 5 Q. Okay. And the same for Sarah Kellen; have you
 6 seen or -- have you seen Jeffrey Epstein speak with
 7 Sarah Kellen?
 8 A. I've seen him speak with her, yes.
 9 Q. Can you tell me a single specific conversation
 10 that you have overheard between Jeffrey Epstein and
 11 Sarah Kellen?
 12 A. One thing that comes to mind would be make
 13 sure we have Oreo cookies on the airplane. It would be
 14 something completely nonchalant.
 15 Q. Okay. And do you know or have reason to know
 16 of any employment relationship between Sarah Kellen and
 17 Jeffrey Epstein?
 18 A. I have no knowledge of any of that.
 19 Q. Do you know if Sarah Kellen works for Jeffrey
 20 Epstein?
 21 A. I do not know.
 22 Q. Do you know if Sarah Kellen schedules massages
 23 for Jeffrey Epstein?
 24 A. I have no idea.
 25 Q. Has Jeffrey Epstein ever indicated to you that

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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 ever talked to you about massage therapy or have you
 6 ever overheard her talking about that?
 7 A. No.
 8 Q. You certainly read the papers over the last
 9 couple of years, correct?
 10 A. Not on my top ten list. I mean, I've read a
 11 couple articles, but I'm not one to focus on that so
 12 much as some people would.
 13 Q. Okay. When the investigation about Jeffrey
 14 Epstein came about, the criminal investigation -- you're
 15 aware that's what I'm talking about, right?
 16 A. That was last year?
 17 Q. Well, it was a couple years ago.
 18 A. Right, okay.
 19 Q. Did you speak with Jeffrey Epstein about that
 20 investigation?
 21 A. No.
 22 Q. Were you told not to speak with him about that
 23 investigation?
 24 A. I think we knew ourselves that we weren't --
 25 it wouldn't be proper to even bring it up.

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1 Q. All right. When you read in the newspapers
 2 the allegations that Mr. Epstein was involved with
 3 numerous underage girls for sexual reasons, were you
 4 surprised?
 5 A. I didn't believe it.
 6 Q. Do you believe it today?
 7 A. I don't believe it.
 8 Q. You don't believe that Jeffrey Epstein was
 9 involved with underage girls in a sexual way?
 10 MR. CRITTON: Form.
 11 THE WITNESS: You're asking for my opinion,
 12 and I don't think my opinion is relevant in that
 13 matter.
 14 BY MR. EDWARDS:
 15 Q. I think it's relevant. Can you just tell me
 16 whether today you believe that Jeffrey Epstein has
 17 engaged in sex with underage girls?
 18 MR. CRITTON: Form; speculation, irrelevant,
 19 always.
 20 THE WITNESS: It's irrelevant.
 21 BY MR. EDWARDS:
 22 Q. I need an answer.
 23 A. I don't believe he had sex with underage
 24 women.
 25 Q. Or engaged in any sexual acts with underage

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1 women?
 2 MR. CRITTON: Form.
 3 THE WITNESS: No.
 4 BY MR. EDWARDS:
 5 Q. You think that this is just a story that a
 6 bunch of underage women have made up?
 7 A. Speculation.
 8 MR. CRITTON: Objection. Now it's
 9 argumentative. Who gives a darn what he thinks one
 10 way or another? If he has personal knowledge --
 11 MR. EDWARDS: You're objecting to the form?
 12 MR. CRITTON: It's argumentative.
 13 MR. EDWARDS: You're objecting to the form?
 14 MR. CRITTON: Yes.
 15 MR. EDWARDS: Okay.
 16 BY MR. EDWARDS:
 17 Q. Is that something that you believe that a
 18 bunch of women -- some of which know each other, some
 19 don't, some of which have been on the airplane and some
 20 which haven't -- made this up, that Jeffrey Epstein
 21 engaged in some sexual conduct with them?
 22 MR. CRITTON: Form.
 23 THE WITNESS: What I believe doesn't matter in
 24 this case, does it?
 25

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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 MR. REINHART: I'm going to instruct him not
 6 to answer. Move on.
 7 MR. EDWARDS: Is there a privilege that we're
 8 asserting?
 9 MR. REINHART: No, it's irrelevant. It's
 10 harassment and not likely to lead to discoverable
 11 evidence.
 12 MR. EDWARDS: I'm going to put on the record
 13 right now that it is -- we are allowed discovery
 14 into a RICO count. We are also allowed discovery
 15 into the intent of Mr. Epstein in developing a
 16 criminal enterprise designed to sexually exploit
 17 and sexually abuse underage girls. We believe that
 18 in doing so, he associated intentionally with
 19 people of similar beliefs that sex with underage
 20 girls is okay, and that there have been many
 21 discussions with this witness, as well as many
 22 other witnesses with -- to insure his protection
 23 from law enforcement that they not answer these
 24 specific questions. And thus, the opinions and
 25 beliefs of all of these witnesses that we are

<p style="text-align: center;">69</p> <p>1 alleging associated with this criminal enterprise 2 are certainly reasonably calculated to lead to the 3 discovery of admissible evidence. And if you're 4 still instructing the witness, based on that 5 proffer, not to answer any of these questions, I'm 6 going to continue to ask the questions and you can 7 instruct him not to answer and we can go to the 8 Court. 9 MR. REINHART: My response is to his opinion 10 whether people making allegations in this case are 11 colluding or making up a story is irrelevant to 12 what you just said. So I am going to instruct him 13 not to answer any question that goes to his opinion 14 of someone else's motivation or the truth of facts 15 to which he has no knowledge. 16 So yes, I'm instructing him not to answer. 17 MR. CRITTON: Let me add in my part, is that I 18 think -- you're certainly not only capable to ask 19 questions with regard to what his personal 20 knowledge is, and if he knows something or he has 21 reasonable basis for it; certainly you are entitled 22 to that information. I think you've asked those 23 questions and he's given you straightforward 24 answers as to what he knew or what he didn't know 25 under those circumstances. And as to what his</p>	<p style="text-align: center;">71</p> <p>1 A. It's an opinion, and I believe that he has 2 not. 3 Q. Okay. Isn't it true that at some point in 4 time you learned that Jeffrey Epstein has -- strike 5 that. 6 MR. CRITTON: When you ultimately get to a 7 good place to break, will you let us know? 8 MR. EDWARDS: Let's break now. 9 (A break was 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 name anybody? 16 A. Nadia, Sarah; just people that we see 17 routinely on the airplane. 18 Q. That's people you see routinely in the last 19 five to ten years, right? 20 A. Yes. 21 Q. Prior to that time, anybody that you've 22 noticed as Jeffrey Epstein's friend may be Ghislaine 23 Maxwell? 24 A. What time frame? 25 Q. Is that a person that at some point in time</p>
<p style="text-align: center;">70</p> <p>1 thoughts are on something which he has no factual 2 basis or even an assumption to know one way or 3 another is irrelevant. That's ultimately for a 4 fact-finder in this case. 5 While it's interesting, it's argumentative and 6 I don't think he's -- I mean, do it on a 7 question-by-question basis. If he has knowledge, 8 that's great, but to argue your case with this 9 witness or any other witness doesn't serve a 10 purpose and I think is, you know -- I think it's 11 not a good use of our time, I'll put it that way. 12 But you know, you can go ahead and ask. 13 MR. EDWARDS: I can ask the question and if 14 the witness is being instructed not to answer, 15 we'll let a judge decide whether he needs to answer 16 the question and whether it's discoverable or not. 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 reason 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 sex or engaged in sexual activity with underage women?</p>	<p style="text-align: center;">72</p> <p>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 were 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 in 18 years of traveling and being 21 the pilot and driving -- and taking this person, Jeffrey 22 Epstein, from one property in New York to New Mexico and 23 Florida and around the world, you have no idea what he 24 does in terms of how he makes money? 25 A. No, sir.</p>

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1 Q. I was produced this flight log -- tell me if
2 I'm using the wrong term. What is this called, this
3 book that I've been provided by Dave Rogers?
4 A. I've never seen that book.
5 Q. I'll let you see it. I don't know that it was
6 always in a book, so maybe that's why you haven't seen
7 it. Tell me what we're looking at.
8 A. Well, judging with the name at the bottom, I
9 believe this is Dave's flight log, log book.
10 Q. I didn't know if it was called a flight log.
11 A. Pilot log book, how's that? That's the
12 appropriate name.
13 Q. It was marked as Composite Exhibit 1 in
14 Roger's deposition, as indicated by the exhibit sticker.
15 We'll mark it the same in your deposition as well.
16 MR. CRITTON: Why don't you refer to it as
17 his?
18 MR. EDWARDS: Fine.
19 BY MR. EDWARDS:
20 Q. It's the pilot log book of Dave Rogers?
21 A. Yes.
22 Q. And the years provided in this book are 2002
23 through 2005; I can represent that to you. I'm going to
24 ask you about certain people that David Rogers wrote
25 down as being on the airplane and I want to ask you if

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1 you know who they are. This person right here is Cindy
2 Lopez. It seems like she flew on numerous flights. Do
3 you know who that is?
4 A. No. I heard the name, but I don't know who
5 that is.
6 Q. All right. Is that somebody that you remember
7 seeing on any of the flights that you were on?
8 A. What year are we talking about here? I don't
9 remember.
10 Q. Well, this is January 2002. You'd probably
11 know how to read this book a little bit better than me,
12 so I don't know.
13 A. He keeps his a lot more current, so I know the
14 name. If she walked in here right now, I would probably
15 look right through her, to be honest.
16 Q. Do you know what affiliation or relationship
17 she had with Jeffrey Epstein?
18 A. No.
19 Q. Okay. There are various -- each row I'm told
20 by David Rogers is a different flight and it indicates
21 where it takes off from and where it lands, et cetera.
22 There's a lot of other information, especially over on
23 this side of the page that I'm not familiar with, nor do
24 I need to be.
25 A. Right.

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1 Q. But it's evident that the plane is being used,
2 at least for this time period, January of 2002 through
3 2005, on a fairly regular basis. I mean, we're looking
4 at January 6th, 11th, 13th, 13th, 14th, right?
5 A. Uh-huh.
6 Q. I mean, is that something that you would say
7 accurately reflects the amount of use of Jeffrey
8 Epstein's planes?
9 A. Yes.
10 Q. So he travels quite frequently?
11 A. Yes.
12 Q. And he travels with many different people,
13 right?
14 MR. CRITTON: Form.
15 THE WITNESS: Yes.
16 MR. CRITTON: Can I ask one question? I was
17 wondering what happened, who has possession of now
18 what's the original Exhibit No. 1 of Mr. Rogers'
19 deposition? Did you retain it?
20 MR. REINHART: The actual book itself?
21 MR. EDWARDS: The court reporter took it,
22 right?
23 MR. CRITTON: The one marked as an exhibit,
24 did you keep that?
25 MR. REINHART: This is it.

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1 MR. EDWARDS: This is it?
2 MR. CRITTON: Who took it from the deposition
3 the other day?
4 MR. EDWARDS: I have this one right now.
5 MR. REINHART: That's the only copy?
6 MR. EDWARDS: Okay.
7 MR. CRITTON: So you took the original?
8 MR. EDWARDS: Apparently. It has the original
9 sticker.
10 MR. CRITTON: When I say "the original," the
11 original copy. Would you have someone recreate
12 what you've got and send it to us so we have it?
13 MR. EDWARDS: Sure. In fact, why don't I wait
14 until I get the whole thing and I'll copy all the
15 pages and send it to you instead of piecemeal.
16 MR. HOROWITZ: You mean before the transcript
17 comes?
18 MR. EDWARDS: We can copy it.
19 MR. CRITTON: If you give it to me, I'll copy
20 it and send it back to you.
21 MR. REINHART: I have a copy. It just doesn't
22 have the exhibit sticker on.
23 MR. EDWARDS: That's what was told to me the
24 other day, that's why I took it.
25 MR. CRITTON: I want something -- I just don't

<p style="text-align: center;">77</p> <p>1 want to -- if you give me a copy, I'll put a 2 sticker on it. 3 MR. REINHART: Or just copy the page that has 4 the exhibit sticker on it. 5 MR. CRITTON: Sorry. 6 BY MR. EDWARDS: 7 Q. Like on this flight, we have "JE." I'm 8 assuming that's Jeffrey Epstein, correct? 9 A. Yes, I'll assume. 10 Q. "GM," Ghislaine Maxwell, right? 11 A. Yes. 12 Q. "SK," Sarah Kellen? 13 A. I would assume. 14 Q. I mean -- okay. And then this name, do you 15 recognize that person, Alexia? 16 A. Never heard it. 17 Q. And then Cindy Lopez? 18 A. Yes. 19 Q. You've heard that name? 20 A. I've heard the name. 21 Q. Not sure who that is, though? 22 A. No. 23 Q. There's only one, two, three, four, five, six 24 people on that flight? 25 A. Uh-huh.</p>	<p style="text-align: center;">79</p> <p>1 that is, does it? 2 A. No. 3 Q. Okay. Do you know what the purpose of her 4 being on the airplane flight along with Jeffrey Epstein, 5 Ghislaine Maxwell and Sarah Kellen would be? 6 A. No. 7 Q. Okay. Do you know how it comes about that 8 Cindy Lopez gets on that flight? How does she even know 9 there's a flight available? 10 A. I don't know. 11 Q. All right. Well, let's go down to somebody 12 that we may all know a little bit better. February 9th, 13 2002, there's a flight that has Bill Clinton, four 14 Secret Service agents and then instead of listing names 15 or initials or anything else, it's just listed as two 16 males, one female, Jeffrey Epstein, Ghislaine Maxwell, 17 Sarah Kellen and I forget who Dave Rogers told me "AP" 18 is. Do you remember who that is? 19 A. No. 20 Q. Okay. Either way, how is it that someone like 21 Bill Clinton gets on a Jeffrey Epstein flight? 22 MR. CRITTON: Form. 23 THE WITNESS: I don't know. 24 BY MR. EDWARDS: 25 Q. Do you know before the flight takes off that</p>
<p style="text-align: center;">78</p> <p>1 Q. That's pretty typical of the amount of 2 passengers that you would have on a flight? 3 A. It varied, sure. 4 Q. Okay. But it varied between -- if we look a 5 few lines down, Jeffrey Epstein and Ghislaine Maxwell 6 were the only two passengers. Certainly there were 7 flights like that as well, right? 8 A. Mm-hmm. 9 Q. And so it varied from having one or two people 10 to six or seven people, right? 11 A. Yes. 12 Q. What's the most people that you remember 13 traveling on any of Jeffrey Epstein's airplanes? 14 A. Twenty-five. 15 Q. Okay. That would be a rarity, wouldn't you 16 say? 17 A. Oh, yeah. 18 Q. Because I've looked through this log. I 19 haven't seen any place where there were 25, but there 20 are lines that have maybe eight or nine people listed. 21 A. Right. 22 Q. Let's see. There's a flight from 23 January 15th -- sorry, January 17th, January 20th and 24 January 22nd of 2002 that all had Cindy Lopez. That 25 doesn't serve to refresh your recollection as to who</p>	<p style="text-align: center;">80</p> <p>1 Bill Clinton's going to be a passenger on the flight? 2 A. Yes. 3 Q. And how do you know? How do you get that 4 information? 5 A. The day before I'd get a phone call from, say, 6 Sarah saying we're leaving tomorrow going to wherever, 7 and sometimes she'll say who's going, sometimes she 8 won't. On a case where President Clinton would be on 9 board, we would put a little extra catering on board or 10 do that little extra TLC to the aircraft. 11 Q. If it's leaving -- this says it's leaving from 12 MIA and where is it landing? 13 A. HPN I believe is White Plains. 14 Q. Okay. Do you remember that flight? 15 A. I remember being on it. 16 Q. Well, I mean, if you look through here, 17 obviously you had Bill Clinton on the airplane ten or 18 twenty times, right? 19 A. Yeah. He's my main focus. I remember him 20 being on the aircraft, sure. 21 Q. Do you remember him being on the airplane with 22 younger girls? 23 MR. CRITTON: Form. 24 THE WITNESS: No. 25</p>

<p style="text-align: center;">81</p> <p>1 BY MR. EDWARDS: 2 Q. Okay. Do you know what his relationship was 3 with Jeffrey Epstein? 4 A. No. 5 Q. Do you know if they were friends? 6 A. Assuming. 7 Q. But you're assuming why? Just because he's on 8 his plane? 9 A. Yeah. 10 Q. Okay. So you assume that the people that are 11 listed on here are friends of Jeffrey Epstein's and 12 that's why they are riding on his plane? 13 A. I'm speculating. 14 Q. I'm just not familiar with the -- because I've 15 never been on a private flight -- with the manner in 16 which you go about getting on one of these flights. I 17 mean, you have to, I guess, know that Jeffrey Epstein 18 has a plane, that it's going from a destination that you 19 are at and want to go to, and that it's available and 20 those kind of things. Can you tell me, enlighten me -- 21 A. Well, it's not publicly offered, no. It would 22 be no different than you jumping in your car and knowing 23 you're going to the mall. I mean, it's not public 24 information, you know, where planes are coming to and 25 from, and you don't put your name out there to get</p>	<p style="text-align: center;">83</p> <p>1 this time with Doug Band, three Secret Service agents, 2 Jeffrey Epstein, Ghislaine Maxwell and Sarah Kellen. Do 3 you remember that flight? 4 A. Where did we go? 5 Q. Starts in JFK. 6 A. Right. 7 Q. Where is that? 8 MR. CRITTON: Do you have a date? 9 MR. EDWARDS: March 19th, 2002. 10 THE WITNESS: EGGW I believe is Luton, 11 England. 12 BY MR. EDWARDS: 13 Q. Okay. Do you remember flying to England? 14 A. I do remember flying to England. I just don't 15 remember that trip. What airplane were we in? We were 16 in the Boeing. 17 Q. Do you remember the purpose of the trip? 18 A. No. 19 Q. Do you know who Doug Band is? 20 A. I heard he's Clinton's, how would you say, 21 assistant. I mean, I've seen that in the newspaper, 22 seen it on CNN. 23 Q. Okay. Did you ever hear that Doug Band and 24 Ghislaine Maxwell were together, even for a day or a 25 night?</p>
<p style="text-align: center;">82</p> <p>1 onboard a flight. 2 Q. Does Jeffrey Epstein charge these people as 3 passengers? 4 A. I don't know. 5 Q. Okay. Are these people such as Bill Clinton, 6 does that mean that Bill Clinton called Sarah Kellen or 7 somebody affiliated with Jeffrey Epstein to get on the 8 plane or that Jeffrey Epstein called Bill Clinton and 9 asked do you want a ride? 10 MR. CRITTON: Form; predicate. 11 THE WITNESS: I have no idea. 12 BY MR. EDWARDS: 13 Q. No idea? 14 A. No idea whatsoever. 15 Q. Joe Pagano, do you know who that is? 16 A. Yes. 17 Q. What's his relationship with Jeffrey Epstein, 18 or what was it back in February -- sorry, March 17th of 19 2002, when he and Sarah Kellen and Jeffrey Epstein and 20 Todd and one female were on this flight? 21 A. I don't know to what extent or what his 22 relationship is. He just was a passenger on the 23 airplane. 24 Q. Okay. And the next day -- sorry, two days 25 later on the 19th of March, Bill Clinton flies again,</p>	<p style="text-align: center;">84</p> <p>1 A. No. 2 Q. Did you ever hear that Doug Band and Ghislaine 3 Maxwell were the people attributed to introducing Bill 4 Clinton and Jeffrey Epstein? 5 MR. CRITTON: Form. 6 THE WITNESS: I don't know. 7 BY MR. EDWARDS: 8 Q. All right. There's another flight here on 9 January -- I can't read this upside down. Maybe it says 10 May -- 11 A. Looks like. 12 Q. -- 22nd, 2002. Again, with President Bill 13 Clinton, Janice, Jessica. Can you tell me who Janice 14 and Jessica are? 15 A. I don't remember. 16 Q. Would you know them if you saw them? 17 A. Probably not because the names don't even ring 18 a bell. 19 Q. All right. And then there are plenty of 20 flights, many of flights where Jeffrey Epstein, 21 Ghislaine Maxwell and Sarah Kellen are the primary 22 passengers, or at least are some of the passengers on 23 the flights, correct? 24 A. Mm-hmm, yes. 25 Q. And still, as you sit here, you being the</p>

<p style="text-align: center;">85</p> <p>1 pilot of these flights, you're not sure what their 2 relationship is or whether any of them were socially 3 connected in any real way? 4 MR. CRITTON: Form. 5 THE WITNESS: No. When you're flying the 6 airplane, there's a lot more going on than 7 passengers' relations. 8 BY MR. EDWARDS: 9 Q. All right. You remember this person, Virginia 10 Roberts, are you familiar with her at all? 11 A. I remember the name, that's it. 12 Q. What do you think her relationship is to 13 Jeffrey Epstein? 14 A. No idea. 15 MR. CRITTON: What date are you on, Brad? 16 MR. EDWARDS: Oh, sorry. I am at June 21st, 17 2002. 18 BY MR. EDWARDS: 19 Q. That's not somebody that you specifically 20 remember? 21 A. Mm-mm, no. 22 Q. No? Is that somebody that you think was a 23 regular flyer for any period of time in Jeffrey 24 Epstein's life? 25 A. Not a regular.</p>	<p style="text-align: center;">87</p> <p>1 we're referring to the same flight on June 21st of 2002, 2 that includes Jean Luc Brunel, Virginia Roberts, Jeffrey 3 Epstein, Ghislaine Maxwell, Sarah Kellen, those are the 4 passengers of this flight, does that serve to jog your 5 memory as to who Virginia Roberts is? 6 A. No. I mean, you see how frequently we fly. I 7 mean, it's -- the passengers in the back are so far 8 removed from an operation of commanding an airplane like 9 that, it's nothing that sticks in your head. 10 Q. And you as the pilot, is there any way that 11 you would know what's going on in the back of the 12 airplane? 13 A. No. My concerns are all on the cockpit. 14 MR. CRITTON: Brad, the last one that you 15 mentioned, was that the same date, June 21st, '02? 16 MR. EDWARDS: Yes. 17 BY MR. EDWARDS: 18 Q. There's another name here that I was going to 19 ask you do you know. June 23rd, 2002, Juliana Barbosa, 20 are you familiar with that name? 21 A. No. 22 Q. Also on the same flight with Jean Luc Brunel. 23 That doesn't help to jog your memory either, right? 24 A. No. 25 Q. That's somebody that you remember as a</p>
<p style="text-align: center;">86</p> <p>1 Q. Okay. Jean Luc Brunel, is that a name that 2 you know? 3 A. Yes. 4 Q. How do you know that name? 5 A. Only because it's a unique name and his attire 6 is very unique. So you remember certain things. So I 7 know he who that is. 8 Q. Do you know what he does? 9 A. No. 10 Q. Do you know his association with Jeffrey 11 Epstein, if any? 12 A. No, I don't know what the relationship is. 13 Q. Have you ever heard of him owning or running 14 or managing a modeling company? 15 A. I have seen that in the paper a few years 16 back. 17 Q. Okay. Other than seeing it in the paper, have 18 you ever talked to Jean Luc Brunel or Jeffrey Epstein 19 about owning or running or managing a modeling company? 20 A. No. 21 Q. Do you know if Jeffrey Epstein's affiliated 22 with the modeling company that's owned, run or managed 23 by Jean Luc Brunel? 24 A. No, I have no idea. 25 Q. And seeing that this is a flight now, that</p>	<p style="text-align: center;">88</p> <p>1 frequent passenger? 2 A. Who are you referring to? 3 Q. Juliana Barbosa? 4 A. No. 5 Q. Dr. Jarecki, is that somebody that you 6 remember flying? 7 A. I know the name. He may have been on the 8 airplane once or twice. I'm guessing only. 9 Q. Do you remember meeting him? 10 A. Yes, I have met him. 11 Q. Do you remember his purpose for being on the 12 airplane? 13 A. No, sir. 14 Q. Amanda Venaro, do you remember her purpose for 15 being on the airplane? 16 A. No. 17 MR. REINHART: Can we get a date? 18 MR. EDWARDS: I was asking him if he 19 remembered Amanda Venaro. I wasn't referring to a 20 specific flight. 21 BY MR. EDWARDS: 22 Q. You don't remember her being on the flight? 23 A. I don't remember the name. 24 Q. Me showing you the flight isn't going to jog 25 the memory?</p>

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1 A. No. The name that would launch it first --
 2 MR. CRITTON: Could I ask you a question? You
 3 have the original exhibit marked at the deposition.
 4 It looks like it's been highlighted.
 5 MR. EDWARDS: I highlighted it.
 6 MR. CRITTON: Oh, okay. So you've highlighted
 7 the original exhibit that's marked for the
 8 deposition? I just want the record to reflect
 9 that.
 10 MR. EDWARDS: Yeah.
 11 MR. CRITTON: Okay. Thank you.
 12 MR. EDWARDS: At the time I highlighted it I
 13 didn't realize I was holding on to the original
 14 exhibit. I didn't realize that until you just
 15 pointed that out.
 16 MR. CRITTON: I've noticed that.
 17 MR. EDWARDS: So now when I give it to you,
 18 I'm giving you my work product as well. I don't
 19 see how this works against you, but anyway.
 20 BY MR. EDWARDS:
 21 Q. Melissa Stall, is that a name that you
 22 remember?
 23 A. No.
 24 Q. Okay. And then Jean Luc Brunel is somebody
 25 who I noticed flew relatively frequently, so is that why

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1 you -- that name jogs your memory a little better than
 2 some of these other people?
 3 A. He dresses uniquely.
 4 Q. In what way?
 5 A. Just loud clothes, so something that you would
 6 remember, that's all.
 7 Q. Do you know his role in Jeffrey's life?
 8 A. No.
 9 Q. Ever heard that he is affiliated with Jeffrey
 10 Epstein because they both have a sexual attraction to
 11 underage girls?
 12 MR. CRITTON: Form.
 13 THE WITNESS: You're making an assumption on
 14 that.
 15 BY MR. EDWARDS:
 16 Q. Have you ever heard that?
 17 MR. REINHART: He's asked you if you ever
 18 heard that.
 19 BY MR. EDWARDS:
 20 Q. If your answer is no, it's no.
 21 A. I'm sorry, I thought you said they did. No, I
 22 have not.
 23 Q. Okay. I keep highlighting this name, Virginia
 24 Roberts, just because it looks like somebody that's
 25 regularly flying on the airplane. But the more that you

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1 see her name, that doesn't change your opinion as to
 2 whether or not you remember her or what --
 3 A. I remember the name, you know, that's all.
 4 Q. Do you remember about what age she was when
 5 she was flying on the airplane?
 6 A. No.
 7 Q. This could be somebody who is 50 years old or
 8 ten years old, for all you know?
 9 MR. CRITTON: Form.
 10 THE WITNESS: Yes.
 11 BY MR. EDWARDS:
 12 Q. Okay.
 13 A. I mean, I would only be guessing at an age.
 14 Q. Yeah, but I mean, you don't remember her at
 15 all. So you don't --
 16 A. I remember the name, exactly.
 17 Q. Other than the name?
 18 A. Right, yes, sir.
 19 Q. But you can't even come close to putting a
 20 face with that name?
 21 A. I mean, no. I mean, if you said draw her
 22 picture with -- I couldn't come close to even getting
 23 it.
 24 Q. Okay. You remember this flight where
 25 President Clinton, Kevin Spacey and Chris Tucker,

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1 Jeffrey Epstein, Ghislaine Maxwell?
 2 A. Yes.
 3 Q. From JFK to what is this, LPAZ?
 4 A. LPAZ, that is --
 5 Q. South Africa or something?
 6 A. No, it's the Azores Islands, Santa Maria.
 7 Q. Do you know the purpose of that trip?
 8 A. That was a fuel stop.
 9 Q. Okay. And do you know why Chris Tucker and
 10 Kevin Spacey were on that airplane?
 11 A. No.
 12 Q. Did you talk to them?
 13 A. They came up in the cockpit and said hello.
 14 So they conversed, nothing more.
 15 Q. Another name that is on here a few times, I'm
 16 specifically referring right now to the dates of
 17 September 23rd and 24th of 2002, is Ron Burkle. Do you
 18 know who that is, Ron Burkle?
 19 A. I know what that is, yes. I didn't realize he
 20 was on our airplane.
 21 Q. Right now that is the first time that you
 22 remember Ron Burkle being on your airplane?
 23 A. Yeah.
 24 Q. You don't know the purpose for him being on
 25 that airplane?

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1 A. No. Granted, I'm seeing this for the first
2 time, so I'm trying to --
3 Q. Let me ask you that. Because this was given
4 to me at a deposition of Dave Rogers, who I understand
5 was the chief pilot for Mr. Epstein, and now you're the
6 cheap pilot, but you always kind of worked in tandem,
7 correct?
8 A. Sure; we complemented each other.
9 Q. And you both worked for the same company that
10 flies Jeffrey Epstein's airplanes, right?
11 A. Yes.
12 Q. So I was of the presumption, which may have
13 been -- I may have been misled here, or I may have, you
14 know, misunderstood the purpose behind this book or how
15 it was created. I thought that you had probably seen
16 this before at some point in time?
17 A. Oh, no.
18 Q. Did you know that Dave Rogers was keeping this
19 book?
20 A. No. I know he keeps a pilot log book.
21 Q. Okay. But you didn't know he was keeping the
22 names of the people who were on the airplane?
23 A. No. It's not required, so I mean, it's...
24 Q. So today is the first time that you are
25 learning that the names of the people that are on the

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1 airplane was kept by Dave Rogers?
2 A. Yes, in his log book.
3 Q. Okay. And it's my understanding when you fly
4 back into the country through Customs, you have to
5 report the people that are on the airplane, right?
6 A. Yes.
7 Q. And who would create that document or call
8 that information into Customs?
9 A. Whoever the captain was for the day.
10 Q. At times would that be you?
11 A. Yes.
12 Q. Okay. And at times when you would come into
13 the country with passengers -- well, not at times.
14 Didn't you also have to report their date of birth?
15 A. Sure.
16 Q. At times weren't there also people that you
17 would bring in from other countries into the United
18 States that were under the age of 18?
19 A. Yes.
20 Q. And at some times those were flights that
21 included Jean Luc Brunel and girls that were under the
22 age of 18, right?
23 MR. CRITTON: Form.
24 THE WITNESS: I don't remember those flights.
25

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1 BY MR. EDWARDS:
2 Q. Okay. You don't remember which flights it
3 would have been where there would have been girls under
4 the age of 18?
5 MR. CRITTON: Form.
6 THE WITNESS: Well, I would have to look at
7 the flight logs.
8 BY MR. EDWARDS:
9 Q. It's not illegal to have somebody under the
10 age of 18 on a flight anyway, right?
11 A. No, not at all.
12 Q. Were you ever aware that you, as pilot, were
13 transporting girls under the age of 18 who were supposed
14 to be models?
15 MR. CRITTON: Form.
16 THE WITNESS: I had no knowledge.
17 BY MR. EDWARDS:
18 Q. Okay. You never knew who the people on the
19 airplane were, what their purpose was, their role with
20 Jeffrey Epstein or Jean Luc Brunel?
21 A. No.
22 Q. All right. Do you know Juliette Bryant?
23 A. No, I don't remember that name.
24 Q. Andrea Metrovich?
25 A. I remember the name.

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1 Q. She flew frequently at least for a period of
2 time. Do you remember that?
3 A. Yes.
4 Q. Is that somebody that you thought was familiar
5 with the modeling industry or related to the modeling
6 industry?
7 A. No.
8 Q. Okay. And these people, did Jeffrey Epstein
9 ever tell you how he was associated with any of them?
10 A. No.
11 Q. Did you ever wonder how he was associated with
12 any of them?
13 A. No, never interested.
14 Q. And on several of these -- on most of these,
15 the names or initials of the people that are on the
16 flight are listed. Do you know on the occasions where
17 it lists generically two females or three females or six
18 females, do you know why that was done?
19 A. Just because we didn't know our -- the
20 person's name. We tried to do the best we could to keep
21 the records.
22 Q. When you say "we tried to do the best that we
23 could" --
24 A. Dave and I.
25 Q. Okay. But the first time that you learned

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1 that he kept anybody's names was today, right?
 2 A. Well, I didn't know he kept them in his log
 3 book. We would fill out the passenger manifest as
 4 we're -- having passengers' names in your pilot log
 5 book, he's probably the only person in the world that
 6 does that.
 7 Q. Okay.
 8 A. So when you were mentioning putting the names
 9 down, when you said female or male, you know, I was
 10 referring to the passenger manifest.
 11 Q. For each of these same flights, then, that
 12 we're referring to out of this log book that was marked
 13 as Composite Exhibit 1 in Dave Rogers' deposition, am I
 14 understanding you correctly, then, there would also be a
 15 passenger manifest for each of these flights?
 16 A. Yes.
 17 Q. Now, where would I find the passenger
 18 manifest? Who keeps that documentation?
 19 A. Corporate -- our corporate office.
 20 Q. Which is whom?
 21 A. Up in New York, Darren Indyke.
 22 Q. At what corporation is that, though?
 23 A. NES, LLC, I guess.
 24 MR. REINHART: Do you know for sure?
 25 THE WITNESS: I don't know for sure. I mean,

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1 when you say -- we would just send them up to New
 2 York.
 3 BY MR. EDWARDS:
 4 Q. Did you ever keep a copy of them?
 5 A. No.
 6 Q. Why did you keep a passenger manifest?
 7 A. Just for tracking of -- to have the times on
 8 there for --
 9 MR. REINHART: Can I confer with him on one
 10 thing before you ask a question?
 11 MR. EDWARDS: Yeah, yeah.
 12 (Off the record discussion.)
 13 MR. REINHART: Mr. Edwards, let him amend his
 14 prior answer. I think he misunderstood the
 15 question.
 16 MR. EDWARDS: I don't know what question we're
 17 amounting the answer to.
 18 MR. REINHART: Let me clarify this way: As
 19 the passenger manifests, they are corporate
 20 documents of either JEGER or Hyperion Air, whatever
 21 company owns the plane. Mr. Visoski has physical
 22 custody of them. He retains them but they're not
 23 his documents. They're the corporate documents.
 24 So they're not in New York.
 25 THE WITNESS: Those are the ones that I have

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1 at the airport office that I had turned into
 2 counsel that has the passenger names on them.
 3 BY MR. EDWARDS:
 4 Q. Okay.
 5 A. It's called a passenger manifest.
 6 Q. Okay.
 7 MR. REINHART: Right.
 8 BY MR. EDWARDS:
 9 Q. The passenger manifest, just so I understand
 10 exactly what that is, tell me. Tell me in your own
 11 words.
 12 A. It's departure time, the city, the landing
 13 time exactly and the passengers that would have been on
 14 that flight.
 15 Q. And at times on that passenger manifest would
 16 you list also generically female or male?
 17 A. Yes. That was the document I was referring to
 18 stating that if we didn't know a person, we did not go
 19 out of our way to find out a name. We just put in to
 20 account for how many people were on the aircraft at that
 21 time.
 22 Q. Who is currently in the custody or control --
 23 sorry. Who currently maintains or has possession of the
 24 passenger manifest from 1998 through the present,
 25 through today for those airplanes that you flew related

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1 to Jeffrey Epstein?
 2 A. I currently have, which counsel has now, 2005,
 3 I believe, until the present time. And the records
 4 previous to that I believe were turned into counsel with
 5 the previous investigation with Jack Goldberger's
 6 office, I believe. I believe they maintain those
 7 records.
 8 Q. When you say "turned into counsel," there are
 9 a lot of counsel involved here.
 10 A. Jack Goldberger's office, I believe.
 11 Q. When you say "the previous investigation,"
 12 you're talking about the criminal investigation?
 13 A. Exactly, yes, sir.
 14 Q. And you're aware in that criminal
 15 investigation, obviously, that Jeffrey Epstein pled
 16 guilty to certain charges, correct?
 17 A. From what I read, yes.
 18 Q. Well, you did visit him in jail, right?
 19 A. Yes. We didn't talk about that.
 20 Q. Okay. You know in order to go to jail,
 21 though, you have to be convicted of some crime, right?
 22 MR. CRITTON: Form; argumentative.
 23 THE WITNESS: Yes.
 24 BY MR. EDWARDS:
 25 Q. It wasn't like he was visiting the jail and

<p style="text-align: center;">101</p> <p>1 you were visiting and you happened to bump into each 2 other. You actually went to see him while he was an 3 inmate in jail? 4 A. Right, yes. 5 Q. Okay. So when we're talking about the 6 criminal investigation, we're talking about the criminal 7 investigation revolving around the allegations of 8 Jeffrey Epstein engaging in sex acts with minors? 9 MR. CRITTON: Form. 10 BY MR. EDWARDS: 11 Q. That's the criminal investigation you're 12 talking about, right? 13 MR. CRITTON: Form. 14 THE WITNESS: I don't know the full definition 15 of really what happened there. I know that it was 16 something to do with solicitation of prostitution. 17 That's all I read. 18 BY MR. EDWARDS: 19 Q. Okay. Were you aware that the allegations 20 revolved around underage girls or girls under the age of 21 18? 22 MR. CRITTON: Form. 23 THE WITNESS: I was aware it revolved around 24 it, yes. 25</p>	<p style="text-align: center;">103</p> <p>1 Q. And for the passenger manifest prior to 2005, 2 how far do those passenger manifests go back in time? 3 A. They should go back, I guess, to 1991 or 4 whenever we started existence. 5 Q. And did you turn them over from 1991 all the 6 way through to 2005? 7 A. I don't know. I didn't turn them in. Dave 8 Rogers did. 9 Q. Are you in possession of a copy of any of 10 those materials? 11 A. No. 12 Q. I thought that, you know, ten minutes ago when 13 we were talking about this you said you had them back at 14 an office or -- 15 A. That was the office, the airplane office, 16 which I've given to Bruce, which is the current log. He 17 is in possession of them now. I had possession of them. 18 Q. Okay. What he's in possession of -- just so I 19 know what documents are where, he's in possession of the 20 passenger manifests from 2005 through the present? 21 A. Correct. 22 Q. If I want to obtain the passenger manifests 23 from 1998 through 2005, that's something that I would 24 request from whom? 25 THE WITNESS: Help me out. That's --</p>
<p style="text-align: center;">102</p> <p>1 BY MR. EDWARDS: 2 Q. Who first made you aware of that? 3 A. The newspaper. 4 Q. Were you ever questioned by the police? 5 A. I don't know who questioned me, actually. I 6 did have a questioning session, but I don't even 7 remember who questioned me. 8 Q. Where did that take place? 9 A. I don't remember. 10 Q. At your house? 11 A. No. I'm thinking it was Jack Goldberger's 12 office, or it may have been downtown at the Palm Beach 13 County Courthouse or something in that area there. 14 Q. Okay. So it either happened at an attorney's 15 office that represented -- 16 A. Exactly, yeah, I think so. 17 Q. -- Jeffrey Epstein or the other side? 18 A. Yeah. 19 Q. And during that questioning, is that when you 20 turned over the passenger manifest from prior to 2005? 21 A. Yes. 22 Q. And you turned those manifests directly over 23 to Jack Goldberger? 24 A. Yes. Actually, I believe Dave Rogers did 25 that. I wasn't in possession of those records.</p>	<p style="text-align: center;">104</p> <p>1 MR. REINHART: If you know. 2 THE WITNESS: I don't know who possesses them 3 right now. They were turned into Jack Goldberger's 4 office a year and a half or two years ago. 5 BY MR. EDWARDS: 6 Q. You started out by indicating that you sent 7 these passenger manifests, or a copy thereof, to Darren 8 Indyke or someone at NES, LLC; is that correct? 9 A. Correct. 10 Q. If I requested them from NES, LLC, that's 11 somebody at some point in time was in possession of all 12 the passenger manifests? 13 A. Sure. 14 Q. And NES, LLC's address is the one you gave me 15 at 301 East 66th Street? 16 A. I believe so. I don't know what address 17 they're using for that. I know that -- 18 Q. But Darren Indyke's the attorney that I would 19 call -- 20 A. Yes, sir. 21 Q. -- and he could probably steer me in the right 22 direction? 23 A. Yes. 24 MR. CRITTON: Form. 25</p>

<p style="text-align: center;">105</p> <p>1 BY MR. EDWARDS: 2 Q. Do you know Amy Taylor? 3 A. Yes. 4 Q. How do you know her? 5 A. She was on the airplane. 6 Q. How old is she? 7 A. I have no idea. 8 Q. Age range? 9 A. Twenty-eight. 10 Q. Now? 11 A. Yeah, 28, or maybe if not older now. She was 12 probably 28 probably, I guess. She was somebody in her 13 late 20s. 14 Q. So we're talking about 2003? That's what I'm 15 trying to understand. 16 A. I'm guessing. 17 Q. We're talking 2009 now. We're saying 28. By 18 that do you mean in 2003 she was 23 or 24 years old? 19 A. You're having me guess on her age. 20 Q. Yeah. 21 A. I mean, I can't be accurate. 22 Q. Somebody between 18 and 25? 23 MR. CRITTON: Form. 24 BY MR. EDWARDS: 25 Q. At the time you were seeing her back in --</p>	<p style="text-align: center;">107</p> <p>1 hello. 2 Q. That's somebody who was on the airplane 3 multiple times? 4 A. More than once. I mean, I have no account for 5 how many times. 6 Q. Well, I've asked you about a bunch of names, 7 most of which you don't really remember, but that's one 8 name you do remember. 9 A. Yeah, I remember the name, yeah. 10 Q. Okay. And that's somebody who you actually -- 11 you would remember the face too? 12 A. I might remember Amy's face. 13 Q. All right. Do you remember why she would have 14 ever been on your airplane? 15 A. No idea. 16 Q. President Andres Postrana, at the time I guess 17 that was the president of Colombia back in February -- 18 sorry, March 20th of 2003. Do you know who that is? 19 A. I don't remember him being on the airplane, 20 but I know who that is. 21 Q. Okay. He's on the airplane with Jeffrey 22 Epstein, Ghislaine Maxwell, Sarah Kellen and Jean Luc 23 Brunel? 24 A. Where did we go? 25 Q. I'll let you look at it. I'm talking about</p>
<p style="text-align: center;">106</p> <p>1 A. If you want me to guess -- 2 Q. No, I don't want you to guess. 3 A. I don't know then. 4 Q. Well, if I say between ten and fifty? 5 A. That's a range. 6 Q. If I say between ten and fifty, you're not 7 guessing there anymore. You know she's in there, right? 8 A. She's in the middle there, yeah. 9 Q. Okay. How can we narrow that down? We're 10 talking about somebody in her 20s? 11 A. In her 20s. 12 Q. At least that's what you believed? 13 A. Yes. 14 Q. All right. Is that somebody that you know to 15 be associated or friendly with Ghislaine Maxwell? 16 A. I don't know. 17 Q. Do you know what her relationship was to 18 Jeffrey Epstein or Ghislaine Maxwell? 19 A. No. 20 Q. Do you know where she is now? 21 A. No idea. 22 Q. When's the last time you talked to her? 23 A. I don't know. What date do you have on there? 24 Q. February 2003. 25 A. So, probably that long ago. I may have said</p>	<p style="text-align: center;">108</p> <p>1 this line, PBI, left out of Palm Beach? 2 A. Palm Beach to Nassau. I'm sorry, I don't 3 remember that one. 4 Q. When we're saying we're going down to Nassau, 5 is that a place that you frequently went to with the 6 airplane? 7 A. No, not at all. 8 Q. And is that a route that you would take for 9 the ultimate destination to be Little St. James? 10 A. No. 11 Q. If the ultimate destination was Little 12 St. James -- show me a flight where the ultimate 13 destination was Little St. James. 14 A. Yeah, right here. TIST, that's St. Thomas. 15 Q. Okay. So on that flight that you just pointed 16 to, March 27th, 2003, we have Jeffrey Epstein, Sarah 17 Kellen, Cindy Lopez again, Brent Tyndall -- do you know 18 who Brent Tyndall is? 19 A. Yes. 20 Q. And who is that? 21 A. I believe he was the chef. 22 Q. And Magale Blanchen (phonetic), is that 23 somebody you know to be a model these days? 24 A. I have no idea. 25 Q. Do you remember that flight?</p>

