

1           Q    Because other law firms have asked very  
2 similar questions and you haven't responded to  
3 any of theirs either. I just want to understand  
4 what the relationship between [REDACTED],  
5 [REDACTED] is to you invoking your Fifth  
6 Amendment rights today, if you can articulate  
7 that for me.

8           MR. [REDACTED]: Form, compound,  
9 argumentative.

10          A    [REDACTED], [REDACTED] has been  
11 described by the U.S. Attorney as a criminal  
12 enterprise and as part of the largest fraud in  
13 Florida's history. It has been reported that  
14 your firm fabricated multiple cases using me, and  
15 against me in order to fleece unsuspecting  
16 investors out of millions of dollars.

17          Q    Another long time friend of yours is  
18 Ghislaine Maxwell, right?

19          A    I intend to respond to all relevant  
20 questions. I would like to answer most of these  
21 questions today, but I can't because my attorneys  
22 have counseled me that I cannot provide answers  
23 to any questions relevant to this lawsuit. I  
24 must accept their advice or risk losing my Sixth  
25 Amendment right to effective representation.

1           Therefore I'll assert my Constitutional  
2 rights under the Fifth, Sixth and Fourteenth  
3 Amendment.

4           THE WITNESS: Excuse me, could we take a  
5 break?

6           MR. [REDACTED] Already?

7           THE WITNESS: Restroom.

8           THE VIDEOGRAPHER: Going off the video  
9 record 11:38 a.m.

10          THE WITNESS: Thank you.

11          (Pause in the proceedings.)

12          THE VIDEOGRAPHER: We're back on the  
13 video record at 11:48 a.m.

14          Q How did you meet Ghislaine Maxwell?

15          A I intend to respond to all relevant  
16 questions to this lawsuit; however, at the  
17 present time my attorneys have counseled me that  
18 I cannot provide answers to any questions  
19 relevant to this lawsuit, and must accept this  
20 advice or risk losing effective -- my right to  
21 effective representation. Accordingly,  
22 therefore, I assert my Fifth, Sixth and  
23 Fourteenth Amendment rights to the U.S.  
24 Constitution.

25          Q You would agree, would you not, that

1 Ghislaine Maxwell shares your sexual obsession  
2 for underage minor females?

3 MR. [REDACTED] Argumentative, speculation,  
4 harassing.

5 A You know, Mr. [REDACTED] the current U.S.  
6 Attorney has described your law firm as a  
7 criminal enterprise, and as taking part in one of  
8 the largest frauds in Florida's history. It has  
9 been widely reported that your firm fabricated  
10 multiple cases of a sexual nature against  
11 people -- other people and me, in order to fleece  
12 unsuspecting investors out of millions of  
13 dollars, so unfortunately at this time in  
14 response to your questions, my attorneys have  
15 advised me I must assert my Sixth Amendment,  
16 Fifth Amendment and Fourteenth Amendment rights,  
17 though I believe, as you know, I would really  
18 like to answer these questions, but at this  
19 moment, although at this time I have to assert  
20 those rights or risk losing effective counsel.

21 Q Do you know [REDACTED]?

22 A I intend to respond to all relevant  
23 questions regarding this lawsuit; however, at the  
24 present time my counsel has advised me that I  
25 cannot provide answers to any questions relevant

1 to this lawsuit. Your firm has been described as  
2 a criminal enterprise, and is part of the largest  
3 fraud in Florida's history fabricating sexual  
4 cases against me and others. Therefore,  
5 unfortunately, although I would like to answer  
6 all of your questions today, I'm going to have to  
7 assert my Fifth, Sixth and Fourteenth Amendment  
8 right.

9 Q Did you and Ghislaine Maxwell sexually  
10 assault [REDACTED] at Leslie Wexler's house?

11 A I intend to respond to all relevant  
12 questions regarding this lawsuit; however, at the  
13 present time my attorneys have counseled me I  
14 cannot provide answers to any questions relevant  
15 to this lawsuit and must accept this right or  
16 risk losing my Sixth Amendment rights to  
17 effective presentation. Accordingly, I assert my  
18 Constitutional rights as guaranteed by the Fifth,  
19 Sixth and Fourteenth amendments to the U.S.  
20 Constitution.

21 Q Stating Ghislaine Maxwell and you had  
22 devised several schemes to lure underage girls to  
23 you for sex; isn't that correct?

24 MR. [REDACTED] Form, argumentative,  
25 harassing?

1           A   Mr. ████████ your firm has fabricated  
2 multiple cases of sexual harassment claims and  
3 other types of sexual cases against me and others  
4 in order to be part of what the U.S. Attorney has  
5 described as the largest fraud, the largest fraud  
6 in Florida's history. I would like to answer all  
7 your questions; however, my attorneys have  
8 counseled me that at least today, I must assert  
9 my Fifth, Sixth and Fourteenth Amendment rights  
10 under the U.S. Constitution.

11           Q   Do you own a home in Manhattan?

12           A   I intend to respond to all relevant  
13 questions to this lawsuit; however, at the  
14 present time my attorneys have counseled me that  
15 I cannot provide answers to any questions  
16 relevant to this lawsuit, and I must accept their  
17 advice or risk losing my Sixth Amendment right to  
18 effective representation.