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

<p style="text-align: center;">113</p> <p>1 A. I don't know what his role is.</p> <p>2 Q. Have you ever worked for a company called Air</p> <p>3 Ghislaine? Do you know that company?</p> <p>4 A. Yes.</p> <p>5 Q. Do you know what that company does?</p> <p>6 A. No.</p> <p>7 Q. Have you ever been an employee of that</p> <p>8 company?</p> <p>9 A. No.</p> <p>10 Q. Do you know who runs that company?</p> <p>11 A. No.</p> <p>12 Q. Is Jeffrey Epstein associated with that</p> <p>13 company?</p> <p>14 A. I don't know.</p> <p>15 Q. How have you heard of that company?</p> <p>16 A. It's the company name that our registration</p> <p>17 for the helicopters is under, Air Ghislaine.</p> <p>18 Q. Is that somebody who's ever paid you, a</p> <p>19 company who's ever paid you?</p> <p>20 A. No.</p> <p>21 Q. Do you know Igor Zinoviev?</p> <p>22 A. Yes.</p> <p>23 Q. How do you know him?</p> <p>24 A. Met him on the airplane.</p> <p>25 Q. What is your understanding of his affiliation</p>	<p style="text-align: center;">115</p> <p>1 Q. Do you know -- did you tell me, do you know</p> <p>2 what Leslie Gruff does for Jeffrey Epstein?</p> <p>3 A. I don't know her exact title.</p> <p>4 Q. You talked to all of these individuals at some</p> <p>5 point in time, either on the phone or in person, right?</p> <p>6 A. Yes.</p> <p>7 Q. And you don't know whether they play a role in</p> <p>8 Jeffrey Epstein's life, or if they do, what they do?</p> <p>9 A. Exactly.</p> <p>10 Q. And how do you decide who you're going to call</p> <p>11 for what reason?</p> <p>12 A. For example? Can you be more specific?</p> <p>13 Q. If you're going to make a telephone call and</p> <p>14 you're going to talk to let's say Leslie Gruff, why</p> <p>15 would you choose to call her?</p> <p>16 A. I don't know. You're having me make the phone</p> <p>17 call. I don't know why I would call her.</p> <p>18 Q. Have you ever called her?</p> <p>19 A. I think, yes, I've called her, sure.</p> <p>20 Q. Why? What would be the reason that you would</p> <p>21 call her? Somebody told you to call her? Here, call</p> <p>22 this number?</p> <p>23 A. I may have called her maybe to find out if we</p> <p>24 had a departure time for any specific trip. I mean,</p> <p>25 that would be...</p>
<p style="text-align: center;">114</p> <p>1 with Jeffrey Epstein?</p> <p>2 A. I don't know. He doesn't talk much.</p> <p>3 Q. Okay. And Sandy Berger, do you know who that</p> <p>4 is?</p> <p>5 A. I don't know.</p> <p>6 Q. Do you know any reason why you would have</p> <p>7 flown him on the airplane?</p> <p>8 A. I don't even know the name.</p> <p>9 Q. Adrianna Muchinska?</p> <p>10 A. I know the name Adrianna.</p> <p>11 Q. Somebody who flew on the plane pretty</p> <p>12 regularly?</p> <p>13 A. I would have to look at the logs. I think</p> <p>14 we've had that name on several -- it's a common first</p> <p>15 name. I'm not familiar really on who that is.</p> <p>16 Q. What about Bella, do you know who Bella is?</p> <p>17 Is that a name you ever heard?</p> <p>18 A. Yes.</p> <p>19 Q. Works up in the New York office or something?</p> <p>20 A. Yes.</p> <p>21 Q. Have you ever spoken with Bella personally?</p> <p>22 A. Yes.</p> <p>23 Q. Do you know what she does for Jeffrey Epstein,</p> <p>24 if anything?</p> <p>25 A. I don't know exactly what her role is.</p>	<p style="text-align: center;">116</p> <p>1 Q. Okay. So you're calling her related to</p> <p>2 Jeffrey Epstein?</p> <p>3 A. Sure.</p> <p>4 Q. Okay. So you know that she plays some role in</p> <p>5 some aspect of Jeffrey Epstein's life, whatever that is?</p> <p>6 A. Right.</p> <p>7 Q. Okay. So when I'm asking these questions</p> <p>8 about these people, and I feel like I'm getting answers</p> <p>9 that I'm not really not sure that these people have any</p> <p>10 role in their life, that's not -- that's not completely</p> <p>11 accurate, right?</p> <p>12 MR. CRITTON: Form; argumentative.</p> <p>13 BY MR. EDWARDS:</p> <p>14 Q. I mean, you do know that these people are</p> <p>15 somehow involved with him, whether socially or</p> <p>16 business-wise or otherwise, and during the course of</p> <p>17 your years, you've made telephone calls on his behalf or</p> <p>18 to coordinate things with them right?</p> <p>19 A. Right.</p> <p>20 MR. CRITTON: Object to the form. You said</p> <p>21 "these people."</p> <p>22 BY MR. EDWARDS:</p> <p>23 Q. I'm talking about Sarah Kellen. That's</p> <p>24 somebody you called before, right?</p> <p>25 A. Sure.</p>

<p style="text-align: center;">117</p> <p>1 Q. What would be a reason you called Sarah 2 Kellen? 3 MR. CRITTON: Object to form. Probably the 4 same reasons he said two hours ago, for scheduling 5 purposes. But you've covered that. Go ahead and 6 answer it again. 7 THE WITNESS: For scheduling purposes, would 8 be my only reason to call her. 9 BY MR. EDWARDS: 10 Q. That's funny that you used the exact same 11 words that Mr. Critton wants you to use. 12 MR. CRITTON: It's what he said two hours ago. 13 BY MR. EDWARDS: 14 Q. What would be the reason why you would call 15 Ms. Maxwell, Ghislaine Maxwell? 16 A. Same reason. 17 Q. That's not somebody you call these days, 18 though, right? 19 A. I haven't seen her in some time. 20 Q. What made you stop calling Ghislaine Maxwell 21 where you thought at one point in time you thought she 22 was a person to call related to your job? 23 A. Just was no reason to. 24 Q. Is that somebody who you think is still 25 affiliated or associated with Jeffrey Epstein or his --</p>	<p style="text-align: center;">119</p> <p>1 BY MR. EDWARDS: 2 Q. Do you remember making that phone call after 3 reading the message? 4 A. Let me look at the date here. Okay. March. 5 MR. REINHART: The question is, do you 6 remember making the call? 7 THE WITNESS: Okay, let me. "Person for the 8 car will be here in 15 minutes to drop off foam and 9 papers." I don't know. 10 BY MR. EDWARDS: 11 Q. That doesn't mean anything to you? 12 A. That doesn't -- I mean, you're talking four 13 years ago. I can't answer that accurately. I mean... 14 MR. REINHART: So the answer is you don't 15 recall? 16 THE WITNESS: Yeah, I don't recall. 17 BY MR. EDWARDS: 18 Q. If you don't remember, that's fine. 19 (Plaintiff's Exhibit Nos. 2 AND 3 were marked 20 for identification.) 21 BY MR. EDWARDS: 22 Q. So I'll show you Exhibit 3, the same type of 23 document, and I can make the representation that this 24 was message pads provided by the state attorney's office 25 relative to the criminal investigation revolving around</p>
<p style="text-align: center;">118</p> <p>1 whatever he does? 2 A. I'd only can speculating. I don't know. 3 Q. All right. Do you know the number 4 (917)868-6145? 5 MR. CRITTON: Could you say it slowly. 917? 6 MR. EDWARDS: 868-6145. Thank you. And just 7 in case you didn't get it, I'm going to mark these 8 as an exhibit so that we can read them later. 9 BY MR. EDWARDS: 10 Q. Do you know that number? 11 A. Yes. 12 Q. What is that number? 13 A. That's my cell phone. 14 Q. Okay. Is that still your cell phone? 15 A. Yes, sir. 16 Q. All right. I'm going to show you two 17 documents here or pieces of paper. We'll mark them as 18 Exhibit 2 and Exhibit 3. The first one is dated 19 March 5th, 2005. Do you remember making this telephone 20 call? And just for the record, this looks like a 21 message that's being taken relative to a phone call that 22 you made. 23 MR. REINHART: So the question is does he 24 remember making the phone call? 25</p>	<p style="text-align: center;">120</p> <p>1 Jeffrey Epstein. So that's how I have these documents. 2 I'm not trying to pull out old documents. 3 MR. CRITTON: What's the date? 4 MR. EDWARDS: March 19th. 5 MR. REINHART: The question is, do you 6 remember the call? 7 THE WITNESS: "Tom from Midnight Express is 8 at" -- help me out -- "convention center with new 9 boat. They are two points -- two parts of this." 10 BY MR. EDWARDS: 11 Q. "Show"? 12 A. "Show up the water" -- 13 MR. REINHART: "On the water." 14 THE WITNESS: "On the water and at the 15 center." 16 BY MR. EDWARDS: 17 Q. Do you remember making that call? 18 A. No. I mean, "Tom from Midnight Express is at 19 convention center with new boat. They are two parts 20 of" -- I mean -- 21 Q. But as Jeffrey Epstein's pilot, why would you 22 be leaving such a message about Tom from Midnight 23 Express relative to boats and a boat show? 24 A. I help out with boat purchases or, you know, 25 anything to do with, you know, that moves. So I mean,</p>

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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 on

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 least

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

11 A. Yes.

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

13 of you have discussed?

14 A. Yes.

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

16 least some evidence that a conversation existed between

17 yourself and Jeffrey Epstein relative to a boat or a

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

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1 testimony has been, you know, you're just the 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 are or you are 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 to 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 aware of

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

24 known him?

25 A. Two or three.

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1 Q. And has he consulted with you on each of those

2 purchases?

3 A. Not every one of them, no.

4 Q. Does he own any boats now that you're aware

5 of?

6 A. I don't know if he owns 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 be 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, seven years ago. It was a

23 while ago.

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

25 A. Not on that one specifically, no.

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

2 Jeffrey Epstein being the primary user 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 an opinion

7 of what horsepower should be on the 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 is just giving some opinions about the

12 boat?

13 A. Mm-hmm.

14 Q. Is 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 as -- have you ever

23 known Jeffrey Epstein to have a girlfriend, somebody you

24 consider a girlfriend?

25 A. No.

<p style="text-align: center;">125</p> <p>1 Q. In the 18 years and all the travels you had 2 with him, do you know anything about Jeffrey Epstein's 3 sex life? 4 A. No. 5 Q. Do you know who he has sex with? 6 A. No. 7 Q. Do you know if he has sex 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 at 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 that the -- any gifts or 22 other items or things given to you by Jeffrey Epstein 23 exclusively are the pool heater, the 40-acres of land 24 and the -- 25 A. Use of a company --</p>	<p style="text-align: center;">127</p> <p>1 Q. Did he ever 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 was that? 8 A. Probably a month ago, I'm guessing. 9 Q. For what purpose? 10 A. They gave us a 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 me just check. 24 (Off the record discussion.) 25 MR. REINHART: Okay. He has custody of it,</p>
<p style="text-align: center;">126</p> <p>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 was recently 8 taken, other than Jeffrey Epstein and Nadia Marcinkova, 9 was there anybody else on that flight? 10 A. No. 11 Q. How long -- did you also fly them back from 12 Miami 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 was 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.</p>	<p style="text-align: center;">128</p> <p>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, the 9 owner of the helicopter? Yes, Air Ghislaine. 10 Q. Air Ghislaine? 11 A. That's the helicopter. 12 Q. And the name Ghislaine is obviously not that 13 typical of a 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 were you at the Sikorsky 19 facility? 20 A. Three hours, four hours. 21 Q. And what time of day was 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?</p>

<p style="text-align: center;">129</p> <p>1 A. They have a new helicopter being developed 2 there, so they're trying to look for investors in it. 3 So they were just kind of pushing their product. 4 Q. Do you know what Jeffrey Epstein does for a 5 living for business today, these days? 6 A. No. 7 Q. Do you know or have you ever been to the 8 Florida Science Foundation? 9 A. Yes, sir. 10 Q. And do you know what the Florida Science 11 Foundation does? 12 A. Not exactly. 13 Q. Well, generally? 14 A. No, I don't. I mean, really, I don't. 15 Q. Okay. Is it your understanding that Jeffrey 16 Epstein is somehow affiliated with the Florida Science 17 Foundation? 18 A. It's my understanding that, yes. 19 Q. I mean, did you just by happenstance stumble 20 into the Florida Science Foundation, or was it related 21 to your relationship with Jeffrey Epstein? 22 A. I've heard that's where his office was. I 23 mean, I have no other -- 24 Q. Why did you go there? 25 A. Talk about airplanes.</p>	<p style="text-align: center;">131</p> <p>1 Q. Back in his office? 2 A. Yes, sir. 3 Q. What was that conversation? 4 A. Give me a time frame. I mean, I've been there 5 several times. 6 Q. Okay. How many times do you think you've been 7 to the Florida Science Foundation? 8 A. Twenty, thirty. I mean... 9 Q. Well, the Florida Science Foundation's only 10 been around since late 2007; is that right? 11 MR. CRITTON: Form. 12 BY MR. EDWARDS: 13 Q. Something around that? 14 A. I don't know exactly. 15 Q. All right. So in the last 20 years -- in the 16 last couple of years you've been there 20 or 30 times, 17 approximately? 18 A. Yes, sir. 19 Q. And during those times when you've been there, 20 without having to go through each conversation, did you 21 ever talk to him about the fact that he was on probation 22 or that he was -- 23 A. No. 24 Q. -- any part of the criminal investigation? 25 A. No, not at all.</p>
<p style="text-align: center;">130</p> <p>1 Q. Talk to who? 2 A. Jeffrey. 3 Q. Jeffrey just happened to be at the Florida 4 Science Foundation? 5 A. Yes. 6 Q. How did you know that he was going to be at 7 the Florida Science Foundation? 8 A. He called me and told me. 9 Q. And he said come to the Florida Science 10 Foundation to talk to me about what? 11 A. Maintenance on the airplanes, upcoming. It's 12 an ongoing. 13 Q. And did he have an office there? 14 A. Yes. 15 Q. So this is -- when you walked in, this is the 16 place that's right next to Jack Goldberger's office? 17 MR. CRITTON: Form. 18 THE WITNESS: Yes. 19 BY MR. EDWARDS: 20 Q. And you walk in and there's a reception desk 21 right there? 22 A. Yes. 23 Q. Is that where you talked or did you talk 24 somewhere behind that reception desk? 25 A. Behind the reception area.</p>	<p style="text-align: center;">132</p> <p>1 Q. What was the purpose of the conversation? 2 A. We were sometimes talking about TVs, you know, 3 the latest plasma that's out there, LCD, you know, 4 setting up a stereo systems, you know, in the Palm Beach 5 house. That's usually the main thrust of our 6 conversations these days. 7 Q. How would you know to go to the Florida 8 Science Foundation on each of those occasions? Would he 9 just call you? 10 A. Yeah, he would call me and say come on by or I 11 got a brochure on a new Samsung. 12 Q. With each time you were at the Florida Science 13 Foundation, how long would you stay typically? 14 A. Ten, fifteen minutes. Not much more than 15 that. 16 Q. You would go there for ten or fifteen minutes, 17 have a conversation about a TV and leave? 18 A. Yes, sir. 19 Q. Why couldn't you have that conversation over 20 the phone? What was it about? 21 MR. CRITTON: Form. 22 THE WITNESS: If it was pertaining to a TV and 23 I'd have a brochure, a picture of the TV -- one 24 particular TV we looked at it was the size of a -- 25 like five foot diagonal, so I had a photo of myself</p>

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1 standing next to it or the salesperson. So I mean,
 2 there's a reason to visually show him something
 3 reference to that.
 4 BY MR. EDWARDS:
 5 Q. Did you ever communicate with Jeffrey
 6 Epstein -- you can send him an e-mail, right? You could
 7 have done that?
 8 A. Yes.
 9 Q. To send him the picture or something like
 10 that, that was an option?
 11 A. Right.
 12 Q. And what's Jeffrey Epstein's e-mail address
 13 that you use?
 14 A. I have to do it on my computer, you know,
 15 with -- I have to type in the prompts for it because
 16 it's a long e-mail address.
 17 Q. Okay. How long have you e-mail corresponded
 18 with Jeffrey Epstein?
 19 A. Probably two years. A year to two years. I
 20 mean, it's fairly -- something we just started doing. I
 21 mean, we'd never done that in the past.
 22 Q. Well, in the past he was in jail or have some
 23 restrictions?
 24 A. The restrictions, yes.
 25 Q. So you you'd see him on the airplane

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1 frequently?
 2 A. Exactly.
 3 Q. So when you didn't see him on the airplane
 4 frequently, then some of your correspondence was by
 5 e-mail, other times by telephone?
 6 A. Mm-hmm.
 7 Q. And other times in person?
 8 A. Yes.
 9 Q. And what was your e-mail -- what was the
 10 substance of the e-mail correspondence that you would
 11 have with Jeffrey Epstein?
 12 A. It would have to be related. I mean, you have
 13 to give me a topic. I mean, whether it be a car --
 14 Q. Never about the criminal investigation?
 15 A. Oh, no, no, never.
 16 Q. Do you know what his intention is or his plans
 17 are for when he is off probation?
 18 A. No idea.
 19 Q. Or off community control?
 20 A. I have no idea.
 21 Q. Has he ever indicated to you he wants you to
 22 fly him to some other location outside the United States
 23 to live permanently?
 24 A. Oh, no.
 25 Q. Have you ever flown to his place in Paris?

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1 A. We've landed in Paris.
 2 Q. You're aware that he has some control over
 3 another piece of property over there?
 4 A. I know we've picked up luggage at a residence.
 5 I don't know to what extent his ownership is, if any.
 6 Q. All right.
 7 A. Right.
 8 Q. And are you aware that he has some employees
 9 that listen to what he says that work in that house?
 10 MR. CRITTON: Form.
 11 THE WITNESS: In Paris, yes, there is one
 12 person there.
 13 BY MR. EDWARDS:
 14 Q. What's his name?
 15 A. Voltzan. Because I always thought there was
 16 nobody there.
 17 Q. Vultzan Cauldron (phonetic)?
 18 A. I don't know exactly. I would have to look it
 19 up.
 20 Q. Have you talked to him before?
 21 A. No.
 22 Q. When you've been in Paris --
 23 A. You're not going to ask why?
 24 Q. Well, I'm assuming he doesn't speak English.
 25 A. There you go, okay.

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1 Q. So I thought there was no need for that?
 2 A. Okay. I just wanted to see.
 3 Q. Where do you stay when Jeffrey Epstein is in
 4 Paris?
 5 A. A hotel.
 6 Q. Okay. And in New Mexico, when you land there,
 7 you stay on the ranch somewhere, but at your place?
 8 A. I stay at my place.
 9 Q. And in New York, you have an apartment that he
 10 sets you up at, right, the 301?
 11 A. Yes, I have a place I could stay.
 12 Q. And in St. Thomas?
 13 A. Hotel.
 14 Q. And in Paris you stay at a home?
 15 A. (Nodding.)
 16 Q. Are there any other properties such as what we
 17 were talking about today -- I'm not saying Jeffrey
 18 Epstein is the sole owner or direct owner, but any other
 19 properties that you're familiar with that Jeffrey
 20 Epstein is -- has direct access to and at least it gives
 21 the appearance to you that he is the owner or controller
 22 of that property?
 23 MR. CRITTON: Form.
 24 THE WITNESS: Name the list that you've
 25 stated.

<p style="text-align: center;">137</p> <p>1 BY MR. EDWARDS: 2 Q. The Manhattan house. 3 A. Yes. 4 Q. Mansion or whatever we want to call it, the 5 Zorro Ranch, the island of St. James, the Palm Beach 6 house. 7 A. Mm-hmm. 8 Q. And the Paris place. 9 A. That's all I'm aware of. 10 Q. And have you ever at any of those five places 11 hung around him and stayed around him for -- during the 12 daytime for the course of an entire day? 13 A. No. 14 Q. All right. So do you know what he does during 15 his days while he's there? 16 A. No. 17 Q. Are you aware of a list of underage girls that 18 is kept to come over and service him each of those days? 19 MR. CRITTON: Form. 20 THE WITNESS: Absolutely not. 21 BY MR. EDWARDS: 22 Q. I'm the first person to ever even imply that 23 to you, right? 24 A. A list, yes, you are. 25 Q. Okay. Have you ever been made aware that</p>	<p style="text-align: center;">139</p> <p>1 BY MR. EDWARDS: 2 Q. And ask you about some of the allegations in 3 here and see if you know anything about them. It 4 indicates he owns a flight of aircraft that includes a 5 Gulfstream, a helicopter, and a Boeing 727. True? 6 MR. CRITTON: What's the question? 7 THE WITNESS: Please repeat. 8 BY MR. EDWARDS: 9 Q. Are you aware of him owning a Gulfstream IV 10 aircraft, a helicopter and a Boeing 727? I think we 11 talked about it, right? 12 A. Right. 13 Q. Okay. And it indicates a fleet of motor 14 vehicles? 15 MR. CRITTON: Wait a minute. He said right, 16 is that we talked about it, as distinct from him 17 knowing one way or another. 18 THE WITNESS: What's the question? 19 BY MR. EDWARDS: 20 Q. Do you know that he owns those things? 21 A. I do not know that he owns them. 22 Q. Do you believe that he owns those things? 23 MR. CRITTON: Form. 24 THE WITNESS: I would be guessing, so... 25</p>
<p style="text-align: center;">138</p> <p>1 Sarah Kellen keeps a list of underage girls to service 2 Jeffrey Epstein for sexual purposes? 3 A. I am not aware of them. 4 MR. CRITTON: Form to the last question. 5 BY MR. EDWARDS: 6 Q. Have you ever been made aware that Ghislaine 7 Maxwell keeps a list of girls in the nearby areas of 8 each of -- at Jeffrey Epstein's residences to service 9 him sexually? 10 A. No. 11 MR. CRITTON: Form. 12 BY MR. EDWARDS: 13 Q. Okay. Have you ever read some of the 14 complaints that have been filed against him in the 15 various courts, whether state court or federal court, 16 against Jeffrey Epstein? 17 A. No, I have not. 18 Q. All right. So this Jane Doe 102 versus 19 Jeffrey Epstein, you're not familiar with who that 20 person is? 21 A. No idea. 22 Q. Okay. I'm going to mark Jane Doe, one of the 23 22, versus Epstein as Exhibit No. 4 to this deposition. 24 (Plaintiff's Exhibit No. 4 was marked for 25 identification.)</p>	<p style="text-align: center;">140</p> <p>1 BY MR. EDWARDS: 2 Q. What does the company NES, LLC, do to your 3 knowledge? 4 A. I have no idea. 5 Q. How does that company generate profit, if you 6 know? 7 A. I have no idea. 8 Q. That's the company that pays your paycheck, 9 but you have absolutely no clue what they do to generate 10 money? 11 A. No, sir. 12 Q. If anything? 13 A. Correct. 14 Q. Have you ever heard that that company 15 generates money through sex trafficking of young girls? 16 MR. CRITTON: Form. 17 THE WITNESS: Absolutely not. 18 BY MR. EDWARDS: 19 Q. Never, okay. Have you ever heard that Jeffrey 20 Epstein has a sexual preference for underage girls? 21 Other than what you've read in the newspaper, have you 22 heard that from any other individuals before? 23 A. No. 24 Q. Ever heard that he has had sex or sexual 25 relationships with many minor girls, some as young as 12</p>

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

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

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1 defendant transported minor girls from Turkey." Did you
 2 ever leave in one of his airplanes out of Turkey?
 3 A. I'd have to look at the records. I don't
 4 recall Turkey.
 5 Q. Do you ever remember taking any minor girls
 6 out of Turkey?
 7 A. No, I don't remember.
 8 Q. What records would you have to look at to see
 9 if you took people out or left out of Turkey?
 10 A. I'd have to look at the flight logs, but I
 11 personally don't remember flying into Turkey.
 12 Q. And would the flight logs coming into the
 13 United States from Turkey indicate the names of the
 14 people on the plane?
 15 A. They might.
 16 Q. Okay. Where would I get those particular
 17 flight logs that would have that information?
 18 A. Depended upon what year you're talking.
 19 Q. We're talking in this particular complaint
 20 between 1998 and 2002.
 21 A. I'm not -- I don't possess those passenger
 22 manifests.
 23 Q. Do you know who would possess those?
 24 A. That would be I guess --
 25 MR. REINHART: Do you know who has them today?

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1 THE WITNESS: I do not know who has them
 2 today.
 3 BY MR. EDWARDS:
 4 Q. Who did you give them to?
 5 A. Actually, I didn't give them to anybody. Dave
 6 Rogers was in possession of those logs. So I don't know
 7 where they are right now.
 8 Q. You're still thinking that the best evidence
 9 of that, any flight that may have left out of Turkey,
 10 would be in the flight logs that's marked as Composite
 11 Exhibit 1, or are we talking about the manifests that
 12 we've been referring to?
 13 A. I don't know how accurate that log book is or
 14 even how accurate the passenger manifest is.
 15 Q. Okay. So there may be no actual documentation
 16 indicating a flight leaving out of Turkey when, in fact,
 17 a flight may have left out of Turkey?
 18 A. Correct.
 19 Q. Okay. The Czech Republic is the next place
 20 listed. Is that a place you've flown to or from in a
 21 Jeffrey Epstein airplane?
 22 A. More specific, could you name the city?
 23 Q. I can't name the city, at least the complaint
 24 doesn't name the city. But I've been to the Czech
 25 Republic before. Anywhere within that country, have you

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1 ever flown to or from in a Jeffrey Epstein airplane?
 2 A. We have flown to Prague.
 3 Q. Okay. Have you picked people up in Prague and
 4 flown out of Prague?
 5 A. I don't remember.
 6 Q. I'm not saying no, you didn't, but --
 7 A. Best of my knowledge.
 8 Q. -- you don't remember?
 9 A. Exactly. Best of my knowledge, I don't
 10 remember.
 11 Q. Do you remember the reason for going to Turkey
 12 or to Prague?
 13 A. No.
 14 Q. This also says Asia. Have you ever flown to
 15 or from Asia with Jeffrey Epstein?
 16 A. Yes.
 17 Q. Or on a Jeffrey Epstein airplane?
 18 A. Yes.
 19 Q. Do you know the purpose of those flights to
 20 and from Asia?
 21 A. No.
 22 Q. Did it ever occur to you that maybe it was to
 23 pick up minor girls for him to have sex with on the back
 24 of the airplane?
 25 MR. CRITTON: Form.

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1 THE WITNESS: Never occurred to me.
 2 BY MR. EDWARDS:
 3 Q. Did you ever hear that he maintained some of
 4 these underage girls as sex slaves --
 5 A. Never heard of such a thing.
 6 Q. -- from the age of 12 through the age of 16?
 7 MR. CRITTON: Form.
 8 THE WITNESS: No knowledge of that.
 9 BY MR. EDWARDS:
 10 Q. Ever picked up girls that looked young, many
 11 of whom who spoke no English? Do you ever remember
 12 that?
 13 A. Zero, do not.
 14 Q. All right. The complaint goes on to say,
 15 "Plaintiff was required to be sexually exploited by
 16 defendant's adult male peers, including royalty." So
 17 I'm going to talk, do you have any familiarity with
 18 Prince Andrew?
 19 A. I know who he is.
 20 Q. Was he ever on the airplane?
 21 A. He may have been on the airplane.
 22 Q. Do you remember him on the airplane with young
 23 girls?
 24 A. No, I do not.
 25 Q. Do you remember Jeffrey Epstein flying in to

<p style="text-align: center;">153</p> <p>1 meet with Prince Andrew? 2 A. I don't remember. I know that happened, but I 3 couldn't be accurate. 4 Q. Has Prince Andrew ever been on the airplane at 5 the same time as a young girl, to the best of your 6 memory and knowledge? 7 A. To the best of my knowledge, no. 8 Q. This also says politicians, talking about 9 local or U.S. politicians. Do you remember certain 10 politicians being on the airplane? 11 A. No -- I mean yes, I do. 12 Q. What politicians would that be? 13 A. President Clinton. 14 Q. Okay. Who else? 15 A. Former president of Israel -- help me out with 16 the name, Barak? 17 Q. Ehud Barak? 18 A. Yes, those are the two that I remember. 19 Q. How many times was Ehud Barak on the airplane 20 that you piloted for Mr. Epstein? 21 A. Maybe once. 22 Q. And where did that flight pick up and where 23 did it go to, to the best of your memory? 24 A. Best of my memory, it was Palm Beach to 25 Teterboro.</p>	<p style="text-align: center;">155</p> <p>1 BY MR. EDWARDS: 2 Q. Okay. Do you remember who else was on that 3 flight that left after 10 p.m.? 4 A. No, I do not. 5 Q. Do you remember why it left after 10 p.m.? 6 A. No, I do not. 7 Q. Do you remember Jeffrey Epstein instructing 8 you to wait until after 10 p.m. to leave? 9 A. No. 10 Q. Would you have listened to him if he had told 11 you -- if he had instructed you to do that? 12 A. I don't understand the question. 13 Q. Well, if he told you wait until after 10 p.m., 14 I realize there's going to be a fine, but wait until 15 after 10 p.m. to leave, intentionally leaving 16 after 10 p.m., do you remember that instruction ever -- 17 A. No, I don't remember that instruction. 18 Q. Okay. 19 A. I mean, it just happened to be departing 20 after 10 and there is a penalty for leaving after 10 for 21 noise. So there was no intention to... 22 Q. All right. This also talks about this 23 particular person 15 years old being sexually exploited 24 by businessmen and/or other professional or personal 25 acquaintances. Are you aware of other personal or</p>
<p style="text-align: center;">154</p> <p>1 Q. Where is Teterboro? 2 A. In New Jersey. 3 Q. And what was the purpose of that flight, do 4 you know? 5 A. I don't know. 6 Q. Was Jeffrey Epstein on the flight? 7 A. I'd have to look at the flight logs to 8 guarantee. 9 Q. Anything about that flight stick out in your 10 mind? 11 A. None. 12 Q. Such as a fine needing to be paid because it 13 left after 10:00 p.m.? 14 A. For that was the flight, yes. 15 Q. You remember that? 16 A. It's coming back to me. 17 Q. And do you remember young girls being on that 18 flight? 19 A. No. 20 Q. All right. 21 A. I remember the fine. 22 Q. Do you remember who paid the fine? 23 MR. CRITTON: Hold on. Let me object to form 24 of the question. "Do you remember" it suggests 25 that there were. So form, predicate.</p>	<p style="text-align: center;">156</p> <p>1 professional acquaintances of Jeffrey Epstein also 2 sexually abusing or exploiting little kids or underage 3 girls on your airplane? 4 MR. CRITTON: Form. 5 THE WITNESS: No. 6 BY MR. EDWARDS: 7 Q. If you had been aware that Mr. Epstein was -- 8 and by this -- this is more in the form of a 9 hypothetical, and that I'm not going to suggest to you 10 it's a fact that he was. But if you had been aware that 11 every single day Jeffrey Epstein's goal was to locate 12 underage girls for the purposes of sex, and either have 13 sex with them on the airplane or at some other 14 designation that you were destination that you were 15 traveling him to, would you have continued to pilot 16 those planes? 17 MR. CRITTON: Form. 18 THE WITNESS: You said it was hypothetical? 19 BY MR. EDWARDS: 20 Q. Right, it is a hypothetical. 21 A. Why would I want to answer that? Because 22 you're being hypothetical. I mean, it would obviously 23 be wrong. 24 Q. Sure. Well, a hypothetical question is a 25 legal question that I'm allowed to ask.</p>

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

<p style="text-align: center;">161</p> <p>1 pretty much after 10. But we've been here since 2 10:00. I want to take a lunch break. 3 MR. EDWARDS: Let's do it. 4 MR. CRITTON: For an hour? 5 MR. EDWARDS: Sure. 6 (A break was had at 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 as 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?</p>	<p style="text-align: center;">163</p> <p>1 just talked about general happenings that go on in 2 there. 3 Q. What did 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 a great deal. You know, we got major 8 maintenance on the big airplane, so we discussed that a 9 little bit. And then it was really just how 10 uncomfortable he was there. 11 Q. How long did you visit with him on that first 12 visit, July 3rd? 13 A. I think we stayed the full hour. 14 Q. All right. Is 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 aware 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 us 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.</p>
<p style="text-align: center;">162</p> <p>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 see us both at 10 the same time. There was no apparent reason. 11 Q. How did you know that Jeffrey wanted to see 12 you? 13 A. I don't recall who called and told me that he 14 wanted to see 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</p>	<p style="text-align: center;">164</p> <p>1 Q. And did Igor talk to him as 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 a 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, or if 10 not, we may have met at the airport and drove together. 11 But we did 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 mean "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 a corporation.</p>

<p style="text-align: center;">165</p> <p>1 MR. CRITTON: Form; move to strike. Sounds 2 like a guess. 3 BY MR. EDWARDS: 4 Q. To the best of your knowledge, that's how most 5 of the items that you've discussed -- that being the 6 Boeing and the Gulfstream -- they were usually held in 7 corporate names, to your knowledge? 8 A. To my knowledge, exactly, yes. 9 Q. And so when you're saying the -- when you're 10 talking about the Hummer vehicle and you're stating that 11 it's likely a corporate entity, is that just something 12 that you're guessing about, or do you have knowledge? 13 A. No, I'm just guessing. 14 Q. Okay. 15 A. I have no proof -- 16 Q. -- of ownership of who it's registered to or 17 anything like that? 18 A. Exactly. 19 Q. Is it registered to you? 20 A. No, no. 21 Q. So it's registered to somebody other than you? 22 A. Exactly. 23 Q. Okay. 24 A. I just drive it, I guess. 25 Q. Okay. So on July 5th, 2008, you go back to</p>	<p style="text-align: center;">167</p> <p>1 facility that was holding Jeffrey Epstein, they're 2 accurate, your name is the first one listed on the top 3 of the sheet? 4 A. Right. There may have been earlier dates. I 5 have no idea. 6 Q. Well, you know, the first date that he could 7 have been in there it looks like was 7/1/08 and then, 8 you know, so I guess somebody could have seen him 7/1 or 9 7/2, but those records were never provided to us. You 10 see we were provided a whole big stack. 11 A. I understand. 12 Q. The next date I'm going to talk to you about 13 is 7/12/08. 14 A. Uh-huh. 15 Q. It looks, again, like it's yourself and Igor 16 Zinoviev? 17 A. Mm-hmm. 18 Q. And that's something we talked about in this 19 deposition. I'm going to ask you again, I don't know 20 that you elaborated last time, what is your 21 understanding of his relationship with Jeffrey Epstein? 22 Is that a friend of his? 23 A. I don't know his job description. I mean, 24 he's somebody that's around a lot, but I don't know his 25 exact job description. His English is, to say, not</p>
<p style="text-align: center;">166</p> <p>1 see him in jail again, and again, Igor Zinoviev is 2 listed as a visitor. Did you go with him together on 3 that occasion? 4 A. I didn't even realize it was two days after 5 the first visit. 6 Q. Well, I mean, you see where this is going? 7 A. Yeah, I do. It gets further apart, yeah. 8 Q. Do you remember what the discussion was on 9 7/5/08? 10 A. No, because it's probably similar to the first 11 one. I mean, we talked -- actually, one of the visits 12 we talked about fishing and just trying to -- you know, 13 we were talking about things that would just occupy his 14 mind with intelligent conversation that he probably 15 wasn't getting there. So for that hour of the day, I 16 tried to give my best of intelligent conversation to 17 him. 18 Q. Okay. On his visitor log you were the first 19 one to go visit him. Did you know that? 20 A. I did not know that. I wasn't aware of that. 21 MR. CRITTON: Let me just object to form to 22 the last question. 23 BY MR. EDWARDS: 24 Q. Well, at least if these records are accurate, 25 which are the records that were provided to us by the</p>	<p style="text-align: center;">168</p> <p>1 100 percent, so conversation with somebody that doesn't 2 fully understand you, you know, you get lost in 3 translation a little bit. So I don't -- 4 Q. So on these three visits to the jail, the 5 first three that we're talking about that we've talked 6 about so far, each of those times you traveled to and 7 from the jail with Igor? 8 A. Mm-hmm. 9 Q. Yes? 10 A. Yes, yes. 11 Q. And each of those time, is it fair to say you 12 had some form of communication either on the way to the 13 jail or -- 14 A. Sure. 15 Q. -- to the jail? 16 A. Yeah. 17 Q. Since you're going to see an inmate in the 18 jail, is it a safe assumption a portion of that 19 conversation was about the person that you're going to 20 see and possibly the crime that was committed? 21 A. Yes, that would be a good assumption. 22 Q. Okay. And what was the form -- what was the 23 substance of that conversation that you can remember 24 related to Jeffrey Epstein and the location you were 25 going to visit him?</p>

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1 A. I think Igor and I discussed on trying to be
2 upbeat and not look at the position that he's in sitting
3 across the table from us, to be upbeat and uplift his
4 spirits.
5 Q. Did you and Igor discuss whether or not you
6 were going to talk to him about his plea of guilty or
7 the fact that he's not registered as a sex offender?
8 A. No.
9 Q. Or whether you were going to stay away from
10 those topics?
11 MR. CRITTON: Form.
12 THE WITNESS: We never -- we don't discuss
13 that amongst ourselves and/or with Jeffrey in any
14 way, form.
15 BY MR. EDWARDS:
16 Q. Okay. But that's not -- I realize you didn't
17 discuss that. You've told me that.
18 A. Right, but we didn't discuss that even prior
19 to going in, as you asked.
20 Q. Okay. So your discussion was mainly hey,
21 let's be upbeat?
22 A. Yes.
23 Q. And that was to, in essence, maintain his
24 spirits or raise his spirits?
25 A. Exactly.

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1 Q. Okay. And you were doing that as a friend of
2 his, not just his pilot, right?
3 A. I felt honored that he asked me to come and
4 give support like that, because prior to him going away,
5 it was known to us that there was going to be no
6 visitors, because I had offered to him that I would be
7 happy to come and visit him if he deemed it necessary,
8 and he says no, I'm not going to have anybody.
9 Q. So --
10 A. I guess it was so bad there, that he may have
11 changed his mind and wanted to have some visitors.
12 Q. When did you have this conversation with him
13 where he indicated he was not going to have visitors
14 while he was in jail?
15 A. I don't exactly remember. It may have been on
16 the trip heading to Palm Beach, the last flight.
17 Q. From his island, from St. Thomas I guess it
18 would be from?
19 A. I forgot where it started from. It might have
20 been New York or the island, one of the two. I don't
21 remember the last flight.
22 Q. And I mean, did at least the fact come up that
23 hey, this a person who you're -- is going to be in jail
24 for some time?
25 A. Mm-hmm, yes.

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1 Q. And in the course of that conversation, again,
2 the allegations and the unusual I'll call it case
3 against him, that didn't come up between you and
4 Mr. Epstein?
5 A. I never talked about it with him.
6 Q. And at that point in time, what were you aware
7 of in terms of the number of girls that he was alleged
8 to have had sexual -- some sort of sexual relationship
9 with him at his Palm Beach house?
10 A. What was the question? How many girls?
11 Q. Yeah, how many girls were you --
12 A. Aware of?
13 Q. -- aware of?
14 A. None. I wasn't aware of any, to be honest.
15 Q. The next visit is on 7/17/08 and it's Igor
16 Zinoviev and somebody named Jean Rene and then yourself
17 Do you know who Jean Rene is?
18 A. No.
19 Q. Do you think that that visit, that you visited
20 him at the same time that Jean Rene visited?
21 MR. CRITTON: What's the date?
22 MR. EDWARDS: It's 7/17/08.
23 THE WITNESS: No, I don't know a Jean Rene,
24 unless somebody came after. I mean, I don't -- I
25 don't know a Jean Rene.