19                   Accordingly, therefore, I have to assert  
20 my Fifth, Sixth and Fourteenth Amendment right  
21 under the U.S. Constitution.

22           Q   Do you own an island in the U.S. Virgin  
23 Islands?

24           A   I intend to respond to all relevant  
25 questions regarding this lawsuit; however, at the

1 present time my attorneys have counseled me that  
2 I cannot provide answers to any questions  
3 relevant to this lawsuit, no matter how much I  
4 would like to.

5 Therefore, I must accept their advice or  
6 risk losing my Sixth Amendment right to effective  
7 representation; therefore, I have to assert my  
8 Fifth, Sixth and Fourteenth Amendment right under  
9 the U.S. Constitution.

10 Q Do you own a home in New Mexico?

11 A I intend to respond to all relevant  
12 questions regarding this lawsuit and as I've had  
13 to do with most of your questions here today, I'm  
14 going to have to take my attorneys' advice and  
15 assert my Fifth, Sixth and Fourteenth Amendment  
16 right under the U.S. Constitution or risk losing  
17 effective representation.

18 Q Is it true that you have had underage  
19 females, at each of those homes, for orgies with  
20 you and Ghislaine Maxwell?

21 MR. [REDACTED]: Form, argumentative,  
22 speculation and harassing.

23 A I would like to answer that question. I  
24 really would. However, as your firm has been  
25 described by the U.S. Attorney as a criminal

1     enterprise, which its principal purpose was  
2     racketeering conspiracy to generate money for the  
3     firm and its co-conspirators through the  
4     operation of enterprise and through various  
5     activities including mail fraud, wire fraud and  
6     money laundering, and fabricating multiple sex  
7     cases against me and others, though I would like  
8     to answer your question today, Mr. [REDACTED] my  
9     counsel has advised me I must take the Fifth,  
10    Sixth and Fourteenth Amendment right provided by  
11    the U.S. Constitution.

12           Q    Do you know somebody named [REDACTED]  
13    (phonetic)?

14           MR. [REDACTED]: Can you spell that, for the  
15    record?

16           MR. [REDACTED] No.

17           MR. [REDACTED]: Or for the court reporter?

18           A    No.

19           Q    You don't know the name?

20           A    No. Could you spell it?

21           Q    (Witness shrugs.)

22           A    Okay.

23           Q    Did your sexual obsession with underage  
24    minor females grow at some point in time to allow  
25    you access to these underage minors every single

1 day for sex?

2 MR. [REDACTED]: Overbroad. Speculation,  
3 argumentative, compound, harassing and  
4 confusing as well; as worded. Do you want  
5 to break it down, Mr. [REDACTED]

6 Q Isn't it true that for the past ten  
7 years you have found a way to engage in sexual  
8 conduct with underage minors on an every day  
9 basis?

10 MR. [REDACTED]: Speculation. Argumentative.

11 A As your firm has been described as a  
12 criminal enterprise by the United States Attorney  
13 and is part of the scheme to defraud people in  
14 South Florida of millions of dollars, you have  
15 fabricated sexual cases and sexual claims against  
16 people like me and others. Unfortunately at this  
17 time although I would like to answer your  
18 questions, Mr. [REDACTED] my counsel has advised me  
19 I cannot. They have advised me I must assert my  
20 Fifth, Sixth and Fourteenth Amendment rights  
21 under the U.S. Constitution.

22 Q Isn't it true that you have promised  
23 underage minors money or other benefits to engage  
24 in sexual conduct with you over the past ten  
25 years?

1           A    Again, as I've answered many of your  
2           questions today, and unfortunately will probably  
3           end up not answering most of your questions  
4           today, as your firm has been described, the firm  
5           bringing this lawsuit, I believe, if I'm wrong  
6           please, correct me --

7           Q    You're wrong.

8           A    This is the firm that didn't notice this  
9           deposition?

10          Q    Did not?

11          A    Did not?

12          Q    No.

13          A    I apologize.  Though your former firm  
14          has been described, and the person you represent,  
15          ██████, in this case was represented by the firm  
16          that was described by the U.S. Attorney as  
17          perpetrating one of the largest frauds in South  
18          Florida's history, fabricating multiple sexual  
19          cases against me and others in order to fleece  
20          unsuspecting investors out of millions and  
21          millions of dollars, so though unfortunately, I  
22          would like to answer each one of your questions  
23          today, my counsel has advised me I must assert my  
24          Sixth Amendment, Fourteenth Amendment and Fifth  
25          Amendment right, though I believe you know, I

1 would like to answer those questions, though at  
2 this moment I must assert those rights or risk  
3 losing my attorneys.

4 Q Sure, let's test that answer.

5 A Okay.

6 Q Let's talk about Jane Doe 102, Jane Doe  
7 102, [REDACTED], who was represented by [REDACTED]

8 [REDACTED] firm, had nothing to do with

9 [REDACTED] Do you know [REDACTED]?

10 A Who?

11 Q [REDACTED]

12 A Can you spell it?

13 Q Common spelling, [REDACTED] like the

14 State --

15 A Can you spell it for me, please?

16 Q [REDACTED]

17 A What's the last name, how is it

18 spelled?

19 Q [REDACTED], I believe.

20 A I intend to respond to all relevant  
21 questions regarding this lawsuit; however, at the  
22 present time my attorneys have counseled me that  
23 I cannot provide answers to any questions that  
24 may be relevant to this lawsuit and I must accept  
25 this advice or risk losing my Sixth Amendment

1 right to effective representation. Accordingly,  
2 I assert my Constitutional rights as guaranteed  
3 by the Fifth, Sixth and Fourteenth Amendment to  
4 the Constitution.

5 Q Just for the record, I can only spell it  
6 the way it was spelled in your flight logs from  
7 your airplane. I don't know exactly how she  
8 spells her name, only how your pilot would spell  
9 her name.

10 MR. [REDACTED] Form, speculating.

11 Q If I misspell it --

12 MR. [REDACTED] Form, speculation,  
13 argumentative, harassing.

14 MR. [REDACTED] That's harassing?

15 MR. [REDACTED] It assumes facts currently  
16 not in evidence in this particular  
17 deposition; therefore, I move to strike.

18 MR. [REDACTED] I was responding to his  
19 question asking me how to spell her name. I  
20 don't know how other than his own pilot.

21 MR. [REDACTED] Mr. [REDACTED] he asked you to  
22 spell the name, you then spelled the name,  
23 then went on with another narrative and  
24 there wasn't a question posed, on the floor.

25 Q You would agree you interacted with [REDACTED]

1 every day in a sexual way, when she was 15 years  
2 old, right?

3 A Again, I'm sorry?

4 Q Sure. You would agree that you  
5 interacted with [REDACTED] sexually on an every day  
6 basis when she was 15 years old?

7 A You know, again, Mr. [REDACTED] I would  
8 like to answer all your questions here today. My  
9 attorneys have asked me -- advised me that I must  
10 assert my Sixth Amendment, Fourteenth Amendment  
11 and Fifth Amendment rights provided by the U.S.  
12 Constitution and the fact that the current U.S.  
13 Attorney has described your law firm as a  
14 criminal enterprise, is one of the largest frauds  
15 in Florida's history for fabricating sexual --  
16 cases of a sexual nature against me and others.  
17 Unfortunately, although I would like to answer  
18 those questions, if I do I risk losing my  
19 attorneys' counsel. Therefore, I must assert my  
20 right.

21 MR. [REDACTED] Madam court reporter, I'll  
22 attach as an exhibit, the Jane Doe number  
23 102 versus Jeffrey Epstein complaint, at  
24 some point in time. It will be Exhibit 1,  
25 as I'm going to go through some of the facts

1 as alleged in the complaint and as will be  
2 testified to by the plaintiff.

3 (Jane Doe number 102 versus Jeffrey  
4 Epstein complaint was deemed marked as  
5 Exhibit number 1 for identification, as of  
6 this date.)

7 MR. [REDACTED] Counsel, do you have an extra  
8 copy of that for me?

9 MR. [REDACTED] No.

10 MR. [REDACTED]: May I look at it real quick?

11 MR. [REDACTED] No. It has my notes on  
12 it.

13 MR. [REDACTED] I understood, I saw the  
14 highlights.

15 MR. [REDACTED] The notes are highlighted  
16 so when we copy it, it will not show up.

17 MR. [REDACTED] Just for the record, that's a  
18 current, operative pleading, correct?

19 MR. [REDACTED] Correct.

20 THE WITNESS: What does that mean?

21 MR. [REDACTED]: There may have been some  
22 amendments to a complaint and I want to make  
23 sure that's the operative complaint at issue  
24 that he is speaking of today.

25 THE WITNESS: Can I go off the record

1 for a second?

2 May I ask you a question?

3 MR. [REDACTED] Sure. Can we take a break

4 for a second?

5 MR. [REDACTED] Again?

6 THE WITNESS: Just a question.

7 MR. [REDACTED] He wants to speak with me for

8 a second.

9 THE VIDEOGRAPHER: Off the video record

10 12:01 p.m.

11 (Pause in the proceedings.)

12 THE VIDEOGRAPHER: We are back on the

13 video record at 12:02 p.m.

14 Q Is it true, Mr. Epstein, that you and

15 Ghislaine Maxwell forced [REDACTED] to have sex with

16 you on a daily basis?

17 MR. [REDACTED]: Form, argumentative,

18 harassing.

19 A Unfortunately at this time, though I

20 would really like to answer those questions, and

21 like I have done for most of your questions here

22 today, Mr. [REDACTED] your firm was described as a

23 criminal enterprise, a serious criminal

24 enterprise by the current U.S. Attorney. Part of

25 that criminal enterprise was fabricating cases of

1 a sexual nature against me and others in order to  
2 fleece unsuspecting investors out of millions of  
3 dollars. Though, unfortunately at this time no  
4 matter how I would like to respond to your  
5 questions, I must assert my Sixth Amendment,  
6 Fifth Amendment and Fourteenth Amendment rights  
7 under the U.S. Constitution or risk having my  
8 attorneys resign.