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1 BY MR. EDWARDS:
2 Q. Okay. And then before you visited him again,
3 the visitors are listed as Nadia Marcinkova or Sarah
4 Kellen?
5 A. Mm-hmm.
6 Q. Mainly those two individuals. And they list
7 as addresses, 301 East 66th Street as their residence?
8 A. Uh-huh.
9 Q. Given your previous testimony, does that
10 surprise you that they list those -- that address as
11 their residence?
12 MR. CRITTON: Form.
13 THE WITNESS: I've seen them there, so I mean,
14 I'm not surprised.
15 BY MR. EDWARDS:
16 Q. Okay. Did you know that they were visiting
17 him in jail?
18 A. No, I didn't know who was scheduled to see him
19 or whatever.
20 Q. Did Jeffrey talk to you at any point in time
21 about Nadia Marcinkova or Sarah Kellen?
22 A. No, not at all.
23 MR. REINHART: Can we get a time frame for
24 that? Ever?
25 MR. EDWARDS: Oh, no, well, I was talking --

<p style="text-align: center;">173</p> <p>1 I'm sorry.</p> <p>2 BY MR. EDWARDS:</p> <p>3 Q. I was talking right now about in the</p> <p>4 conversations that you had with him that we've discussed</p> <p>5 with you and him in the jail facility. Did he discuss</p> <p>6 with you Nadia Marcinkova or Sarah Kellen?</p> <p>7 A. No, no.</p> <p>8 Q. Did he talk to you about whether or not you</p> <p>9 should talk to anybody about his criminal investigation</p> <p>10 or possible litigation?</p> <p>11 A. No, not at all.</p> <p>12 Q. The next time you see him is on August 9th,</p> <p>13 2008, at the jail. In that occasion it mentions as his</p> <p>14 visitors that day Nadia Marcinkova, Sarah Kellen and</p> <p>15 Larry Visoski. Did you go to the jail with Sarah and</p> <p>16 Nadia that time?</p> <p>17 A. No. Who was on there? Which one are you</p> <p>18 referring to?</p> <p>19 Q. The next one, I tried to highlight them just</p> <p>20 so that --</p> <p>21 A. Right, that one.</p> <p>22 MR. REINHART: 8/9.</p> <p>23 BY MR. EDWARDS:</p> <p>24 Q. 8/9/08?</p> <p>25 A. One of those two we all drove together. I</p>	<p style="text-align: center;">175</p> <p>1 at the house.</p> <p>2 Q. Those are cars that Jeffrey Epstein owns, to</p> <p>3 your knowledge?</p> <p>4 A. I don't know who owns them.</p> <p>5 Q. What cars are there that -- I know with this</p> <p>6 case we're dealing with a lot of corporations and it's</p> <p>7 not like asking me, Hey, what car do you own? But what</p> <p>8 cars are you aware that are -- that you believe are used</p> <p>9 primarily by Jeffrey Epstein?</p> <p>10 A. Used primarily by Jeffrey Epstein, a Mercedes</p> <p>11 S500 sedan. I don't remember the year on that one.</p> <p>12 Q. Okay.</p> <p>13 A. There's a Cadillac Escalade.</p> <p>14 Q. Okay.</p> <p>15 A. Those are his two main cars that he would be</p> <p>16 driven in or --</p> <p>17 Q. What are the other cars that you regularly see</p> <p>18 parked at his Palm Beach mansion, if there are any?</p> <p>19 A. It would be a whole array. Half the time the</p> <p>20 parking lot is full because of construction workers,</p> <p>21 yards keepers.</p> <p>22 Q. Okay. Fair enough. What vehicle does Sarah</p> <p>23 Kellen drive or Nadia Marcinkova drive when they're down</p> <p>24 here, if you know?</p> <p>25 A. I mean, anybody has a choice to pick out a car</p>
<p style="text-align: center;">174</p> <p>1 don't remember which one it was. It was either the 9 or</p> <p>2 the 16, and then the other one I met everybody there.</p> <p>3 So I can't be accurate on which time we all drove</p> <p>4 together.</p> <p>5 Q. How did you coordinate driving together?</p> <p>6 A. I don't exactly remember now. I mean, I think</p> <p>7 Sarah and I may have conversed on the phone and said do</p> <p>8 you want to meet at Jeffrey's house and we all drive</p> <p>9 together? Does it make sense to get together and drive</p> <p>10 one car.</p> <p>11 Q. Is that jail visit the result of Jeffrey</p> <p>12 Epstein requesting your presence there, or is that the</p> <p>13 result of you wanting to go see him as a friend in jail?</p> <p>14 A. A combination of both. I'm sure if I said,</p> <p>15 Hey, I'd like to come to jail and visit you, that he</p> <p>16 would either say yea or nay.</p> <p>17 Q. Okay. And you said at least on one of those</p> <p>18 occasions you rode to and from the jail with Sarah and</p> <p>19 Nadia?</p> <p>20 A. Yes.</p> <p>21 Q. And during any of -- obviously, when you're in</p> <p>22 the car together -- well, who's driving the car?</p> <p>23 A. I was driving, I believe.</p> <p>24 Q. And that's the Hummer again?</p> <p>25 A. Actually, I think we take one of the suburbans</p>	<p style="text-align: center;">176</p> <p>1 or whatever there. I've seen Nadia driving a Mercedes</p> <p>2 convertible.</p> <p>3 Q. Is that different than the Mercedes S500</p> <p>4 sedan?</p> <p>5 A. Yes, I think it's different.</p> <p>6 Q. When you say they have basically a choice of</p> <p>7 cars to drive --</p> <p>8 A. Well, there's cars in the lot there.</p> <p>9 Q. Obviously, they can't get in one of the</p> <p>10 construction workers' cars?</p> <p>11 A. No.</p> <p>12 MR. REINHART: Let him finish his question.</p> <p>13 BY MR. EDWARDS:</p> <p>14 Q. So that's kind of what I'm getting at. What</p> <p>15 other cars do you think that Jeffrey Epstein has --</p> <p>16 whether it's titled, I don't know --</p> <p>17 A. Right.</p> <p>18 Q. -- but he is the person in control of that</p> <p>19 vehicle?</p> <p>20 A. Right.</p> <p>21 Q. What other vehicles do you think he's</p> <p>22 controlling in Palm Beach?</p> <p>23 A. In Palm Beach?</p> <p>24 Q. We've named the Mercedes S500 sedan, Cadillac</p> <p>25 Escalade?</p>

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1 A. Right.

2 Q. And I've identified a Mercedes convertible?

3 A. Right.

4 Q. In addition to that, are there any others that

5 you're aware of?

6 A. That he's in control of?

7 Q. Yes.

8 A. No.

9 Q. And does the conversation come up between

10 Nadia and Sarah and yourself about the reason why

11 Jeffrey Epstein is in jail?

12 MR. REINHART: Can we get a time frame?

13 MR. EDWARDS: At any time.

14 BY MR. EDWARDS:

15 Q. At any time have you ever had that exact

16 conversation ever come up?

17 A. No, we didn't talk about that among ourselves

18 really.

19 Q. And have you ever been told that Nadia

20 Marcinkova provides the role of a sex slave to Jeffrey

21 Epstein? That's just her role in life?

22 MR. CRITTON: Form.

23 MR. REINHART: That's just have you been told

24 that.

25 THE WITNESS: No.

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1 BY MR. EDWARDS:

2 Q. Have you been led to believe that by anybody?

3 A. No.

4 MR. CRITTON: Form.

5 BY MR. EDWARDS:

6 Q. Do you have any -- based on your observations,

7 do you have any other opinion as to what role she plays

8 in Jeffrey Epstein's life, if any?

9 A. I don't have an opinion on what the role is.

10 Q. Do you agree with the criminal statutes that

11 are in place to protect young children from sexual

12 predators? Do you agree with those statutes?

13 MR. CRITTON: Form.

14 MR. REINHART: I'm going to direct him not to

15 answer the question. It's irrelevant and it's not

16 likely to lead to discoverable evidence what his

17 opinion is on a law that's been passed by the

18 legislature of Florida.

19 MR. EDWARDS: Just so the record is clear, I

20 don't know that we did this last time, but it's

21 been alleged in the complaint -- it has been

22 alleged in several complaints that Jeffrey Epstein

23 particularly prays on vulnerable disadvantaged

24 females, underage females, and that in order to

25 gain access to the multitude of underage females,

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1 he utilizes various people, schedulers, pilots,

2 handlers and other associates and co-conspirators

3 that have a similar mentality; that is, people that

4 do not agree with laws related to sex abuse and

5 abuse of children. And that's why this line of

6 questioning regarding whether or not this witness

7 has a motive or a bias or was involved in

8 conversations related to his motive or bias, to

9 continue to work for Jeffrey Epstein or believed

10 the same beliefs of Jeffrey Epstein, is at least

11 reasonably calculated to the lead the discovery of

12 admissible evidence, and that is the argument at

13 least along those lines being made to the judge

14 regarding these questions.

15 MR. CRITTON: Can we talk for just one minute?

16 Because maybe -- can I talk with -- well, I know I

17 can talk with Bruce. Let's just take a break.

18 (A break was had at 2:45 p.m.)

19 MR. EDWARDS: We're back on the record. Do

20 you have the same position?

21 MR. REINHART: Let me say this: He previously

22 said he would have never allowed anything on the

23 plane to be done illegally. If you want to ask if

24 he agrees with the law applied by the

25 legislature -- do you agree the law passed by the

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1 state of Florida should be complied with?

2 THE WITNESS: I don't know what the law is.

3 BY MR. EDWARDS:

4 Q. Okay. The laws in place to protect children

5 under the age of 18 from being sexually touched,

6 fondled, molested by people over the age of 24, do you

7 agree with those laws?

8 A. Yes.

9 Q. And you agree that persons who commit a

10 violation of those laws should be prosecuted?

11 A. Persons that do that.

12 MR. CRITTON: Form.

13 BY MR. EDWARDS:

14 Q. Yes, persons that do that.

15 A. Persons that do that, absolutely.

16 Q. And if you were to receive confirmed -- what

17 you would perceive as confirmed information that Jeffrey

18 Epstein was one of those persons, would you continue to

19 be employed by or alongside of Jeffrey Epstein?

20 MR. CRITTON: Form; speculation.

21 THE WITNESS: You're assuming that there's

22 guilt.

23 BY MR. EDWARDS:

24 Q. No. I'm saying, hypothetically, if you were

25 convinced that Jeffrey Epstein was guilty of those acts

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

<p style="text-align: center;">185</p> <p>1 different periods. Was there ever a time when they 2 allowed you to stay for more than an hour? 3 A. No, not to my knowledge. 4 Q. Okay. So again, it's Sarah Kellen and Nadia 5 Marcinkova, same questions: Did you ever ask them their 6 involvement with Jeffrey Epstein? 7 A. Absolutely not. 8 Q. And again, what was the discussion with 9 Jeffrey Epstein along with Sarah Kellen and Nadia 10 Marcinkova? 11 A. On the last visits, it was mainly airplane 12 stuff and later on in the visitations, we were advised 13 that you could leave early, so I would only stay for 14 maybe 30 minutes and then, you know, Jeffrey would 15 continue his conversations with them and then I would 16 just wait outside. 17 Q. Okay. 18 A. So I would do my business with him talking 19 about airplanes or whatever I had coming up and then 20 exit. 21 Q. And then why did you stop visiting him in jail 22 after that September 6th, 2008, visit? 23 A. I was never called back to visit. 24 Q. Okay. Well, shortly after that then he was on 25 work release?</p>	<p style="text-align: center;">187</p> <p>1 telephone, how frequently would you talk to him? 2 A. How frequently during a given week? 3 Q. Yeah. 4 A. More specific? 5 Q. Sure. 6 A. Depends upon what's going on that week. 7 Q. I mean, is it somebody you would talk to him 8 every day? 9 A. No. 10 Q. All right. Well, at that point in time, he's 11 going from the jail to the Florida Science Foundation 12 and back, and if you're not going to see him in person, 13 and you're not corresponding by e-mail, then would you 14 correspond by telephone, that either being you call him 15 or he called you? 16 A. Yes. 17 Q. And, you know, in any given week, what was the 18 typical week like? I mean -- 19 A. How many times? 20 Q. Yes. 21 A. Maybe once in a week, sometimes twice in a 22 day. I mean, it would vary. There was no routine. 23 Q. And what would the conversation be? 24 A. Mostly we discussed audio and video, TVs, home 25 theaters. It's a niche of his and we're constantly</p>
<p style="text-align: center;">186</p> <p>1 A. Well, that's true. 2 Q. Right? 3 A. Yeah. 4 Q. So the next times you would have gone to see 5 him would have been at the Florida Science Foundation, 6 where we talked about earlier? 7 A. I've seen him there, yes. 8 Q. Okay. And in fact, I think you said you saw 9 him 20 or 30 times -- 10 A. Sure. 11 Q. -- over the last two years, last year and a 12 half or so? 13 A. Yes. 14 Q. And how long would you stay each time at the 15 Florida Science Foundation and talk to him? 16 A. Like my original answer, ten, fifteen minutes. 17 Q. Okay. And how frequently would you talk to 18 Jeffrey Epstein while he was at the Florida Science 19 Foundation? 20 MR. REINHART: I'm sorry, you're talking in 21 person or all conversations? Because he testified 22 he had phone conversations and personal visits. 23 BY MR. EDWARDS: 24 Q. I was actually talking about phone 25 conversations. So when you would call him on the</p>	<p style="text-align: center;">188</p> <p>1 looking at new items that are out there, you know, 2 what's the biggest LCD flat screen out there. 3 Q. Okay. And since he's been out of jail and on 4 community control or house arrest or whatever it is, 5 where he's located at his home now, have you visited him 6 at his home? 7 A. I have been to the home. I haven't visited, 8 but I have had work to do there. 9 Q. And have you called him on the telephone 10 there? 11 A. Once I think I've called the house. Normally 12 he calls me because it's usually he needs me to do 13 something. 14 Q. And what have those conversations been about 15 since he's been out of jail? 16 A. Let's put a stereo in the gym, let's put a TV 17 in the living room, let's put a bigger stereo in the 18 gym, let's put a bigger, bigger stereo in the gym, let's 19 go redo what we've done. It's always audio. He's a 20 very audio file person. 21 Q. Do you know of any other modifications that 22 he's made to the house at 358 El Brillo since the time 23 that he went into jail? 24 MR. CRITTON: Form; predicate. 25 THE WITNESS: Meaning? Be more specific.</p>

<p style="text-align: center;">189</p> <p>1 BY MR. EDWARDS: 2 Q. Structural modifications, architectural 3 modifications? 4 A. Starting what date? 5 Q. June 30th, 2008. 6 MR. REINHART: I think the question on the 7 table was have you observed any structural changes 8 to the house at El Brillo since Mr. Epstein went to 9 jail? 10 THE WITNESS: Structural changes? 11 BY MR. EDWARDS: 12 Q. Structural, architectural, anything like that, 13 changes to the house, to the interior of the house since 14 he went to jail? 15 A. No. I mean, if you could be more specific. I 16 mean, you're talking furniture or? 17 Q. I've never been in the house, so I can't be 18 much more specific. Have you noticed any changes from 19 before he went to jail to after he went to jail, the 20 inside of the house, that you could be specific about? 21 A. No, I can't be specific. 22 MR. REINHART: Can I talk to Mr. Visoski for a 23 second? 24 MR. EDWARDS: Sure. 25 (Off the record discussion.)</p>	<p style="text-align: center;">191</p> <p>1 A. No, I don't. It's not my airplane. 2 Q. We still don't know whose airplane it is yet. 3 The time when you took Mr. Epstein to Miami in the last 4 month, do you know which attorney he was going to see? 5 A. No, I do not. 6 Q. And do you know whether it was related to 7 civil cases or criminal cases or anything else? 8 A. No idea. 9 Q. Do you know where the location was in Miami 10 that he was going to? 11 A. No, I do not. 12 Q. Other than yourself visiting Mr. Epstein at 13 the Florida Science Foundation, are you aware of any 14 other visitors, people that visited him? 15 A. No, I'm not. Just whoever was there during my 16 visit. 17 Q. Okay. Are you aware of a corporation named 18 the Zorro Trust? 19 A. I've heard the name. 20 Q. And is that something that you've heard 21 relative to your involvement with Jeffrey Epstein? 22 A. Yes. I mean, I don't even remember where I 23 heard Zorro Trust. I have no definition of it, but I 24 know the name is out there. 25 Q. Okay. Is that a company that you believe is</p>
<p style="text-align: center;">190</p> <p>1 MR. REINHART: I think Mr. Visoski can expand 2 on his previous answer. Why don't you expand. 3 THE WITNESS: Can we go back to that one? 4 BY MR. EDWARDS: 5 Q. Sure. The question dealt with the structural 6 architectural changes you're aware of. 7 A. There has been a kitchen extension, but when 8 you asked the question, I was unaware of when that 9 actually took place. So to be accurately answering your 10 question, I know there's been a kitchen extension. I 11 don't exactly know when that transpired, but... 12 Q. How do you know about the extension? How do 13 you know this happened? 14 A. I knew what the kitchen looked like before and 15 after the extension and I don't -- I thought it was 16 during the hurricane season when they actually did that 17 extension. 18 Q. Who made you aware of it? 19 A. Nobody. I just walked in the kitchen and 20 noticed a bigger room than what it was. 21 Q. All right. Do you know who Martin Nowack is? 22 A. No. 23 Q. Do you ever remember him being on your 24 airplane, or that name of somebody being on your 25 airplane?</p>	<p style="text-align: center;">192</p> <p>1 affiliated or related to Jeffrey Epstein in some way? 2 A. I have no definition. I don't know who it is. 3 Q. Do you know how you heard about it? 4 A. I don't remember. That's going back in the 5 early days of when Zorro existed. 6 Q. Who was at the Florida Science Foundation when 7 you would meet with Jeffrey Epstein on these meetings? 8 A. Sarah would be there. 9 Q. Anybody else? 10 A. Story would be there on occasion. That's 11 pretty much it. 12 Q. And would they be in the same room with 13 yourself and Jeffrey Epstein when you had conversations 14 with him? 15 A. No, not really. Not particularly. 16 Q. They would just be at the location? 17 A. Sure, yes. 18 Q. Anybody else that worked there or was 19 affiliated with the Florida Science Foundation that you 20 know of? 21 A. Not to my knowledge. I mean, I do my business 22 and get in and get out. 23 Q. Can anybody other than Jeffrey Epstein have an 24 office at the Florida Science Foundation? 25 A. Not that I know of.</p>

<p style="text-align: center;">193</p> <p>1 Q. All right. And were you deeded the property 2 that we spoke about earlier on the New Mexico ranch? Is 3 that deeded to you? 4 A. Yes. 5 Q. And has it been since back in, I think you 6 said 1998 or 1999 or whenever it was? 7 A. Yes. 8 Q. Okay. And do you know -- and did you build a 9 house on it then? 10 A. Yes, I did. 11 Q. Okay. And that's a property that I think you 12 said you have a mortgage on it, that's a property that 13 you pay -- you mortgaged that property? 14 A. Yes, sir. 15 Q. All right. And as well, the home you own 16 here, you have a mortgage on that property as well? 17 A. That is correct. 18 Q. All right. Are you familiar with a vehicle, a 19 Chevy Suburban 1500, year 1999? 20 A. Do you have a color? 21 Q. No. I can tell you the plate. I could tell 22 you the VIN. Chevy Suburban -- Chevy Suburban 1500, 23 registered to Larry Visoski? 24 A. That would be mine. That's a white one, then. 25 Q. Okay. When did you get it?</p>	<p style="text-align: center;">195</p> <p>1 Q. Well, we've just described this wide array of 2 cars that Jeffrey had for people to use -- 3 A. Well, you said for him to use. 4 MR. CRITTON: Hold it. 5 BY MR. EDWARDS: 6 Q. Is there a reason why? 7 MR. CRITTON: Wait. You guys are both talking 8 over one another. You need to let him wait and 9 finish his question because if I want to assert an 10 objection, neither one of you gives me a chance, 11 which may be the plan. Form. 12 MR. EDWARDS: Yeah, we have a conspiracy 13 against you. 14 MR. CRITTON: I knew it. I'll take that as an 15 admission. 16 BY MR. EDWARDS: 17 Q. Is there any reason -- did Jeffrey say that he 18 wanted that vehicle to use or to be parked at his house? 19 A. No. 20 Q. Then how did it come about that you started 21 parking that vehicle at his home? 22 A. I think the origination of that came when I 23 started using the Hummer, that the Suburban was parked 24 in my driveway and I wanted to get it out of my driveway 25 as an eyesore. So hence, I decided to let people at the</p>
<p style="text-align: center;">194</p> <p>1 A. I'm guessing. It was probably two years old 2 when I got it. Maybe '99. Maybe '01, '02. 3 Q. Something you still drive? 4 A. Occasionally. It's kind of a beat up car now, 5 so it's kind of a knock around. 6 Q. Best of your knowledge, it stays parked at 7 your house? 8 A. Recently it's been in Jeffrey's driveway, 9 but... 10 Q. Why? 11 A. Just for an extra car to use. 12 Q. For Jeffrey to use? 13 A. No. I mean, for anybody that would come to 14 the house to help out. Igor I think has driven the car 15 before. 16 Q. How did it come about that you began to park 17 the Chevy Suburban, the 1999 car that we're talking 18 about, at Jeffrey's house? 19 A. When there was more activity here in West Palm 20 Beach. We were never usually coming here that often, 21 and now with all this going on, with Jeffrey being in 22 town longer, we needed more cars and transportation. So 23 my car was just sitting in the driveway at home while I 24 was driving the Hummer. So I decided to let them use 25 the Hummer at the house.</p>	<p style="text-align: center;">196</p> <p>1 house drive it as a grocery shopping car or something, 2 or just as extra transportation. 3 Q. Okay. But when you go to park the car at 4 somebody else's house, you have to let them know, Hey, 5 I'm giving you the keys? 6 A. Mm-hmm. 7 Q. Who did you give the keys to? 8 A. I don't know if I gave the keys to anybody. I 9 may have just left them on the counter there and told 10 Yanush this is an extra car if you guys needed it to run 11 around because it was an eyesore at my driveway. 12 Q. Are you familiar with a Mercedes-Benz SUV 13 1999? 14 A. Say that again. 15 Q. Mercedes SUV, 1999 registered in your name? 16 A. Yes. 17 Q. And what car is that? 18 A. That's my car -- my wife's car. 19 Q. Does that stay at your house? 20 A. Yes. 21 Q. And that's the car that's parked at your house 22 now? 23 A. Yes. 24 Q. Are you familiar with a Land Rover, Range 25 Rover Sport 2008?</p>

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

<p style="text-align: center;">201</p> <p>1 A. I did not.</p> <p>2 Q. So your suspicions were never -- your</p> <p>3 curiosity was never piqued at all as to why these cars</p> <p>4 are being placed in your name?</p> <p>5 A. My curiosity was piqued.</p> <p>6 Q. You never asked him the question, you just</p> <p>7 agreed to do it?</p> <p>8 A. That's correct.</p> <p>9 Q. That goes for the Jaguar X-Type?</p> <p>10 A. Yes.</p> <p>11 Q. Are you familiar with a motorcycle, Big Dog</p> <p>12 Chopper Motorcycle, 2003?</p> <p>13 A. That is mine.</p> <p>14 Q. Yours?</p> <p>15 A. Yes.</p> <p>16 Q. Registered in your name for a good purpose,</p> <p>17 right?</p> <p>18 A. Yes, it is.</p> <p>19 Q. At your house?</p> <p>20 A. Yes.</p> <p>21 Q. You use it?</p> <p>22 A. Absolutely.</p> <p>23 Q. All right. Ford F-250, 2008, registered in</p> <p>24 your name, are you familiar with that?</p> <p>25 A. It's not registered in my name.</p>	<p style="text-align: center;">203</p> <p>1 Q. Who drives that car, Ford F-250?</p> <p>2 A. That was shipped to St. Thomas.</p> <p>3 Q. For who to use and for what purpose?</p> <p>4 A. Well, that car should have been put under LSJ,</p> <p>5 LLC.</p> <p>6 Q. What's LSJ, LLC?</p> <p>7 A. Little St. James.</p> <p>8 Q. And that's a corporation?</p> <p>9 A. Yes.</p> <p>10 Q. Your understanding is that's a corporation</p> <p>11 affiliated with Jeffrey Epstein?</p> <p>12 A. I know it's a corporation. I don't know its</p> <p>13 affiliation to Jeffrey.</p> <p>14 Q. At this point in time, the way that this car</p> <p>15 comes about is through a conversation with yourself and</p> <p>16 Jeffrey Epstein?</p> <p>17 A. Yes, yes.</p> <p>18 Q. So to make some representation that this --</p> <p>19 that this corporation LSJ, LLC, you're not sure if that</p> <p>20 has any affiliation with Jeffrey Epstein?</p> <p>21 A. I don't have any facts to tie the two</p> <p>22 together.</p> <p>23 Q. Common sense would dictate?</p> <p>24 A. Yes.</p> <p>25 Q. Okay.</p>
<p style="text-align: center;">202</p> <p>1 Q. Okay. So if that's registered in your name,</p> <p>2 that would be a shock to you? That would be a surprise</p> <p>3 to you?</p> <p>4 A. Yes, it would be.</p> <p>5 Q. There should be no documentation from you</p> <p>6 where you would be the registered owner of the Ford</p> <p>7 F-250?</p> <p>8 A. What year?</p> <p>9 Q. 2008.</p> <p>10 A. I remember buying that car. I just -- that</p> <p>11 shouldn't be in my name.</p> <p>12 Q. What do you mean you remember buying that car?</p> <p>13 A. I do a lot -- I do all the car purchases for</p> <p>14 Mr. Epstein. I'm a car fanatic, so for years I've been</p> <p>15 the car-shopper. I'm the car fanatic.</p> <p>16 Q. Okay. But these cars aren't classic vehicles.</p> <p>17 These are vehicles that are not being refurbished or</p> <p>18 anything, they're being driven around town?</p> <p>19 A. No, but they're fun. The new Range Rover is a</p> <p>20 nice car.</p> <p>21 Q. This Ford F250, that's a car also that's Palm</p> <p>22 Beach -- as you would say a Palm Beach car?</p> <p>23 A. No.</p> <p>24 Q. That's a car that stays at your house?</p> <p>25 A. No.</p>	<p style="text-align: center;">204</p> <p>1 MR. CRITTON: Form.</p> <p>2 BY MR. EDWARDS:</p> <p>3 Q. Again, that's not a car that you use, the Ford</p> <p>4 F-250?</p> <p>5 A. No, it's not even here.</p> <p>6 Q. And when you say on St. Thomas, is it on</p> <p>7 actual St. Thomas, or is it on Little St. James?</p> <p>8 A. No, it's on St. Thomas. It's a work vehicle.</p> <p>9 Q. For whom?</p> <p>10 A. For the workers, for the island.</p> <p>11 MR. REINHART: Be careful to answer his</p> <p>12 question. I think his question is, is it on</p> <p>13 St. Thomas or Little St. James island? Where</p> <p>14 physically is the car, if you know.</p> <p>15 THE WITNESS: I don't know for a fact.</p> <p>16 BY MR. EDWARDS:</p> <p>17 Q. It's your understanding it's on St. Thomas?</p> <p>18 A. Yes.</p> <p>19 Q. And when you say "the workers," what's going</p> <p>20 on on St. Thomas to where there's workers that need an</p> <p>21 F-250?</p> <p>22 A. Just moving sand. I don't know the exact</p> <p>23 detail for it.</p> <p>24 Q. What were you told about the need for this car</p> <p>25 to be on St. Thomas?</p>

<p style="text-align: center;">205</p> <p>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 on 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 was 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 it was a wire 19 transfer or 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.</p>	<p style="text-align: center;">207</p> <p>1 Q. Okay. And by "Jeffrey's boat," it was 2 purchased with Jeffrey's money? 3 A. That is 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 one I thought you were talking 22 about originally. 23 Q. That's the same boat? 24 A. That's the same boat. 25 Q. Is there any other boat that's registered in</p>
<p style="text-align: center;">206</p> <p>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 was registered in your 6 name? 7 A. It's registered to LSJ. It's Jeffrey's boat 8 that we keep here in West Palm Beach. 9 Q. And do you keep it at your home? 10 A. No. 11 Q. Do you know that the registration is to 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 it out to 16 St. Thomas for it to live, but since Jeffrey's here, 17 we're keeping it 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 mean "since Jeffrey's here we're 21 keeping it in Florida"? What does Jeffrey being here 22 have to do with keeping a boat that's registered in your 23 name and 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.</p>	<p style="text-align: center;">208</p> <p>1 your name? 2 A. No. 3 Q. Did you know that in -- let me ask you this: 4 Do you have a 2003 Ferrari F75-M? 5 A. No. 6 Q. Any reason 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 in 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 we 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," it 22 was his money. I was the one that negotiated it, to be 23 clear. It was his car for use in New York. 24 Q. Are you aware of the Zorro Trust winning an 25 85 million-dollar Power Ball lottery in 2008?</p>

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

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

<p style="text-align: center;">217</p> <p>1 regard to if you bought boats or you bought cars on his 2 behalf, that's very similar to your prior experience 3 with working with another private individual? 4 A. That is correct. 5 Q. In terms of the records, the manner in which 6 you flew the plane or -- I don't want to say flew the 7 plane, but in which you operated and maintained the 8 plane for Mr. Epstein are substantially the same you've 9 done with other private individuals? 10 A. Right, exactly the same. We wouldn't treat 11 Mr. Epstein any different than any prior -- previous 12 jobs that I had. It's the same routine we carry over 13 and that's why we're good at what we do. We take care 14 of the airplanes to the best of our ability. 15 Q. Is your focus as the pilot, as the captain of 16 both of the airplanes when you took over that 17 responsibility a number of years ago, is it your 18 obligation to get the passengers there safely -- onboard 19 and safely to the destination and then return? 20 A. Yes, that was always job number one. 21 Q. And most of us have had I'd say a much more 22 substantial experience in flying commercial planes and I 23 rarely see -- in fact, I can't remember the last time 24 particularly after 2001 I saw the pilots coming back 25 into the cabin shaking hands and helping distribute the</p>	<p style="text-align: center;">219</p> <p>1 L.M.? 2 A. No, I have not. 3 Q. Did Mr. Edwards, in approximately four hours, 4 little over four hours of questioning, ever ask you one 5 question about L.M. that you can recall? 6 A. Not that I recall. 7 Q. Have you ever heard the name E.W.? Did you 8 ever know someone named E.W.? 9 A. Never heard that name. 10 Q. In approximately four-and-a-half hours of 11 questioning by Mr. Edwards, did he ever ask you about 12 E.W.? 13 A. No, he did not. 14 Q. In approximately the -- are you familiar with 15 an individual by the name of Jane Doe(S.R.)? 16 A. I never heard that name. 17 Q. In approximately four-and-a-half hours of 18 questioning by Mr. Edwards, did he ever ask you 19 questions about Jane Doe(S.R.)? 20 A. No, he did not. 21 MR. CRITTON: That's all I have. 22 MR. EDWARDS: I only have two questions based 23 on what your testimony just was to Mr. Critton. 24 25</p>
<p style="text-align: center;">218</p> <p>1 snacks or liquids. Maybe I'm not on the same flights 2 that some of the other lawyers here are, but I assume 3 you fly commercial from time to time? 4 A. Sure. 5 Q. Do you ever see the pilots interacting with 6 the people who are in the back of the airplane? 7 A. No, not at all. They stay at their station up 8 front. 9 Q. You got -- as the captain of the planes, when 10 you're flying, you have substantial responsibilities not 11 only to the people on the plane, but as well to the air 12 space which you're flying? 13 A. Yes. 14 Q. Okay. By the way, we've been here about -- 15 for about an hour and ten -- we started about ten. It's 16 now 3:30. Did you ever hear the name L.M.? Has 17 Mr. Edwards ever asked you one question about L.M.? 18 MR. EDWARDS: Is the question have you ever 19 heard of her or did I ask any questions about her, 20 or did you ask both questions and give the same 21 answer? 22 MR. CRITTON: I'll break them down. 23 MR. EDWARDS: It doesn't matter to me. 24 BY MR. CRITTON: 25 Q. Did you ever meet an individual by the name of</p>	<p style="text-align: center;">220</p> <p>1 REDIRECT (LARRY VISOSKI) 2 BY MR. EDWARDS: 3 Q. You said you had three other people that 4 you've flown for? 5 A. Three other previous jobs. I'm trying to be 6 as accurate. 7 Q. Those are private individuals? 8 A. That is correct. 9 Q. And who are those people? 10 A. Herb Glimpsure in Columbus, Ohio, and Edward 11 Seltzer in Miami. And then the other was Tom Boyd, and 12 that was more of a Learjet charter, but he was the owner 13 of five Learjets. Those are my only three jobs in my 14 life. 15 Q. Also wealthy individuals? 16 A. Big time. 17 Q. And did you know what they did for a living? 18 A. Those I did, yes. 19 Q. And did you ever go visit any of those people 20 in jail? 21 MR. CRITTON: Form. 22 THE WITNESS: I know my first individual had 23 trouble with the law after I had left. I don't 24 remember what it was pertaining to; but no, I never 25 visited any of them in jail, no, sir.</p>

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1 BY MR. EDWARDS:
 2 Q. Even the one who had trouble with the law, you
 3 didn't go visit him in jail?
 4 A. No, I did not.
 5 Q. And did any of them put vehicles or other
 6 boats or anything else in your name?
 7 A. No.
 8 Q. Okay. Any of those people ever deed any
 9 property or acres or anything like that to you?
 10 A. No.
 11 Q. Did any of those people ever hire your wife
 12 for employment?
 13 A. No.
 14 Q. And your attorney, is that your attorney paid
 15 for by you, or is this somebody that's hired by Jeffrey
 16 Epstein?
 17 A. It is somebody that is hired by Jeffrey
 18 Epstein.
 19 MR. EDWARDS: Okay.
 20 MR. CRITTON: One follow-up to your question.
 21 RE-CROSS (LARRY VISOSKI)
 22 BY MR. CRITTON:
 23 Q. With regard to the private individuals that
 24 you worked for prior to Mr. Epstein, what was the
 25 longest period of time that you worked for those?

222

1 A. The longest period of time was five years and
 2 the shortest being two years.
 3 MR. CRITTON: Thank you.
 4 MR. EDWARDS: We'll order.
 5 MR. REINHART: We'll read.
 6 MR. CRITTON: We'll take a copy, front page,
 7 mini with index.
 8 (Witness excused.)
 9 (Deposition was concluded at 3:37 p.m.)
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223

1 CERTIFICATE OF OATH
 2 THE STATE OF FLORIDA
 3 COUNTY OF PALM BEACH
 4
 5
 6 I, the undersigned authority, certify that
 7 LARRY VISOSKI personally appeared before me and was duly
 8 sworn on the 15th day of October, 2009.
 9
 10 Dated this 22nd day of October, 2009.
 11
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Wendy Beath Anderson, RPR, CRR, FPR
 Notary Public State of Florida
 My Commission Expires: 9/20/2013
 My Commission No.: DD 906647
 Job #127542

224

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

Wendy Beath Anderson, RPR, CRR, FPR
 Job #127542

225

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

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

Very truly yours,

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

I do hereby waive my signature.

 LARRY VISOSKI

227

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

226

1 CERTIFICATE
 2 - - -
 3 THE STATE OF FLORIDA
 4 COUNTY OF PALM BEACH
 5 I hereby certify that I have read the
 6 foregoing deposition by me given, and that the
 7 statements contained herein are true and correct to the
 8 best of my knowledge and belief, with the exception of
 9 any corrections or notations made on the errata sheet,
 10 if one was executed.
 11
 12 Dated this ____ day of _____,
 13 2009.
 14
 15
 16
 17
 18 _____
 19 LARRY VISOSKI
 20 Job #127542
 21
 22
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 25

ATTACHMENT 20

Certified Copy

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

JANE DOE,

Plaintiff,

vs.

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

JEFFREY EPSTEIN,

Defendant.



DEPOSITION OF

MARK EPSTEIN

September 21, 2009
11:30 a.m.

One Penn Plaza,
New York, New York

Jacklyn Lisi



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M. Epstein

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

MR. COHEN: Objection.

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

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

A. Probably at his house more than anything.

Q. Which house would that be?

A. More likely Florida.

Q. Do you know how he met her?

A. No.

Q. Do you know where she is now?

A. No.

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

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

Q. Have you ever met Leslie Wexner?

A. No.

Q. Have you ever met Donald Trump?



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M. Epstein

A. Yes.

Q. Was that through your brother?

A. Yes.

Q. Where was that?

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

Q. When?

A. Somewhere between 5 and 10 years ago.

Q. Okay. So we are talking about --

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

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

A. Yes.

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

A. I don't remember.

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

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

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

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



1 M. Epstein

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

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

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

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

10 A. They were friends.

11 Q. Do you know how they met?

12 A. No.

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

15 A. I have no idea.

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

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

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

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

25 Q. Were there girls on the plane?



ATTACHMENT 19

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

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

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

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

Page 303

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

Page 304

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

Page 305

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

Page 306

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

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

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

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

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

ATTACHMENT 18

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

L.M.,

Plaintiff,

vs.