9 Q Isn't it true that [REDACTED] was yours and  
10 Ghislaine Maxwell's sex slave from the time she  
11 was 15 through the time she escaped when she was  
12 19?

13 MR. [REDACTED] Again objection,  
14 argumentative, harassing.

15 A Mr. [REDACTED] your firm has been  
16 described as -- excuse me, as a criminal  
17 enterprise by the current U.S. Attorney and part  
18 of the largest fraud in Florida's history. Part  
19 of that fraud was fabricating multiple cases  
20 against people like me and others, of a sexual  
21 nature, in order to fleece unsuspecting investors  
22 out of millions and millions of dollars, so  
23 though I would like to answer that question, my  
24 attorneys have told me today I must assert my  
25 Sixth Amendment, Fourteenth Amendment and Fifth

1 Amendment right.

2 Q Isn't it true that you and Ghislaine  
3 Maxwell celebrated her 16th birthday with her and  
4 had sex with her on that day?

5 MR. [REDACTED]: Form. Compound, confusing,  
6 argumentative, harassing.

7 A Mr. [REDACTED] I would like to answer that  
8 question. My attorneys have told me today, I  
9 have to at least today assert my Fifth Amendment,  
10 Sixth Amendment and Fourteenth Amendment rights  
11 to the U.S. Constitution, especially my concern  
12 is, that your firm has filed fraudulent lawsuits,  
13 fabricated lawsuits, and the U.S. Attorney, the  
14 current U.S. Attorney has described your firm as  
15 a criminal enterprise that -- whose main purpose  
16 was to generate money for the firm and its  
17 co-conspirators through the operation of various  
18 criminal activities, including mail fraud, wire  
19 fraud and money laundering.

20 Q Are you saying that the complaint of  
21 [REDACTED] against you, the allegation in that  
22 complaint, are false?

23 MR. [REDACTED] Form. Misinterprets the  
24 witness's testimony.

25 Q Or saying it is true?

1 MR. [REDACTED] Same objection.

2 Q It is either true or false?

3 A I'll repeat myself, unfortunately, but  
4 the current U.S. Attorney has described your law  
5 firm that filed that filed [REDACTED]'s claim -- was  
6 involved in the filing of [REDACTED]'s claim,  
7 motions -- I'm sorry, do you want to tell me what  
8 it was then? Would you like to tell me the  
9 firm's involvement in this lawsuit, since we will  
10 be here the rest of the day?

11 Q Answer the question.

12 A All right.

13 The U.S. Attorney has described that  
14 firm as a criminal enterprise perpetrating one of  
15 the largest frauds in Florida's history against  
16 unsuspecting investors, fleecing them out of  
17 millions of dollars by creating, crafting and  
18 fabricating fellacious (sic) sexual claims  
19 against people like me and others, so  
20 unfortunately, though I would like to answer your  
21 questions, Mr. [REDACTED] my counsel has advised me  
22 that at least today I must assert my Sixth  
23 Amendment, Fifth Amendment and Fourteenth  
24 Amendment rights under the U.S. Constitution.

25 Q Isn't it true, sir, and I'm reading from

1 the complaint filed by [REDACTED] against you, isn't it  
2 true, sir, that a friend of yours sent you three,  
3 12-year old females for you to sexually abuse on  
4 one of your birthdays?

5 MR. [REDACTED] Form, argumentative,  
6 harassing, and irrelevant to this lawsuit.

7 THE WITNESS: Excuse me.

8 A You're saying it is part of the  
9 lawsuit?

10 Q Yes, I'll read it.

11 "On one of the defendant Epstein's  
12 birthdays, a friend of defendant Epstein sent him  
13 three, 12-year old girls from France who spoke no  
14 English for defendant to sexually exploit and  
15 abuse? After doing so they were sent back to  
16 France the next day."

17 Isn't that true?

18 MR. [REDACTED]: Once again, move to strike,  
19 irrelevant, argumentative, harassing, and  
20 for the record, the exhibit that's being  
21 read from is a complaint that's unrelated to  
22 the instant matter and not filed or  
23 incorporated by the current plaintiff, [REDACTED],  
24 in this matter.

25 A I would like to answer that question, I

1 really would; however, today my attorneys have  
2 told me I have to assert my Fifth Amendment,  
3 Sixth Amendment and Fourteenth Amendment rights  
4 of the U.S. Constitution, especially because your  
5 firm involved in this lawsuit has fabricated,  
6 widely reported, multiple cases of sexual  
7 harassment cases against individuals like me and  
8 others, perpetrating what the U.S. Attorney  
9 called one of the largest frauds in Florida's  
10 history, fleecing people out of millions of  
11 dollars, so though I would like to answer that  
12 question, today I have to assert those rights or  
13 risk losing my attorneys' counsel.

14 Q Isn't it true that you forced [REDACTED] as a  
15 15-year old girl to have sex with numerous  
16 friends of yours?