Case No. 502008CA028051
XXXXMB AD

JEFFREY EPSTEIN,

Defendant.
~~~~~

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

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

October 6, 2009  
10:55 a.m.

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

Jennifer DiLorenzo, court reporter



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

3 MR. PIKE: Form. 3

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

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

6 A. Right, right. 6

7 Q. No. 7

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

10 MR. PIKE: Form. 10

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

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

20 MR. PIKE: Form. 20

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

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

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



1 know, business relationship too.

2 Q. Did you know who Ghislaine Maxwell was?

3 A. Not right away, no, no.

4 Q. Not right away?

5 A. Right.

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

8 A. No, I --

9 MR. PIKE: Form.

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

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

15 A. It was just "Maxwell."

16 Q. Have anything to do with her father?

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

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

22 MR. PIKE: Form.

23 A. Yes.

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

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

*Epstein v. Edwards, et al.*

*Case No.: 50 2009 CA 040800XXXXMBAG*

# 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
6 answer, and you have to wait until I finish my question,
7 because if we talk over one another, then the court
8 reporter can't get it down.

9 A Okay. Yes, sir.

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

13 A Yes.

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

16 A Yes.

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

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

on taken 21 A Ms. Maxwell.

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

reporter, 24 A Ghislaine Maxwell.

your 25 Q And where did the interview take place?

ATTACHMENT 16

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

L.M.

Plaintiff,

-vs-

JEFFREY EPSTEIN
AND SARAH KELLEN,

Defendants.

DEPOSITION OF JANUSZ BANASIAK

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

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

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

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

4 A. No, no.

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

7 A. Correct.

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

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

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

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

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

23 A. They were like partners in business.

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

1 A. No.

2 MR. GOLDBERGER: Form.

3 BY MR. EDWARDS:

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

9 A. No.

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

12 A. Yes.

13 Q. How do you know him?

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

16 Q. When?

17 A. When?

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

19 A. A week ago.

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

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

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

3 A. Yes.

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

6 A. No.

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

8 A. One of the bedrooms upstairs.

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

11 A. Yes.

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

14 A. No.

15 Q. It was him alone?

16 A. Yes.

17 Q. How did he get to the house?

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

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

22 A. Yes.

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

25 (A discussion was held off the record.)

1 BY MR. EDWARDS:

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

4 A. No.

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

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

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

12 A. Yes, I assume.

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

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

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

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

1 Q. How did he --

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

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

8 A. No.

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

12 A. Right.

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

15 A. I think Cadillac Escalade.

16 Q. The black Escalade?

17 A. Yes.

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

21 MR. GOLDBERGER: Form.

22 THE WITNESS: I don't know.

23 BY MR. EDWARDS:

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

1 A. Yes.

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

3 MR. GOLDBERGER: Form.

4 THE WITNESS: Good morning. How are you?

5 Exchange handshake. And I saw him in the

6 kitchen and he was cooking something and that's

7 it.

8 BY MR. EDWARDS:

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

11 A. Yes.

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

15 A. Yes.

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

20 MR. GOLDBERGER: Form.

21 BY MR. EDWARDS:

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

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

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

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

6 A. Yes.

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

10 A. Yes.

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

13 A. Yes.

14 Q. Where were they talking with one another?

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

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

20 A. No.

21 Q. Mr. Brunel walked alone?

22 A. Yes.

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

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

1 Q. Sarah Kellen?

2 A. Yes.

3 Q. And Story Cowles?

4 A. Yes.

5 Q. Okay. Who else, Igor?

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

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

10 A. No.

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

14 A. I guess they are friends.

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

18 A. No.

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

21 A. No.

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

23 A. No.

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

1 to Miami.

2 Q. Okay.

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

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

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

9 Q. And when was that?

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

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

17 A. Right.

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

19 A. Maybe three days.

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

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

24 Q. Well, maybe this will jog your memory:
25 When you drove him to Miami, did you drive him

1 alone --

2 A. Yes.

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

5 A. Alone.

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

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

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

13 A. I don't know.

14 Q. So, his car was in Miami?

15 A. Yes.

16 Q. What kind of car was that?

17 A. Mercedes.

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

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

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

24 A. No. It was a private house.

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

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

3 A. No.

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

11 A. No.

12 Q. Okay.

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

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

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

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

21 A. Yes.

22 Q. And Mr. Epstein frequently calls him?

23 A. I don't know.

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

1 A. Right.

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

7 A. Yes, as far as I remember.

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

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

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

17 A. No, three times total.

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

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

ATTACHMENT 15

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

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

JANE DOE,

Plaintiff,

vs.

JEFFREY EPSTEIN, et al.,

Defendants.

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

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

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

2	<p>APPEARANCES:</p> <p>ON BEHALF OF THE PLAINTIFF: FARMER, JAFFE, WEISSING, EDWARDS, FISTOS & LEHRMAN 425 North Andrews Avenue Suite 2 Fort Lauderdale, Florida 33301-3268 954.524.2820 Brad@pathtojustice.com BY: BRADLEY EDWARDS, ESQ.</p> <p>ON BEHALF OF THE DEFENDANT JEFFREY EPSTEIN: BURMAN, CRITTON, LUTTIER & COLEMAN, LLP 303 Banyan Boulevard Suite 400 West Palm Beach, Florida 33401 561.842.2820 Mpike@bclclaw.com BY: MICHAEL J. PIKE, ESQ.</p> <p>ON BEHALF OF OTHER PLAINTIFFS IN RELATED CASES: MERMELSTEIN & HOROWITZ, P.A. 18205 Biscayne Boulevard Suite 2218 Miami, Florida 33160 305.931.2200 Ssm@sexabuseattorney.com BY: STUART S. MERMELSTEIN, ESQ.</p> <p>ON BEHALF OF THE WITNESS:</p> <p>ROBBINS, TUNKEY, ROSS, AMSEL, RABEN & WAXMAN, P.A. 2250 Southwest Third Avenue 4th Floor Miami, Florida 33129 305.858.9550 Criminalawyer@aol.com BY: ALAN S. ROSS, ESQ. Also Present: Sean McGuire, Videographer U.S. Legal Support</p>	4																																												
3	<p style="text-align: center;">INDEX</p> <table style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="text-align: left;">ADRIANA ROSS</th> <th style="text-align: right;">Page</th> </tr> </thead> <tbody> <tr> <td>Direct Examination By Mr. Edwards</td> <td style="text-align: right;">7</td> </tr> <tr> <td>Cross-Examination By Mr. Mermelstein</td> <td style="text-align: right;">111</td> </tr> <tr> <td>Redirect Examination By Mr. Edwards</td> <td style="text-align: right;">127</td> </tr> <tr> <td>Recross-Examination By Mr. Mermelstein</td> <td style="text-align: right;">133</td> </tr> <tr> <td>Certificate of Oath</td> <td style="text-align: right;">137</td> </tr> <tr> <td>Certificate of Reporter</td> <td style="text-align: right;">138</td> </tr> </tbody> </table> <p style="text-align: center;">EXHIBITS</p> <table style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th colspan="3">PLF'S</th> </tr> <tr> <th style="text-align: left;">No.</th> <th style="text-align: left;">Description</th> <th style="text-align: right;">Page</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Jane Doe 102 v. Jeffrey Epstein complaint</td> <td style="text-align: right;">33</td> </tr> <tr> <td>2A-2G</td> <td>Telephone messages</td> <td style="text-align: right;">62</td> </tr> <tr> <td>3</td> <td>Handwritten notes</td> <td style="text-align: right;">72</td> </tr> <tr> <td>2H</td> <td>Telephone message</td> <td style="text-align: right;">87</td> </tr> <tr> <td>4</td> <td>Gawker.com photo with story</td> <td style="text-align: right;">127</td> </tr> </tbody> </table> <table style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th colspan="3">WITNESS'S</th> </tr> <tr> <th style="text-align: left;">No.</th> <th style="text-align: left;">Description</th> <th style="text-align: right;">Page</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Target letter</td> <td style="text-align: right;">4</td> </tr> </tbody> </table>	ADRIANA ROSS	Page	Direct Examination By Mr. Edwards	7	Cross-Examination By Mr. Mermelstein	111	Redirect Examination By Mr. Edwards	127	Recross-Examination By Mr. Mermelstein	133	Certificate of Oath	137	Certificate of Reporter	138	PLF'S			No.	Description	Page	1	Jane Doe 102 v. Jeffrey Epstein complaint	33	2A-2G	Telephone messages	62	3	Handwritten notes	72	2H	Telephone message	87	4	Gawker.com photo with story	127	WITNESS'S			No.	Description	Page	1	Target letter	4	5
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1	<p>Videotaped deposition taken before JANET L. McKINNEY, Registered Professional Reporter, Florida Professional Reporter, Certified LiveNote Reporter and Notary Public in and for the State of Florida at Large in the above cause.</p> <p>(Whereupon, Witness's Exhibit 1 was marked for identification.)</p> <p>VIDEOGRAPHER: We are now on the video record. Today is Monday, the 15th day of March, 2010. The time is 9:13 a.m. (sic). We are here at 515 East Las Olas Boulevard, 3rd Floor, Fort Lauderdale, Florida, for the purpose of taking the videotape deposition of Adriana Ross taken in Case Number 08-CIV-80893, Jane Doe v. Jeffrey Epstein, et al.</p> <p>The court reporter is Janet McKinney; the videographer is Sean McGuire, both of U.S. Legal Support.</p> <p>Will counsel and all present please introduce yourself and the court reporter will swear the witness.</p> <p>MR. EDWARDS: Brad Edwards. I represent the plaintiff, Jane Doe also "Jane Doe"; EW, "EW"; LM, "LM".</p> <p>MR. MERMELSTEIN: Stuart Mermelstein. I represent Jane Doe Numbers 2 through 8.</p>	1																																												
2	<p>MR. PIKE: Michael Pike on behalf of Jeffrey Epstein.</p> <p>MR. ROSS: And good morning, my name is Alan Ross. I represent the witness, Adriana Ross.</p> <p>THE REPORTER: Would you raise your right hand, please.</p> <p>Do you solemnly swear or affirm the testimony you're about to give will be the truth, and nothing but the truth, so help you God?</p> <p>THE WITNESS: I do.</p> <p>MR. ROSS: Before the deposition begins and in an effort to streamline the process of getting through this deposition on behalf of the witness we have had marked as Witness Exhibit Number 1 an August 31, 2007 letter from the United States Attorney's Office addressed to Miss Ross through her then counsel, Bruce Lyons, which is called a target letter identifying her as a target of a federal Grand Jury investigation in the Southern District of Florida and outlining a number of offenses that were the subject matter of investigation.</p> <p>As a result of that, it is anticipated that some of the questions that may be asked during the course of this deposition she may invoke her Fifth</p>	2																																												
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6

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

7

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

8

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

9

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

10

1 citizen?

2 A. Yes.

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

4 needed to get a work visa?

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

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

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

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

9 came to the United States, what state?

10 A. Florida.

11 Q. And what city in Florida?

12 A. Miami.

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

14 you first arrived in Miami, Florida?

15 A. I do not recall.

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

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

18 agency would send me like on all calls to see

19 photographers to kind of introduce me as a model.

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

21 Elite Models in the United States when you already were

22 modeling in --

23 A. Um-hum.

24 Q. -- Europe?

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

11

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

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

3 just to expand the modeling -- the modeling

4 possibilities, opportunities.

5 Q. Where did you graduate from high school?

6 A. In Warsaw, Poland.

7 Q. What year?

8 A. 2002, I believe.

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

10 college after that?

11 A. I have an associate degree from Miami Dade

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

13 bachelor degree right now.

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

15 Miami Dade?

16 A. 2008. Summer of 2008.

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

18 now?

19 A. Yes.

20 Q. From where?

21 A. Florida International University.

22 Q. In what?

23 A. Accounting.

24 Q. How long have you been in the accounting

25 program?

12

1 A. Since fall 2008.

2 Q. And when do you expect to graduate?

3 A. Fall 2010.

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

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

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

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

8 you were going to stay permanently?

9 A. No.

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

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

12 Christmas.

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

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

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

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

17 correct?

18 A. Right.

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

20 me?

21 A. Well, I got romantically involved with my

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

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

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

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

13

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

2 have you always lived in Miami, Florida?

3 A. No.

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

5 United States?

6 A. New York.

7 Q. Where in New York?

8 A. Manhattan.

9 Q. What was the address in Manhattan where you

10 lived?

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

12 privilege.

13 A. I refuse to answer.

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

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

16 A. I refuse to answer.

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

18 May I speak with you?

19 MR. ROSS: Sure.

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

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

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

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

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

25 moment.

14

1 MR. EDWARDS: No problem.

2 MR. ROSS: Just to be sure, when the witness

3 answers "I refuse to answer" to be clear the full

4 statement that she's not saying for the sake of

5 saving time is that she's invoking her Fifth

6 Amendment right against self-incrimination. Just

7 to be clear.

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

9 along.

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

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

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

13 brevity --

14 MR. ROSS: Exactly.

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

16 BY MR. EDWARDS:

17 Q. All right. So I'm going to ask the question

18 again, I don't remember whether you'd responded yet,

19 but are you familiar with the address in Manhattan

20 301 East 66th Street in New York?

21 A. I refuse to answer.

22 Q. Okay. How long did you live in -- well, what

23 was the first address that you lived in in Miami?

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

25 1040 South Shore Drive, Miami Beach, Florida.

15

1 Q. South Shore. Okay.

2 A. Um-hum.

3 Q. Have you ever had your deposition taken

4 before?

5 A. No.

6 Q. Okay. You're doing very well so far. There's

7 a couple rules I didn't explain but mainly because

8 you're doing very well. I just have to wait for you to

9 finish your answer; you have to wait for me to finish

10 my question. We have one court reporter. She can only

11 take down one of us. Give us an answer that we all

12 understand. Nodding of the head or shaking the head

13 are easy to do and I get what you're saying, but she

14 doesn't. Ah-ha or un-ah are things that are commonly

15 said. They look the same on paper.

16 If I ask a bad question which could happen, as

17 already happened and probably will again, just tell me

18 "I don't understand the question," I'll ask it again --

19 A. Okay.

20 Q. -- all right?

21 And I'm assuming that's the address, 1040

22 South Shore Drive, where you began living in fall of

23 2002?

24 A. Correct.

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

16

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

2 Q. How long did you live at the 1040 South Shore

3 Drive address that you moved into in the fall in 2002?

4 A. Well, since -- since I came I lived there, I

5 always stayed there whether being in Miami traveling

6 back and forth, and I live currently at this address.

7 Q. Okay. What was the first time that you moved

8 from that address to live elsewhere?

9 A. I do not recall.

10 Q. Okay. I know that you told me you lived in

11 New York City and we're not going to discuss -- I'm

12 assuming you're not going to answer a lot of questions

13 about New York City, but at what time period did you

14 move there? Was it right after you got here two weeks,

15 a year later? I'm just trying to get a year as to when

16 you moved to New York?

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

18 answer.

19 A. I refuse to answer.

20 Q. Okay. Do you know a guy by the name of Jean

21 Luc Brunel?

22 A. I refuse to answer.

23 Q. Where are your parents?

24 A. They're in Warsaw, Poland.

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

17

1 have they come to the United States?

2 A. Yes, they have visited me.

3 Q. Have they ever met Jeffrey Epstein?

4 A. I refuse to answer.

5 Q. Have they ever met Jean Luc Brunel?

6 A. I refuse to answer.

7 Q. Where are you currently employed?

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

9 work.

10 Q. Are you also still in the modeling business

11 though?

12 A. No, I'm not.

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

14 modeling?

15 A. It would be late spring, early summer of 2006

16 I went on a trip to Taiwan.

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

18 A. I wanted -- I always kind of knew that it's

19 something that I'm going to be doing and I just decided

20 to go and pursue a college degree.

21 Q. Okay. Is it something that you ever plan to

22 go back to, modeling?

23 A. No.

24 Q. Are you involved at all with the modeling

25 industry?

18

1 A. No.

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

3 others to recruit models, anything like that?

4 A. No.

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

6 Mr. Brunel?

7 A. I refuse to answer.

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

9 Jeffrey Epstein?

10 A. I refuse to answer.

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

12 Maxwell?

13 A. I refuse to answer.

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

15 Kellen?

16 A. I refuse to answer.

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

18 A. I refuse to answer.

19 Q. Did Jeffrey Epstein have anything to do with

20 you moving to New York City?

21 A. I refuse to answer.

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

23 owned or controlled by Jeffrey Epstein?

24 A. I refuse to answer.

25 Q. Are you familiar with the modeling agency MC

19

1 Squared?

2 A. I refuse to answer.

3 Q. Do you know of underage females being

4 transported into this country to work for the modeling

5 agency MC Squared?

6 A. I refuse to answer.

7 Q. Do you know of those underage females being

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

9 Street address?

10 A. I refuse to answer.

11 Q. Can you say whether you have observed

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

13 females?

14 A. I refuse to answer.

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

16 A. I refuse to answer.

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

18 East 66th address frequently with underage females?

19 A. I refuse to answer.

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

21 Mr. Epstein?

22 MR. PIKE: Form.

23 MR. EDWARDS: You can still answer the

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

25 A. I refuse to answer.

20

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

2 began working with Jeffrey Epstein?

3 MR. PIKE: Form.

4 A. I refuse to answer.

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

6 MR. PIKE: Form.

7 A. I refuse to answer.

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

9 him?

10 A. I refuse to answer.

11 Q. Why did you stop working for him?

12 MR. PIKE: Form.

13 A. I refuse to answer.

14 Q. What initially were you hired to do?

15 A. I refuse to answer.

16 MR. PIKE: Form.

17 Q. Has Jeffrey Epstein ever paid you to stay

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

19 MR. PIKE: Form.

20 A. I refuse to answer.

21 Q. Have you talked to Sarah Kellen or Nadia

22 Marcinkova about the things that went on in Jeffrey

23 Epstein's house?

24 MR. PIKE: Form.

25 A. I refuse to answer.

21

1 Q. Did you sign a confidentiality agreement with

2 Jeffrey Epstein?

3 A. I refuse to answer.

4 MR. PIKE: Form.

5 Q. Did that confidentiality agreement outline

6 what you should say to authorities should he be caught

7 with underage females?

8 MR. PIKE: Form.

9 A. I refuse to answer.

10 Q. Is there another book or manual or written

11 memorialization of what you, as an employee of Jeffrey

12 Epstein, should do if confronted by law enforcement?

13 MR. PIKE: Form.

14 A. I refuse to answer.

15 Q. Are you invoking your Fifth Amendment right

16 because you believe you could be prosecuted?

17 MR. ROSS: Invoke.

18 A. I refuse to answer.

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

20 testify against Jeffrey Epstein?

21 MR. PIKE: Form.

22 A. I refuse to answer.

23 Q. When did you first learn that Jeffrey Epstein

24 had a sexual obsession for underage females?

25 A. I refuse to answer.

22

1 MR. PIKE: Form.

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

3 Epstein sexually interacting with females as young as

4 12 years old?

5 A. I refuse to answer.

6 MR. PIKE: Form.

7 Q. Is it true that you have observed Jeffrey

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

9 to 17?

10 MR. PIKE: Form.

11 A. I refuse to answer.

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

13 A. I refuse to answer.

14 MR. PIKE: Form.

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

16 Epstein?

17 MR. PIKE: Form.

18 A. I refuse to answer.

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

20 Jeffrey Epstein when she was underage?

21 MR. PIKE: Form.

22 A. I refuse to answer.

23 Q. What have you been told about Jeffrey

24 Epstein's sexual obsession with underage minor

25 children?

23

1 MR. PIKE: Form.

2 A. I refuse to answer.

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

4 sexually with underage minors on an everyday basis?

5 MR. PIKE: Form.

6 A. I refuse to answer.

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

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

9 is that true?

10 MR. PIKE: Form.

11 A. I refuse to answer.

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

13 would access new underage minor females for sex every

14 day?

15 MR. PIKE: Form.

16 A. I refuse to answer.

17 Q. How many assistants did Jeffrey Epstein hire

18 to bring him underage minor females for sex?

19 A. I refuse to answer.

20 MR. PIKE: Form.

21 Q. Were you one of those assistants that helped

22 to bring him underage minor females?

23 MR. PIKE: Form.

24 A. I refuse to answer.

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

24

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

2 the Florida Statutes that protect children against

3 sexual offenders or sexual predators?

4 MR. ROSS: Invoke.

5 A. I refuse to answer.

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

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

8 questions about it.

9 It says: "A person who intentionally touches

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

11 genital area or buttocks or the clothing covering them

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

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

14 perpetrator, commits lewd or lascivious molestation, a

15 second degree felony."

16 After hearing that statute isn't that

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

18 Mr. Epstein to have committed on an everyday basis

19 while you were working for him?

20 MR. PIKE: Form.

21 A. I refuse to answer.

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

23 more than 100 underage females; is that true?

24 MR. PIKE: Form.

25 A. I refuse to answer.

25

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

2 a child molester?

3 MR. PIKE: Form.

4 A. I refuse to answer.

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

6 age of 12?

7 MR. PIKE: Form.

8 A. I refuse to answer.

9 Q. Have you ever known Jeffrey Epstein to have

10 sex with an adult?

11 MR. PIKE: Form.

12 A. I refuse to answer.

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

14 MR. PIKE: Form.

15 A. I refuse to answer.

16 Q. When was the first time you learned of

17 Mr. Epstein getting a massage from an underage minor

18 female?

19 MR. PIKE: Form.

20 A. I refuse to answer.

21 Q. I realize some of these questions may sound

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

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

24 payroll or inner circle recognize or talk about. So

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

<p style="text-align: right;">26</p> <p>1 term means?</p> <p>2 MR. PIKE: Form.</p> <p>3 A. I refuse to answer.</p> <p>4 Q. Isn't "massage" the word that was told by</p> <p>5 Jeffrey Epstein to all of his employees to refer to</p> <p>6 whatever acts he engages in with underage females in</p> <p>7 his bedroom?</p> <p>8 MR. PIKE: Form.</p> <p>9 A. I refuse to answer.</p> <p>10 Q. At this point -- were you -- were you ever in</p> <p>11 the bedroom with him when he was engaging in sexual</p> <p>12 acts with underage females and calling them "massages"?</p> <p>13 MR. PIKE: Form.</p> <p>14 A. I refuse to answer.</p> <p>15 Q. Did you ever participate in any of the sexual</p> <p>16 acts that Jeffrey Epstein was having with underage</p> <p>17 females?</p> <p>18 MR. PIKE: Form.</p> <p>19 A. I refuse to answer.</p> <p>20 Q. Now, just so that the record is clear there is</p> <p>21 not a single piece of evidence that ever indicates that</p> <p>22 you were involved with underage females, I'm not even</p> <p>23 implying that and I realize that you invoking it may --</p> <p>24 may give the wrong light and that's not -- that's not</p> <p>25 my intention, so -- but were you ever aware of Nadia</p>	<p style="text-align: right;">28</p> <p>1 Q. Is there a book or manual or is it written</p> <p>2 anywhere that the -- that sex with underage minors is</p> <p>3 to be referred to as a "massage"?</p> <p>4 A. I refuse to answer.</p> <p>5 MR. PIKE: Form.</p> <p>6 Q. Were there ever team meetings, for lack of a</p> <p>7 better word, where Jeffrey Epstein and possibly</p> <p>8 Ghislaine Maxwell, Sarah Kellen, yourself, would talk</p> <p>9 about this organization of obtaining underage girls for</p> <p>10 Jeffrey Epstein for sex?</p> <p>11 MR. PIKE: Form.</p> <p>12 A. I refuse to answer.</p> <p>13 Q. What methods does Jeffrey Epstein use to gain</p> <p>14 access to underage minor females for sex?</p> <p>15 MR. PIKE: Form.</p> <p>16 A. I refuse to answer.</p> <p>17 Q. What is your understanding of Jeffrey</p> <p>18 Epstein's involvement with the modeling industry?</p> <p>19 MR. PIKE: Form.</p> <p>20 A. I refuse to answer.</p> <p>21 Q. Have you ever modeled for MC Squared?</p> <p>22 MR. PIKE: Form.</p> <p>23 A. I refuse to answer.</p> <p>24 Q. Has Jeffrey Epstein ever promised you anything</p> <p>25 related to a modeling career?</p>
<p style="text-align: right;">27</p> <p>1 Marcinkova participating in sex with underage females?</p> <p>2 A. I refuse to answer.</p> <p>3 Q. Have you read the police reports related to</p> <p>4 the criminal investigation into Mr. Epstein?</p> <p>5 A. I refuse to answer.</p> <p>6 Q. And you're aware of this 87-page police report</p> <p>7 that details numerous females that indicate that they</p> <p>8 were involved sexually with Mr. Epstein when they were</p> <p>9 minors?</p> <p>10 A. I refuse to answer.</p> <p>11 MR. PIKE: Form.</p> <p>12 Q. Did anyone instruct you to use the code word</p> <p>13 "massage"?</p> <p>14 A. I refuse to answer.</p> <p>15 Q. And when referring to these underage minor</p> <p>16 females that would come over to Mr. Epstein's house did</p> <p>17 anybody also tell you to use the term "work"?</p> <p>18 A. I refuse to answer.</p> <p>19 MR. PIKE: Form.</p> <p>20 Q. Meaning when somebody would call to schedule</p> <p>21 one of these underage females for a massage isn't it</p> <p>22 true that they would say "It's time to come to work"</p> <p>23 and schedule a specific appointment?</p> <p>24 MR. PIKE: Form.</p> <p>25 A. I refuse to answer.</p>	<p style="text-align: right;">29</p> <p>1 MR. PIKE: Form.</p> <p>2 A. I refuse to answer.</p> <p>3 Q. Have you ever talked to Jean Luc Brunel about</p> <p>4 modeling?</p> <p>5 A. I refuse to answer.</p> <p>6 Q. Have you ever talked to Jean Luc Brunel about</p> <p>7 his desire to have sex with underage females?</p> <p>8 A. I refuse to answer.</p> <p>9 Q. Isn't it true that Jean Luc Brunel has been in</p> <p>10 trouble for years for having sex with underage minors</p> <p>11 in Europe?</p> <p>12 A. I refuse to answer.</p> <p>13 Q. Are you familiar with The McIntyre Reports?</p> <p>14 A. I refuse to answer.</p> <p>15 Q. Okay. Are you familiar with reports done on</p> <p>16 modeling agencies back in the 80's and 90's related to</p> <p>17 agency owners having sex with underage minors?</p> <p>18 MR. ROSS: Answer the question.</p> <p>19 A. No, I'm not.</p> <p>20 Q. Okay. Did you ever hear of Jean Luc Brunel's</p> <p>21 reputation for having sex with underage girls?</p> <p>22 MR. ROSS: Invoke.</p> <p>23 A. I refuse to answer.</p> <p>24 Q. Do you know how Jean Luc Brunel knows Jeffrey</p> <p>25 Epstein?</p>

30

1 A. I refuse to answer.

2 MR. PIKE: Form.

3 **Q. Isn't their connection the obsession for**

4 **underage minor females?**

5 MR. PIKE: Form.

6 A. I refuse to answer.

7 **Q. Based on your observations of Jeffrey Epstein**

8 **would you categorize his obsession for underage minor**

9 **females as an addiction?**

10 MR. PIKE: Form.

11 A. I refuse to answer.

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

13 **underage minor females to Jeffrey Epstein?**

14 MR. PIKE: Form.

15 A. I refuse to answer.

16 **Q. Have you ever had a sexual relationship with**

17 **Ghislaine Maxwell?**

18 A. I refuse to answer.

19 **Q. Do you know what Ghislaine Maxwell does in**

20 **general for Jeffrey Epstein?**

21 MR. PIKE: Form.

22 A. I refuse to answer.

23 **Q. Have you seen photographs of underage minor**

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

25 **possession?**

31

1 MR. PIKE: Form.

2 A. I refuse to answer.

3 **Q. Were there surveillance cameras, hidden**

4 **surveillance cameras inside Jeffrey Epstein's home?**

5 MR. PIKE: Form.

6 A. I refuse to answer.

7 **Q. Did those surveillance cameras capture**

8 **underage minor females naked?**

9 MR. PIKE: Form.

10 A. I refuse to answer.

11 **Q. And didn't Jeffrey Epstein and Ghislaine**

12 **Maxwell watch those surreptitiously obtained videos of**

13 **underage minor females?**

14 MR. PIKE: Form.

15 A. I refuse to answer.

16 **Q. And those videos and photographs of underage**

17 **minor females were saved on Jeffrey Epstein's computers**

18 **in his house, right?**

19 MR. PIKE: Form.

20 A. I refuse to answer.

21 **Q. Have you seen those photographs and videos on**

22 **Jeffrey Epstein's computers?**

23 MR. PIKE: Form.

24 A. I refuse to answer.

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

32

1 **investigation into Jeffrey Epstein?**

2 A. I refuse to answer.

3 MR. PIKE: Form.

4 MR. ROSS: In addition, attorney-client

5 privilege.

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

7 **anything you talked to your attorney about, I**

8 **apologize.**

9 A. (Nods.)

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

11 **co-conspirator of Jeffrey Epstein's in the**

12 **non-prosecution agreement?**

13 MR. PIKE: Form.

14 A. I refuse to answer.

15 **Q. Do you feel like a victim of Jeffrey**

16 **Epstein's?**

17 MR. PIKE: Form.

18 A. I refuse to answer.

19 **Q. Do you feel like Jeffrey Epstein brainwashed**

20 **you to some extent?**

21 MR. PIKE: Form.

22 A. I refuse to answer.

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

24 **may have played in having underage minor females at**

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

33

1 MR. PIKE: Form.

2 A. I refuse to answer.

3 **Q. Have you known Ghislaine Maxwell and Jeffrey**

4 **Epstein to keep sex slaves?**

5 A. I refuse to answer.

6 **Q. Do you know somebody named Virginia Roberts?**

7 A. I refuse to answer.

8 **Q. Have you met Virginia Roberts?**

9 A. I refuse to answer.

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

11 mark as -- as Plaintiffs Exhibit I a lawsuit that

12 was filed by Bob Josefsberg on behalf of Jane Doe

13 102 v. Jeffrey Epstein just for the purposes of

14 asking the witness some questions.

15 MR. ROSS: I've seen it.

16 (Whereupon, Plaintiff's Exhibit 1 was marked

17 for identification.)

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

19 **Jeffrey Epstein?**

20 A. I refuse to answer.

21 **Q. In the lawsuit it indicates the plaintiff was**

22 **15 years old when Ghislaine Maxwell and Jeffrey Epstein**

23 **had a threesome with this underage minor female. Are**

24 **you aware of that?**

25 MR. PIKE: Form.

34

1 A. I refuse to answer.

2 Q. And Jeffrey Epstein and/or Ghislaine Maxwell

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

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

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

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

7 aware of that?

8 A. I refuse to answer.

9 MR. PIKE: Form.

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

11 addition to molesting Jane Doe 102 along with Ghislaine

12 Maxwell forced her to have sex with other models,

13 actresses, and celebrities?

14 A. I refuse to answer.

15 MR. PIKE: Form.

16 Q. It also indicates that Jeffrey Epstein

17 transported other minor girls from Turkey, the Czech

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

19 that?

20 MR. PIKE: Form.

21 A. I refuse to answer.

22 Q. Is Jeffrey Epstein involved in the

23 international child sex trade?

24 MR. PIKE: Form.

25 A. I refuse to answer.

35

1 Q. Is Jean Luc Brunel his partner in that

2 international child sex trade?

3 MR. PIKE: Form.

4 A. I refuse to answer.

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

6 Epstein forced Jane Doe 102 to have sex with other

7 adult male peers including royalty, politicians,

8 academicians, businessmen and/or other professional and

9 personal acquaintances of Jeffrey Epstein's?

10 MR. PIKE: Form.

11 A. I refuse to answer.

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

13 than Jane Doe 102?

14 MR. PIKE: Form.

15 A. I refuse to answer.

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

17 practice of pimping out underage minor females to other

18 people that have the same sexual obsession with

19 underage minors?

20 MR. PIKE: Form.

21 A. I refuse to answer.

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

23 sex trade?

24 MR. PIKE: Form.

25 A. I refuse to answer.

36

1 Q. Jane Doe 102 ultimately escaped from him and

2 left to Australia, is that your understanding?

3 A. I refuse to answer.

4 MR. PIKE: Form.

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

6 A. I refuse to answer.

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

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

9 girls from France who spoke no English for Epstein to

10 sexually exploit and abuse and after doing so he sent

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

12 with that?

13 MR. PIKE: Form.

14 A. I refuse to answer.

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

16 Mr. Epstein?

17 A. I refuse to answer.

18 MR. PIKE: Form.

19 Q. Who are the friends that send to Jeffrey

20 Epstein underage minor females for his birthday so that

21 he can abuse?

22 A. I refuse to answer.

23 MR. PIKE: Form.

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

25 A. I refuse to answer.

37

1 Q. Have you ever met Prince Andrew?

2 A. I refuse to answer.

3 Q. Has Prince Andrew been involved with underage

4 minor females to your knowledge?

5 A. I refuse to answer.

6 Q. Have you ever met Alan Dershowitz?

7 A. I refuse to answer.

8 Q. When Alan Dershowitz stays at Jeffrey

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

10 house when underage minor females have been in the

11 bedroom with Jeffrey Epstein?

12 A. I refuse to answer.

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

14 publication or online resource RadarOnline?

15 A. I refuse to answer.

16 Q. Is that something that you assisted

17 Mr. Epstein with when he purchased RadarOnline?

18 A. I refuse to answer.

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

20 endeavor?

21 A. I refuse to answer.

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

23 another way to gain access to underage minor females

24 for sex?

25 MR. PIKE: Form.

38

1 A. I refuse to answer.

2 **Q. Have you been to all of Jeffrey Epstein's**

3 **properties?**

4 MR. PIKE: Form.

5 A. I refuse to answer.

6 **Q. Certainly you've been to the property at 358**

7 **El Brillo Way, correct?**

8 MR. PIKE: Form.

9 A. I refuse to answer.

10 **Q. Have you been to his property in Manhattan?**

11 A. I refuse to answer.

12 MR. PIKE: Form.

13 **Q. And have you been to his island in -- it was**

14 **Little St. James, I believe he calls it Little**

15 **St. Jeff's now?**

16 MR. PIKE: Form.

17 A. I refuse to answer.

18 **Q. And have you witnessed underage child sex**

19 **orgies on that island?**

20 MR. PIKE: Form.

21 A. I refuse to answer.

22 **Q. Do you know a female named Jeletzia?**

23 A. I refuse to answer.

24 **Q. Do you know where Jeletzia lives these days?**

25 A. I refuse to answer.

39

1 **Q. What is your understanding of Sarah Kellen's**

2 **role in Jeffrey Epstein's life?**

3 A. I refuse to answer.

4 MR. PIKE: Form.

5 **Q. Isn't it true that she gets paid just to bring**

6 **him underage minor females for sex?**

7 MR. PIKE: Form.

8 A. I refuse to answer.

9 **Q. And additionally, she schedules the**

10 **appointments for underage minor females for him to**

11 **molest?**

12 A. I refuse to answer.

13 MR. PIKE: Form.

14 **Q. You know Dana Burns?**

15 A. I refuse to answer.

16 **Q. Does she still work for Ghislaine Maxwell?**

17 A. I refuse to answer.

18 **Q. Was she an underage minor child victim of**

19 **Jeffrey Epstein's?**

20 A. I refuse to answer.

21 **Q. Through discovery we've talked to numerous**

22 **witnesses about, you know, Jeffrey Epstein and people**