17 A Are you kidding?

18 Q Reading from a lawsuit.

19 A Sorry, Mr. [REDACTED] Though I would like  
20 to answer that question as well, as I've answered  
21 most of your other questions here today, I would  
22 like to respond; however, my attorneys here today  
23 have advised me I have to assert my Fifth  
24 Amendment, Sixth Amendment and Fourteenth  
25 Amendment rights under the U.S. Constitution,

1 especially as your firm has been accused by the  
2 U.S. Attorney as being a criminal enterprise, and  
3 part of the largest fraud in Florida's history.  
4 Basically -- sorry, if I didn't read correctly,  
5 um... the operation of the enterprise through  
6 various criminal activities including mail fraud,  
7 wire fraud and money laundering, fabricating  
8 sexual harassment cases against people like me  
9 and others.

10 Q By the way --

11 A Yes, sir?

12 Q -- didn't [REDACTED] receive a round trip  
13 ticket paid for by you to Thailand, and she  
14 ultimately did not get back on the plane but  
15 instead escaped to Australia?

16 A I would like to answer that question,  
17 but today I would have to assert my Sixth  
18 Amendment rights, my Fifth Amendment rights and  
19 my Fourteenth Amendment rights under the U.S.  
20 Constitution, especially since your firm has been  
21 described as perpetrating one of the largest  
22 frauds in Florida's history, fleecing investors  
23 out of millions of dollars, being described by  
24 the U.S. Attorney of South Florida, as a criminal  
25 enterprise engaged in various criminal activities

1 including mail fraud, wire fraud and money  
2 laundering.

3 Q Do you know a man named Jean Luc  
4 Brunel?

5 A Can you spell it?

6 Q He was at your house last week, does  
7 that remind you?

8 MR. [REDACTED]: Form, move to strike,  
9 speculation, argumentative, harassing.

10 Is there a question on the table, Mr.

11

[REDACTED]

12 MR. [REDACTED] Yes.

13 Q Do you know him?

14 A Can you spell his name for me, please?

15 Q I don't need to spell his name. Do you  
16 know who I'm talking about, Mr. Brunel?

17 A Sorry, Mr. what?

18 Q B-r-u-n-e-l.

19 A I would like to answer that question as  
20 well, but my attorneys have counseled me today I  
21 have to assert my Sixth Amendment rights, Fifth  
22 Amendment rights and Fourteenth Amendment rights  
23 under the U.S. Constitution or risk losing my  
24 right to effective representation.

25 Q What's the purpose for you asking me to

1 spell his name? Are you acting like you don't  
2 know him?

3 MR. [REDACTED]: Form, move to strike,  
4 argumentative and irrelevant as worded.

5 Mr. [REDACTED] you know that there are  
6 various standing orders, if not in this  
7 case, in various other cases, that  
8 specifically describe the protections of the  
9 Fifth Amendment. Federal Courts have  
10 ordered that certain questions that you are  
11 asking shall not be answered or Mr. Epstein  
12 would risk losing his Fifth Amendment  
13 right --

14 MR. [REDACTED] I understand that. He is  
15 asking to spell people's names.

16 MR. [REDACTED]: -- under the United States  
17 Constitution. A lot of these questions here  
18 today that you're asking have already been  
19 ruled on by various Courts, that the Fifth  
20 Amendment protects any response thereto, so  
21 I would like -- I'm giving you some leeway  
22 here with regard to the argumentative  
23 questions. We've already -- and I'm not  
24 obviously testifying for the witness, but  
25 we've already handled a lot of these issues

1 in court and we have already adjourned one  
2 deposition for being argumentative, and I  
3 think you understand what the Court said  
4 there, so having said that, and I understand  
5 that you have a job to do, but having said  
6 that, I would like to caution you  
7 professionally, if you continue with the  
8 argumentative questions, I am going to have  
9 to terminate this deposition --

10 MR. [REDACTED] I completely understand.

11 MR. [REDACTED] Okay. We are here today  
12 to --

13 MR. [REDACTED] Mr. Brunel --

14 MR. [REDACTED]: I want the Court to know we  
15 are here today to allow you to ask your  
16 questions, but the harassing and  
17 argumentative tone is not going to be  
18 tolerated.

19 MR. [REDACTED] We have a video. We can  
20 show the Court the tone. It is obviously  
21 not harassing.

22 MR. [REDACTED]: That's fine.

23 Q Mr. Brunel is a long-term friend of  
24 yours, right?

25 A I intend to respond to all relevant

1 questions of this lawsuit; however, today my  
2 attorneys have counseled me I cannot provide  
3 answers to any questions that may be relevant to  
4 this lawsuit and I must accept their advice or  
5 risk losing my Sixth Amendment right to effective  
6 representation.

7 Q You know him as somebody who has been  
8 caught engaging in sex with underage minors in  
9 the past; is that correct?

10 MR. [REDACTED]: Form.

11 A You will have to repeat the question,  
12 I'm sorry.

13 Q You know Mr. Brunel as somebody who has  
14 been caught engaging in sex with minors in the  
15 past; is that correct?

16 MR. [REDACTED]: Form.

17 A I intend to respond to all relevant  
18 questions regarding this lawsuit; however, at the  
19 present time my attorneys have counseled me that  
20 I cannot provide answers to any questions  
21 relevant to this lawsuit, and I must accept their  
22 advice or risk losing my Sixth Amendment right to  
23 effective representation as your firm has been  
24 described by the U.S. Attorney as a criminal  
25 enterprise and part of one of the largest frauds

1 in Florida's history specifically said you have  
2 been fabricating -- the law firm has been  
3 fabricating multiple cases of a sexual nature in  
4 order to fleece unsuspecting investors out of  
5 millions of dollars, including mail fraud, wire  
6 fraud and money laundering, so unfortunately,  
7 though I would like to answer all your questions  
8 here today, I must assert my Sixth Amendment,  
9 Fourteenth Amendment and Fifth Amendment right.

10 Q You were involved in a modeling business  
11 with him called M.C. Squared; is that correct?

12 A Again?

13 Q You were involved in a modeling agency  
14 with --

15 A What do you mean --

16 Q -- with Mr. Brunel called M.C. Squared?

17 A "Involved" means what, what do you  
18 mean?

19 Q You tell the jury your involvement with  
20 the modeling agency. You can clarify for me,  
21 I'll let you do that.

22 MR. [REDACTED]: Object to the form.

23 A I intend to respond to all relevant  
24 questions regarding this lawsuit. However, at  
25 the present time my attorneys have counseled me

1 that I cannot provide answers to any questions  
2 relevant to this lawsuit and I must accept their  
3 advice or risk losing my Fifth, Sixth and  
4 Fourteenth Amendment rights under the U.S.  
5 Constitution.

6 Q When you were being criminally  
7 investigated and [REDACTED] was in Australia, is it  
8 true that you made a personal telephone call to  
9 her telling her not to come forward with any of  
10 the information she knew?

11 MR. [REDACTED]: Form.

12 A Again?

13 Q Putting a time frame on it, the time  
14 frame where you were being criminally  
15 investigated --

16 A What time frame is that?

17 Q In her complaint it is not specific,  
18 but, let's just make it whenever. At some point  
19 in time did you place a telephone call to [REDACTED] in  
20 Australia warning her not to come forward with  
21 any information about you engaging in sex with  
22 her while she was a minor?

23 MR. [REDACTED]: Form.

24 A I intend to respond to all relevant  
25 questions regarding this lawsuit; however, at the

1 present time my attorneys have counseled me that  
2 I cannot provide answers to any questions  
3 relevant to this lawsuit and I must accept their  
4 advice or risk losing my Sixth Amendment right to  
5 effective representation.

6 Q With respect to underage females, isn't  
7 it true that you have made the statement, in  
8 quotes, "the younger the better"?

9 MR. [REDACTED]: Form.

10 A Again, as your firm has been described  
11 by the current U.S. Attorney as a criminal  
12 enterprise involved in mail fraud, wire fraud,  
13 money laundering, and specifically crafting,  
14 fabricating multiple cases of sexual -- of a  
15 sexual nature against people like me, and others,  
16 in order to fleece many, many unsuspecting  
17 investors out of millions of dollars; I would  
18 like to answer your questions here today, Mr.  
19 [REDACTED] but unfortunately, my attorneys have  
20 counseled me that I must assert my Fifth, Sixth  
21 and Fourteenth Amendment right or they will  
22 resign.

23 Q Who are your current employees?

24 MR. [REDACTED]: Form.

25 A Say that again.

1           Q   Who are your current employees, people  
2 who work for you, that you pay?

3           A   I intend to respond to all relevant  
4 questions regarding this lawsuit; however, at the  
5 present time my attorneys have counseled me that  
6 I cannot provide answers to any questions that  
7 may be relevant to this lawsuit, or risk losing  
8 my Sixth Amendment right to effective  
9 representation. Accordingly, therefore, I must  
10 assert my Sixth Amendment, Sixth Amendment and  
11 Fourteenth Amendment rights as provided by the  
12 U.S. Constitution.

13          Q   Isn't it true you pay your employees to  
14 bring you underage minor females for sex?

15               MR. [REDACTED]: Form, argumentative,  
16 speculation, harassing.

17          A   Mr. [REDACTED] your firm has been  
18 described the current U.S. Attorney as a criminal  
19 enterprise, a criminal enterprise, part of the  
20 largest fraud in South Florida's history; but  
21 part of that fraud was fabricating, um,  
22 fictitious cases against me -- excuse me, against  
23 people like me, of a sexual nature, in order to  
24 fleece unsuspecting investors out of millions of  
25 dollars.

1           Unfortunately at this time, though, I  
2 would like to answer every one of your  
3 questions. My attorney has advised me I must  
4 assert my Sixth Amendment, Fourteenth Amendment  
5 and Fifth Amendment rights or risk losing them as  
6 my attorneys.

7           Q   Isn't it true when underage females were  
8 brought to you, you would engage in sex with them  
9 and pay them?