23 **that work for him. I don't know if you'll be able to**

24 **answer any of these questions but I'll ask them anyway**

25 **one at a time.**

40

1 **Is Sarah Kellen somebody who travels with**

2 **Jeffrey Epstein?**

3 MR. PIKE: Form.

4 A. I refuse to answer.

5 **Q. And when Jeffrey Epstein is coming to town**

6 **doesn't he call Sarah Kellen, his number one assistant?**

7 MR. PIKE: Form.

8 A. I refuse to answer.

9 **Q. And at some point in time, it looks like in**

10 **early 2005 or late 2004, you were also an assistant of**

11 **Jeffrey Epstein's, correct?**

12 MR. PIKE: Form.

13 A. I refuse to answer.

14 **Q. And how was it that you transitioned from**

15 **being involved in modeling to being an employee of**

16 **Jeffrey Epstein?**

17 MR. PIKE: Form.

18 A. I refuse to answer.

19 **Q. Other than arranging for underage minor**

20 **females to come to Jeffrey Epstein's house did you do**

21 **anything else for Jeffrey Epstein?**

22 MR. PIKE: Form.

23 A. I refuse to answer.

24 **Q. Did you ever fly on Jeffrey Epstein's**

25 **airplane?**

41

1 A. I refuse to answer.

2 **Q. Did you witness Jeffrey Epstein abuse --**

3 **sexually abusing underage minor females on his**

4 **airplane?**

5 MR. PIKE: Form.

6 A. I refuse to answer.

7 **Q. Did you know that it was illegal for Jeffrey**

8 **Epstein to interact sexually with underage minor**

9 **females?**

10 MR. PIKE: Form.

11 A. I refuse to answer.

12 **Q. Did you ever object to Jeffrey Epstein**

13 **interacting sexually with underage minor females?**

14 MR. PIKE: Form.

15 A. I refuse to answer.

16 **Q. Would Jeffrey Epstein get angry at you if you**

17 **did not have an appointment set for him with an**

18 **underage minor female?**

19 MR. PIKE: Form.

20 A. I refuse to answer.

21 **Q. Has Jeffrey Epstein contacted you in the last**

22 **year?**

23 A. I refuse to answer.

24 MR. PIKE: Form.

25 **Q. Has Sarah Kellen contacted you within the last**

42

1 year?

2 A. I refuse to answer.

3 Q. Has anybody that is associated with Jeffrey

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

5 MR. PIKE: Form.

6 A. I refuse to answer.

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

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

9 you within the last year?

10 MR. PIKE: Form.

11 A. I refuse to answer.

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

13 underage minor females?

14 A. I refuse to answer.

15 Q. Are you familiar with LM?

16 A. I refuse to answer.

17 Q. Do you remember what LM looked like?

18 A. I refuse to answer.

19 Q. Are you familiar with EW?

20 A. I refuse to answer.

21 Q. Do you remember what EW looked like?

22 A. I refuse to answer.

23 Q. Are you familiar with Jane Doe?

24 A. I refuse to answer.

25 Q. These are all females that were underage minor

43

1 females that Jeffrey Epstein interacted with sexually

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

3 true?

4 A. I refuse to answer.

5 MR. PIKE: Form.

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

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

8 more than 100 times; is that true?

9 MR. PIKE: Form.

10 A. I refuse to answer.

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

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

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

14 true?

15 MR. PIKE: Form.

16 A. I refuse to answer.

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

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

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

20 that true?

21 MR. PIKE: Form.

22 A. I refuse to answer.

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

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

25 females for Jeffrey Epstein to molest?

44

1 A. I refuse to answer.

2 MR. ROSS: Form.

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

4 a better word "ritual" with these underage minor

5 females in his bedroom?

6 MR. PIKE: Form.

7 A. I refuse to answer.

8 Q. Wouldn't it generally begin with Jeffrey

9 Epstein placing a call to Sarah Kellen or yourself and

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

11 Beach mansion?

12 MR. PIKE: Form.

13 A. I refuse to answer.

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

15 females stored in the computer system?

16 MR. PIKE: Form.

17 A. I refuse to answer.

18 Q. And that computer system is interconnected

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

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

21 that correct?

22 MR. PIKE: Form.

23 A. I refuse to answer.

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

25 females stored in the computer system?

45

1 MR. PIKE: Form.

2 A. I refuse to answer.

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

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

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

6 MR. PIKE: Form.

7 A. I refuse to answer.

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

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

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

11 house and set a specific appointment for that person;

12 is that correct?

13 MR. PIKE: Form.

14 A. I refuse to answer.

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

16 that he wanted his two or three appointments to molest

17 underage minor females?

18 MR. PIKE: Form.

19 A. I refuse to answer.

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

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

22 that day; is that correct?

23 MR. PIKE: Form.

24 A. I refuse to answer.

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

46

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

47

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

48

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

49

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

50

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

51

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

52

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

53

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

54

1 A. I refuse to answer.

2 **Q. And he ordered you to come over and take those**

3 **computers out of his house, correct?**

4 A. I refuse to answer.

5 MR. PIKE: Form.

6 **Q. And you could basically take the local**

7 **database that exposed this criminal enterprise that**

8 **I've been talking about dealing with sex with underage**

9 **minor vehicles -- underage minor females and you could**

10 **take the evidence from his home, correct?**

11 MR. PIKE: Form.

12 A. I refuse to answer.

13 **Q. And you've seen the material that's on those**

14 **computers, correct?**

15 MR. PIKE: Form.

16 A. I refuse to answer.

17 **Q. And if I were to look at those computers it**

18 **would display exactly what I've been describing to you**

19 **today, right?**

20 MR. PIKE: Form.

21 A. I refuse to answer.

22 **Q. And you went to his house with a male,**

23 **correct?**

24 A. I refuse to answer.

25 MR. PIKE: Form.

55

1 **Q. There was one other guy with you that helped**

2 **that assisted you to take these computers from his**

3 **home; is that right?**

4 MR. PIKE: Form.

5 A. I refuse to answer.

6 **Q. Where did you take those?**

7 A. I refuse to answer.

8 **Q. Did you take those -- was it Bill Reilly that**

9 **went to the home?**

10 A. I refuse to answer.

11 **Q. Do you know who Bill Reilly is?**

12 A. I refuse to answer.

13 **Q. He's one of the investigators hired by Roy**

14 **Black to represent Jeffrey Epstein?**

15 A. I refuse to answer.

16 **Q. Did you take those computers ever to your**

17 **house?**

18 A. I refuse to answer.

19 **Q. And I guess the house that I would be talking**

20 **about is the 1040 South Shore Drive, have those**

21 **computers ever been to that house?**

22 MR. PIKE: Form.

23 A. I refuse to answer.

24 **Q. Were you nervous about the fact that you were**

25 **taking these computers out of the home at a time when a**

56

1 **search warrant was imminent?**

2 A. I refuse to answer.

3 **Q. Did you ever question when you were directed**

4 **to take these computers from his home?**

5 A. I refuse to answer.

6 **Q. How much additional money or bonus were you**

7 **paid to take the computers that we're talking about out**

8 **of Jeffrey Epstein's house?**

9 MR. PIKE: Form.

10 A. I refuse to answer.

11 **Q. Would those computers reveal criminal activity**

12 **of only Jeffrey Epstein or of others?**

13 MR. PIKE: Form.

14 A. I refuse to answer.

15 **Q. Did you talk with Sarah Kellen about the**

16 **criminal investigation into Jeffrey Epstein and others?**

17 A. I refuse to answer.

18 **Q. Well, at some point in time what's been marked**

19 **as Defense Exhibit 1, you received a Grand Jury**

20 **investigation target letter, correct?**

21 A. I refuse to answer.

22 **Q. Well, we have it right here. I'm familiar**

23 **with it. I know you got the letter and I know that,**

24 **you know, the substance of it you're not going to tell**

25 **me about. But this letter is dated August 31st, 2007,**

57

1 **the search warrant was executed on his home back in**

2 **October of 2005. So during those two years leading up**

3 **to this target letter who did you talk to?**

4 A. I refuse to answer.

5 **Q. Did you --**

6 MR. ROSS: And privilege. Attorney-client

7 privilege.

8 **Q. Okay. In addition to your attorney did you**

9 **talk to anybody else about the criminal investigation?**

10 A. I refuse to answer.

11 **Q. And Bruce Lyons was your initial computer --**

12 **computer -- was your initial attorney in this case,**

13 **correct?**

14 MR. ROSS: You can answer yes or no.

15 A. Yes.

16 **Q. Okay. And that was an attorney that was hired**

17 **for you by Jeffrey Epstein?**

18 MR. ROSS: Invoke.

19 A. I refuse to answer.

20 **Q. Someone that was paid for by Jeffrey Epstein**

21 **to represent you?**

22 MR. PIKE: Form.

23 A. I refuse to answer.

24 **Q. So once he hired you a criminal attorney then**

25 **it seemed like you did something wrong?**

58

1 MR. PIKE: Form.

2 A. I refuse to answer.

3 **Q. You hadn't actually gone into any relationship**

4 **with Jeffrey Epstein with the intent to commit crimes,**

5 **did you?**

6 A. I refuse to answer.

7 **Q. You didn't know that he was a child molester**

8 **when you first met him, did you?**

9 MR. PIKE: Form.

10 A. I refuse to answer.

11 **Q. Were you impressed by his money and his**

12 **lifestyle?**

13 A. I refuse to answer.

14 **Q. Did you think that he could get you further in**

15 **life if you would just listen to what he said?**

16 MR. PIKE: Form.

17 A. I refuse to answer.

18 **Q. At this point in time you have no contact with**

19 **him as a child molester, do you?**

20 MR. PIKE: Form.

21 A. I refuse to answer.

22 **Q. Did Jeffrey Epstein assist in getting you a**

23 **visa?**

24 A. I refuse to answer.

25 MR. PIKE: Form.

59

1 **Q. Has he done any favors for your family?**

2 A. I refuse to answer.

3 MR. PIKE: Form.

4 **Q. Is he paying for your college?**

5 A. I refuse to answer.

6 MR. PIKE: Form.

7 **Q. Right now is he paying for your college?**

8 MR. ROSS: Invoke.

9 A. I refuse to answer.

10 MR. PIKE: Form.

11 **Q. Did Jeffrey Epstein ever talk to you about the**

12 **chances of him going to prison?**

13 A. I refuse to answer.

14 MR. PIKE: Form.

15 **Q. Did Jeffrey Epstein ever talk to you about**

16 **what he intended his defenses to be to the criminal**

17 **actions he committed against these underage minors?**

18 A. I refuse to answer.

19 MR. PIKE: Form.

20 **Q. Did he tell you that he would spend as much**

21 **money as possible to intimidate and harass these**

22 **underage minor victims?**

23 A. I refuse to answer.

24 MR. PIKE: Form.

25 **Q. Did he tell you that he would destroy their**

60

1 **credibility?**

2 A. I refuse to answer.

3 **Q. Did he tell you that he could scare them to go**

4 **away?**

5 A. I refuse to answer.

6 MR. PIKE: Form and form to the last question.

7 MR. EDWARDS: All right. Let's see, what did

8 I say, I said this was --

9 MR. ROSS: I.

10 MR. EDWARDS: -- Plaintiff's I and we're going

11 to write on the back of it and then -- okay.

12 **Q. Jeffrey Epstein kept message pads near all of**

13 **his phones in his home, right?**

14 MR. PIKE: Form.

15 A. I refuse to answer.

16 **Q. And those are message pads that have a carbon**

17 **copy back side to them, you're familiar with them?**

18 MR. PIKE: Form.

19 A. I refuse to answer.

20 **Q. And this is for anybody who takes a message**

21 **they write it down that somebody called, the reason for**

22 **calling, the time that they called?**

23 MR. PIKE: Form.

24 A. I refuse to answer.

25 **Q. And many a times anytime that Jeffrey Epstein**

61

1 **was in town there were at least two scheduled**

2 **"massages" for lack of a better word, with Jeffrey**

3 **Epstein and these underage minor females, correct?**

4 A. I refuse to answer.

5 MR. PIKE: Form.

6 **Q. And do you have the -- and there was a**

7 **particular scheduling book that contained these**

8 **appointments with -- between Jeffrey Epstein and**

9 **underage minor females, correct?**

10 MR. PIKE: Form.

11 A. I refuse to answer.

12 **Q. And it was your primary responsibility to**

13 **assist Sarah Kellen in setting these appointments up,**

14 **right?**

15 A. I refuse to answer.

16 MR. PIKE: Form.

17 **Q. It took at least two or three full-time**

18 **employees to keep up with Jeffrey Epstein's addiction**

19 **to underage minors, correct?**

20 A. I refuse to answer.

21 MR. PIKE: Form.

22 **Q. Lesley Groff did pretty much the same thing up**

23 **in New York, right?**

24 MR. PIKE: Form.

25 A. I refuse to answer.

62

1 **Q.** And you're familiar that there is this group
 2 of girls in New York that were summoned to his home for
 3 generally the exact same thing as the Palm Beach girls?
 4 A. I refuse to answer.
 5 **Q.** All right.
 6 MR. PIKE: Form.
 7 **Q.** I'm going to show you an exhibit here, we'll
 8 mark it as -- you know what, it's a bunch of message
 9 pads, I'm going to mark it as 2A, -B, -C, -D, whatever.
 10 So we'll say 2A.
 11 (Whereupon, Plaintiff's Exhibit 2A through 2H
 12 were marked for identification.)
 13 **Q.** Do you recognize it?
 14 A. I refuse to answer.
 15 **Q.** Okay.
 16 MR. PIKE: May I see that?
 17 MR. EDWARDS: Sure.
 18 **Q.** Do you recognize the handwriting on it?
 19 A. I refuse to answer.
 20 **Q.** It indicates "Adriana hasn't confirmed Julie
 21 for 11 yet, so she is keeping Brittany on hold in case
 22 Julie doesn't call back."
 23 What does that message mean?
 24 A. I refuse to answer.
 25 MR. PIKE: Form.

63

1 **Q.** Julie's an underage minor female that Jeffrey
 2 Epstein was going to molest at 11:00, correct?
 3 MR. PIKE: Form.
 4 A. I refuse to answer.
 5 **Q.** And if Julie wasn't available then you had
 6 another underage minor female named Brittany that could
 7 step in her place and fulfill that role for Jeffrey
 8 Epstein, correct?
 9 MR. PIKE: Form.
 10 A. I refuse to answer.
 11 **Q.** All right. 2B is another message pad and I'm
 12 going to -- we'll stop skipping the process of moving
 13 this on and I'm assuming you're not going to be able to
 14 answer as to whether or not you -- you recognize that
 15 either, right?
 16 A. I refuse to answer.
 17 **Q.** Okay. This is a message from 9/4/05, so
 18 September 4th, 2005, 7:25 p.m. saying "Adriana
 19 cancelled Julie. She would like to speak to you I
 20 believe about college," and a telephone number. And
 21 then a question from you, "Should I schedule anyone
 22 else?" What did that message mean?
 23 MR. PIKE: Form.
 24 A. I refuse to answer.
 25 **Q.** That another typical ploy of Mr. Epstein's,

64

1 that he would promise these girls something in order to
 2 get them to allow him to sexually abuse them?
 3 MR. PIKE: Form.
 4 A. I refuse to answer.
 5 **Q.** Because he certainly did not want them to tell
 6 the police, correct?
 7 A. I refuse to answer.
 8 **Q.** And did you have many meetings about what to
 9 do if any of these girls told the police?
 10 A. I refuse to answer.
 11 MR. PIKE: Form.
 12 **Q.** Was it always known that Jeffrey Epstein would
 13 hire everyone attorneys and tell everyone just not to
 14 talk?
 15 MR. PIKE: Form.
 16 A. I refuse to answer.
 17 **Q.** And at the same time then he could employ a
 18 bunch of investigators, dig up a bunch of dirt on these
 19 girls, and intimidate them and scare them to go away,
 20 correct?
 21 MR. PIKE: Form.
 22 A. I refuse to answer.
 23 **Q.** And Jeffrey Epstein doesn't like -- he didn't
 24 like any of these underage minor females, right?
 25 MR. PIKE: Form.

65

1 A. I refuse to answer.
 2 **Q.** In fact, it was the opposite, he liked to hurt
 3 them; isn't that true?
 4 MR. PIKE: Form.
 5 A. I refuse to answer.
 6 **Q.** And after they came forward if they told the
 7 truth he was dead set on hurting them even more,
 8 correct?
 9 MR. PIKE: Form.
 10 A. I refuse to answer.
 11 **Q.** And that's also a feeling that Ghislaine
 12 Maxwell shared as well, correct?
 13 A. I refuse to answer.
 14 **Q.** And that's something that she also told you,
 15 "Don't worry. If we get caught we have it covered and
 16 we'll just attack these little girls."
 17 MR. PIKE: Form.
 18 A. I refuse to answer.
 19 **Q.** All right. There's another message from
 20 9/10/05. "Adriana says Lauren confirmed for 4 p.m."
 21 Can you tell us what that message means?
 22 MR. PIKE: Form.
 23 A. I refuse to answer.
 24 **Q.** It's another underage minor female that
 25 Jeffrey Epstein's going to molest at 4 p.m., correct?

66

1 A. I refuse to answer.

2 Q. And when I say "molest", you know, he may say

3 "massage", I mean, that's -- that's something

4 interchangeable, right?

5 MR. PIKE: Form.

6 A. I refuse to answer.

7 Q. It's the routine that I described in detail

8 that is identical with every single girl every single

9 time, correct?

10 A. I refuse to answer.

11 Q. And it's basically as far as he can get with

12 this underage minor female without her crying or

13 screaming or running out of the house?

14 MR. PIKE: Form.

15 A. I refuse to answer.

16 Q. Did you ever see any of the girls cry or

17 scream or run out of the house?

18 MR. PIKE: Form.

19 A. I refuse to answer.

20 Q. Did you have a personal relationship with any

21 of these underage minor females?

22 A. I refuse to answer.

23 Q. There's another message here from 9/10/05,

24 same day later in the day, 10 p.m. saying "Julie will

25 be at 11. Do you want me to cancel Brittany?"

67

1 Do you know what that message means?

2 MR. PIKE: Form.

3 A. I refuse to answer.

4 Q. What is this?

5 There's another message from 9/11/05 saying "I

6 got a car for," and then the name is blotted out. The

7 State Attorney's Office blotted the names of minors out

8 sometimes in their file. So do you -- do you know --

9 can you fill in that blank?

10 A. I refuse to answer.

11 Q. Do you know if this was the car that he rented

12 for Jane Doe 4?

13 A. I refuse to answer.

14 Q. All right. Or the car that he rented for AH?

15 A. I refuse to answer.

16 MR. PIKE: Form.

17 Q. You're familiar with both of those people,

18 right?

19 A. I refuse to answer.

20 Q. In fact, AH was somebody that was over at

21 Jeffrey Epstein's house many times, correct?

22 A. I refuse to answer.

23 MR. PIKE: Form.

24 Q. 9/3/2005. Message from Adriana saying "I left

25 message for Ashley to confirm for 11 a.m. and Vanessa

68

1 for 4:30 p.m."

2 Do you remember leaving that message?

3 A. I refuse to answer.

4 Q. And this is --

5 MR. PIKE: Form.

6 Q. It's his typical schedule where he schedules

7 one underage minor female to molest in the morning and

8 one in the afternoon, correct?

9 MR. PIKE: Form.

10 A. I refuse to answer.

11 Q. I mean, considering this is -- have you ever

12 worked anywhere else where there is somebody sexually

13 molesting underage minor females on a daily basis like

14 this?

15 MR. PIKE: Form.

16 A. I refuse to answer.

17 Q. At some point in time did you tell your

18 parents that this was happening?

19 MR. PIKE: Form.

20 A. I refuse to answer.

21 Q. Did you ever talk to anybody else in the house

22 and say "Hey, look, this is not right"?

23 A. I refuse to answer.

24 Q. Do you feel sorry for these girls?

25 A. I refuse to answer.

69

1 Q. And you say you do or you do not remember AH?

2 A. I refuse to answer.

3 Q. Okay. And do you know what happened up in the

4 bedroom between AH as a minor and Jeffrey Epstein?

5 MR. PIKE: Form.

6 A. I refuse to answer.

7 Q. Well, this is what she tells police: "She

8 arrived at the house, went upstairs to the bedroom.

9 She advised she immediately removed her clothing and

10 Nadia Marcinkova and Epstein were already naked in the

11 bedroom. AH explained that Nadia Marcinkova and she

12 had a sexual encounter that included kissing, touching,

13 and oral sex. AH remembered that she climaxed and was

14 removing herself from the massage table. Epstein then

15 turned AH onto her stomach on the massage table and

16 inserted his penis into her vagina. AH stated Epstein

17 began to pump his penis in her vagina. AH became upset

18 over this. She said her head was being held forcibly

19 against the bed as he continued to pump inside her.

20 She screamed 'No,' and Epstein stopped. He would

21 normally pay her \$200, but for this he apologized and

22 paid her a thousand dollars for that visit."

23 Are you familiar with that encounter?

24 A. I refuse to answer.

25 MR. PIKE: Form.

70

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

71

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

72

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

73

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

74

1 **Q. And if I showed you every single message pad**
 2 **here would you be able to answer any of the questions**
 3 **about any of the messages that were left at Jeffrey**
 4 **Epstein's house?**
 5 A. I refuse to answer.
 6 MR. EDWARDS: Okay. That saves us a lot of
 7 time.
 8 MR. ROSS: It did.
 9 **Q. Have you ever met Bill Clinton?**
 10 A. I refuse to answer.
 11 **Q. Is Bill Clinton -- was Bill Clinton a friend**
 12 **of Jeffrey Epstein's?**
 13 A. I refuse to answer.
 14 **Q. Is Bill Clinton somebody who Jeffrey Epstein**
 15 **has ever procured underage minor females for?**
 16 A. I refuse to answer.
 17 MR. PIKE: Form.
 18 **Q. And just -- and just for, you know, the sake**
 19 **of what the evidence shows, there's no evidence that I**
 20 **have that indicates that that happened, but if you were**
 21 **going to answer that question I'm willing to ask it.**
 22 **Have you met him at Jeffrey Epstein's house in**
 23 **Palm Beach County?**
 24 MR. PIKE: Form.
 25 A. I refuse to answer.

75

1 **Q. You have flown on Jeffrey Epstein's airplanes**
 2 **numerous times, correct?**
 3 A. I refuse to answer.
 4 **Q. As well has Bill Clinton and you're aware of**
 5 **that, right?**
 6 MR. PIKE: Form.
 7 A. I refuse to answer.
 8 **Q. Have you ever seen the flight logs from**
 9 **Jeffrey Epstein's airplanes?**
 10 MR. PIKE: Form.
 11 A. I refuse to answer.
 12 **Q. And on many times it is Bill Clinton, Secret**
 13 **Service agents, Jeffrey Epstein, Ghislaine Maxwell,**
 14 **Sarah Kellen, and others. Have you -- do you know**
 15 **about those flights?**
 16 A. I refuse to answer.
 17 MR. PIKE: Form.
 18 **Q. And have you ever witnessed sex on any of**
 19 **Jeffrey Epstein's flights?**
 20 A. I refuse to answer.
 21 MR. PIKE: Form.
 22 **Q. Do you know Emmy Taylor?**
 23 A. I refuse to answer.
 24 **Q. Is that somebody that is Ghislaine Maxwell's**
 25 **sex slave?**

76

1 A. I refuse to answer.
 2 **Q. And isn't it typical for Jeffrey Epstein to**
 3 **have a sex slave that flies with him on the airplane?**
 4 A. I refuse to answer.
 5 MR. PIKE: Form.
 6 **Q. And one of the qualifications is that the**
 7 **section slave be underage, correct?**
 8 MR. PIKE: Form.
 9 A. I refuse to answer.
 10 **Q. And if the sex slave is 15 years old isn't it**
 11 **your understanding and based on your observations that**
 12 **he will even make them dress as if they're 11 or 12?**
 13 MR. PIKE: Form.
 14 A. I refuse to answer.
 15 MR. PIKE: Form.
 16 **Q. Do you know President Andres Pastrana?**
 17 A. I refuse to answer.
 18 **Q. Do you know him as somebody who has had sex**
 19 **with underage minor females brought to him by Jeffrey**
 20 **Epstein?**
 21 MR. PIKE: Form.
 22 A. I refuse to answer.
 23 **Q. Have you ever heard of Ehud Burak?**
 24 A. I refuse to answer.
 25 MR. PIKE: Form.

77

1 **Q. Is that another person that Epstein -- Jeffrey**
 2 **Epstein procures underage minor females for?**
 3 MR. PIKE: Form.
 4 A. I refuse to answer.
 5 **Q. You've met Naomi Campbell I'm assuming?**
 6 A. I refuse to answer.
 7 **Q. Anytime separate and apart from any dealings**
 8 **with Jeffrey Epstein have you met her in the modeling**
 9 **industry? That's a model, right?**
 10 MR. PIKE: Form.
 11 MR. ROSS: You can answer the question.
 12 A. No, I have not.
 13 **Q. Okay. Do you know Todd Meister?**
 14 A. I refuse to answer.
 15 **Q. Joel Pashcow?**
 16 A. I refuse to answer.
 17 **Q. You've been to their houses?**
 18 A. I refuse to answer.
 19 **Q. Do you know Aline Weber?**
 20 A. I refuse to answer.
 21 **Q. Have you ever stayed at the 301 East 66th**
 22 **Street places with Aline Weber?**
 23 MR. PIKE: Form.
 24 A. I refuse to answer.
 25 **Q. And typically aren't there at least 16**

78

1 underage minor females staying at those various
 2 condominiums located at 301 East 66th Street?
 3 A. I refuse to answer.
 4 Q. And those females get work visas to say that
 5 they're models, but actually they are prostituted out
 6 by Jeffrey Epstein and John Luc Brunel, correct?
 7 A. I refuse to answer.
 8 MR. PIKE: Form.
 9 Q. And various businessmen and politicians around
 10 New York and Washington, D.C. go to those apartments
 11 frequently to have sex with underage minors; is that
 12 true?
 13 A. I refuse to answer.
 14 Q. Do you remember a flight on December 3rd, 2004
 15 that you took with Jeffrey Epstein, Nadia Marcinkova,
 16 Sarah Kellen, and somebody with initials SH --
 17 A. I refuse to answer.
 18 Q. -- from JFK to PBI?
 19 MR. PIKE: Form.
 20 Q. Do you remember that?
 21 A. I refuse to answer.
 22 Q. Who is SH?
 23 A. I refuse to answer.
 24 Q. Is that an underage minor?
 25 A. I refuse to answer.

79

1 Q. Do you remember a flight that you took
 2 December 27th with Nadia Marcinkova and Jeffrey
 3 Epstein?
 4 A. I refuse to answer.
 5 Q. What airport is this, TIST?
 6 A. I refuse to answer.
 7 Q. Do you know Doug Band?
 8 A. I refuse to answer.
 9 Q. Isn't that Bill Clinton's assistant?
 10 A. I refuse to answer.
 11 Q. You've been on the airplane with him before?
 12 A. I refuse to answer.
 13 Q. Have you been on the airplane with Bill
 14 Clinton before?
 15 A. I refuse to answer.
 16 Q. Who is Tatiana?
 17 A. I refuse to answer.
 18 Q. That's somebody you've flown with on Jeffrey
 19 Epstein's plane on numerous occasions, correct?
 20 MR. PIKE: Form.
 21 A. I refuse to answer.
 22 Q. In fact, during the year 2005 you flew on
 23 Jeffrey Epstein's plane would you say more than 50
 24 times?
 25 A. I refuse to answer.

80

1 MR. PIKE: Form.
 2 Q. And you flew to his island, right?
 3 A. I refuse to answer.
 4 MR. PIKE: Form.
 5 Q. You flew to New Mexico?
 6 A. I refuse to answer.
 7 MR. PIKE: Form.
 8 Q. You flew to New Jersey?
 9 MR. PIKE: Form.
 10 A. I refuse to answer.
 11 Q. Several of the flights are just yourself,
 12 Jeffrey Epstein, and Sarah Kellen. What did you do on
 13 those flights?
 14 MR. PIKE: Form.
 15 A. I refuse to answer.
 16 Q. Who's Adam Perrylang?
 17 A. I refuse to answer.
 18 Q. Is that somebody that you were made to have
 19 sex with?
 20 A. I refuse to answer.
 21 Q. Did Jeffrey Epstein ever make you have sex
 22 with any females?
 23 MR. PIKE: Form.
 24 A. I refuse to answer.
 25 Q. Did he ever make you have sex with any of his

81

1 friends?
 2 MR. PIKE: Form.
 3 A. I refuse to answer.
 4 Q. Who is Sandy Berger?
 5 A. I refuse to answer.
 6 Q. That's somebody else that was affiliated with
 7 Bill Clinton at one point in time, correct?
 8 A. I refuse to answer.
 9 Q. A close friend of Jeffrey Epstein's?
 10 MR. PIKE: Form.
 11 A. I refuse to answer.
 12 Q. He called the house within three weeks of the
 13 search warrant being executed. Did he tip off Jeffrey
 14 Epstein?
 15 MR. PIKE: Form.
 16 A. I refuse to answer.
 17 Q. Is he somebody that's involved with underage
 18 minors?
 19 A. I refuse to answer.
 20 Q. Do you know Igor Zinoviev?
 21 A. I refuse to answer.
 22 Q. Andrea Metrovich?
 23 A. I refuse to answer.
 24 Q. Have you flown on the airplane with Alan
 25 Dershowitz before?

<p style="text-align: right;">82</p> <p>1 MR. PIKE: Form.</p> <p>2 A. I refuse to answer.</p> <p>3 Q. And Jean Luc Brunel is somebody who you have</p> <p>4 been on the airplane with several times, correct?</p> <p>5 A. I refuse to answer.</p> <p>6 MR. PIKE: Form.</p> <p>7 Q. And when Jean Luc Brunel is on this airplane</p> <p>8 there are underage minor -- minor females on the</p> <p>9 airplane with you, correct?</p> <p>10 MR. PIKE: Form.</p> <p>11 A. I refuse to answer.</p> <p>12 Q. Is there a back room to this airplane? Is</p> <p>13 there any sort of separation or is it all one big room?</p> <p>14 MR. PIKE: Form.</p> <p>15 A. I refuse to answer.</p> <p>16 Q. So if Jeffrey Epstein and Jean Luc Brunel are</p> <p>17 engaged in sex acts with underage minors did you --</p> <p>18 A. I refuse --</p> <p>19 Q. Sorry -- did you observe any of those acts?</p> <p>20 A. I refuse to answer.</p> <p>21 MR. PIKE: Form.</p> <p>22 Q. And on numerous of the flights the flight logs</p> <p>23 indicate someone's name then oftentimes initials, but</p> <p>24 sometimes it would just say "three females". Do you</p> <p>25 know why?</p>	<p style="text-align: right;">84</p> <p>1 give you a ticket, correct?</p> <p>2 MR. PIKE: Form.</p> <p>3 A. I refuse to answer.</p> <p>4 Q. Was it ever your job to call the police</p> <p>5 department and ask if any police reports were on file</p> <p>6 or anybody complained about the activities at Jeffrey</p> <p>7 Epstein's house?</p> <p>8 MR. PIKE: Form.</p> <p>9 A. I refuse to answer.</p> <p>10 Q. Have you ever gone physically to the police</p> <p>11 department?</p> <p>12 A. I refuse to answer.</p> <p>13 Q. Was there a flight where you flew alone with</p> <p>14 Jean Luc Brunel?</p> <p>15 A. I refuse to answer.</p> <p>16 Q. Have you ever flown on the plane with Prince</p> <p>17 Andrew?</p> <p>18 MR. PIKE: Form.</p> <p>19 A. I refuse to answer.</p> <p>20 Q. Do you know Zinta Braukis?</p> <p>21 A. I refuse to answer.</p> <p>22 Q. That's another model that Jeffrey Epstein</p> <p>23 knows, correct?</p> <p>24 A. I refuse to answer.</p> <p>25 MR. PIKE: Form.</p>
<p style="text-align: right;">83</p> <p>1 A. I refuse to answer.</p> <p>2 MR. PIKE: Form.</p> <p>3 Q. Who's Claire Hazel?</p> <p>4 A. I refuse to answer.</p> <p>5 Q. Do you know Jo-Jo and Lynn Fontanella?</p> <p>6 A. I refuse to answer.</p> <p>7 Q. They're the house managers up at the mansion</p> <p>8 up in Manhattan, correct?</p> <p>9 MR. PIKE: Form.</p> <p>10 A. I refuse to answer.</p> <p>11 Q. And they assist Mr. Epstein in engaging in</p> <p>12 underage sex with minors in New York, correct?</p> <p>13 MR. PIKE: Form.</p> <p>14 A. I refuse to answer.</p> <p>15 Q. They also maintain a pretty close relationship</p> <p>16 with the police?</p> <p>17 A. I refuse to answer.</p> <p>18 Q. And that's a big component also, right, that</p> <p>19 Jeffrey Epstein has -- is friendly with the law</p> <p>20 enforcement, correct?</p> <p>21 MR. PIKE: Form.</p> <p>22 A. I refuse to answer.</p> <p>23 Q. Like law enforcement would do favors for not</p> <p>24 only Jeffrey Epstein but his various assistants. If</p> <p>25 you were speeding around the neighborhood they wouldn't</p>	<p style="text-align: right;">85</p> <p>1 Q. Somebody that he had engaged in sex with when</p> <p>2 she was underage?</p> <p>3 A. I refuse to answer.</p> <p>4 Q. She actually got a modeling contract out of</p> <p>5 it?</p> <p>6 MR. PIKE: Form.</p> <p>7 A. I refuse to answer.</p> <p>8 Q. Why does Jean Luc Brunel and Jeffrey Epstein</p> <p>9 fly together so often?</p> <p>10 MR. PIKE: Form.</p> <p>11 A. I refuse to answer.</p> <p>12 Q. And why does Ghislaine Maxwell also fly so</p> <p>13 often with Jeffrey Epstein and Jean Luc Brunel?</p> <p>14 A. I refuse to answer.</p> <p>15 MR. PIKE: Form.</p> <p>16 Q. Isn't it true that all three of them are</p> <p>17 obsessed and addicted to sex with underage minors?</p> <p>18 MR. PIKE: Form.</p> <p>19 A. I refuse to answer.</p> <p>20 MR. PIKE: Brad, how much longer do you have?</p> <p>21 MR. EDWARDS: How long? You want to take a</p> <p>22 break?</p> <p>23 MR. PIKE: Yeah.</p> <p>24 MR. EDWARDS: Sure. It's going a lot faster</p> <p>25 than I thought it would.</p>

86

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

87

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

88

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

89

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

90

1 MR. PIKE: Form.

2 Q. He devised this scheme of having underage

3 minor girls bring him other underage minor girls so

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

5 to 16 years old, correct?

6 A. I refuse to answer.

7 Q. Have you heard Jeffrey Epstein say "The

8 younger the better?"

9 A. I refuse to answer.

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

11 him happy the younger the girl was?

12 A. I refuse to answer.

13 MR. PIKE: Form.

14 Q. The less developed the girl is the more

15 excited Jeffrey Epstein gets; is that true?

16 MR. PIKE: Form.

17 A. I refuse to answer.

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

19 the future?

20 A. I refuse to answer.

21 MR. PIKE: Form.

22 Q. Would you ever work for him again?

23 A. I refuse to answer.

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

25 A. I refuse to answer.

91

1 MR. PIKE: Form.

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

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

4 correct?

5 A. I refuse to answer.

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

7 child molestation ring?

8 MR. PIKE: Form.

9 A. I refuse to answer.

10 Q. Did you ever tell anyone while you were

11 working for him that you wanted to stop?

12 A. I refuse to answer.

13 MR. PIKE: Form.

14 Q. Did you continue working there because you

15 were just scared to stop?

16 A. I refuse to answer.

17 MR. PIKE: Form.

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

19 Jeffrey Epstein might do to you if you quit performing

20 your services for his child molestation ring?

21 A. I refuse to answer.

22 MR. PIKE: Form.

23 Q. Did Jeffrey Epstein ever threaten you?

24 A. I refuse to answer.

25 MR. PIKE: Form.

92

1 Q. Did Ghislaine Maxwell ever threaten you?

2 A. I refuse to answer.

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

4 A. I refuse to answer.

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

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

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

8 yourself or someone named Janusz Banaziak or Louella

9 Rabuyo, Alfredo Rodriguez, Nadia Marcinkova, Sarah

10 Kellen, various people that we know to have been

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

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

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

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

15 assistants is going to call the underage minor to give

16 them an appointment?

17 A. I refuse to answer.

18 MR. PIKE: Form.

19 Q. And what would happen on the occasions where

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

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

22 MR. PIKE: Form.

23 A. I refuse to answer.

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

25 her happy?

93

1 A. I refuse to answer.

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

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

4 on inside this house," right?

5 MR. PIKE: Form.

6 A. I refuse to answer.

7 Q. And did Jeffrey Epstein tell you that because

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

9 underprivileged type girls they're likely not going to

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

11 MR. PIKE: Form.

12 A. I refuse to answer.

13 Q. Did Ghislaine Maxwell talk to you about that

14 as well?

15 A. I refuse to answer.

16 MR. PIKE: Form.

17 Q. Have you seen Jeffrey Epstein angry?

18 A. I refuse to answer.

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

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

21 right?

22 A. I refuse to answer.

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

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

25 A. I refuse to answer.

94

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

2 A. I refuse to answer.

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

4 old and cooperated with everything he said because they

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

6 A. I refuse to answer.

7 MR. PIKE: Form.

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

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

10 there, right?

11 A. I refuse to answer.

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

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

14 out?

15 A. I refuse to answer.

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

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

18 the kitchen with the other closets, correct?

19 A. I refuse to answer.

20 MR. PIKE: Form.

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

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

23 door at the top of that stairway, right?

24 A. I refuse to answer.

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

95

1 a right and you head towards a little hallway that

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

3 A. I refuse to answer.

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

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

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

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

8 MR. PIKE: Form.

9 A. I refuse to answer.

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

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

12 girls?

13 A. I refuse to answer.

14 MR. PIKE: Form.

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

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

17 A. I refuse to answer.

18 MR. PIKE: Form.

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

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

21 MR. PIKE: Form.

22 A. I refuse to answer.

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

24 pregnant at 16 years old that Jeffrey Epstein bought

25 everything on her baby registry, right?

96

1 A. I refuse to answer.

2 MR. PIKE: Form.

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

4 the gifts over to her home?

5 MR. PIKE: Form.

6 A. I refuse to answer.

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

8 Jeffrey Epstein own a Mercedes?

9 MR. PIKE: Form.

10 A. I refuse to answer.

11 Q. And do you remember when Sarah Kellen loaded

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

13 my client's trailer?

14 A. I refuse to answer.

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

16 thank her while she was pregnant she continued to bring

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

18 MR. PIKE: Form.

19 A. I refuse to answer.

20 Q. Because LM would no longer qualify as somebody

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

22 correct?

23 MR. PIKE: Form.

24 A. I refuse to answer.

25 Q. Because the only real disqualifications for

97

1 interacting sexually with Mr. Epstein are if you have

2 tattoos, right?

3 A. I refuse to answer.

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

5 A. I refuse to answer.

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

7 African-American or black girl, have you?

8 A. I refuse to answer.

9 Q. If you've been pregnant?

10 A. I refuse to answer.

11 Q. Or if you are pregnant, correct?

12 A. I refuse to answer.

13 Q. But certainly he was not above having a

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

15 females, correct?

16 A. I refuse to answer.

17 Q. In fact --

18 MR. PIKE: Form.

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

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

21 service, correct?

22 MR. PIKE: Form.

23 A. I refuse to answer.

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

25 these girls a favor?

98

1 A. I refuse to answer.

2 **Q. I mean, doesn't he think that these girls are**

3 **lucky that he ever -- that they ever -- that he ever**

4 **allowed them out of their trailer and into his mansion,**

5 **correct?**

6 A. I refuse to answer.

7 MR. PIKE: Form.

8 **Q. We've defined the molestation statute or at**

9 **least I read it to you earlier and now we've talked**

10 **about this scheme of Jeffrey Epstein gaining access to**

11 **this number of underage minor females. At the time**

12 **when you were working for him did you recognize him as**

13 **a serial child molester?**

14 MR. PIKE: Form.

15 A. I refuse to answer.

16 **Q. Do you know of anybody that ever worked for**

17 **him that quit working for him because of what he was**

18 **doing?**

19 A. I refuse to answer.

20 MR. PIKE: Form.

21 **Q. Do you know Michael Friedman?**

22 A. I refuse to answer.

23 **Q. Is that somebody you ever met there?**

24 A. I refuse to answer.

25 **Q. What countries does Jeffrey Epstein typically**

99

1 **bring underage minor females from?**

2 A. I refuse to answer.

3 **Q. Do you know why he chooses the countries that**

4 **he chooses to import underage minor females from?**

5 A. I refuse to answer.

6 MR. PIKE: Form.

7 **Q. Was Nadia -- do you know how old Nadia**

8 **Marcinkova was when she came to this country?**

9 A. I refuse to answer.

10 **Q. Have you had conversations with Nadia**

11 **Marcinkova about Jeffrey Epstein bringing her to this**

12 **country?**

13 A. I refuse to answer.

14 **Q. She's been described by some as his**

15 **Yugoslavian lesbian sex slave. Is that something that**

16 **is an accurate description based on the observations**

17 **you have?**

18 A. I refuse to answer.

19 MR. PIKE: Form.

20 **Q. Did you ever engage in any lesbian sex with**

21 **Nadia Marcinkova?**

22 A. I refuse to answer.

23 **Q. Has Sarah Kellen ever had sex with Jeffrey**

24 **Epstein?**

25 MR. PIKE: Form.

100

1 A. I refuse to answer.

2 **Q. Do you know how it is that Sarah Kellen met**

3 **Jeffrey Epstein?**

4 A. I refuse to answer.

5 **Q. Do you know Story Cowles?**

6 A. I refuse to answer.

7 **Q. You know who Sergio Cordero is?**

8 A. I refuse to answer.

9 **Q. Well, that's somebody who also assists**

10 **Mr. Epstein in bringing him underage minor females for**

11 **sex, correct?**

12 A. I refuse to answer.

13 MR. PIKE: Form.

14 **Q. And Khalid Monroe, you know who that is?**

15 A. I refuse to answer.

16 **Q. Also somebody that through MC Squared or some**

17 **affiliation with that modeling agency would help for**

18 **Jeffrey Epstein to gain access to underage minor**

19 **females for sex, correct?**

20 MR. PIKE: Form.

21 A. I refuse to answer.

22 **Q. And do you know of trips that Mr. Cordero,**

23 **Mr. Brunel, and Mr. Epstein took to Brazil specifically**

24 **for the purposes of Mr. Epstein engaging in sex with**

25 **12-year-old girls?**

101

1 MR. PIKE: Form.

2 A. I refuse to answer.

3 **Q. Are you -- you are aware that Jeffrey Epstein**

4 **pled guilty to two felonies related to his sexual**

5 **interactions, correct?**

6 A. I refuse to answer.

7 **Q. Okay.**

8 VIDEOGRAPHER: Excuse me, counsel.