10           MR. [REDACTED]: Form, argumentative,  
11 harassing.

12           A   (Witness shakes head.)

13           Q   Are you shaking your head to say "no" --

14           A   Excuse me.

15           Q   Are you shaking your head to say "no, I  
16 don't know how to interpret that answer?"

17           A   I didn't realize I was shaking my head.

18           MR. [REDACTED] I thought he was actually  
19 answering a question.

20           MR. [REDACTED]: We'll just strike. The rules  
21 are well-known to every lawyer who practices  
22 in the State of Florida, that it is clear  
23 that a nod of the head or shake of the head  
24 is not understood by the record, so  
25 therefore Mr. Epstein was clearly not

1           responding to one of your questions and you  
2           know that, Mr. [REDACTED]

3           MR. [REDACTED]    This is on the video.

4           MR. [REDACTED]:  Nonetheless you know the  
5           rules.  Nonetheless.  If we have a question  
6           on the table, would you please repeat it so  
7           I can recall it and Mr. Epstein can endeavor  
8           to answer it.

9           MR. [REDACTED]    Sure, and if it was only  
10          the court reporter, I would agree, but the  
11          jury is going to see a video and everybody  
12          knows commonly, if somebody shakes their  
13          head, they are saying "no," and if that was  
14          the answer, I wanted to give him a chance to  
15          elaborate on it, that's it.

16          Q    Isn't it true that when underage females  
17          would come to your house, you would engage in  
18          sexual activity with them and then pay them?

19          MR. [REDACTED]:  Same objections.

20          A    Unfortunately I would like to answer  
21          that question today, but my attorneys have  
22          counseled me that I must assert my Sixth  
23          Amendment right, my Fifth Amendment right and my  
24          Fourteenth Amendment right under the U.S.  
25          Constitution.

1           The fact that your firm has been  
2 described as a criminal enterprise and part of  
3 one of the largest frauds in Florida's -- South  
4 Florida's history, part of that fraud has been  
5 described as fabricating cases of sexual nature  
6 against me and others in order to fleece  
7 unsuspecting investors out of millions of  
8 dollars. I would like to answer that question,  
9 Mr. [REDACTED] however, today, I must assert my  
10 Fifth, Sixth and Fourteenth Amendment right.

11           Q In addition to paying these underage  
12 females for sexual activity, you also paid them  
13 to bring their underage friends to you, to also  
14 engage in sexual activity with them?

15           MR. [REDACTED]: Form.

16           Q Is that correct?

17           A I intend to respond to all relevant  
18 questions regarding this lawsuit; however, at the  
19 present time my attorneys have counseled me that  
20 I may not, and I must assert -- they have advised  
21 me I must assert my Sixth Amendment right, my  
22 Fifth Amendment right and my Fourteenth Amendment  
23 rights under the U.S. Constitution.

24           Q You would pay underage females 200 to  
25 \$300 for engaging in sexual activity with you or

1 for procuring another underage female to engage  
2 in sexual activity with you; is that correct?

3 MR. [REDACTED]: Form, move to strike.

4 Assumes facts not in evidence and calls for  
5 a legal conclusion as well, argumentative.

6 A I intend to respond to all relevant  
7 questions regarding this lawsuit; however, at the  
8 present time my attorneys have counseled me that  
9 I cannot provide answers to any questions that  
10 may be relevant to this lawsuit, and I must  
11 accept their advice or risk losing my Sixth  
12 Amendment right to effective representation.

13 Accordingly, therefore, I must assert my  
14 constitutional rights as guaranteed by the Fifth,  
15 Sixth and Fourteenth Amendment to the U.S.  
16 Constitution.

17 Q Would you agree that your scheme was  
18 devised to coerce these underage minors to bring  
19 you as many other underage minors, as were  
20 available for you to engage in sexual activity  
21 with?

22 MR. [REDACTED]: Form.

23 A Can you repeat the question?

24 Q Yes. Would you agree that your scheme  
25 was devised to coerce underage girls into

1 bringing as many other underage girls to you, as  
2 were available for sexual purposes?

3 MR. [REDACTED]: Form.

4 A Did you say "for sexual purposes"?

5 Q Yes, for sexual purposes.

6 A I'm not surprised. Since your firm was  
7 described as perpetrating one of the largest  
8 frauds in Florida's history by crafting,  
9 fabricated sexual harassment cases against people  
10 like me and others in order to fleece  
11 unsuspecting investors out of millions of  
12 dollars, I would like to answer that question.  
13 However, today my attorneys have advised me I  
14 must assert my Sixth Amendment, Fifth Amendment  
15 and Fourteenth Amendment right under the U.S.  
16 Constitution, and if I don't do so, I risk  
17 losing -- uh... losing effective representation.

18 Q Utilizing this method of using underage  
19 minors to bring you other underage minors, you  
20 were able to engage in sex with hundreds of  
21 underage minor females. Is that true?

22 MR. [REDACTED]: Form, argumentative,  
23 harassing and calls for speculation.

24 A Since, Mr. [REDACTED] your firm has been  
25 described as a criminal enterprise by the U.S.

1 Attorney, and as part of the largest fraud in  
2 South Florida's history, and as part of the fraud  
3 fabricating malicious cases of sexual harassment  
4 and other cases of sexual nature against people  
5 like me and others, although I would like to  
6 answer that question today, my attorneys have  
7 advised me I must assert my Sixth Amendment,  
8 Fourteenth Amendment and Fifth Amendment rights  
9 of the U.S. Constitution. Although I believe you  
10 know I would really like to answer your  
11 questions, but at this moment if I don't assert  
12 those rights, I risk having my attorneys resign.