9 MR. ROSS: I object on privilege grounds --

10 attorney-client privilege grounds.

11 MR. EDWARDS: Okay, fine. I was trying to get

12 into an area we may get answers.

13 VIDEOGRAPHER: Could I just get you to put

14 your phone on the table? I'm starting to get

15 interference.

16 MR. ROSS: The phone?

17 VIDEOGRAPHER: Yes, sir.

18 MR. EDWARDS: You got a secret phone?

19 VIDEOGRAPHER: It's anytime it receives any

20 kind of information.

21 MR. ROSS: Oh, okay, yeah, it's --

22 VIDEOGRAPHER: It's not that it's ringing.

23 MR. ROSS: Right. It's not doing it now.

24 VIDEOGRAPHER: I apologize for the

25 interruption.

102

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

103

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

104

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

105

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

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 access to underage minor females**
7 **that were foreigners, correct?**
8 A. I refuse to answer.
9 MR. PIKE: Form.
10 **Q. He's also involved in the modeling agency,**
11 **too, correct?**
12 MR. PIKE: Form.
13 A. I refuse to answer.
14 **Q. That's a friend of or former friend of Jean**
15 **Luc Brunel's?**
16 A. I refuse to answer.
17 **Q. How many times has Jean Luc Brunel shown up at**
18 **Jeffrey Epstein's house with underage minor females?**
19 MR. PIKE: Form.
20 A. I refuse to answer.
21 **Q. And when that would happen isn't it true that**
22 **they would have orgies with these underage minor**
23 **females?**
24 MR. PIKE: Form.
25 A. I refuse to answer.

107

1 **Q. What was done -- or let me ask it a different**
2 **way. Strike that.**
3 **Where is the scheduling book for the massage**
4 **appointments for Jeffrey Epstein?**
5 MR. PIKE: Form.
6 A. I refuse to answer.
7 **Q. Is that something else that was removed from**
8 **the home prior to the search warrant being executed?**
9 A. I refuse to answer.
10 MR. PIKE: Form.
11 **Q. Do you know how it is that -- well, did**
12 **Jeffrey Epstein ever tell you that because of the**
13 **people he knew he would not be going to prison for the**
14 **crimes that he committed?**
15 A. I refuse to answer.
16 MR. PIKE: Form.
17 **Q. And is it your understanding that Ken Starr**
18 **had played a major role in devising the non-prosecution**
19 **agreement or having the government agree not to**
20 **prosecute Jeffrey Epstein for his crimes against**
21 **minors?**
22 A. I refuse to answer.
23 MR. PIKE: Form.
24 **Q. Is it also your understanding that Bill**
25 **Clinton played somewhat of a role in helping Jeffrey**

108

1 **Epstein out of the trouble that he would have been in**
2 **related to his sexual interactions with minor females?**
3 A. I refuse to answer.
4 MR. PIKE: Form.
5 **Q. Did Jeffrey Epstein tell you that you need to**
6 **cooperate if you want the protection that me and my**
7 **connections can give you for this activity?**
8 MR. PIKE: Form.
9 A. I refuse to answer.
10 **Q. You admit that you called LM on the telephone**
11 **for her to come to Jeffrey Epstein's house to be**
12 **molested by Jeffrey Epstein when she was an underage**
13 **female?**
14 A. I refuse to answer.
15 MR. PIKE: Form. Asked and answered twice.
16 **Q. Do you agree that you called EW on the**
17 **telephone for the purposes of her coming to Jeffrey**
18 **Epstein's house for him to sexually molest her?**
19 MR. PIKE: Same objection.
20 A. I refuse to answer.
21 **Q. And do you agree that you called Jane Doe and**
22 **told her to come to your house to work, meaning for**
23 **Jeffrey Epstein to sexually molest her?**
24 MR. PIKE: Asked and answered.
25 A. I refuse to answer.

109

1 **Q. The first trial that is set in these cases is**
2 **in July of this year. Do you intend to be in the local**
3 **area?**
4 MR. ROSS: You can answer.
5 A. Yes.
6 **Q. Okay. And what address will you be at?**
7 MR. ROSS: You can answer.
8 A. 1040 South Shore Drive.
9 **Q. That's Miami?**
10 A. Miami Beach, Florida.
11 **Q. And the ZIP is?**
12 A. 33141.
13 **Q. And I presume that if I needed to find you or**
14 **locate you or anything else I could go through your**
15 **attorney?**
16 A. Yes.
17 **Q. Okay. Who do you live at that address with?**
18 MR. ROSS: You can answer.
19 A. With my husband and my mom-in-law and his
20 sister as well.
21 **Q. And your husband's name is Duncan?**
22 A. Duncan Ross.
23 **Q. And your mother-in-law's name?**
24 A. Monica Ross.
25 **Q. And who else lives at the house with you, I'm**

110

1 **sorry?**

2 A. His sister.

3 **Q. And her name is?**

4 A. Stella Erin Ross.

5 **Q. And have you told Monica or Stella your**

6 **involvement with Jeffrey Epstein?**

7 A. I refuse to answer.

8 **Q. Have you told your parents?**

9 A. I refuse to answer.

10 **Q. Are your parents in the country now?**

11 MR. ROSS: You can answer.

12 A. No.

13 **Q. Do they have plans to come back?**

14 MR. ROSS: You can answer.

15 A. They may visit, I'm not sure.

16 **Q. But on a permanent basis they're in Poland?**

17 A. Yes.

18 **Q. Okay. What's the address where they are in**

19 **Poland?**

20 A. Kuznicy Kollatajowska 33, Warsaw, Poland.

21 **Q. She's great. I'm sure she got that.**

22 A. Would you like me to spell it out?

23 K-U-Z-I-N-C-Y, second word,

24 K-O-L-L-A-T-A-J-O-W-S-K-I-A, Warsaw, Poland 02495.

25 MR. EDWARDS: One way to never find a witness

111

1 is just move to Poland. There's no way.

2 MR. ROSS: Couldn't get anyone to type the

3 subpoena.

4 MR. EDWARDS: Right, exactly. All right. I

5 don't have any other questions for you. Thank you.

6 THE WITNESS: Thank you.

7 CROSS-EXAMINATION

8 BY MR. MERMELSTEIN:

9 **Q. Okay. Mrs. Ross, I have some questions for**

10 **you. Your husband, Duncan Ross, what does he do for a**

11 **living?**

12 A. He's a Ph.D. student.

13 **Q. And what is he a Ph.D. in?**

14 A. He works on bone marrow transplant immunology.

15 **Q. So is he a medical doctor?**

16 A. He's scientist. He's working on his Ph.D.

17 degree.

18 **Q. And which school is he working on his Ph.D.**

19 **at?**

20 A. University of Miami.

21 **Q. And how long has he been doing that?**

22 A. I cannot recall when he started but we were

23 already married. Maybe one or two years into my

24 marriage. I do not recall the exact time.

25 **Q. And I believe you testified that you met him**

112

1 **in Europe, correct?**

2 A. Correct.

3 **Q. And did he have a different employment or**

4 **profession then?**

5 A. Yes.

6 **Q. What was he doing then?**

7 A. Well, at that time he was serving in the

8 entertainment business. He was DJing and -- yeah.

9 When I met him he came to Europe for a DJ event. DJing

10 event.

11 **Q. And where was that in Europe?**

12 A. He went to Spain and then I was in Monaco at

13 the time and he knew the people that I was there with

14 and we were introduced. That's where we met.

15 **Q. And did he have connections to modeling in the**

16 **United States?**

17 A. Yes.

18 **Q. And how did he have those connections?**

19 A. I'm -- you know, I'm not sure. I don't know

20 at this time, but he knew agencies here and he was

21 doing, I believe, some photographic work as well

22 himself.

23 **Q. So he was a DJ and a professional**

24 **photograph -- photographer?**

25 A. Yes. You may say so, yes.

113

1 **Q. And a scientist as well?**

2 A. Yes.

3 **Q. Did he do work for particular modeling**

4 **agencies in the United States?**

5 A. I mean, do you -- I don't understand your

6 question. Do you mean like --

7 **Q. Well, did he perform work or services for**

8 **particular modeling agencies in the United States?**

9 A. Well, I believe he would hire models from

10 modeling agencies, yes.

11 **Q. He would hire models?**

12 A. Yes, for -- you know, that's how -- how it

13 works. You hire a model from a modeling agency for a

14 particular job, a client that you may have.

15 **Q. So as a photographer he would hire models for**

16 **a particular modeling agency?**

17 MR. PIKE: Form.

18 A. Yes.

19 **Q. And do you know which modeling agencies he**

20 **typically worked with?**

21 A. Well, I presume Elite Models because, you

22 know, he had connection and he invited me. I think

23 just various Miami Beach -- you know, Miami, South

24 Beach modeling agencies.

25 **Q. Did he work for MC Squared?**

114

1 A. I refuse to answer.
2 **Q. In 2004 and 2005 you were employed by Jeffrey
3 Epstein, correct?**
4 MR. PIKE: Form.
5 A. I refuse to answer.
6 **Q. And as an employee of Jeffrey Epstein you were
7 under his instruction and supervision, correct?**
8 MR. PIKE: Form.
9 A. I refuse to answer.
10 MR. PIKE: Let's go off the record for a
11 second.
12 MR. MERMELSTEIN: Sure.
13 VIDEOGRAPHER: Off the record at 12:12 p.m.
14 (Discussion off the record.)
15 MR. MERMELSTEIN: I'll be brief on the general
16 questions.
17 VIDEOGRAPHER: On the record, 12:14 p.m.
18 BY MR. MERMELSTEIN:
19 **Q. And as an employee of Jeffrey Epstein were you
20 also subject to the -- to the instructions and
21 supervision of Ghislaine Maxwell?**
22 MR. PIKE: Form.
23 A. I refuse to answer.
24 **Q. And as an employee of Jeffrey Epstein did you
25 work under the supervision and instruction of his**

115

1 **primary assistant Sarah Kellen?**
2 MR. PIKE: Form.
3 A. I refuse to answer.
4 **Q. Okay. Did Jeffrey Epstein tell you that --
5 that he recruited from western Palm Beach County
6 underage girls to come to his Palm Beach mansion for
7 sexual activity?**
8 MR. PIKE: Form.
9 A. I refuse to answer.
10 **Q. And did Jeffrey Epstein have a computer
11 database at his Palm Beach mansion where he listed
12 underage high school girls in Palm Beach County and
13 their contact information so that he could have these
14 underage minors come to his house for sexual activity?**
15 MR. PIKE: Form.
16 A. I refuse to answer.
17 **Q. And did Jeffrey Epstein tell you that the
18 reason he brought in underage minors from western Palm
19 Beach County is because he anticipated they would be
20 impressed, in awe, and intimidated by his wealth?**
21 MR. PIKE: Form.
22 A. I refuse to answer.
23 **Q. And as young girls who were impressed and in
24 awe and intimidated of his wealth they would do what he
25 asked them to do?**

116

1 MR. PIKE: Form.
2 A. I refuse to answer.
3 **Q. And as young underage girls who were
4 impressed, intimidated, and in awe of his wealth they
5 would be unlikely to -- to complain to authorities that
6 he was engaging in sexual activity with them?**
7 A. I refuse to answer.
8 MR. PIKE: Form.
9 **Q. Okay. Did Jeffrey Epstein instruct you to
10 call girls on the telephone to schedule appointments
11 for them to come to his Palm Beach house for massages
12 which were, in fact, to be sexual activity?**
13 MR. PIKE: Form.
14 A. I refuse to answer.
15 **Q. Prior to May 2005 did you call Jane Doe 4 to
16 schedule appointments for her to come to the Epstein
17 house to engage in -- to give Jeffrey Epstein a massage
18 which would, in fact, be sexual activity with Jeffrey
19 Epstein?**
20 MR. PIKE: Form.
21 A. I refuse to answer.
22 **Q. Okay. Prior to May 2005 while you were at the
23 Epstein house in Palm Beach did you receive calls from
24 Jane Doe 4 regarding the scheduling of an appointment
25 for her to come to the Epstein house to give Jeffrey**

117

1 **Epstein a massage?**
2 MR. PIKE: Form.
3 A. I refuse to answer.
4 **Q. When Jane Doe 7 -- let me strike that.
5 Do you know Jane Doe 7?**
6 A. I refuse to answer.
7 **Q. When Jane Doe 7 was a minor female did you
8 call Jane Doe 7 to schedule appointments for her to
9 come to the Epstein house in Palm Beach to give Epstein
10 a massage?**
11 MR. PIKE: Form.
12 A. I refuse to answer.
13 **Q. When Jane Doe 7 was a minor female did you
14 receive calls from Jane Doe 7 while you were at the
15 Epstein house for her to come to the house by
16 appointment and give Jeffrey Epstein a massage?**
17 MR. PIKE: Form.
18 A. I refuse to answer.
19 **Q. The computer database that Jeffrey Epstein
20 maintained girls from western Palm Beach County who
21 would come to the house in Palm Beach to give Epstein a
22 massage, did that computer database include the name
23 and contact information for Jane Doe 2?**
24 MR. PIKE: Form.
25 A. I refuse to answer.

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1 **Q. Do you know who Jane Doe 2 is?**
2 A. I refuse to answer.
3 **Q. Do you know who Jane Doe 5 is?**
4 A. I refuse to answer.
5 **Q. Did the computer database that Epstein**
6 **maintained on his computers in his home have the name**
7 **and contact information for Jane Doe 5 so that Epstein**
8 **could contact her for -- for massages in his Palm Beach**
9 **home?**
10 MR. PIKE: Form.
11 A. I refuse to answer.
12 **Q. Do you know the name Jane Doe 6?**
13 A. I refuse to answer.
14 **Q. Did the computer database that Epstein**
15 **maintained in his home of underage girls who he would**
16 **have come over for massages and sexual activity did**
17 **that computer database include the name and contact**
18 **information for Jane Doe 6?**
19 A. I refuse to answer.
20 **Q. Do you know the name Jane Doe 3?**
21 A. I refuse to answer.
22 **Q. Did the computer database that Jeffrey Epstein**
23 **maintained in his home include the name and contact**
24 **information of Jane Doe 3 so that he could contact Jane**
25 **Doe 3 to come to his Palm Beach home and give him a**

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1 **message which would become sexual activity?**
2 A. I refuse to answer.
3 **Q. Did the computer database that Jeffrey Epstein**
4 **maintained in his home include the name Jane Doe 4?**
5 MR. PIKE: Form.
6 A. I refuse to answer.
7 **Q. Do you know Jane Doe 4?**
8 A. I refuse to answer.
9 **Q. Did the -- did Jeffrey Epstein tell you that**
10 **he maintained the contact information for Jane Doe 4 in**
11 **his computer database in his home so that he could**
12 **contact her to come to his Palm Beach mansion for**
13 **massages?**
14 MR. PIKE: Form.
15 A. I refuse to answer.
16 **Q. Did you know for a fact that the computer**
17 **database included the name Jane Doe 4 so that Jeffrey**
18 **Epstein could contact her and she would come to the**
19 **Palm Beach mansion to give Jeffrey Epstein a massage?**
20 MR. PIKE: Form.
21 A. I refuse to answer.
22 **Q. Did you know that the computer database that**
23 **Jeffrey Epstein maintained his home contained the name**
24 **and contact information of Jane Doe 7 --**
25 A. I refuse -- sorry.

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1 **Q. I'm sorry -- so he would contact Jane Doe 7**
2 **and have her come to his house to give him a massage?**
3 A. I refuse to answer.
4 **Q. Are you aware that the computer database that**
5 **Jeffrey Epstein maintained in his home contained the**
6 **name Jane Doe 8 so that he could contact Jane Doe 8 and**
7 **have him come to the house in Palm Beach for purposes**
8 **of giving him a massage?**
9 MR. PIKE: Form.
10 A. I refuse to answer.
11 **Q. You removed three computers from the Palm**
12 **Beach house with another gentleman prior to the search**
13 **warrant being issued by the Palm Beach police; isn't**
14 **that correct?**
15 A. I refuse to answer.
16 MR. PIKE: Form. Asked and answered.
17 **Q. And Jeffrey Epstein instructed you to remove**
18 **those computers; is that correct?**
19 MR. PIKE: Form, asked and answered.
20 A. I refuse to answer.
21 **Q. And Jeffrey Epstein told you that the reason**
22 **he was instructing you to remove the computers was to**
23 **hide his sexual activities with underage minors from**
24 **the authorities?**
25 MR. PIKE: Form.

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

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1 A. I refuse to answer.
2 **Q. Did Jeffrey Epstein tell you that he induced,**
3 **persuaded, or enticed underage girls to engage in**
4 **sexual activities with him when they came to his Palm**
5 **Beach mansion to give him a massage?**
6 MR. PIKE: Form.
7 A. I refuse to answer.
8 **Q. Would you instruct -- when you spoke to**
9 **underage girls to schedule appointments for massage in**
10 **Epstein's home would you instruct these girls to lie**
11 **about their ages and say they were 18 years old when**
12 **you knew that they were younger than 18?**
13 A. I refuse to answer.
14 **Q. Did Jeffrey Epstein instruct you as to what to**
15 **say to the girls who you contacted by telephone to make**
16 **appointments to schedule massages in Epstein's home?**
17 A. I refuse to answer.
18 MR. PIKE: Form.
19 **Q. And would Jeffrey Epstein tell you to have the**
20 **girls who you contacted by the telephone to make**
21 **appointments to come to the mansion to give Jeffrey**
22 **Epstein massages, that they should -- that these girls**
23 **should lie about their ages to Jeffrey Epstein?**
24 MR. PIKE: Form.
25 A. I refuse to answer.

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1 **Q. Prior to May 2005 are you aware that Jeffrey**
2 **Epstein had numerous appointments with Jane Doe 4 for**
3 **her to come to the mansion to come to give him a**
4 **massage?**
5 A. I refuse to answer.
6 MR. PIKE: Form.
7 **Q. Prior to May 2005 are you aware that Jane Doe**
8 **4 would come to the mansion to give Jeffrey Epstein a**
9 **massage on a frequent and regular basis?**
10 A. I refuse to answer.
11 MR. PIKE: Form.
12 **Q. Are you aware that prior to May 2005 Jeffrey**
13 **Epstein engaged with -- engaged in sexual activities**
14 **with Jane Doe 4 at the Palm Beach mansion 50 to a**
15 **hundred times?**
16 A. I refuse to answer.
17 MR. PIKE: Form.
18 **Q. Did Jeffrey Epstein admit to you that on**
19 **numerous occasions he -- when Jane Doe 4 was an**
20 **underage minor he touched her breasts?**
21 MR. PIKE: Form.
22 A. I refuse to answer.
23 **Q. Did Jeffrey Epstein admit to you that on**
24 **numerous occasions when Jane Doe 4 was an underage**
25 **minor he touched and groped her buttocks?**

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1 A. I refuse to answer.
2 **Q. Did Jeffrey Epstein admit to you on numerous**
3 **occasions when Jane Doe 4 was an underage minor that he**
4 **rubbed Jane Doe 4's vagina?**
5 A. I refuse to answer.
6 MR. PIKE: Form.
7 **Q. Did Jeffrey Epstein admit to you that on**
8 **occasions prior to Jane Doe 4 turning the age of 18**
9 **that he performed oral sex on Jane Doe 4?**
10 MR. PIKE: Form.
11 A. I refuse to answer.
12 **Q. Did Jeffrey Epstein admit to you that on**
13 **numerous occasions prior to Jane Doe 4 reaching the age**
14 **of 18 he would place a vibrator on Jane Doe 4's**
15 **genitals?**
16 MR. PIKE: Form.
17 A. I refuse to answer.
18 **Q. Did Jeffrey Epstein admit to you that prior to**
19 **Jane Doe 4 becoming 18 years of age he would masturbate**
20 **in her presence?**
21 A. I refuse to answer.
22 MR. PIKE: Form to the last question.
23 MR. MERMELSTEIN: Hum?
24 MR. PIKE: Form to the last question.
25 **Q. Did Jeffrey Epstein admit to you that prior to**

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1 **Jane Doe 7 reaching the age of 18 years old he would**
2 **touch her breasts?**
3 MR. PIKE: Form.
4 A. I refuse to answer.
5 **Q. Did Jeffrey Epstein admit to you that prior to**
6 **Jane Doe 7 reaching the age of 18 he would grope her --**
7 **grobe Jane Doe 7's buttocks?**
8 MR. PIKE: Form.
9 A. I refuse to answer.
10 **Q. And did Jeffrey Epstein admit to you that**
11 **prior to Jane Doe 7 reaching the age of 18 he would rub**
12 **Jane Doe 7's vagina?**
13 A. I refuse to answer.
14 MR. PIKE: Form.
15 **Q. Do you know who Haley Robson is?**
16 A. I refuse to answer.
17 **Q. Did Jeffrey Epstein instruct you to call Haley**
18 **Robson on numerous occasions to recruit underage girls**
19 **to come to the Palm Beach Mansion to give Jeffrey**
20 **Epstein a massage?**
21 MR. PIKE: Form.
22 A. I refuse to answer.
23 **Q. Did Jeffrey Epstein instruct you on numerous**
24 **occasions to contact Haley Robson for the purpose of**
25 **scheduling underage girls for appointments to come to**

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

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

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

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

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

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

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

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

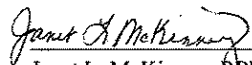
134	<p>1 A. I refuse to answer.</p> <p>2 Q. And did you schedule Lauren --</p> <p>3 MR. PIKE: Form.</p> <p>4 Q. -- Lauren Murphy to come to the Palm Beach</p> <p>5 mansion as an underage female to give Jeffrey Epstein</p> <p>6 messages?</p> <p>7 MR. PIKE: Form.</p> <p>8 A. I refuse to answer.</p> <p>9 Q. Also what has been marked as Exhibit 2F is a</p> <p>10 phone message from you to Jeffrey Epstein dated</p> <p>11 September 11th, 2005 at 9:15 a.m. And the message was</p> <p>12 that you got a car for a particular person. Do you</p> <p>13 recall that?</p> <p>14 MR. PIKE: Form.</p> <p>15 A. I refuse to answer.</p> <p>16 Q. Is the car that you obtained on</p> <p>17 September 11th, 2005 for Jane Doe 4?</p> <p>18 MR. PIKE: Form.</p> <p>19 A. I refuse to answer.</p> <p>20 Q. And Jane Doe 4 is a girl who had been coming</p> <p>21 to the Palm Beach mansion to give Jeffrey Epstein a</p> <p>22 massage and engage in sexual activities with him for a</p> <p>23 substantial period of time; is that correct?</p> <p>24 A. I refuse to answer.</p> <p>25 Q. And also what has been marked as Exhibit 2H --</p>	136	<p>1 and no word index.</p> <p>2 MR. MERMELSTEIN: I'll take a copy with a</p> <p>3 mini.</p> <p>4 (The deposition was concluded at 12:42 p.m.)</p> <p>5 (Reading and signing of the deposition was</p> <p>6 waived by the witness and all parties.)</p> <p>7</p> <p>8</p> <p>9</p> <p>10</p> <p>11</p> <p>12</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>
135	<p>1 actually --</p> <p>2 MR. EDWARDS: Is that G?</p> <p>3 MR. MERMELSTEIN: Are they similar?</p> <p>4 MR. EDWARDS: Yeah, I guess they blocked out</p> <p>5 names on one of them and they didn't on the other.</p> <p>6 MR. MERMELSTEIN: Right. Okay.</p> <p>7 Q. And what has been marked as Exhibit 2G is a</p> <p>8 message from you to Jeffrey Epstein dated</p> <p>9 September 3rd, 2005 at 8:50 p.m. And the message you</p> <p>10 left is, quote, "I left message for Ashley to confirm</p> <p>11 for 11:00 a.m. and Vanessa for 4:30 p.m."</p> <p>12 Did you, in fact, leave that message?</p> <p>13 MR. PIKE: Form.</p> <p>14 A. I refuse to answer.</p> <p>15 Q. And this message that you left confirmed an</p> <p>16 appointment for Jane Doe 4 for 4:30 p.m., correct?</p> <p>17 A. I refuse to answer.</p> <p>18 MR. MERMELSTEIN: All right. That's all I</p> <p>19 have.</p> <p>20 MR. ROSS: Waive.</p> <p>21 MR. MERMELSTEIN: All right.</p> <p>22 VIDEOGRAPHER: Off the record, 12:42 p.m.</p> <p>23 THE REPORTER: Are you ordering?</p> <p>24 MR. EDWARDS: Yes.</p> <p>25 MR. PIKE: I want a copy, a mini, no ASCII,</p>	137	<p>1 CERTIFICATE OF OATH</p> <p>2 STATE OF FLORIDA</p> <p>3 COUNTY OF BROWARD</p> <p>4</p> <p>5 I, Janet L. McKinney, Registered Professional</p> <p>6 Reporter, Florida Professional Reporter, Certified</p> <p>7 LiveNote Reporter, Notary Public, State of Florida,</p> <p>8 certify that ADRIANA ROSS personally appeared before me</p> <p>9 on March 15, 2010 and was duly sworn.</p> <p>10 Signed this 21st day of March, 2010.</p> <p>11</p> <p>12</p> <p>13</p> <p>14  Janet L. McKinney</p> <p>15 Registered Professional Reporter</p> <p>16 Florida Professional Reporter</p> <p>17 Certified LiveNote Reporter</p> <p>18 Notary Public, State of Florida</p> <p>19 Commission No.: DD552183</p> <p>20 Expires: June 2, 2010</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>

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

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

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

17 Dated this 21st day of March, 2010.

18 
19 Janet L. McKinney, RPR, FPR

20 Registered Professional Reporter
21 Florida Professional Reporter
22 Certified LiveNote Reporter
23
24
25

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ATTACHMENT 14

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

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

JANE DOE NO. 2,
Plaintiff,
-vs- VOLUME I OF III
JEFFREY EPSTEIN,
Defendant.

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

VIDEOTAPED DEPOSITION OF
SARAH KELLEN

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

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

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

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

L.M.,
Plaintiff,
-vs- VOLUME I OF III
JEFFREY EPSTEIN,
Defendant.

VIDEOTAPED DEPOSITION OF
SARAH KELLEN

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

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

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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 III
JEFFREY EPSTEIN,
Defendant.

VIDEOTAPED DEPOSITION OF
SARAH KELLEN

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

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

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

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

B.B.
Plaintiff,
-vs- VOLUME I OF III
JEFFREY EPSTEIN
AND SARAH KELLEN,
Defendants.

VIDEOTAPED DEPOSITION OF
SARAH KELLEN

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

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

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

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 23
 24
 25

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1 Appearances continued...
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 17 ALSO PRESENT:
 18 Jessica Cadwell, Paralegal
 19 Burman, Critton, Luttier & Coleman, P.A.
 20 Joseph Kozak, Videographer
 21 Prose Court Reporting Services
 22
 23
 24
 25

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

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

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

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

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

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

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

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

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

1 MR. RHEINHART: Same instruction, same
 2 objection.
 3 THE WITNESS: At the advice of my lawyer,
 4 I must invoke my Fifth Amendment right.
 5 BY MR. KUVIN:
 6 Q. Would you agree with me that Jeffrey
 7 Epstein is a sexual offender?
 8 MR. RHEINHART: Object to the form of the
 9 question and instruct the witness not to answer
 10 on her Fifth Amendment privilege.
 11 THE WITNESS: On the advice of my lawyer I
 12 must invoke my Fifth Amendment right.
 13 BY MR. KUVIN:
 14 Q. Would you agree with me that
 15 Jeffrey Epstein sexually abused you?
 16 MR. RHEINHART: Objection to the form,
 17 both as to the form of the question as to
 18 harassing and instruct the witness not to
 19 answer, based on the Fifth Amendment privilege.
 20 THE WITNESS: On the advice of my lawyer,
 21 I must invoke my Fifth Amendment right.
 22 BY MR. KUVIN:
 23 Q. Would you agree with me that you were a
 24 minor when Jeffrey Epstein first had sexual
 25 relations with you?

1 question. It's ambiguous and compound, and I
 2 will instruct the witness not to answer based
 3 on her Fifth Amendment privilege.
 4 THE WITNESS: On the advice of my lawyer,
 5 I must invoke my Fifth Amendment right.
 6 BY MR. KUVIN:
 7 Q. And why did you do that?
 8 MR. RHEINHART: Object to the form. It's
 9 ambiguous, in fact that what?
 10 BY MR. KUVIN:
 11 Q. Why did you bring minor girls to
 12 Jeffrey Epstein for him to have sex with?
 13 MR. RHEINHART: Same objection as to form
 14 and instruct the witness not to answer.
 15 THE WITNESS: On the advice of my lawyer,
 16 I must invoke my Fifth Amendment right.
 17 BY MR. KUVIN:
 18 Q. What do you currently do for a job?
 19 MR. RHEINHART: Instruct the witness not
 20 to answer the question.
 21 THE WITNESS: On the advice of my lawyer,
 22 I must invoke my Fifth Amendment right.
 23 BY MR. KUVIN:
 24 Q. Would you agree with me that you currently
 25 work for Jeffrey Epstein?

1 MR. RHEINHART: Object to the form. It
 2 assumes facts not before the witness. It is a
 3 compound question and I would instruct the
 4 witness not to answer based on her Fifth
 5 Amendment privilege.
 6 THE WITNESS: On the advice of my lawyer,
 7 I must invoke my Fifth Amendment right.
 8 BY MR. KUVIN:
 9 Q. Would you agree with me that you have had
 10 sex with Jeffrey Epstein?
 11 MR. RHEINHART: Same instruction.
 12 THE WITNESS: On the advice of my lawyer,
 13 I must invoke my Fifth Amendment right.
 14 BY MR. KUVIN:
 15 Q. Would you agree with me that you first had
 16 sex with Jeffrey Epstein when you were under the age
 17 of 18?
 18 MR. RHEINHART: Same instruction.
 19 THE WITNESS: On the advice of my lawyer,
 20 I must invoke my Fifth Amendment right.
 21 BY MR. KUVIN:
 22 Q. Would you agree with me, ma'am, that you
 23 brought numerous underage girls to Jeffrey Epstein
 24 so that he could have sex with them?
 25 MR. RHEINHART: Object to the form of the

1 MR. RHEINHART: Instruct the witness not
 2 to answer the question.
 3 THE WITNESS: On the advice of my lawyer,
 4 I must invoke my Fifth Amendment right.
 5 BY MR. KUVIN:
 6 Q. How long have you worked for
 7 Jeffrey Epstein?
 8 MR. RHEINHART: Same instruction.
 9 THE WITNESS: On the advice of my lawyer,
 10 I must invoke my Fifth Amendment right.
 11 BY MR. KUVIN:
 12 Q. Would you agree with me that you've worked
 13 for Jeff, Jeffrey Epstein for over 20 years as his
 14 personal assistant?
 15 MR. RHEINHART: Instruct the witness not
 16 to answer the question.
 17 THE WITNESS: On the instruction of my
 18 lawyer, I must invoke my Fifth Amendment right.
 19 BY MR. KUVIN:
 20 Q. Would you agree with me that when you
 21 first were hired by Jeffrey Epstein as his personal
 22 assistant, you were under the age of 18?
 23 MR. RHEINHART: Object to the form. It's
 24 compound and assumes facts not present before
 25 the witness, and I instruct the witness not to

1 answer the question based on her Fifth
 2 Amendment privilege.
 3 THE WITNESS: On the instruction of my
 4 lawyer, I must invoke my Fifth Amendment right.
 5 BY MR. KUVIN:
 6 Q. Who introduced you to Jeffrey Epstein the
 7 first time that you met him?
 8 MR. RHEINHART: Same instruction.
 9 THE WITNESS: On the instruction of my
 10 lawyer, I must invoke my Fifth Amendment right.
 11 BY MR. KUVIN:
 12 Q. Did Ghislaine Maxwell introduce you to
 13 Jeffrey Epstein for the first time?
 14 MR. RHEINHART: Same instruction.
 15 THE WITNESS: On the instruction of my
 16 lawyer, I must invoke my Fifth Amendment right.
 17 BY MR. KUVIN:
 18 Q. When was the first time you were in
 19 Jeffrey Epstein's home located on El Brillo Way on
 20 Palm Beach Island?
 21 MR. RHEINHART: Object to the form of the
 22 question as compound and assuming facts not
 23 before the witness. And I instruct the witness
 24 not to answer based on her Fifth Amendment
 25 privilege.

1 witness, and I will instruct the witness not to
 2 answer based on her Fifth Amendment privilege.
 3 THE WITNESS: On the instruction of my
 4 lawyer, I must invoke my Fifth Amendment right.
 5 BY MR. KUVIN:
 6 Q. Would you agree with me that
 7 Jeffrey Epstein owns numerous planes, private
 8 planes?
 9 MR. RHEINHART: Instruct the witness not
 10 to answer.
 11 THE WITNESS: On the instruction of my
 12 lawyer, I must invoke my Fifth Amendment right.
 13 BY MR. KUVIN:
 14 Q. And you've been on every one of those
 15 private planes; isn't that true?
 16 MR. RHEINHART: Object to the form. It
 17 assumes facts not before the witness, and I
 18 will instruct the witness not to answer based
 19 on her Fifth Amendment privilege.
 20 THE WITNESS: On the instruction of my
 21 lawyer, I must invoke my Fifth Amendment right.
 22 BY MR. KUVIN:
 23 Q. Ma'am, isn't it true that you've seen the
 24 passenger manifest for Jeffrey Epstein's plane?
 25 MR. RHEINHART: Object to the form. It

1 THE WITNESS: On the instruction of my
 2 lawyer, I must invoke my Fifth Amendment right.
 3 BY MR. KUVIN:
 4 Q. Would you agree with me that
 5 Jeffrey Epstein owns a home at 358 El Brillo Way,
 6 Palm Beach Island, Florida?
 7 MR. RHEINHART: Instruct the witness not
 8 to answer based on her Fifth Amendment
 9 privilege.
 10 THE WITNESS: On instruction of my
 11 counsel, I must invoke my Fifth Amendment
 12 right.
 13 BY MR. KUVIN:
 14 Q. Would you agree with me that you've been
 15 in that home numerous times?
 16 MR. RHEINHART: Instruct the witness not
 17 to answer the question based on her Fifth
 18 Amendment privilege.
 19 THE WITNESS: On instruction of my lawyer,
 20 I must invoke my Fifth Amendment right.
 21 BY MR. KUVIN:
 22 Q. Would you agree with me that you have gone
 23 on Jeffrey Epstein's plane numerous times?
 24 MR. RHEINHART: Object to the form. It
 25 assumes facts that are not present for the

1 assumes facts that are not established as known
 2 to this witness, and I instruct the witness not
 3 to answer the question based on her Fifth
 4 Amendment privilege.
 5 THE WITNESS: On the instruction of my
 6 lawyer, I must invoke my Fifth Amendment right.
 7 MR. KUVIN: Let me show you what we'll
 8 mark as Exhibit 2.
 9
 10 (Plaintiff's Exhibit No. 2 was marked for
 11 identification.)
 12 MR. KUVIN: Thank you.
 13 MR. RHEINHART: Do you want to zoom in on
 14 it like you did the last time?
 15 MR. KUVIN: No, that's fine.
 16 MR. RHEINHART: Take your time.
 17 MR. KUVIN: And flip through.
 18 BY MR. KUVIN:
 19 Q. All right. Ma'am, would you agree with me
 20 that this is a passenger manifest for one of
 21 Jeffrey Epstein's airplanes?
 22 MR. RHEINHART: Instruct the witness not
 23 to answer the question based on her Fifth
 24 Amendment privilege.
 25 THE WITNESS: On the instruction of my

1 lawyer I must exercise my Fifth Amendment
2 right.

3 BY MR. KUVIN:

4 Q. And would you agree with me that you
5 appear as a passenger on these flight manifests on
6 numerous occasions?

7 MR. RHEINHART: Object to the form. It
8 assumes facts not established as known to this
9 witness, and I instruct the witness not to
10 answer the question.

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

14 BY MR. KUVIN:

15 Q. Would you agree with me that your name
16 does, in fact, appear on the passenger manifest for
17 these planes, for this plane?

18 MR. RHEINHART: Same objection and same
19 instruction.

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

22 BY MR. KUVIN:

23 Q. Who are the two females that appear on the
24 passenger manifest for January 11, 2005, on the
25 first page of Exhibit 2?

1 Amendment privilege.

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

4 BY MR. KUVIN:

5 Q. Would you also agree with me that the two
6 unknown females listed on the passenger manifest
7 marked as Exhibit 2 were underage girls, under the
8 age of 18?

9 MR. RHEINHART: Object to the form. It
10 calls for speculation. Also it's not been
11 established this witness has any knowledge of
12 this document and instruct her not to answer
13 based on her Fifth Amendment privilege.

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

16 BY MR. KUVIN:

17 Q. Would you agree with me that the girls
18 that are listed as females one, and the second
19 female for this flight of January 11, 2005, from
20 West Palm Beach to the U.S. Virgin Islands, that
21 those two females were under the age of 17?

22 MR. RHEINHART: Same objection. It has
23 not been established the witness has any
24 knowledge of this document. It calls for her
25 to speculate, and I instruct her not to answer

1 MR. RHEINHART: I'll object to the form,
2 and it has not been established this witness
3 knows anything about this document, and I will
4 instruct her not to answer based on the Fifth
5 Amendment privilege.

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

8 BY MR. KUVIN:

9 Q. Do you agree with me that you took a
10 flight on Jeffrey Epstein's plane from West Palm
11 Beach to the U.S. Virgin Islands, St. Thomas on
12 January 11, 2005?

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

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

18 BY MR. KUVIN:

19 Q. Would you agree with me that on that
20 flight were you, Jeffrey Epstein, Nadia Marcinkova
21 and two unknown females?

22 MR. RHEINHART: Object to the form. Again
23 assumes facts that have not been established
24 this witness has any knowledge of and instruct
25 the witness not to answer based on her Fifth

1 based on her Fifth Amendment privilege.

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

4 BY MR. KUVIN:

5 Q. Would you agree with me that the two
6 females shown on the flight with you of January 11,
7 2005 were under the age of 16?

8 MR. RHEINHART: Same objection as to form.
9 It has not been established this witness knows
10 anything about whether there were these
11 witnesses, these females and who they are, so
12 it's asking her to speculate, and I instruct
13 her not to answer based on her Fifth Amendment
14 privilege.

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

18 BY MR. KUVIN:

19 Q. Ma'am, you were on that flight of
20 January 11, 2005, were you not?

21 MR. RHEINHART: I instruct the witness not
22 to answer based on her Fifth Amendment
23 privilege.

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

1 BY MR. KUVIN:
 2 Q. You also agree with me that the two girls
 3 that are listed as on that flight with you of
 4 January 11, 2005, were under the age of 15 years
 5 old?
 6 MR. RHEINHART: Object to the form. It
 7 calls for speculation, lack of personal
 8 knowledge, and instruct the witness not to
 9 answer based on her Fifth Amendment privilege.
 10 THE WITNESS: On the instruction of my
 11 lawyer, I must invoke my Fifth Amendment right.
 12 BY MR. KUVIN:
 13 Q. Would you agree with me that the two
 14 females listed as being on that flight with you of
 15 January 11 of 2005 were under the age of 14 years
 16 old?
 17 MR. RHEINHART: Object to the form. It
 18 calls for speculation. The witness has no
 19 personal knowledge and instruct the witness not
 20 to answer based on her Fifth Amendment
 21 privilege.
 22 THE WITNESS: On the instruction of my
 23 lawyer, I must invoke my Fifth Amendment right.
 24 BY MR. KUVIN:
 25 Q. Would you agree with me that the two

1 MR. RHEINHART: Same instruction.
 2 THE WITNESS: On the instruction of my
 3 lawyer, I must invoke my Fifth Amendment right.
 4 BY MR. KUVIN:
 5 Q. Who is Dana Burns?
 6 MR. RHEINHART: Same instruction.
 7 THE WITNESS: On the advice of my lawyer,
 8 I must invoke my Fifth Amendment right.
 9 BY MR. KUVIN:
 10 Q. Who is Mark Zeff?
 11 MR. RHEINHART: Same instruction.
 12 THE WITNESS: On the advice of my lawyer,
 13 I must invoke my Fifth Amendment right.
 14 BY MR. KUVIN:
 15 Q. Who is David Mullen?
 16 MR. RHEINHART: Same instruction.
 17 THE WITNESS: On the advice of my lawyer,
 18 I must invoke my Fifth Amendment right.
 19 BY MR. KUVIN:
 20 Q. Who is Todd Meister?
 21 MR. RHEINHART: Same instruction.
 22 THE WITNESS: On the advice of my lawyer,
 23 I must invoke my Fifth Amendment right.
 24 BY MR. KUVIN:
 25 Q. Who is Jean-Luc Brunel?

1 females listed as being on the flight with you of
 2 January 11, 2005, from West Palm Beach to the U.S.
 3 Virgin Islands, with Jeffrey Epstein as well, were
 4 under the age of 13 years old and you were aware of
 5 that?
 6 MR. RHEINHART: Object to the form both as
 7 compound, it also assumes facts that it has not
 8 been established this witness has any knowledge
 9 of, calls for her to speculate, and I instruct
 10 her not to answer based on her Fifth Amendment
 11 privilege.
 12 THE WITNESS: On the instruction of my
 13 lawyer I must invoke my Fifth Amendment right.
 14 BY MR. KUVIN:
 15 Q. Who is Adriana Musinska?
 16 MR. RHEINHART: I'm sorry. Can you repeat
 17 the name?
 18 MR. KUVIN: Musinska, M-u-s-i-n-s-k-a.
 19 MR. RHEINHART: I'll instruct the witness
 20 not to answer based on her Fifth Amendment
 21 privilege.
 22 THE WITNESS: On instruction of my lawyer,
 23 I must invoke my Fifth Amendment right.
 24 BY MR. KUVIN:
 25 Q. Who's Ghislaine Maxwell?

1 MR. RHEINHART: Same instruction.
 2 THE WITNESS: On the advice of my lawyer,
 3 I must invoke my Fifth Amendment right.
 4 BY MR. KUVIN:
 5 Q. Ma'am, would you agree with me that all of
 6 the names I just recently mentioned where you
 7 invoked your Fifth Amendment, were involved in a
 8 conspiracy to abuse underaged girls, girls under the
 9 age of 18 for sexual gain and pleasure?
 10 MR. RHEINHART: Object to the form of the
 11 question. It calls for a legal conclusion. It
 12 is compound. It calls for her to speculate.
 13 There is no basis for her to be able to give a
 14 legal opinion as to what a conspiracy is, and I
 15 instruct her not to answer based on her Fifth
 16 Amendment privilege.
 17 THE WITNESS: On the advice of my lawyer,
 18 I must invoke my Fifth Amendment right.
 19 BY MR. KUVIN:
 20 Q. Would you agree with me that all of the
 21 names I just mentioned were individuals that were
 22 working together for their own sexual gain and
 23 pleasure?
 24 MR. RHEINHART: Object to the form of the
 25 question as ambiguous and compound. I instruct

1 her not to answer based on her Fifth Amendment
 2 privilege.
 3 THE WITNESS: On the advice of my lawyer I
 4 must invoke my Fifth Amendment privilege.
 5 BY MR. KUVIN:
 6 Q. What is MC Squared?
 7 MR. RHEINHART: I instruct the witness not
 8 to answer based on her Fifth Amendment
 9 privilege.
 10 THE WITNESS: On the advice of my lawyer I
 11 must invoke my Fifth Amendment right.
 12 BY MR. KUVIN:
 13 Q. Would you agree with me that MC Squared is
 14 a modeling agency that was funded by
 15 Jeffrey Epstein?
 16 MR. RHEINHART: I instruct the witness not
 17 to answer based on her Fifth Amendment
 18 privilege.
 19 THE WITNESS: The advice of my lawyer I
 20 must invoke my Fifth Amendment right.
 21 BY MR. KUVIN:
 22 Q. Would you agree with me that MC Squared
 23 was wholly funded by Jeffrey Epstein?
 24 MR. RHEINHART: Object to the form of the
 25 question as to what "wholly funded" means, and

1 BY MR. KUVIN:
 2 Q. Would you agree with me that Jeffrey
 3 Epstein worked closely with Jean-Luc Brunel in order
 4 to obtain girls from out of state and bring them to
 5 Florida for their own sexual pleasure?
 6 MR. RHEINHART: Object to the form as
 7 ambiguous, whose own sexual pleasure, and
 8 instruct the witness not to answer the question
 9 based on her Fifth Amendment privilege.
 10 MR. KUVIN: Perfectly good objection. She
 11 doesn't have to answer the question. Let me
 12 clarify.
 13 BY MR. KUVIN:
 14 Q. Would you agree with me, ma'am, that both
 15 Jean-Luc Brunel and Jeffrey Epstein worked together
 16 to obtain underage girls from out of state and bring
 17 them to Florida for both of their own sexual
 18 pleasure?
 19 MR. RHEINHART: I'm going to object as
 20 compound and instruct -- I object to the form
 21 as compound, and instruct the witness not to
 22 answer based on her Fifth Amendment privilege.
 23 THE WITNESS: On the instruction of my
 24 lawyer I must invoke my Fifth Amendment right.
 25

1 I would instruct the witness not to answer the
 2 question based on her Fifth Amendment
 3 privilege.
 4 THE WITNESS: On the advice of my lawyer I
 5 must invoke my Fifth Amendment right.
 6 BY MR. KUVIN:
 7 Q. Would you agree with me that
 8 Jeffrey Epstein is the sole individual whose money
 9 was used to start the company, MC Squared?
 10 MR. RHEINHART: Instruct the witness not
 11 to answer the question based on her Fifth
 12 Amendment privilege.
 13 THE WITNESS: On the advice of my lawyer I
 14 must invoke my Fifth Amendment right.
 15 BY MR. KUVIN:
 16 Q. Would you agree with me that
 17 Jean-Luc Brunel worked with Jeffrey Epstein to
 18 obtain underage girls for both of their sexual
 19 pleasure?
 20 MR. RHEINHART: Object to the form of the
 21 question as ambiguous and instruct the witness
 22 not to answer based on her Fifth Amendment
 23 privilege.
 24 THE WITNESS: On the advice of my lawyer I
 25 must invoke my Fifth Amendment right.

1 BY MR. KUVIN:
 2 A. Would you agree with me that
 3 Ghislaine Maxwell, Jean-Luc Brunel, and Jeffrey Epstein
 4 worked together to obtain underage girls from out of
 5 state and bring them into the State of Florida for their
 6 own sexual pleasure?
 7 MR. RHEINHART: Object to the form of the
 8 question as compound and ambiguous, and
 9 instruct the witness not to answer based on her
 10 Fifth Amendment privilege.
 11 THE WITNESS: On the instruction of my
 12 lawyer, I must invoke my Fifth Amendment right.
 13 (Katherine Ezell and Amy Ederi
 14 entered the deposition.)
 15 MR. GOLDBERGER: That's why we're --
 16 MR. KUVIN: That's why we lost them.
 17 MR. RHEINHART: Do you want to take a
 18 one-minute break so we can --
 19 MR. KUVIN: Yeah, let's take a quick
 20 one-minute break.
 21 THE VIDEOGRAPHER: We're now off video
 22 record. The time is 10:56 a.m.
 23 (A brief recess was held.)
 24 (Plaintiff's Exhibit No. 3 was marked for
 25 identification.)

1 THE VIDEOGRAPHER: We're now on video
 2 record at 11:01 a.m.
 3 MR. KUVIN: Just for the video record and
 4 for the written record Katherine Ezell and Amy
 5 Ederi have now appeared and are present in
 6 person.
 7 MR. GOLDBERGER: Just one more matter for
 8 the record. Jack Goldberger, on behalf of
 9 Jeffrey Epstein. Rather than impose a form
 10 objection to every question, I think we have
 11 reached an agreement that on behalf of
 12 Mr. Epstein, I am adopting the form objections
 13 that Mr. 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 as leading, as compound, and instruct

1 personal knowledge and instruct her not to
 2 answer based on her Fifth Amendment privilege.
 3 It's also compound.
 4 THE WITNESS: On the instruction of my
 5 lawyer I must invoke my Fifth Amendment
 6 privilege.
 7 BY MR. KUVIN:
 8 Q. The witness says that you may not have
 9 knowledge or we don't know whether you have
 10 knowledge regarding this passenger manifest, so let
 11 me ask you, do you have any knowledge about this
 12 passenger manifest?
 13 MR. RHEINHART: Object to the form of the
 14 question as ambiguous as to this and what a
 15 manifest is, and also her knowledge, and I will
 16 instruct her not to answer based on her Fifth
 17 Amendment privilege.
 18 THE WITNESS: On the instruction of my
 19 lawyer, I must invoke my Fifth Amendment
 20 privilege.
 21 BY MR. KUVIN:
 22 Q. Based on the objection, do you know what a
 23 manifest is?
 24 MR. RHEINHART: Object to the form of the
 25 question as ambiguous and instruct her not to

1 the witness not to answer based on her Fifth
 2 Amendment privilege.
 3 THE WITNESS: On the instruction of my
 4 lawyer I must invoke my Fifth Amendment right.
 5 BY MR. KUVIN:
 6 Q. Would you agree with me that there was an
 7 agreement between Jeffrey Epstein,
 8 Ghislaine Maxwell, Jean-Luc Brunel, yourself and
 9 Nadia Marcinkova to bring in girls that were
 10 underage from out of state for sexual contact?
 11 MR. RHEINHART: Object to the form of the
 12 question as leading and compound, and I
 13 instruct the witness not to answer based on her
 14 Fifth Amendment privilege.
 15 THE WITNESS: On the instruction of my
 16 lawyer I must invoke my Fifth Amendment
 17 privilege.
 18 BY MR. KUVIN:
 19 Q. All right. Let me show you what we've
 20 premarked as Plaintiff's Exhibit 3. Do you
 21 recognize this as the passenger manifest for one of
 22 Jeffrey Epstein's planes?
 23 MR. RHEINHART: I object to the form of
 24 the question. It assumes facts that this
 25 witness, evidence that this witness has no

1 answer based on her Fifth Amendment privilege.
 2 THE WITNESS: On the instruction of my
 3 lawyer I must invoke my Fifth Amendment right.
 4 BY MR. KUVIN:
 5 Q. Have you heard the word "manifest" before?
 6 MR. RHEINHART: I'll instruct the witness
 7 not to answer based on her Fifth Amendment
 8 privilege.
 9 THE WITNESS: On the instruction of my
 10 lawyer I must invoke my Fifth Amendment right.
 11 BY MR. KUVIN:
 12 Q. Would you agree with me, ma'am, that you
 13 have seen this passenger manifest, listed as
 14 Exhibit 3, in the past?
 15 MR. RHEINHART: I'll instruct the witness
 16 not to answer based on her Fifth Amendment
 17 privilege.
 18 THE WITNESS: On the instruction of my
 19 lawyer I must invoke my Fifth Amendment right.
 20 BY MR. KUVIN:
 21 Q. Who is Zinta Broukis?
 22 MR. RHEINHART: I'll instruct the witness
 23 not to answer based on her Fifth Amendment
 24 privilege.
 25 THE WITNESS: On the instruction of my

1 lawyer I must invoke my Fifth Amendment
 2 privilege.
 3 MR. KUVIN: Spelling for the court
 4 reporter is Z-i-n-t-a, B-r-o-u-k-i-s.
 5 BY MR. KUVIN:
 6 Q. Who is Eva Andersson, with two S's?
 7 MR. RHEINHART: I'll instruct the witness
 8 not to answer based on her Fifth Amendment
 9 privilege.
 10 THE WITNESS: On the instruction of my
 11 lawyer, I must invoke my Fifth Amendment right.
 12 BY MR. KUVIN:
 13 Q. Who is Sevina Dubin (phonetic)?
 14 MR. RHEINHART: Same instruction.
 15 THE WITNESS: On the instruction of my
 16 lawyer, I must invoke my Fifth Amendment right.
 17 BY MR. KUVIN:
 18 Q. Who is Mya Dubin (phonetic)?
 19 MR. RHEINHART: Same instruction.
 20 THE WITNESS: On the instruction of my
 21 lawyer I must invoke my Fifth Amendment right.
 22 BY MR. KUVIN:
 23 Q. Who is Chris Valdez (phonetic)?
 24 MR. RHEINHART: Same instruction.
 25 THE WITNESS: On the instruction of my

1 listed in the passenger list to the left?
 2 MR. RHEINHART: Object to the form, the
 3 question is leading and instruct the witness
 4 not to answer based on the Fifth Amendment
 5 privilege.
 6 THE WITNESS: On the instruction of my
 7 lawyer, I must invoke my Fifth Amendment right.
 8 BY MR. KUVIN:
 9 Q. Would you agree with me that you were on a
 10 plane with Jeffrey Epstein on April 27, 2005?
 11 MR. RHEINHART: Same instruction.
 12 THE WITNESS: On the instruction of my
 13 lawyer, I must invoke my Fifth Amendment right.
 14 BY MR. KUVIN:
 15 Q. Would you agree with me that on that plane
 16 of April 27, 2005, from Teterboro, New Jersey, to
 17 West Palm Beach, was a female who was under the age
 18 of 16?
 19 MR. RHEINHART: Object to the form. It
 20 assumes facts not established. Any personal
 21 knowledge by this witness, and instruct her not
 22 to answer based on her Fifth Amendment
 23 privilege. It also calls for speculation.
 24 THE WITNESS: On the instruction of my
 25 lawyer, I must invoke my Fifth Amendment

1 lawyer I must invoke my Fifth Amendment right.
 2 BY MR. KUVIN:
 3 Q. Who is James Stanley?
 4 MR. RHEINHART: Same instruction.
 5 THE WITNESS: On the instruction of my
 6 lawyer, I must invoke my Fifth Amendment right.
 7 BY MR. KUVIN:
 8 Q. Who is Sophia Stanley?
 9 MR. RHEINHART: Same instruction.
 10 THE WITNESS: On the instruction of my
 11 lawyer I must invoke my Fifth Amendment right.
 12 BY MR. KUVIN:
 13 Q. Who is Alexis Stanley?
 14 MR. RHEINHART: Same instruction.
 15 THE WITNESS: On the instruction of my
 16 lawyer, I must invoke my Fifth Amendment right.
 17 BY MR. KUVIN:
 18 Q. Ma'am, if you would, in Exhibit 3, would
 19 you turn to the date of April 27, 2005, for me?
 20 It's about halfway through the packet. April 27,
 21 '05. Are you there?
 22 A. Uh-huh.
 23 Q. Okay. On this particular date, will you
 24 agree with me that you flew from Teterboro,
 25 New Jersey to West Palm Beach on a plane with people

1 privilege.
 2 BY MR. KUVIN:
 3 Q. Would you agree with me that on the flight
 4 of April 27, 2005, from Teterboro, New Jersey to
 5 West Palm Beach was a female on the plane with you
 6 that was under the age of 15?
 7 MR. RHEINHART: Object to the form of the
 8 question. It requires speculation. It assumes
 9 facts not established before this witness.
 10 I'll instruct her not to answer based on her
 11 Fifth Amendment privilege. It's also
 12 ambiguous.
 13 THE WITNESS: On the instruction of my
 14 lawyer, I must invoke my Fifth Amendment
 15 privilege.
 16 BY MR. KUVIN:
 17 Q. Will you turn to May 6, 2005, please. And
 18 this is, for the record, in Exhibit 3. On May 6th,
 19 2005, ma'am, will you agree with me that you took a
 20 flight from Teterboro, New Jersey to West Palm
 21 Beach, with Jeffrey Epstein, Nadia Marcinkova,
 22 Andriana, Andrea Musinska, David Mullen, Larry
 23 Morrison and another female?
 24 MR. RHEINHART: Object to the form of the
 25 question as compound, calling for speculation.

1 I instruct the witness not to answer based on
 2 her Fifth Amendment privilege.
 3 THE WITNESS: On the instruction of my
 4 lawyer, I must invoke my Fifth Amendment
 5 privilege.
 6 BY MR. KUVIN:
 7 Q. Would you agree with me, ma'am, that on
 8 the flight of May 6th, 2005, that's shown in
 9 Exhibit 3, that the female identified in the
 10 passenger manifest was under the age of 16?
 11 MR. RHEINHART: Object to the form. It
 12 assumes facts not established that this witness
 13 has any personal knowledge. It calls for her
 14 to speculate, and I'll instruct her not to
 15 answer based on her Fifth Amendment privilege.
 16 THE WITNESS: On the instruction of my
 17 lawyer, I must invoke my Fifth Amendment
 18 privilege.
 19 BY MR. KUVIN:
 20 Q. Would you agree with me that the female
 21 identified in the passenger manifest of May 6th,
 22 2005, was under the age of 15?
 23 MR. RHEINHART: Same objection as the
 24 previous question, same instruction.
 25 THE WITNESS: On the instruction of my

1 BY MR. KUVIN:
 2 Q. Do you also agree with me on that flight
 3 of June 20th, 2005, was an unidentified female,
 4 according to the passenger manifest?
 5 MR. RHEINHART: Object to the form --
 6 excuse me -- as leading, and instruct the
 7 witness not to answer based on her Fifth
 8 Amendment privilege.
 9 THE WITNESS: On the instruction of my
 10 lawyer, I must choose to invoke my Fifth
 11 Amendment privilege.
 12 BY MR. KUVIN:
 13 Q. Would you agree with me that that female
 14 listed on the flight of June 20, 2005, was under the
 15 age of 16 years old?
 16 MR. RHEINHART: Objection to the form as
 17 leading and also requiring speculation. I'll
 18 instruct the witness not to answer based on her
 19 Fifth Amendment privilege.
 20 THE WITNESS: On the instruction of my
 21 lawyer, I must choose to invoke my Fifth
 22 Amendment privilege.
 23 BY MR. KUVIN:
 24 Q. Would you agree with me that the
 25 unidentified female on the passenger manifest of

1 lawyer I must invoke my Fifth Amendment
 2 privilege.
 3 BY MR. KUVIN:
 4 Q. Would you agree with me that the female
 5 listed in the passenger manifest of May 6th, 2005,
 6 was under the age, was under the age of 14?
 7 MR. RHEINHART: Same instruction as to the
 8 previous two questions and the same objection
 9 as to those two questions.
 10 THE WITNESS: On the instruction of my
 11 lawyer I must invoke my Fifth Amendment
 12 privilege.
 13 BY MR. KUVIN:
 14 Q. If you would turn to the date of June 20
 15 of 2005 for me, please. On the date of June 20,
 16 2005, would you agree with me that you took a flight
 17 with Jeffrey Epstein from West Palm Beach to
 18 Teterboro, New Jersey?
 19 MR. RHEINHART: Object to the form as
 20 leading. I'll instruct the witness not to
 21 answer based on her Fifth Amendment privilege.
 22 THE WITNESS: On the instruction of my
 23 lawyer, I must invoke my Fifth Amendment
 24 privilege.
 25

1 June 20, 2005, was under the age of 14?
 2 MR. RHEINHART: Objection, calls for
 3 speculation, instruct the witness not to answer
 4 based on her Fifth Amendment privilege.
 5 THE WITNESS: On the instruction of my
 6 lawyer, I must invoke my Fifth Amendment
 7 privilege.
 8 BY MR. KUVIN:
 9 Q. Turn to the date of June 30, if you would,
 10 2005. Would you agree with me that you took a
 11 flight from Teterboro, New Jersey, to West Palm
 12 Beach on June 30, 2005, with Jeffrey Epstein?
 13 MR. RHEINHART: Object to the form as
 14 leading and compound, instruct the witness not
 15 to answer based on her Fifth Amendment
 16 privilege.
 17 THE WITNESS: On the instruction of my
 18 lawyer I must, I must invoke my Fifth Amendment
 19 right.
 20 BY MR. KUVIN:
 21 Q. Would you agree with me that Dana Burns
 22 was on that flight?
 23 MR. RHEINHART: Same instruction.
 24 THE WITNESS: On the instruction of my
 25 lawyer I must invoke my Fifth Amendment

1 privilege.
 2 BY MR. KUVIN:
 3 Q. Would you agree with me that there was
 4 also another female on that flight with you?
 5 MR. RHEINHART: Same instruction.
 6 THE WITNESS: On the instruction of my
 7 lawyer, I must invoke my Fifth Amendment
 8 privilege.
 9 BY MR. KUVIN:
 10 Q. Would you agree with me that you had
 11 personal knowledge that that young female on that
 12 flight with you of June 30, 2005, was under the age
 13 of 16?
 14 MR. RHEINHART: Object to the form as
 15 compound and calling for speculation, and
 16 instruct the witness not to answer based on her
 17 Fifth Amendment privilege.
 18 THE WITNESS: On the instruction of my
 19 lawyer, I must invoke my Fifth Amendment
 20 privilege.
 21 BY MR. KUVIN:
 22 Q. Would you agree with me that you had
 23 personal knowledge that that young female on the
 24 flight of June 30, 2005, was under the age of 15?
 25 MR. RHEINHART: Same instruction, calls

1 THE WITNESS: On the instruction of my
 2 lawyer I must invoke my Fifth Amendment
 3 privilege.
 4 BY MR. KUVIN:
 5 Q. Would you agree with me that on both of
 6 those flights were girls that were under the age of
 7 16?
 8 MR. RHEINHART: Same form objection as to
 9 compound, also ambiguous and requiring
 10 speculation and instruct the witness not to
 11 answer based on her Fifth Amendment privilege.
 12 THE WITNESS: The instruction of my lawyer
 13 I must invoke my Fifth Amendment privilege.
 14 BY MR. KUVIN:
 15 Q. Would you agree with me, ma'am, that you
 16 have flown on Jeffrey Epstein's plane from
 17 Teterboro, New Jersey, to West Palm Beach, on
 18 numerous occasions where there were girls on the
 19 plane under the age of 16?
 20 MR. RHEINHART: Object to the form as
 21 compound and ambiguous as to what numerous
 22 means. Instruct the witness not to answer
 23 based on her Fifth Amendment privilege.
 24 THE WITNESS: On the instruction of my
 25 lawyer I must invoke my Fifth Amendment

1 for speculation.
 2 THE WITNESS: On the instruction of my
 3 lawyer, I must invoke my Fifth Amendment
 4 privilege.
 5 BY MR. KUVIN:
 6 Q. Would you agree with me that you had
 7 personal knowledge that that young female on the
 8 flight of June 30, 2005, with you was under the age
 9 of 14?
 10 MR. RHEINHART: Objection to form as to
 11 compound and requiring speculation. I'll
 12 instruct the witness not to answer based on her
 13 Fifth Amendment privilege.
 14 THE WITNESS: On the instruction of my
 15 lawyer I must invoke my Fifth Amendment
 16 privilege.
 17 BY MR. KUVIN:
 18 Q. Ma'am, just so we can be quicker about
 19 this, there are flights of July 5th, July 15. It
 20 looks like those are the last two. Would you agree
 21 with me that on July 5th and July 15, you took
 22 flights on Jeffrey Epstein's plane?
 23 MR. RHEINHART: Object to the form as
 24 compound and instruct the witness not to answer
 25 based on Fifth Amendment privilege.

1 privilege.
 2 BY MR. KUVIN:
 3 Q. Would you agree with me that you have
 4 flown on Jeffrey Epstein's plane from Teterboro, New
 5 Jersey, to West Palm Beach on at least 100 occasions
 6 where there were girls on the plane with you under
 7 the age of 16?
 8 MR. RHEINHART: Object to the form as
 9 compound, requiring speculation and ambiguous,
 10 and instruct her not to answer based on her
 11 Fifth Amendment privilege.
 12 THE WITNESS: On the instruction of my
 13 lawyer I must invoke my Fifth Amendment
 14 privilege.
 15 BY MR. KUVIN:
 16 Q. Would you agree with me, ma'am, that you
 17 have flown on Jeffrey Epstein's plane at least 100
 18 times from Teterboro, New Jersey to West Palm Beach,
 19 Florida, where there were girls under the age of 15
 20 on the plane with you?
 21 MR. RHEINHART: Same objections as the
 22 previous question, same instruction.
 23 THE WITNESS: On the instruction of my
 24 lawyer, I must invoke my Fifth Amendment
 25 privilege.

1 BY MR. KUVIN:
 2 Q. Would you agree with me that you have
 3 flown on Jeffrey Epstein's plane from Teterboro, New
 4 Jersey to West Palm Beach on at least 100 occasions
 5 where there were girls on the plane with you that
 6 were under the age of 14?

7 MR. RHEINHART: Objection to the form.
 8 It's compound and ambiguous, calls for
 9 speculation and instruct her not to answer
 10 based on her Fifth Amendment privilege.

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

14 BY MR. KUVIN:
 15 Q. Would you agree with me that you have been
 16 on the plane, one of Jeffrey Epstein's -- strike
 17 that.

18 Would you agree with me that you have
 19 been on Jeffrey Epstein's plane with him to Paris
 20 where there have been girls on the plane with you
 21 under the age of 16?

22 MR. RHEINHART: Objection to the form as
 23 compound, assuming facts not established the
 24 witness has any knowledge, and instruct the
 25 witness not to answer based on her Fifth

1 occasions where Jeffrey Epstein was flying with
 2 young girls under the age of 16 from Teterboro, New
 3 Jersey, to Florida, West Palm Beach, Florida, with
 4 girls under the age of 16, was doing so, so that he
 5 could have sexual contact with them?

6 MR. RHEINHART: Object to the form. It's
 7 compound and requires her to assume facts that
 8 have not been established, and it's ambiguous,
 9 and instruct her not to answer based on the
 10 Fifth Amendment privilege.

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

13 BY MR. KUVIN:

14 Q. Do you agree with me that on the flights
 15 from West Palm Beach to Paris, where you were
 16 present on the plane with Jeffrey Epstein, that
 17 there were girls under the age of 16 that
 18 Jeffrey Epstein was having sexual contact with on
 19 that plane?

20 MR. RHEINHART: Same objections as
 21 previously stated. It's compound, ambiguous,
 22 and assumes facts that she has no knowledge, or
 23 it has not been established that she has any
 24 knowledge of, and instruct her not to answer
 25 based on the Fifth Amendment, and it's leading.

1 Amendment privilege. It's also leading.

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

5 BY MR. KUVIN:
 6 Q. Would you agree with me that you have been
 7 on the plane with Jeffrey Epstein on flights to
 8 Paris where there have been girls on the plane with
 9 you under the age of 15?

10 MR. RHEINHART: Same objection and same
 11 instruction as the previous question.

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

15 BY MR. KUVIN:
 16 Q. Would you agree with me that you have been
 17 on those same flights we have been discussing where
 18 there have been girls under the age of 14?

19 MR. RHEINHART: Same instruction and same
 20 objection as the previous two questions.

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

24 BY MR. KUVIN:
 25 Q. Would you agree with me that on the

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

3 BY MR. KUVIN:

4 Q. Ma'am, you've been on the plane, you've
 5 been on a plane with Jeffrey Epstein in the past,
 6 have you not?

7 MR. RHEINHART: Objection to the form as
 8 leading, and instruct her not to answer based
 9 on the Fifth Amendment privilege.

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

13 BY MR. KUVIN:

14 Q. Have you been on a plane with
 15 Jeffrey Epstein ever in your entire life?

16 MR. RHEINHART: Instruct the witness not
 17 to answer based on her Fifth Amendment right.

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

21 BY MR. KUVIN:

22 Q. Have you ever been on a plane with
 23 Jeffrey Epstein where there was a girl on the plane
 24 with you under the age of 14?

25 MR. RHEINHART: Same instruction.

1 THE WITNESS: On the instruction of my
 2 lawyer, I must invoke my Fifth Amendment
 3 privilege.
 4 BY MR. KUVIN:
 5 Q. Ma'am, isn't it true that you've seen
 6 Jeffrey Epstein have sex with girls under the age of
 7 14 on his plane?
 8 MR. RHEINHART: Objection to the form. It
 9 assumes facts that it's not been established
 10 that she would have any knowledge of, and I'll
 11 instruct her not to answer based on her Fifth
 12 Amendment right.
 13 THE WITNESS: On the instruction of my
 14 lawyer, I must invoke my Fifth Amendment
 15 privilege.
 16 BY MR. KUVIN:
 17 Q. Would you agree with me that you've seen
 18 Jeffrey Epstein have sex with girls on his plane in
 19 your presence during flights to Paris?
 20 MR. RHEINHART: Same objection previously
 21 stated, and it assumes facts that have not been
 22 established and instruct her not to answer
 23 based on her Fifth Amendment right.
 24 THE WITNESS: On the instruction of my
 25 lawyer, I must invoke my Fifth Amendment

1 MR. RHEINHART: Same objection as stated
 2 to the previous question; it's ambiguous and
 3 instruct her not to answer based on the Fifth
 4 Amendment.
 5 THE WITNESS: On the instruction of my
 6 lawyer, I must invoke my Fifth Amendment right.
 7 MR. KUVIN: Just to clarify, is the
 8 ambiguity the word "sex"?
 9 MR. RHEINHART: Sex and also assumes that
 10 she's ever met Jeffrey Epstein in her life.
 11 MR. KUVIN: Any other words in there I
 12 need to clarify?
 13 MR. RHEINHART: No.
 14 BY MR. KUVIN:
 15 Q. Okay. Ma'am, do you -- what's your
 16 definition of the word "sex"?
 17 MR. RHEINHART: Object to the form of the
 18 question and instruct the witness not to answer
 19 based on her Fifth Amendment privilege.
 20 THE WITNESS: On the instruction of my
 21 lawyer, I must invoke my Fifth Amendment right.
 22 BY MR. KUVIN:
 23 Q. Would you agree with me that the word
 24 "sex" means both vaginal intercourse as well as oral
 25 sex? Would you agree with that definition?

1 privilege.
 2 BY MR. KUVIN:
 3 Q. Ma'am, isn't it true that you've seen
 4 Jeffrey Epstein and Jean-Luc Brunel have sex with
 5 girls under the age of 14 on Mr. Epstein's plane on
 6 flights to Paris?
 7 MR. RHEINHART: Objection to the form.
 8 It's compound, as to several answers all at the
 9 same time and certain facts, and instruct her
 10 not to answer based on her Fifth Amendment.
 11 THE WITNESS: On the instruction of my
 12 lawyer, I must invoke my Fifth Amendment
 13 privilege.
 14 BY MR. KUVIN:
 15 Q. Ma'am, isn't it true that you have had sex
 16 with Jeffrey Epstein on his plane?
 17 MR. RHEINHART: Instruct the witness not
 18 to answer based on the Fifth Amendment
 19 privilege, also object to the form of the
 20 question as compound and ambiguous.
 21 THE WITNESS: On the instruction of my
 22 lawyer, I must invoke my Fifth Amendment right.
 23 BY MR. KUVIN:
 24 Q. Isn't it true that you've had sex with
 25 Jeffrey Epstein on his plane on flights to Paris?

1 MR. RHEINHART: You can answer that.
 2 THE WITNESS: No.
 3 BY MR. KUVIN:
 4 Q. Okay. Would you agree with me that sex,
 5 for the purpose of our questions here today, will be
 6 limited strictly to vaginal intercourse?
 7 A. Sorry. Can you repeat that?
 8 Q. Yes. For the purpose of my questions here
 9 today, will you agree that the word "sex" will be
 10 limited to vaginal intercourse between a man's penis
 11 and a woman's vagina?
 12 MR. RHEINHART: If you're instructing her
 13 that in the future she should assume that
 14 that's what you mean by your question, that's
 15 fine.
 16 MR. KUVIN: Okay.
 17 MR. RHEINHART: If that's what you mean,
 18 then that's understood.
 19 MR. KUVIN: That's what I mean.
 20 MR. RHEINHART: Okay.
 21 MR. KUVIN: All right. Let's go with that
 22 definition. And for the purposes of my
 23 questions, "oral sex" will mean contact between
 24 an individual's mouth and a man's sexual organ,
 25 penis. Fair enough?

1 MR. RHEINHART: Understood.
 2 MR. KUVIN: Okay.
 3 BY MR. KUVIN:
 4 Q. Working with those definitions if we
 5 could, would you agree with me that you had sex with
 6 Jeffrey Epstein on his plane?
 7 MR. RHEINHART: Objection to the form.
 8 It's compound and instruct her not to answer
 9 based on the Fifth Amendment privilege, because
 10 to do so would implicitly admit that she's ever
 11 met Jeffrey Epstein in her life, and so as to
 12 that she's invoking the Fifth Amendment
 13 privilege.
 14 THE WITNESS: On the instruction of my
 15 lawyer, I must invoke my Fifth Amendment
 16 privilege.
 17 BY MR. KUVIN:
 18 Q. Would you agree with me that you have had
 19 oral sex with Jeffrey Epstein on his plane?
 20 MR. RHEINHART: Same objection stated to
 21 the previous question. It's compound and it
 22 assumes facts that's not been established as to
 23 which she is invoking her Fifth Amendment
 24 privilege.
 25 THE WITNESS: On the instruction of my

1 Mr. Epstein's residence, as to her knowledge of
 2 Mr. Epstein and other facts as to which she's
 3 invoking her Fifth Amendment privilege.
 4 THE WITNESS: On the instruction of my
 5 lawyer, I must to invoke my Fifth Amendment
 6 privilege.
 7 MR. KUVIN: Let me show you what we'll
 8 mark as Exhibit 6. And this one I'm going to
 9 show it to the camera real briefly, if I could.
 10 Okay.
 11 MR. RHEINHART: Let me see it. Thank you.
 12 (Plaintiff's Exhibit No. 6 was marked for
 13 identification.)
 14 BY MR. KUVIN:
 15 Q. Ma'am, do you recognize any of the girls
 16 shown in Exhibit 6?
 17 MR. RHEINHART: I'll instruct the witness
 18 not to answer based on her Fifth Amendment
 19 privilege.
 20 THE WITNESS: On the instruction of my
 21 lawyer, I must invoke my Fifth Amendment right.
 22 BY MR. KUVIN:
 23 Q. Would you agree with me that that is you
 24 on the right in this photograph, the far right?
 25 MR. RHEINHART: I'll instruct the witness

1 lawyer, I must invoke my Fifth Amendment
 2 privilege.
 3 BY MR. KUVIN:
 4 Q. Would you agree with me that you have had
 5 sex with Jeffrey Epstein in his home --
 6 MR. RHEINHART: Object to the --
 7 MR. KUVIN: -- here in West Palm, in West
 8 Palm Beach?
 9 MR. RHEINHART: I'll instruct the witness
 10 not to answer based on her Fifth Amendment
 11 privilege and same objection previously stated
 12 to the last two questions.
 13 THE WITNESS: On the instruction of my
 14 lawyer, I must invoke my Fifth Amendment
 15 privilege.
 16 BY MR. KUVIN:
 17 Q. Would you agree with me that you have had
 18 oral sex with Jeffrey Epstein in his home in West
 19 Palm Beach?
 20 MR. GARCIA: Is it West, or Palm Beach?
 21 MR. KUVIN: Palm Beach Island, I think
 22 it's, because -- yeah, for clarity, his home on
 23 Palm Beach.
 24 MR. RHEINHART: Object to the form. It
 25 assumes facts as to her knowledge of

1 not to answer.
 2 THE WITNESS: On the instruction of my
 3 lawyer, I must invoke my Fifth Amendment
 4 privilege.
 5 BY MR. KUVIN:
 6 Q. Would you agree with me that that is
 7 Nadia Marcinkova on the left in that photograph that
 8 we marked as Exhibit 6?
 9 MR. RHEINHART: Same instruction.
 10 THE WITNESS: On the instruction of my
 11 lawyer, I must invoke my Fifth Amendment
 12 privilege.
 13 BY MR. KUVIN:
 14 Q. How old are you in this photograph?
 15 MR. RHEINHART: Same instruction.
 16 THE WITNESS: On the instruction of my
 17 lawyer, I must invoke my Fifth Amendment
 18 privilege.
 19 BY MR. KUVIN:
 20 Q. How old is Nadia Marcinkova in this
 21 photograph, if you know?
 22 MR. RHEINHART: I'm going to object to the
 23 form in that it assumes facts as to her
 24 knowledge of anything about Ms. Marcinkova, and
 25 as to which she is invoking her Fifth Amendment

1 privilege.
 2 THE WITNESS: On the instruction of my
 3 lawyer, I must invoke my Fifth Amendment
 4 privilege.
 5 MR. KUVIN: This is Exhibit 7. Let me
 6 show you what we'll mark as Exhibit 7.
 7 (Plaintiff's Exhibit No. 7 was marked for
 8 identification.)
 9 BY MR. KUVIN:
 10 Q. Do you recognize the girl that's shown in
 11 Exhibit 7?
 12 MR. RHEINHART: I need to consult with her
 13 one second.
 14 MR. KUVIN: Sure.
 15 THE VIDEOGRAPHER: Are we off the record?
 16 MR. KUVIN: No, no.
 17 MR. RHEINHART: Instruct the witness to
 18 invoke her Fifth Amendment privilege as to
 19 Exhibit 7.
 20 MR. KUVIN: She's clipped up. Okay.
 21 MR. RHEINHART: Now you have to answer.
 22 THE WITNESS: On the advice of my lawyer,
 23 I must invoke my Fifth Amendment privilege.
 24 BY MR. KUVIN:
 25 Q. Would you agree with me that the girl

1 THE WITNESS: On the instruction of my
 2 lawyer, I must invoke my Fifth Amendment
 3 privilege.
 4 BY MR. KUVIN:
 5 Q. Would you agree with me that Haley Robson
 6 has been to Mr. Epstein's home on hundreds of
 7 occasions?
 8 MR. RHEINHART: Object to the form as
 9 compound and also assumes knowledge as this
 10 witness has and instruct her to invoke her
 11 Fifth Amendment privilege relating to
 12 Ms. Robson.
 13 THE WITNESS: On the instruction of my
 14 lawyer, I must invoke my Fifth Amendment
 15 privilege.
 16 BY MR. KUVIN:
 17 Q. Would you agree with me that you directed
 18 Haley Robson on hundreds of occasions to bring girls
 19 under the age of 16 to Mr. Epstein's house?
 20 MR. RHEINHART: Object to the form of the
 21 question as compound and ambiguous and assuming
 22 facts as to which there is no factual basis
 23 that this witness has any knowledge and
 24 instruct the witness not to answer based on her
 25 Fifth Amendment privilege.

1 shown in Exhibit 7 is Haley Robson?
 2 MR. RHEINHART: Instruct the witness not
 3 to answer based on the Fifth Amendment
 4 privilege.
 5 THE WITNESS: On the instruction of my
 6 lawyer, I must invoke my Fifth Amendment
 7 privilege.
 8 BY MR. KUVIN:
 9 Q. Do you agree with me that Haley Robson was
 10 under the age of 16 when she was first asked to go
 11 to Mr. Epstein's home?
 12 MR. RHEINHART: Objection to the form. It
 13 assumes any knowledge by this witness as to the
 14 person you identified as Haley Robson. It's
 15 compound and I would instruct her not to answer
 16 based on her Fifth Amendment privilege.
 17 THE WITNESS: On the instruction of my
 18 lawyer, I must invoke my Fifth Amendment
 19 privilege.
 20 BY MR. KUVIN:
 21 Q. Would you agree with me that you know
 22 personally Haley Robson?
 23 MR. RHEINHART: Instruct the witness not
 24 to answer based on the Fifth Amendment
 25 privilege.

1 THE WITNESS: On the instruction of my
 2 lawyer, I must choose to invoke my Fifth
 3 Amendment right.
 4 BY MR. KUVIN:
 5 Q. Would you agree with me that on hundreds
 6 of occasions you directed Haley Robson to bring
 7 underage girls under the age of 16 to Mr. Epstein's
 8 home for sex with Mr. Epstein?
 9 MR. RHEINHART: Object to the form. It's
 10 compound and it assumes facts as to this --
 11 that this witness has no personal knowledge,
 12 and it's been established by this record, and
 13 instruct her to invoke her Fifth Amendment
 14 privilege.
 15 THE WITNESS: On the instruction of my
 16 lawyer, I must invoke my Fifth Amendment
 17 privilege.
 18 MR. KUVIN: We'll mark this as Exhibit 8.
 19 (Plaintiff's Exhibit No. 8 was marked for
 20 identification.)
 21 BY MR. KUVIN:
 22 Q. Ma'am, do you recognize the person that's
 23 shown in Exhibit 8?
 24 MR. RHEINHART: Let me consult one second.
 25 MR. KUVIN: Sure.

1 MR. RHEINHART: I instruct the witness not
 2 to answer the question based on her Fifth
 3 Amendment privilege.
 4 THE WITNESS: Based on the instruction of
 5 my lawyer, I must invoke my Fifth Amendment
 6 right.
 7 BY MR. KUVIN:
 8 Q. Would you agree with me that the person
 9 shown on Exhibit 8 is you?
 10 MR. RHEINHART: Same instruction.
 11 THE WITNESS: On the instruction of my
 12 lawyer, I must invoke my Fifth Amendment
 13 privilege.
 14 BY MR. KUVIN:
 15 Q. Would you agree with me that this is a
 16 modeling shot of you that was taken through one of
 17 Mr. Epstein's modeling agencies?
 18 MR. RHEINHART: Object to the form of the
 19 question as compound and assuming facts as to
 20 which there has been no basis that this witness
 21 has any personal knowledge, and she's going
 22 invoke her Fifth Amendment privilege.
 23 THE WITNESS: On the instruction of my
 24 lawyer, I must invoke my Fifth Amendment
 25 privilege.

1 MR. GARCIA: He didn't make a Fifth
 2 Amendment objection. So can we just rephrase
 3 the question?
 4 MR. RHEINHART: I would instruct the
 5 witness not to answer based on the Fifth
 6 Amendment privilege to clarify.
 7 MR. KUVIN: Okay. Let's mark this as
 8 Exhibit 9.
 9 MR. RHEINHART: And for the record, the
 10 basis is that it assumes her knowledge of
 11 anything relating to Jeffrey Epstein, the
 12 question assumed that.
 13 (Plaintiff's Exhibit No. 9 was marked for
 14 identification.)
 15 BY MR. KUVIN:
 16 Q. Ma'am, do you recognize the girl shown in
 17 Exhibit 9?
 18 MR. RHEINHART: I'll instruct the witness
 19 not to answer based on her Fifth Amendment
 20 privilege.
 21 THE WITNESS: On the instruction of my
 22 lawyer, I must invoke my Fifth Amendment right.
 23 BY MR. KUVIN:
 24 Q. Would you agree with me that the girl
 25 shown in Exhibit 9 is Nadia Marcinkova?

1 BY MR. KUVIN:
 2 Q. Would you agree with me that you were
 3 under the age of 18 in this photograph we've marked
 4 as Exhibit 8?
 5 MR. RHEINHART: Same objection as to the
 6 previous question and same instruction.
 7 THE WITNESS: On the instruction of my
 8 lawyer, I must invoke my Fifth Amendment right.
 9 BY MR. KUVIN:
 10 Q. Would you agree with me that you were
 11 under the age of 17 in this photograph that we've
 12 marked as Exhibit 8?
 13 MR. RHEINHART: Same objection as the
 14 previous two question and the same instruction.
 15 THE WITNESS: On the instruction of my
 16 lawyer, I must invoke my Fifth Amendment right.
 17 BY MR. KUVIN:
 18 Q. Would you agree with me that Jeffrey
 19 Epstein kept this photograph of you in his home, if
 20 you know.
 21 MR. RHEINHART: Object to the form of the
 22 question as compound and ambiguous, and I would
 23 instruct the witness not to answer.
 24 THE WITNESS: On the instruction of my
 25 lawyer, I must invoke my Fifth Amendment right.

1 MR. RHEINHART: Same instruction.
 2 THE WITNESS: On the instruction of my
 3 lawyer, I must invoke my Fifth Amendment
 4 privilege.
 5 MR. KUVIN: I forgot to do one more thing.
 6 If you could give that back to me for just one
 7 second just for the record so we can see what
 8 we're talking about here.
 9 Okay. I will give you back Exhibit
 10 9.
 11 MR. RHEINHART: Thank you.
 12 BY MR. KUVIN:
 13 Q. Would you agree with me that this
 14 photograph of Nadia Marcinkova was taken when she
 15 was under the age of 18?
 16 MR. RHEINHART: Objection to the form. It
 17 assumes this witness has any knowledge that the
 18 person in the photograph is, in fact, Nadia
 19 Marcinkova. Therefore, it's ambiguous and
 20 compound, and I'll instruct her not to answer
 21 based on her Fifth Amendment privilege.
 22 THE WITNESS: On the instruction of my
 23 lawyer, I must invoke my Fifth Amendment right.
 24 BY MR. KUVIN:
 25 Q. Would you agree with me that the girl

1 shown in that photograph -- strike that.
 2 Would you agree with me that this
 3 photograph was kept by Jeffrey Epstein in his home?
 4 MR. RHEINHART: Objection to the form as
 5 to being compound in that it assumes that she
 6 has any knowledge of Jeffrey Epstein or his
 7 home, and I would instruct her not to answer
 8 based on her Fifth Amendment.
 9 THE WITNESS: On the instruction of my
 10 lawyer, I must invoke my Fifth Amendment right.
 11 BY MR. KUVIN:
 12 Q. Would you agree with me that
 13 Nadia Marcinkova was under the age of 16 when this
 14 photograph was taken in Exhibit 9?
 15 MR. RHEINHART: Objection to the form as
 16 compound and also assuming this witness has any
 17 knowledge that the person in the photograph is,
 18 in fact, Nadia Marcinkova. Therefore, I would
 19 instruct her to invoke her Fifth Amendment
 20 privilege.
 21 THE WITNESS: On the instruction of my
 22 lawyer, I must invoke my Fifth Amendment right.
 23 BY MR. KUVIN:
 24 Q. Ma'am, is Jeffrey Epstein paying for your
 25 attorney today?

1 implicitly assumes that she does, I would
 2 instruct her not to answer it based on her
 3 Fifth Amendment privilege.
 4 THE WITNESS: Upon the instruction of my
 5 lawyer, I must invoke my Fifth Amendment
 6 privilege.
 7 BY MR. KUVIN:
 8 Q. Ma'am, are you aware of the effect, the
 9 emotional effect on the underage girls that have
 10 been abused by Jeffrey Epstein? Are you aware of
 11 the emotional effect that it's had on the underage
 12 girls that have been abused by Jeffrey Epstein?
 13 MR. RHEINHART: Objection to the form as
 14 to, again, the question assumes this witness
 15 has any knowledge, first, of Jeffrey Epstein,
 16 second that Jeffrey Epstein has sexually abused
 17 anyone ever, and third, that anyone has been
 18 damaged by anything that Jeffrey Epstein has
 19 done, and fourth, that she would somehow have
 20 any knowledge of these people's emotional
 21 situations. For all those reasons, the
 22 question is ambiguous and compound, and I would
 23 instruct her not to answer based on her Fifth
 24 Amendment.
 25 THE WITNESS: Upon the instruction of my

1 MR. RHEINHART: I'll instruct the witness
 2 not to answer based on her Fifth Amendment
 3 privilege.
 4 THE WITNESS: On the instruction of my
 5 lawyer, I must invoke my Fifth Amendment right.
 6 BY MR. KUVIN:
 7 Q. Ma'am, is Jeffrey Epstein paying for you
 8 to keep quiet with respect to the things he has done
 9 to underage girls?
 10 MR. RHEINHART: Objection to the form in
 11 that it's ambiguous and compound, also assumes
 12 this witness has any knowledge at all of
 13 Jeffrey Epstein, and therefore I am instructing
 14 her to invoke her Fifth Amendment privilege.
 15 THE WITNESS: On the instruction of my
 16 lawyer, I must invoke my Fifth Amendment
 17 privilege.
 18 BY MR. KUVIN:
 19 Q. Ma'am, how much is Jeffrey Epstein paying
 20 you to keep quiet with respect to things he's done
 21 to underage girls?
 22 MR. RHEINHART: Object to the form as
 23 multiple compound questions, and it's again
 24 assuming this witness has any knowledge at all
 25 of Jeffrey Epstein. Since the question

1 lawyer, I must invoke my Fifth Amendment right.
 2 BY MR. KUVIN:
 3 Q. Ma'am, do you have any regret for what
 4 you've done?
 5 MR. RHEINHART: Objection to the form.
 6 That question is not designed to lead to
 7 discoverable evidence. It's meant solely for
 8 the purpose of harassment, and I would instruct
 9 her not to answer.
 10 BY MR. KUVIN:
 11 Q. Ma'am, do you have any regrets for what
 12 Jeffrey Epstein has done through you in obtaining
 13 underage girls for sexual abuse?
 14 MR. RHEINHART: Same objection as the
 15 previous question as well as that question is
 16 now free to assume this witness has any
 17 knowledge at all of Jeffrey Epstein or
 18 Jeffrey Epstein having abused any underage
 19 women or girls or anything else that
 20 Jeffrey Epstein may ever have done.
 21 And therefore, since it assumes that
 22 fact, I would instruct her not to answer
 23 based on her Fifth Amendment.
 24 BY MR. KUVIN:
 25 Q. Are you scared of Jeffrey Epstein?

1 MR. KUVIN: I'm sorry, you had to respond.
 2 I cut you off.
 3 THE WITNESS: Upon the instruction of my
 4 lawyer, I must invoke my Fifth Amendment right.
 5 BY MR. KUVIN:
 6 Q. Are you scared of Jeffrey Epstein?
 7 MR. RHEINHART: Objection to the form in
 8 that it assumes this witness has ever met
 9 Jeffrey Epstein in her life. Because it
 10 assumes that, I would instruct her not to
 11 answer based on the Fifth Amendment.
 12 THE WITNESS: On the instruction of my
 13 lawyer, I must invoke my Fifth Amendment right.
 14 BY MR. KUVIN:
 15 Q. Are you aware of Jeffrey Epstein's sexual
 16 obsession for children?
 17 MR. RHEINHART: Same instructions as the
 18 previous question, also objection to the
 19 question. It's not designed to lead to any
 20 discoverable evidence at all. It's simply
 21 meant for harassment.
 22 THE WITNESS: On the instruction of my
 23 lawyer, I must invoke my Fifth Amendment
 24 privilege.
 25

1 lawyer, and I must invoke my Fifth Amendment
 2 privilege.
 3 BY MR. KUVIN:
 4 Q. Do you know who Les Wexner is?
 5 MR. RHEINHART: I'll instruct the witness
 6 not to answer based on her Fifth Amendment
 7 privilege.
 8 THE WITNESS: On the instruction of my
 9 lawyer, I must invoke my Fifth Amendment
 10 privilege.
 11 BY MR. KUVIN:
 12 Q. Do you know whether or not Mr. Epstein has
 13 had a homosexual relationship with Les Wexner in the
 14 past?
 15 MR. RHEINHART: Objection to the form in
 16 that it again assumes that this witness knows
 17 anything at all about Jeffrey Epstein or has
 18 ever met Jeffrey Epstein in her life, and
 19 therefore, I would instruct her not to answer
 20 based on her Fifth Amendment privilege, and the
 21 question is compound and ambiguous.
 22 THE WITNESS: On the instruction of my
 23 lawyer, I must invoke my Fifth Amendment
 24 privilege.
 25

1 BY MR. KUVIN:
 2 Q. At what point did you realize that
 3 Jeffrey Epstein was sexually attracted to girls
 4 under the age of 18?
 5 MR. RHEINHART: Once again, the question
 6 assumes this witness knows anything at all
 7 about Jeffrey Epstein, underage women, sexual
 8 abuse of underage women, and she's not going to
 9 answer any questions that assume that as a
 10 predicate. They are objectionable as ambiguous
 11 and compound, and I instruct her not to answer.
 12 THE WITNESS: On the instruction of my
 13 lawyer, I must invoke my Fifth Amendment
 14 privilege.
 15 BY MR. KUVIN:
 16 Q. Are you aware whether or not
 17 Jeffrey Epstein has had any homosexual relationships
 18 in the past?
 19 MR. RHEINHART: Same objection as the
 20 previous question. The question as stated
 21 assumes this witness has some knowledge of
 22 Jeffrey Epstein. And since it assumes that
 23 fact, it is ambiguous and it's compound, and I
 24 instruct her not to answer.
 25 THE WITNESS: On the instruction of my

1 BY MR. KUVIN:
 2 Q. Do you know the magician by the name
 3 David Copperfield?
 4 MR. RHEINHART: I'll instruct the witness
 5 not to answer based on her Fifth Amendment
 6 right.
 7 THE WITNESS: On the instruction of my
 8 lawyer, I must invoke my Fifth Amendment
 9 privilege.
 10 BY MR. KUVIN:
 11 Q. You are aware, are you not, that
 12 David Copperfield has visited Jeffrey Epstein's home
 13 in Palm Beach?
 14 MR. RHEINHART: Objection to the form as
 15 it once again assumes she has some knowledge of
 16 Jeffrey Epstein, or whether he has a home in
 17 Palm Beach. Because those facts are implicit
 18 in the question, the question is ambiguous and
 19 compound. I would instruct her not to answer
 20 based on her Fifth Amendment.
 21 THE WITNESS: On the instruction of my
 22 lawyer, I must invoke my Fifth Amendment
 23 privilege.
 24 BY MR. KUVIN:
 25 Q. You are aware, are you not, that

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

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

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

14 BY MR. KUVIN:

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

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

1 privilege.

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

5 BY MR. KUVIN:

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

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

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

15 BY MR. KUVIN:

16 Q. Do you agree that Jeffrey Epstein is a
17 child molester?

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

23 BY MR. KUVIN:

24 Q. In your own opinion.

25 MR. RHEINHART: I will again instruct her

1 deem the question to be ambiguous and compound,
2 because you're asking her to admit as a
3 predicate that she knows Mr. Epstein. As to
4 any question like that, I am going to instruct
5 her to take the Fifth Amendment on that basis.
6 So I would again instruct her to take the Fifth
7 Amendment as to that question.

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

11 MR. KUVIN: If you want to short circuit
12 that, anytime I mention Jeffrey Epstein you can
13 have a standing objection on that issue. I
14 have no problem.

15 MR. RHEINHART: Great.

16 BY MR. KUVIN:

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

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

1 not to answer based on her Fifth Amendment
2 privilege as well as the question having no
3 legitimate basis and will not lead to
4 discoverable evidence.

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

8 BY MR. KUVIN:

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

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

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

20 BY MR. KUVIN:

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

22 MR. RHEINHART: You can answer that.

23 THE WITNESS: I don't know. You like it a
24 lot. I don't know.
25

1 BY MR. KUVIN:
 2 Q. Okay. Using your definition of obsessed,
 3 would you agree with me that Jeffrey Epstein was
 4 obsessed with underage females?
 5 MR. RHEINHART: Same objection; same
 6 instruction.
 7 THE WITNESS: On the instruction of my
 8 lawyer, I must invoke my Fifth Amendment
 9 privilege.
 10 BY MR. KUVIN:
 11 Q. When was the first time that you learned
 12 Mr. Epstein was getting a massage from a girl under
 13 the age of 16?
 14 MR. RHEINHART: One second.
 15 MR. KUVIN: Sure.
 16 MR. RHEINHART: I want to make the
 17 standing objection for the reasons previously
 18 stated, the question is otherwise also compound
 19 in that it assumes multiple facts and asks her
 20 to answer multiple questions at the same time.
 21 I'll instruct her not to answer based on her
 22 Fifth Amendment.
 23 THE WITNESS: On the instruction of my
 24 lawyer, I must invoke my Fifth Amendment
 25 privilege.

1 lawyer, I must invoke my Fifth Amendment
 2 privilege.
 3 BY MR. KUVIN:
 4 Q. Did you keep a journal with the names of
 5 girls in it in the year 2005?
 6 MR. RHEINHART: Objection to the form as
 7 ambiguous. What do you mean by "journal"?
 8 MR. KUVIN: I will define it.
 9 MR. RHEINHART: Please.
 10 BY MR. KUVIN:
 11 Q. Did you keep a pad of paper, either a
 12 ringed notebook or some other format with the names
 13 of girls and their phone numbers in it in 2005?
 14 MR. RHEINHART: I'll instruct the witness
 15 not to answer based on her Fifth Amendment
 16 privilege. Also the question remains
 17 ambiguous.
 18 THE WITNESS: On the instruction of my
 19 lawyer, I must invoke my Fifth Amendment
 20 privilege.
 21 BY MR. KUVIN:
 22 Q. Would you agree with me that you kept a
 23 pad of paper or a journal, however you want to
 24 describe it, that contain the names of hundreds of
 25 underage girls and their phone numbers?

1 BY MR. KUVIN:
 2 Q. Do you know who owns the home at 358
 3 El Brillo Way?
 4 MR. RHEINHART: Same instructions as to
 5 the standing objection.
 6 THE WITNESS: On the instruction of my
 7 lawyer, I must invoke my Fifth Amendment
 8 privilege.
 9 BY MR. KUVIN:
 10 Q. Have you been on Palm Beach Island before?
 11 MR. RHEINHART: I am sorry. Can you
 12 restate the question?
 13 MR. KUVIN: Sure.
 14 BY MR. KUVIN:
 15 Q. Have you been on the Island of Palm Beach
 16 before?
 17 MR. RHEINHART: You can answer that yes or
 18 no.
 19 THE WITNESS: Yes.
 20 BY MR. KUVIN:
 21 Q. How many times?
 22 MR. RHEINHART: I'll instruct her not to
 23 answer that question based on her Fifth
 24 Amendment privilege.
 25 THE WITNESS: On the instruction of my

1 MR. RHEINHART: Object to the form of the
 2 question. It's compound and asking her to
 3 answer multiple questions at the same time.
 4 It's also leading, and I would instruct her not
 5 to answer based on her Fifth Amendment.
 6 THE WITNESS: On the instruction of my
 7 lawyer, I must invoke my Fifth Amendment right.
 8 BY MR. KUVIN:
 9 Q. Would you agree with me that you kept a
 10 pad of paper, notebook, or journal with the names of
 11 hundreds of girls under the age of 16 so that you
 12 could contact them and have them come to
 13 Jeffrey Epstein's home for sex with him?
 14 MR. RHEINHART: Objection to the form as
 15 compound and ambiguous, and I'll instruct her
 16 not to answer based on Fifth Amendment.
 17 THE WITNESS: On the instruction of my
 18 lawyer, I must invoke my Fifth Amendment
 19 privilege.
 20 BY MR. KUVIN:
 21 Q. Do you know Alfredo Rodriguez?
 22 MR. RHEINHART: I'll instruct the witness
 23 not to answer based on her Fifth Amendment
 24 privilege.
 25 THE WITNESS: On the instruction of my

1 lawyer, I must invoke my Fifth Amendment
 2 privilege.
 3 BY MR. KUVIN:
 4 Q. Are you aware that Alfredo Rodriguez has
 5 pled guilty to federal charges for hiding a journal
 6 containing the names of women?
 7 MR. RHEINHART: Objection to the form as
 8 compound and instruct her not to answer.
 9 THE WITNESS: On the instruction of my
 10 lawyer, I must choose to invoke my Fifth
 11 Amendment privilege.
 12 BY MR. KUVIN:
 13 Q. Do you have a personal fear of criminal
 14 prosecution as you sit here today?
 15 MR. RHEINHART: I instruct the witness --
 16 object to the form. That's the whole basis why
 17 one would invoke the Fifth Amendment so clearly
 18 she's does. I am not going to have her answer
 19 the question. It's solely meant to harass.
 20 MR. KUVIN: So is she not going to answer
 21 that question?
 22 MR. RHEINHART: She's not going to answer
 23 that question.
 24 MR. KUVIN: I think what I need to
 25 establish is that she personally has a fear,

1 prosecution by either the State or the federal
 2 government?
 3 MR. RHEINHART: She's not answering that
 4 question. She's not required to answer the
 5 question. She's invoked her Fifth Amendment
 6 privilege. She will continue to do so as to
 7 that question. You can move on.
 8 BY MR. KUVIN:
 9 Q. Ma'am, are you invoking your Fifth
 10 Amendment because your lawyer is advising you to
 11 invoke your Fifth Amendment, or because you
 12 personally have a fear that you might be prosecuted
 13 by either the state or the federal government?
 14 MR. RHEINHART: We have now been down this
 15 street four times. She's not going to answer
 16 the question. You can move along or we can
 17 leave.
 18 MR. KUVIN: I am just clarifying the
 19 question, and I appreciate it. And you can
 20 object. I just want to make sure that I have a
 21 clear record of every possible machination of
 22 the question so that I don't get hit later with
 23 you didn't ask the specific question you need
 24 to ask. So, I'm not doing it certainly to
 25 harass. I just want to make sure that the

1 not her lawyer. So I would like to establish
 2 whether the witness has a personal fear.
 3 MR. RHEINHART: Well, first of all, under
 4 the Fifth Amendment you don't have to be in
 5 fear. You just have to believe that the
 6 government believes you can be prosecuted for
 7 something. She's been invoking the Fifth
 8 Amendment on her own. It is implicit in her
 9 invocation in what she fears. She's not going
 10 to answer that question.
 11 MR. KUVIN: Well, I tend to disagree. She
 12 hasn't been invoking it on her own. She's been
 13 invoking it after you have instructed her to
 14 invoke it. So I want to know her personal --
 15 MR. RHEINHART: You can take that up with
 16 the judge then. She's not answering the
 17 question. She's invoking her Fifth Amendment
 18 on her own accord based on the advice of her
 19 lawyer. And you can take it up somewhere else,
 20 but she's not answering that question.
 21 MR. KUVIN: Well, then let me clarify the
 22 record.
 23 BY MR. KUVIN:
 24 Q. Ma'am, are you invoking your Fifth
 25 Amendment because you personally have a concern of

1 record is very clear of my question.
 2 MR. RHEINHART: I understand. You can
 3 move on.
 4 BY MR. KUVIN:
 5 Q. Ma'am, have you had any direct
 6 communications with the State Attorney's office in
 7 the last two years?
 8 MR. RHEINHART: When you say "direct
 9 communications," can you clarify?
 10 MR. KUVIN: Yes.
 11 BY MR. KUVIN:
 12 Q. You, personally, have you spoken with
 13 anyone in the State Attorney's office in the last
 14 two years?
 15 MR. KUVIN: I can't imagine there would be
 16 a Fifth Amendment for that.
 17 MR. RHEINHART: Let me consult. If I
 18 might. Okay?
 19 MR. KUVIN: Sure.
 20 MR. RHEINHART: It would all depend on
 21 what was said to her if she could consult with
 22 them now. For example, if they consulted and
 23 they told her they were about to prosecute,
 24 then there could be a Fifth Amendment claim,
 25 couldn't there?

1 MR. KUVIN: No, not as to the statements
 2 they told her. I mean, that's certainly not
 3 Fifth Amendment. That's something that was
 4 told to her.
 5 MR. RHEINHART: We'll take that up
 6 elsewhere if you need to. You can answer.
 7 MR. KUVIN: Okay.
 8 THE WITNESS: No, I have not.
 9 BY MR. KUVIN:
 10 Q. All right. Ma'am, have you had any
 11 personal communications with anyone working for the
 12 federal government in the last two years?
 13 MR. RHEINHART: When you say "the federal
 14 government" do you mean the postal service, the
 15 entire federal government, or do you want to
 16 clarify that?
 17 MR. KUVIN: Well, I certainly could leave
 18 it open-ended. If she's talked to a post
 19 office employee, that would be interesting, but
 20 certainly not to this case.
 21 BY MR. KUVIN:
 22 Q. Let's talk about the U.S. Attorney's
 23 Office or anyone working on behalf of the U.S.
 24 Attorney's Office.
 25 A. Have I personally ever spoken to anyone?

1 Q. Have you spoken with anybody at the U.S.
 2 Attorney's Office in the last five years?
 3 A. No.
 4 Q. Have you spoken with anyone at the FBI in
 5 the last five years?
 6 A. No.
 7 Q. Have you spoken with anyone at the
 8 Palm Beach Police Department in the last five years?
 9 MR. RHEINHART: When you say, "the Palm
 10 Beach Police," for any purpose or as related to
 11 this case? Again, for example, if there was
 12 like a parking ticket --
 13 MR. KUVIN: Sure.
 14 MR. RHEINHART: -- or some other thing, I
 15 want to clarify that.
 16 BY MR. KUVIN:
 17 Q. Let's, let's start with broad, and we can
 18 work to specific. Can you recall having any
 19 conversations for any reason with the Palm Beach
 20 Police Department in the last five years?
 21 A. No.
 22 Q. Okay. Do you have knowledge whether or
 23 not the Palm Beach Police Department ever requested
 24 for you to come in for an interview at any time in
 25 the last five years?

1 Q. Yes, ma'am, personally have you ever had
 2 any conversations with anyone at the U.S. Attorney's
 3 Office or one of their -- one -- a person
 4 representing to be from that office in the last two
 5 years.
 6 A. No.
 7 Q. Okay. Do you know, as you sit here today,
 8 whether or not you ever were requested to give a
 9 statement by the State Attorney's office for the
 10 Palm Beach Police Department?
 11 MR. RHEINHART: May I consult?
 12 MR. KUVIN: Yes.
 13 MR. RHEINHART: You may answer. And for
 14 the record, I was just determining whether the
 15 answer to that question would be protected by
 16 the attorney-client privilege.
 17 MR. KUVIN: Understood.
 18 THE WITNESS: No, I don't. I don't know.
 19 BY MR. KUVIN:
 20 Q. Let me clarify the last two questions I
 21 asked about the State Attorney's Office and the U.S.
 22 Attorney's Office. Have you spoken with anybody
 23 personally at the State Attorney's Office in the
 24 last five years?
 25 A. No.

1 MR. RHEINHART: If you know the answer to
 2 that question because that's something your
 3 attorney told you, you don't have to answer
 4 that question. Otherwise, go ahead and answer.
 5 THE WITNESS: No.
 6 BY MR. KUVIN:
 7 Q. Okay. When did you first retain an
 8 attorney? What date did you first retain a -- I
 9 mean, let me clarify. What date did you first
 10 retain a criminal attorney?
 11 MR. RHEINHART: I'll instruct her not to
 12 answer based on the Fifth Amendment privilege.
 13 THE WITNESS: On the instruction of my
 14 lawyer, I must invoke my Fifth Amendment
 15 privilege.
 16 BY MR. KUVIN:
 17 Q. Did you first retain a criminal attorney
 18 in the year 2005?
 19 MR. RHEINHART: Same instruction.
 20 THE WITNESS: On the instruction of my
 21 lawyer, I must invoke my Fifth Amendment
 22 privilege.
 23 BY MR. KUVIN:
 24 Q. Did you retain a criminal attorney in
 25 2004?

1 MR. RHEINHART: Same instruction.
 2 THE WITNESS: On the instruction of my
 3 lawyer, I must invoke my Fifth Amendment
 4 privilege.
 5 BY MR. KUVIN:
 6 Q. Have you ever worked as a professional
 7 model?
 8 MR. RHEINHART: May I consult?
 9 MR. KUVIN: Sure.
 10 MR. RHEINHART: You can answer the
 11 question.
 12 THE WITNESS: Yes.
 13 BY MR. KUVIN:
 14 Q. When?
 15 A. I don't remember. I don't remember the dates.
 16 It was at least maybe ten years ago.
 17 Q. And you're how old now?
 18 MR. RHEINHART: I'll instruct the witness
 19 not to answer the question. Nice try.
 20 Instruct you not to answer based on
 21 your Fifth Amendment privilege.
 22 THE WITNESS: On the instruction of my
 23 lawyer, I'm going to invoke my Fifth Amendment
 24 privilege.
 25 MR. KUVIN: I'm just trying to find out.

1 assumes facts that have not been established
 2 and it's compound.
 3 THE WITNESS: On the instruction of my
 4 lawyer, I must invoke my Fifth Amendment
 5 privilege.
 6 MR. RHEINHART: And to clarify the
 7 objection is that it assumes that she's ever
 8 met or knows anything about Jean-Luc Brunel.
 9 BY MR. KUVIN:
 10 Q. Were you ever promised anything regarding
 11 your modeling career by Jeffrey Epstein?
 12 MR. RHEINHART: Same objection, instruct
 13 the witness not to answer.
 14 THE WITNESS: On the instruction of my
 15 lawyer, I must invoke my Fifth Amendment
 16 privilege.
 17 BY MR. KUVIN:
 18 Q. You would agree with me that there is a
 19 financial arrangement between Jean-Luc Brunel and
 20 Jeffrey Epstein, do you not?
 21 MR. RHEINHART: Objection. It assumes she
 22 has any knowledge of either Mr. Epstein or
 23 Mr. Brunel, and as to that she is going to
 24 invoke her Fifth Amendment privilege. The
 25 question is compound and therefore ambiguous.

1 MR. RHEINHART: Like I said, good try.
 2 Move on.
 3 BY MR. KUVIN:
 4 Q. With respect to your work as a
 5 professional model, what company did you work for?
 6 MR. RHEINHART: Instruct the witness not
 7 to answer based on the Fifth Amendment
 8 privilege.
 9 THE WITNESS: On the instruction of my
 10 lawyer, I invoke my Fifth Amendment privilege.
 11 BY MR. KUVIN:
 12 Q. What is your understanding of
 13 Mr. Epstein's involvement with the modeling
 14 industry?
 15 MR. RHEINHART: Standing objection, and
 16 instruct the witness not to answer based on
 17 Fifth Amendment, on that basis.
 18 THE WITNESS: Upon the instruction of my
 19 lawyer, I must invoke my Fifth Amendment
 20 privilege.
 21 BY MR. KUVIN:
 22 Q. Were you ever promised anything regarding
 23 your modeling career by Jean-Luc Brunel?
 24 MR. RHEINHART: Instruct the witness not
 25 to answer based on Fifth Amendment, also

1 THE WITNESS: On the instruction of my
 2 lawyer, I must invoke my Fifth Amendment
 3 privilege.
 4 BY MR. KUVIN:
 5 Q. Would you agree with me that
 6 Ghislaine Maxwell provides underage girls to
 7 Mr. Epstein for sex?
 8 MR. RHEINHART: Objection to the form. It
 9 assumes she knows anything at all about
 10 Ghislaine Maxwell and asks her to assume that
 11 she does, and therefore it is compound and
 12 ambiguous, and I would instruct her not to
 13 answer.
 14 THE WITNESS: Upon the instruction of my
 15 lawyer, I must invoke my Fifth Amendment
 16 privilege.
 17 MR. KUVIN: That's a good point. Take a
 18 look at what we'll mark as Exhibit 10.
 19 (Plaintiff's Exhibit No. 10 was marked for
 20 identification.)
 21 MR. KUVIN: All me to show it to the
 22 camera first.
 23 MR. RHEINHART: Okay.
 24 MR. KUVIN: Okay.
 25 THE WITNESS: Okay.

1 BY MR. KUVIN:
 2 Q. Take a look at what we marked as Exhibit
 3 10. Do you recognize the two people in that
 4 photograph?
 5 MR. RHEINHART: I'll instruct the witness
 6 not to answer based on her Fifth Amendment
 7 privilege.
 8 THE WITNESS: On the instruction of my
 9 lawyer, I must invoke my Fifth Amendment
 10 privilege.
 11 BY MR. KUVIN:
 12 Q. Would you agree with me that's
 13 Ghislaine Maxwell on the right and Jeffrey Epstein
 14 on the left?
 15 MR. RHEINHART: Objection to the form. It
 16 assumes that she knows who Ghislaine Maxwell
 17 and Jeffrey Epstein are, and therefore it's
 18 compound and ambiguous, and I would instruct
 19 her not to answer.
 20 THE WITNESS: On the instruction of my
 21 lawyer, I must invoke my Fifth Amendment
 22 privilege.
 23 MR. KUVIN: Okay. I will mark this as
 24 Exhibit 11.
 25

1 You're asking the witness three
 2 questions at the same time, and I would
 3 instruct her not to answer based on the
 4 Fifth Amendment.
 5 THE WITNESS: On the instruction of my
 6 lawyer, I must invoke my Fifth Amendment
 7 privilege.
 8 MR. KUVIN: Just so we're clear, had she
 9 answered the first two questions, then
 10 obviously I wouldn't have to ask the third one
 11 that has all of them in it but --
 12 MR. RHEINHART: If you had accepted her
 13 answer, you would have known that she wasn't
 14 going to answer these, and we could have saved
 15 a few minutes.
 16 MR. KUVIN: And as you well know, I must
 17 ask the question in order to gain the inference
 18 at trial.
 19 MR. RHEINHART: I understand.
 20 MR. KUVIN: All right.
 21 (Plaintiff's Exhibit No. 12 was marked for
 22 identification.)
 23 BY MR. KUVIN:
 24 Q. Do you recognize the gentleman that is
 25 shown --

1 (Plaintiff's Exhibit No. 11 was marked for
 2 identification.)
 3 BY MR. KUVIN:
 4 Q. Let me show you what we marked as
 5 Exhibit 11. Hang on one second.
 6 MR. RHEINHART: Sure.
 7 BY MR. KUVIN:
 8 Q. Do you recognize the young lady shown in
 9 Exhibit 11?
 10 MR. RHEINHART: I'll instruct the witness
 11 not to answer based on her Fifth Amendment
 12 privilege.
 13 THE WITNESS: On the instruction of my
 14 lawyer, I must invoke my Fifth Amendment
 15 privilege.
 16 BY MR. KUVIN:
 17 Q. Do you agree with me that the young girl
 18 shown in Exhibit 11 was recruited by Ghislaine
 19 Maxwell to, for sexual activity with
 20 Jeffrey Epstein?
 21 MR. RHEINHART: Objection to the form. It
 22 assumes she knows who the person is in Exhibit
 23 11, and assumes she knows who Ghislaine Maxwell
 24 is, and assumes she knows who Jeffrey Epstein
 25 is, and is therefore compound.

1 MR. RHEINHART: We'll have a job here.
 2 MR. KUVIN: That is true.
 3 BY MR. KUVIN:
 4 Q. -- that is shown in Exhibit 12?
 5 MR. KUVIN: Let me hold this for the
 6 camera first.
 7 MR. RHEINHART: I'm sorry. Is there a
 8 question pending?
 9 MR. KUVIN: Yes.
 10 BY MR. KUVIN:
 11 Q. Do you recognize the gentleman shown in
 12 Exhibit 12?
 13 MR. RHEINHART: I instruct her not to
 14 answer based on the Fifth Amendment.
 15 THE WITNESS: On the instruction of my
 16 lawyer, I must invoke my Fifth Amendment
 17 privilege.
 18 BY MR. KUVIN:
 19 Q. Would you agree with me that that is
 20 Prince Andrew shown in Exhibit 12?
 21 MR. RHEINHART: Same instruction.
 22 THE WITNESS: On the instruction of my
 23 lawyer, I must invoke my Fifth Amendment
 24 privilege.
 25

1 BY MR. KUVIN:

2 Q. Would you agree with me that you have been
3 present where Jeffrey Epstein and Prince Andrew have
4 had sexual relations with underage girls?

5 MR. RHEINHART: Objection to the form,
6 it's compound in that it assumes she knows who
7 the person is in Picture 12, she knows who
8 Prince Andrew is, and she knows who Jeffrey
9 Epstein is. It's compound and ambiguous, and
10 I'll instruct her not to answer based on her
11 Fifth Amendment.

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

15 BY MR. KUVIN:

16 Q. Would you agree with me that Prince Andrew
17 and Jeffrey Epstein used to share underaged girls
18 for sexual relations?

19 MR. RHEINHART: Same objection previously
20 stated, requires her to also speculate who
21 Prince Andrew is. I instruct her not to answer
22 based on the Fifth Amendment.

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

1 break now.

2 MR. KUVIN: Okay.

3 THE VIDEOGRAPHER: We're now off video
4 record. The time is 11:57 a.m.

5 (A luncheon recess was held.)

6 (Plaintiff's Exhibit No's 4 was marked for
7 identification.)

8 (Plaintiff's Exhibit No. 5 was marked for
9 identification.)

10 THE VIDEOGRAPHER: We're now on video
11 record. The time is 1:02 p.m.

12 MR. KUVIN: All right, counsel. I'm going
13 to ask a couple more general questions, and
14 then when we get into the specifics of the
15 individual girls, I just want to make sure,
16 once again, on the record, as we've done in
17 every deposition in this case, that we'll use
18 the Plaintiff's full name with the
19 understanding that the final transcript will
20 only contain their initials, and there will be
21 a key at the conclusion that's only provided to
22 the parties in this case and their counsel to
23 be kept confidential going forward. But
24 obviously, for the purposes of this deposition,
25 we will be using full names.

1 MR. RHEINHART: Also requires speculation
2 as to who Jeffrey Epstein is as well.

3 BY MR. KUVIN:

4 Q. Do you know who Prince Andrew is?

5 MR. RHEINHART: I'll instruct her not to
6 answer based on the Fifth Amendment.

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

10 MR. KUVIN: It's almost 12:00. Do you
11 want to take a quick lunch?

12 MR. RHEINHART: Sure. How much longer do
13 you think you will be, Mr. Kuvin, before we go
14 on to other counsel?

15 MR. KUVIN: Probably not that much longer.

16 MR. RHEINHART: Okay.

17 MR. KUVIN: I have to get through a couple
18 of more generic stuff, and then get into the
19 specifics of my cases and then --

20 MR. RHEINHART: Okay. So, we, but just so
21 we have a sense of planning whether this is the
22 right time for a lunch break. You're not going
23 to finish in the next 15 or 20 minutes?

24 MR. KUVIN: No, not even close.

25 MR. RHEINHART: Okay. Let's take a lunch

1 MR. RHEINHART: Agreed.

2 MR. KUVIN: Okay. Is there any
3 disagreement with that around the table?

4 MR. HOROWITZ: Agreed.

5 MR. WEISSING: Agreed.

6 MS. EZELL: Agreed.

7 MR. KUVIN: Jack, do you agree to the --

8 MR. GOLDBERGER: I thought I'm not a part
9 of it.

10 MR. KUVIN: Well, you've been playing a
11 part, so I want to make sure you agree.

12 MR. GOLDBERGER: Yeah, I agree. I agree.

13 MR. RHEINHART: Hold on. Let me just
14 explain to her what we're talking about.

15 MR. KUVIN: Please do.

16 MR. RHEINHART: But when the transcript is
17 typed up, it won't have her name it will just
18 have initials. But we'll get a code that
19 explains the name. So that way you would be
20 asked if you recognize the name not a set of
21 initials that you may not understand or a Jane
22 Doe number that you do not know.

23 MR. KUVIN: That's way too confusing.
24 Okay?

25 MR. RHEINHART: Correct.

1 BY MR. KUVIN:
 2 Q. Let's take a look at what I've marked --
 3 premarked as Exhibit 4. It's a stack of documents,
 4 just so you understand what this is and your
 5 attorney can object or agree or disagree as he sees
 6 fit, but this is a stack of documents that was part
 7 of the trash pull from Jeffrey Epstein's home as
 8 part of the criminal investigation. Just so you're
 9 aware of what these are.
 10 MR. RHEINHART: That was retrieved, that
 11 was retrieved by the Palm Beach Police
 12 Department from the trash --
 13 MR. KUVIN: That's correct.
 14 MR. RHEINHART: -- at the home of what is
 15 known to be Mr. Epstein's home?
 16 MR. KUVIN: Correct.
 17 MR. RHEINHART: Okay.
 18 MR. KUVIN: All right. And that's not a
 19 question. I just wanted to kind of give you a
 20 context for what I'm going to be asking you
 21 about.
 22 MR. RHEINHART: Thank you.
 23 BY MR. KUVIN:
 24 Q. All right. In taking a look at Exhibit 4,
 25 I'd like you to take a look at the front page, the

1 objection to the form.
 2 THE WITNESS: At the instruction of my
 3 lawyer, I must invoke my Fifth Amendment
 4 privilege.
 5 BY MR. KUVIN:
 6 Q. Yes. Do you know Alex Hall?
 7 MR. RHEINHART: Instruct the witness not
 8 to answer the question based on her Fifth
 9 Amendment privilege.
 10 THE WITNESS: On the instruction of my
 11 lawyer, I must exercise my Fifth Amendment
 12 privilege.
 13 BY MR. KUVIN:
 14 Q. Will you agree with me that on the first
 15 page of Exhibit 4, you were to arrange for roses to
 16 be delivered to Jane Doe No. 103 at her high school
 17 performance?
 18 MR. RHEINHART: Objection to the form.
 19 It's compound in that it assumes this is the
 20 witness's handwriting and assumes the witness
 21 knows a person by the name of Jane Doe No. 103
 22 and the witness otherwise knows Jeffrey Epstein
 23 whose name is at the bottom of the paper, and
 24 therefore, it's compound and ambiguous, and
 25 instruct her not to answer.

1 first page of those documents.
 2 Is that your handwriting, ma'am?
 3 MR. RHEINHART: Instruct the witness not
 4 to answer based on the Fifth Amendment
 5 privilege.
 6 THE WITNESS: At the instruction of my
 7 lawyer, I must exercise my Fifth Amendment
 8 right.
 9 BY MR. KUVIN:
 10 Q. And, in fact, that is your handwriting on
 11 this notepad, is it not?
 12 MR. RHEINHART: Same instruction. It's
 13 the same question.
 14 THE WITNESS: On the instruction of my
 15 lawyer, I must invoke my Fifth Amendment right.
 16 BY MR. KUVIN:
 17 Q. In this note do you agree that you
 18 arranged for an extension of one month on the rental
 19 car for a young lady under the age of 16?
 20 MR. RHEINHART: Objection to the form. It
 21 is compound. It assumes that this is her
 22 handwriting. It doesn't identify who the young
 23 lady might be, and it's otherwise ambiguous, so
 24 I instruct her not to answer on the Fifth
 25 Amendment privilege in addition to the legal

1 THE WITNESS: On the instruction of my
 2 lawyer, I must exercise my Fifth Amendment
 3 right.
 4 MR. KUVIN: I forgot to mention this at
 5 the beginning, but objection to form usually
 6 covers all that stuff like vague and compound,
 7 and --
 8 MR. RHEINHART: Okay.
 9 MR. KUVIN: -- I'll leave it up to you,
 10 but objection to form as far as the civil arena
 11 context will cover all of those.
 12 MR. RHEINHART: Just figured I'd make the
 13 record clear in case we ever have an issue, or
 14 in case you want to correct it based on what I
 15 believe to be the improper form, I will give
 16 you a chance to correct it.
 17 BY MR. KUVIN:
 18 Q. No problem. All right. On Page 2 of
 19 Exhibit 4, if you'd take a look at that. Is that
 20 your handwriting?
 21 MR. RHEINHART: Instruct the witness not
 22 to answer based on the Fifth Amendment
 23 privilege.
 24 THE WITNESS: On the instruction of my
 25 lawyer, I choose to exercise my Fifth Amendment

1 right.
 2 BY MR. KUVIN:
 3 Q. Do you know who Larry is, as referred to
 4 in Page 2 of Exhibit 4?
 5 MR. RHEINHART: I'm sorry. Can you --
 6 BY MR. KUVIN:
 7 Q. Do you know who --
 8 MR. RHEINHART: -- restate the question?
 9 BY MR. KUVIN:
 10 Q. Do you know who Larry is as referred to in
 11 Page 2 of Exhibit 4?
 12 MR. RHEINHART: So, just so I'm clear,
 13 what the question is, the document on its face
 14 has the name Larry in it. You're just asking
 15 this witness whether she knows who this person
 16 Larry is?
 17 MR. KUVIN: Correct.
 18 MR. RHEINHART: Instruct the witness not
 19 to answer based on her Fifth Amendment
 20 privilege.
 21 THE WITNESS: On the instruction of my
 22 lawyer, I must invoke my Fifth Amendment right.
 23 BY MR. KUVIN:
 24 Q. Do you know why Larry was recommending
 25 that Mr. Epstein leave?

1 MR. RHEINHART: Okay. I would be happy
 2 to.
 3 MR. KUVIN: I just want to clarify,
 4 because I don't think --
 5 MR. RHEINHART: Okay.
 6 MR. KUVIN: I don't think this is a
 7 problem, but I just want to clear it up.
 8 MR. RHEINHART: Thank you, Mr. Kuvin.
 9 I'll let her answer that question.
 10 MR. KUVIN: Not a problem.
 11 MR. RHEINHART: So the question pending
 12 is, is that your handwriting?
 13 MR. KUVIN: Correct.
 14 BY MR. KUVIN:
 15 Q. Is this your handwriting? Just yes or no.
 16 A. No.
 17 Q. Okay. Thank you. All right. Let's look
 18 at Page 4 of Exhibit 4. All right. This one's a
 19 little different. Is this your handwriting?
 20 MR. RHEINHART: Let me consult with her
 21 again.
 22 Okay. That's fine. You can answer
 23 the question consistent with the
 24 conversation we just had.
 25 THE WITNESS: No.

1 MR. RHEINHART: Objection to the form and
 2 instruct the witness not to answer based upon
 3 her Fifth Amendment privilege.
 4 THE WITNESS: On the instruction of my
 5 lawyer, I must invoke my Fifth Amendment right.
 6 BY MR. KUVIN:
 7 Q. Would you agree with me that Larry was
 8 calling to warn Mr. Epstein to leave town because he
 9 was going to be arrested?
 10 MR. RHEINHART: Objection to the form.
 11 The question assumes facts that are not before
 12 her, and it requires her to speculate, and also
 13 implies that she knows anything at all about
 14 Jeffrey Epstein, so I will instruct her not to
 15 answer.
 16 THE WITNESS: On the instruction of my
 17 lawyer, I wish to exercise my Fifth Amendment
 18 right.
 19 BY MR. KUVIN:
 20 Q. Take a look at Page 3 of Exhibit 4,
 21 please. Is that your handwriting?
 22 MR. RHEINHART: I'll instruct her not to
 23 answer based on the Fifth Amendment privilege.
 24 MR. KUVIN: Before we do that, would you
 25 consult with her?

1 BY MR. KUVIN:
 2 Q. Do you know who Danielle is as referred to
 3 in this note of Page 4 of Exhibit 4?
 4 MR. RHEINHART: Instruct the witness not
 5 to answer based on her Fifth Amendment
 6 privilege.
 7 THE WITNESS: On the instruction of my
 8 lawyer, I must exercise my Fifth Amendment
 9 right.
 10 BY MR. KUVIN:
 11 Q. All right. Let's look at Page 5,
 12 Exhibit 4.
 13 Before we go to Page 5, rather, going
 14 back to Page 4 for a minute. Will you agree with me
 15 that Danielle as referred to in Page 4 of Exhibit 4
 16 is a girl that is under the age of 16?
 17 MR. RHEINHART: Object to the form. You
 18 previously asked if she knew who Danielle was,
 19 and she invoked her Fifth Amendment privilege.
 20 Since the new question presumes that she does
 21 know who Danielle is she is going to invoke her
 22 Fifth Amendment privilege upon my instruction.
 23 MR. KUVIN: All right. Let's look at
 24 Page 5.
 25 MR. RHEINHART: Let her answer.

1 MR. KUVIN: I'm sorry, go ahead.
 2 THE WITNESS: On the instruction of my
 3 lawyer, I must invoke my Fifth Amendment
 4 privilege.
 5 BY MR. KUVIN:
 6 Q. All right. Take a look at Page 5, if you
 7 would. Have you ever ordered anything, anything
 8 yourself from Amazon.com?
 9 MR. RHEINHART: You're asking for herself
 10 or anyone else if she has ever placed an order
 11 with Amazon.com for any reason?
 12 MR. KUVIN: I am asking whether she
 13 personally has ever placed an order with a
 14 company called Amazon.com.
 15 MR. RHEINHART: Yes or no. You can answer
 16 that.
 17 THE WITNESS: Yes.
 18 BY MR. KUVIN:
 19 Q. Okay. So you would agree with me that you
 20 know what Amazon.com is?
 21 A. Yes.
 22 Q. Okay. Now, have you ever placed an order
 23 through Amazon.com for things to be delivered at
 24 358 El Brillo Way?
 25 MR. RHEINHART: Instruct the witness to

1 that Page 5 of Exhibit 4 appears to be a receipt for
 2 books ordered through Amazon.com?
 3 MR. RHEINHART: You can answer that yes or
 4 no.
 5 THE WITNESS: It looks like a receipt from
 6 Amazon.
 7 BY MR. KUVIN:
 8 Q. Okay. And did you place this order for
 9 Jeffrey Epstein?
 10 MR. RHEINHART: Instruct the witness not
 11 to answer the question in that the question
 12 presumes that she knows who Jeffrey Epstein is,
 13 and therefore, I instruct her not to answer.
 14 THE WITNESS: On advice of counsel, I must
 15 invoke my Fifth Amendment privilege.
 16 BY MR. KUVIN:
 17 Q. Have you ever read the book identified in
 18 Page 5 of Exhibit 4 called Slave Craft: Road Maps
 19 for Erotic Servitude - Principals, Skills and Tools?
 20 MR. RHEINHART: Instruct the witness not
 21 to answer based on her Fifth Amendment
 22 privilege.
 23 THE WITNESS: On the instruction of my
 24 lawyer, I must choose to invoke my Fifth
 25 Amendment right.

1 invoke her Fifth Amendment privilege as to that
 2 question.
 3 THE WITNESS: On the instruction of my
 4 lawyer, I must invoke my Fifth Amendment
 5 privilege.
 6 BY MR. KUVIN:
 7 Q. Will you agree with me --
 8 MR. RHEINHART: I'm sorry, Mr. Kuvin, for,
 9 for the record, the page, pages of this exhibit
 10 are not numbered, but the page we're looking at
 11 purports to be a receipt for an order from
 12 Amazon.com; is that correct?
 13 MR. KUVIN: Correct. I just want her to
 14 establish foundation before I got into
 15 specifics.
 16 MR. RHEINHART: No, but you referred to it
 17 as Page 5, but they are not numbered, so I just
 18 wanted to make sure that we're looking at the
 19 same page on the exhibit.
 20 MR. KUVIN: That is true. I'm just trying
 21 to establish foundation for the questions I'm
 22 about to ask her.
 23 MR. RHEINHART: Understood.
 24 BY MR. KUVIN:
 25 Q. All right. Ma'am, would you agree with me

1 BY MR. KUVIN:
 2 Q. Did you ever see that book I just
 3 described at the home of Jeffrey Epstein on
 4 358 El Brillo Way?
 5 MR. RHEINHART: Objection to the form in
 6 that it presumes she knows Jeffrey Epstein and
 7 has ever been to 358 El Brillo Way. So, I
 8 instruct her not to answer based on the Fifth
 9 Amendment.
 10 THE WITNESS: On the instruction of my
 11 lawyer, I must choose to invoke my Fifth
 12 Amendment right.
 13 BY MR. KUVIN:
 14 Q. Have you ever seen the book, Training With
 15 Miss Abernathy: A Workbook for Erotic Slaves and
 16 Their Owners, at the home of Jeffrey Epstein on
 17 358 El Brillo Way?
 18 MR. RHEINHART: Same objection and same
 19 instruction as the previous question.
 20 THE WITNESS: On the instruction of my
 21 lawyer, I must choose to invoke my Fifth
 22 Amendment right.
 23 BY MR. KUVIN:
 24 Q. Have you ever read that book that I just
 25 described which is shown in Page 5 of Exhibit 4?

1 MR. RHEINHART: Same instruction.
 2 THE WITNESS: On the instruction of my
 3 lawyer, I must choose to invoke my Fifth
 4 Amendment right.
 5 BY MR. KUVIN:
 6 Q. Let's look at the sixth page of Exhibit 4,
 7 please. Is that your handwriting?
 8 A. No.
 9 Q. All right. Let's look at Page 7. Is that
 10 your handwriting?
 11 A. No.
 12 Q. Okay. Look at the next page which would
 13 be Page 8. Is that your handwriting?
 14 A. No.
 15 Q. Let's see how much quicker this goes.
 16 Let's look at Page 9. Is that your handwriting?
 17 A. No.
 18 Q. Look at Page 9 again, if you would.
 19 MR. RHEINHART: When you say Page 9,
 20 that's the page that purports to say 10:00.
 21 MR. KUVIN: Dr. Bard.
 22 MR. RHEINHART: -- Dr. Bard at the top?
 23 MR. KUVIN: Correct.
 24 MR. RHEINHART: Okay.
 25

1 BY MR. KUVIN:
 2 Q. This note, Page 9 of Exhibit 4, appears to
 3 state that Sarah is trying to move -- and then
 4 there's a blanked out name, for I I then Brittany
 5 could work at 6. Do you know anyone with the name
 6 Brittany?
 7 MR. RHEINHART: If she knows anyone in the
 8 world by that name?
 9 MR. KUVIN: Yeah. We could start with
 10 that.
 11 MR. RHEINHART: I'm saying, in the
 12 context, are you asking in the context of this
 13 note which you just read, or are you asking,
 14 generically, does she know anyone in the world
 15 by the name of Brittany?
 16 MR. KUVIN: Why don't we first do it in
 17 the context of this note.
 18 BY MR. KUVIN:
 19 Q. Is this note referring to you when it
 20 says, "Sarah"?
 21 MR. RHEINHART: Instruct the witness not
 22 to answer based on her Fifth Amendment
 23 privilege.
 24 THE WITNESS: On the advice of counsel, I
 25 must invoke my Fifth Amendment right.

1 BY MR. KUVIN:
 2 Q. Do you know who Dr. Bard is?
 3 MR. RHEINHART: Instruct the witness not
 4 to answer based on the Fifth Amendment, because
 5 this sheet of paper has Jeffrey Epstein's name
 6 on the bottom, so the question implies that she
 7 knows some connection between Dr. Bard and
 8 Mr. Epstein.
 9 MR. KUVIN: Hang on a minute. Based on
 10 the objection, let me reword the question.
 11 BY MR. KUVIN:
 12 Q. Independent from this note and independent
 13 from anyone who may or may not be known as
 14 Jeffrey Epstein, do you know anyone by the name of
 15 Dr. Bard?
 16 A. I'm sorry. Ask the question again.
 17 Q. Yes. I don't want you to assume anything
 18 from, the purpose of my question has anything to do
 19 with someone who may be known as Jeffrey Epstein.
 20 All I'm asking you is, generally, do
 21 you know a person by the name of Dr. Bard?
 22 MR. RHEINHART: Let me consult.
 23 MR. KUVIN: Yes, yeah.
 24 THE WITNESS: At the advice of counsel, I
 25 must invoke my Fifth Amendment right.

1 BY MR. KUVIN:
 2 Q. In the context of this note, do you know
 3 who Brittany is?
 4 MR. RHEINHART: Same instruction.
 5 THE WITNESS: On the advice of counsel, I
 6 must invoke my Fifth Amendment right.
 7 BY MR. KUVIN:
 8 Q. All right. Let's look at Page 10.
 9 MR. RHEINHART: Mr. Kuvin, let me go back.
 10 MR. KUVIN: Sure.
 11 MR. RHEINHART: As to Page 1 of this
 12 exhibit, I think you had asked the witness
 13 whether this was her handwriting.
 14 MR. KUVIN: Do you want to have her go
 15 back and answer?
 16 MR. RHEINHART: Yes, I would. Having
 17 consulted with her further, I will have her go
 18 back to this question.
 19 MR. KUVIN: Let's do that. I'll, I'll go
 20 back and ask the question so that we can be
 21 clear.
 22 BY MR. KUVIN:
 23 Q. On the Exhibit 4, the first page of
 24 Exhibit 4, ma'am, is that your handwriting? Yes or
 25 no.

1 A. No.
 2 Q. Okay. All right. Let's skip Page 10,
 3 because I think that's just a duplicate, and go to
 4 Page 11, if you would.
 5 MR. RHEINHART: Page 11 is --
 6 MR. KUVIN: It looks like DTG Operations,
 7 d/b/a Dollar Rent a Car.
 8 MR. RHEINHART: Got it. It's a printed
 9 sheet, not a handwritten sheet.
 10 MR. KUVIN: Correct.
 11 MR. RHEINHART: Okay. Thank you.
 12 BY MR. KUVIN:
 13 Q. All right. Do you know a gentleman by the
 14 name of Janusz Banasiak, spelled J-a-n-u-s-z,
 15 B-a-n-a-s-i-a-k?
 16 MR. RHEINHART: Instruct the witness not
 17 to answer based on her Fifth Amendment
 18 privilege.
 19 THE WITNESS: On the instruction of, my
 20 lawyer, I must invoke my Fifth Amendment
 21 privilege.
 22 BY MR. KUVIN:
 23 Q. Ma'am, isn't it true that you rented cars
 24 through Dollar Rent a Car for underage girls, girls
 25 under the age of 18?

1 it in giving my advice, so thank you for
 2 clarifying.
 3 MR. KUVIN: Absolutely.
 4 BY MR. KUVIN:
 5 Q. All right. In Page 11 of Exhibit 4,
 6 there's a reference in the top right-hand corner, a
 7 message to a Mr. Goldsmith. Do you see that?
 8 A. Uh-huh.
 9 Q. Yes?
 10 MR. RHEINHART: You have to say yes or no
 11 on the record.
 12 THE WITNESS: Yes, I see it.
 13 BY MR. KUVIN:
 14 Q. Okay. All right. Do you know who
 15 Mr. Goldsmith is?
 16 MR. RHEINHART: I instruct the witness
 17 not to answer based on her privilege against
 18 self-incrimination.
 19 THE WITNESS: At the advice of counsel, I
 20 must invoke my Fifth Amendment privilege.
 21 BY MR. KUVIN:
 22 Q. Is this your handwriting on exhibit -- on
 23 the messages shown in Exhibit 4, Page 11?
 24 MR. RHEINHART: Same instruction.
 25 THE WITNESS: At the advice of counsel, I

1 MR. RHEINHART: Instruct the witness not
 2 to answer based on the Fifth Amendment
 3 privilege.
 4 THE WITNESS: On the instruction of my
 5 lawyer, I must invoke the Fifth Amendment
 6 privilege.
 7 BY MR. KUVIN:
 8 Q. Did you rent any cars from Dollar Rent a
 9 Car in West Palm Beach in the last five years?
 10 MR. RHEINHART: Same instruction.
 11 THE WITNESS: On the instruction of my
 12 lawyer, I must invoke my Fifth Amendment
 13 privilege.
 14 BY MR. KUVIN:
 15 Q. Let's take a look at Page 11.
 16 MR. RHEINHART: If we can just -- let me
 17 go back, Mr. Kuvin, to clarify the prior two
 18 questions. When you say, "did you rent," did
 19 you mean did she personally pay for the rental,
 20 or was she, in any way, involved in arranging
 21 the rental?
 22 MR. KUVIN: The second part, in any way
 23 involved in arranging for the rental of a
 24 vehicle.
 25 MR. RHEINHART: That's how I interpreted

1 must invoke my Fifth Amendment privilege.
 2 MR. RHEINHART: Hold on a second, Sarah.
 3 MR. KUVIN: Yeah, check.
 4 MR. RHEINHART: Okay. Can you repeat the
 5 question again? Maybe I misheard it,
 6 Mr. Kuvin.
 7 MR. KUVIN: Yeah, not a problem. Let me
 8 lay a little foundation for it.
 9 MR. RHEINHART: That's okay. If you can
 10 just ask the question again. I think I just
 11 misheard what you were asking.
 12 BY MR. KUVIN:
 13 Q. Is this your handwriting shown on the
 14 messages which is Page 11 of Exhibit 4?
 15 A. No.
 16 Q. Okay. Is this handwriting that of
 17 Ms. Sjoberg?
 18 MR. KUVIN: Johanna -- I'm sorry, Sjoberg,
 19 Sjoberg? How do you pronounce it, Sjoberg?
 20 MS. CADWELL: Sjoberg?
 21 MR. KUVIN: I knew somebody would know.
 22 MR. RHEINHART: Did we get a
 23 pronunciation, I'm sorry?
 24 MR. KUVIN: Yes.
 25

1 BY MR. KUVIN:
 2 Q. Is this the handwriting of
 3 Johanna Sjoberg, if you know?
 4 MR. RHEINHART: Hold on. Let me object to
 5 the form in that it presumes she knows what
 6 Ms. Sjoberg's handwriting is like or that she's
 7 ever known Ms. Sjoberg. So before you ask the
 8 question, try to clarify that.
 9 MR. KUVIN: Well, that's what I'm trying
 10 to find out.
 11 BY MR. KUVIN:
 12 Q. Do you recognize this as the handwriting
 13 of Johanna Sjoberg? And it can be a yes or no.
 14 MR. RHEINHART: My, my objection to the
 15 form is that you, you haven't asked her whether
 16 she actually knows who Johanna Sjoberg is, or
 17 whether she would recognize her handwriting if
 18 she saw it.
 19 MR. KUVIN: I would love to ask that
 20 question if she'd answer it.
 21 MR. RHEINHART: Well, if she'll answer,
 22 that's a different question. But I think you
 23 need to ask it first otherwise this question is
 24 ambiguous.
 25 MR. KUVIN: All right.

1 appear to be directed -- well, let me, let me back
 2 up.
 3 Page 11 of Exhibit 4 appears to be a
 4 message dated October 2nd, 2005, from Sarah. Do you
 5 see that top left-hand corner?
 6 A. Yes.
 7 Q. Okay. At 10:40 a.m. My question is: Did
 8 you call and leave a message at 10:40 a.m. on
 9 October 2, 2005, stating: Julia's sick and she
 10 can't come today?
 11 MR. RHEINHART: Instruct the witness not
 12 to answer the question based on her Fifth
 13 Amendment privilege.
 14 THE WITNESS: On the instruction of my
 15 lawyer I must exercise my Fifth Amendment
 16 privilege.
 17 BY MR. KUVIN:
 18 Q. Upside down at the bottom of Page 11 is
 19 another phone message dated 10/1 of 2005. Appears
 20 to be written to someone named Sarah. Do you see
 21 that?
 22 A. Yes.
 23 Q. Okay. Do you --
 24 MR. RHEINHART: Is it written, I'm sorry,
 25 is it written to someone named Sarah or it

1 BY MR. KUVIN:
 2 Q. Not, not to beat a dead horse on the
 3 point, do you know Johanna Sjoberg?
 4 MR. RHEINHART: I instruct the witness not
 5 to answer.
 6 THE WITNESS: On advice of counsel, I must
 7 invoke my Fifth Amendment privilege.
 8 BY MR. KUVIN:
 9 Q. Have you seen Johanna Sjoberg's
 10 handwriting in the past?
 11 MR. RHEINHART: Objection to the form as
 12 previously stated. I'll instruct the witness
 13 not to answer.
 14 THE WITNESS: On advice of counsel, I must
 15 invoke my Fifth Amendment privilege.
 16 BY MR. KUVIN:
 17 Q. Do you recognize Page 11 in Exhibit 4 as
 18 the handwriting of Johanna Sjoberg?
 19 MR. RHEINHART: Objection to the form for
 20 the reasons previously stated many, many times,
 21 and I will instruct her not to answer.
 22 THE WITNESS: At the advice of counsel, I
 23 must invoke my Fifth Amendment privilege.
 24 BY MR. KUVIN:
 25 Q. Did you ever see these messages that

1 appears to be a phone call from a person named
 2 Sarah?
 3 MR. KUVIN: From a person named Sarah.
 4 Thank you.
 5 BY MR. KUVIN:
 6 Q. Did you call someone, anyone on October 1
 7 of 2005 at 9:50 a.m., to confirm two people, one at
 8 11:00 and one at 4:00 p.m.?
 9 MR. RHEINHART: Instruct the witness not
 10 to answer based on her Fifth Amendment
 11 privilege against self-incrimination since this
 12 document was seized from Mr. Epstein's home.
 13 THE WITNESS: At the instruction of my
 14 lawyer, I must invoke my Fifth Amendment
 15 privilege.
 16 BY MR. KUVIN:
 17 Q. Are you the Sarah that's referred to in
 18 these phone messages that we've been looking at?
 19 MR. RHEINHART: Instruct the witness not
 20 to answer.
 21 THE WITNESS: On the instruction of my
 22 lawyer, I must invoke my Fifth Amendment
 23 privilege.
 24 BY MR. KUVIN:
 25 Q. Let's skip Page 12 and go to Page 13 of