13 Q Isn't it true with this method you were  
14 able to interact sexually with underage girls  
15 every single day?

16 MR. [REDACTED]: Form, asked and answered.  
17 Same objections.

18 Q Go ahead.

19 A Oh, I'm sorry. Can you repeat it?

20 Q Sure. With this method of --

21 A "This method" being what, sorry?

22 Q Your method of using underage minors to  
23 bring you other underage minors for sex; isn't it  
24 true that that method resulted in you engaging in  
25 sexual activity with underage minors on an every

1 day basis?

2 MR. [REDACTED]: Same objections.

3 A Your firm has been described by the  
4 current U.S. Attorney as a criminal enterprise  
5 engaged in one of the largest frauds in South  
6 Florida's history, and as part of that fraud,  
7 creating, fabricating, malicious cases of sexual  
8 nature against people like me and others, so  
9 unfortunately, though I would like to answer that  
10 question today, I must assert my Sixth Amendment,  
11 Fourteenth Amendment and Fifth Amendment rights  
12 to my counsel's advisement to do, although I  
13 believe you know I would really like to answer  
14 those questions today, I must assert those rights  
15 or risk losing my attorney's representation.

16 Q To keep track of all these underage  
17 minors, you stored their names and telephone  
18 numbers in your home computer; isn't that  
19 correct?

20 MR. [REDACTED]: Form, argumentative,  
21 speculation.

22 A Again? Sorry.

23 Q Are you going to answer the question or  
24 just read? If you are going to answer the  
25 question, of course, I'll keep reading it as many

1 times.

2 A Excuse me?

3 MR. [REDACTED]: The witness is attempting to  
4 answer your question. He asked you to  
5 repeat the question.

6 MR. [REDACTED] He is?

7 MR. [REDACTED] He asked you to repeat the  
8 question.

9 MR. [REDACTED] I don't mind going through  
10 that, Mike, because I do want answers, but  
11 if I'm going to repeat the question multiple  
12 times and get the same answer, we are  
13 wasting time. I want to stop us wasting  
14 time repeating questions if I'm getting the  
15 same nonresponsive answer.

16 MR. [REDACTED]: I understand your intention  
17 here.

18 MR. [REDACTED] Yeah.

19 MR. [REDACTED]: -- however, these questions  
20 are similar in nature, if not identical to  
21 various questions that you've asked in other  
22 indications, so you coming here today is of  
23 no surprise that Mr. Epstein is required to  
24 invoke his Fifth, Sixth and Fourteenth  
25 Amendment rights under the United States

1 Constitution --

2 MR. [REDACTED] I understand that.

3 MR. [REDACTED]: -- if you came here today  
4 thinking you were going to pull a rabbit out  
5 of a habit, and Mr. Epstein was going to  
6 waive his Fifth, Sixth and Fourteenth  
7 Amendment rights to the U.S. Constitution,  
8 at least not today. That will not be  
9 occurring.

10 Q Isn't it true that to keep track of the  
11 names and phone numbers of these underage minor  
12 females, to interact with sexually, you stored  
13 those names and phone numbers in your home  
14 computer?

15 A Thank you. I've heard the question  
16 now. It didn't surprise -- again, I've now heard  
17 the question and the fact that your firm has been  
18 described as a criminal enterprise by the current  
19 U.S. Attorney in South Florida, and part of one  
20 of the largest frauds in Florida's history, it is  
21 reported that your firm fabricated malicious  
22 cases of a sexual nature against people and  
23 against me, in order to fleece unsuspecting  
24 investors out of millions of dollars.

25 Unfortunately, though I would like to

1 answer each one of your questions today, Mr.  
2 [REDACTED] my attorneys have advised me that I must  
3 assert my Sixth Amendment, Fifth Amendment and  
4 Fourteenth Amendment rights under the U.S.  
5 Constitution. So although I would like to  
6 answer, I must assert those rights or risk having  
7 my attorneys resign.

8 Q Do you know [REDACTED] [REDACTED]?

9 A I intend to respond to all relevant  
10 questions regarding this lawsuit; however, at the  
11 present time my attorneys have counseled me that  
12 I cannot provide answers to any questions  
13 relevant to this lawsuit and must accept their  
14 advice or risk losing my Sixth Amendment right to  
15 effective representation.

16 Q Isn't it true you employed [REDACTED] [REDACTED]  
17 to contact underage minor females and make them  
18 appointments to be at your house?

19 A Sorry, again?

20 Q Isn't it true you employed [REDACTED] [REDACTED]  
21 for the purposes of contacting underage minor  
22 females and scheduling them appointments to be at  
23 your house?

24 A The current U.S. Attorney has described  
25 your law firm, Mr. [REDACTED] as a criminal

1 enterprise engaged in one of the largest frauds  
2 in South Florida's history. It has been reported  
3 that your firm fabricated multiple cases of a  
4 sexual nature against me and others, in order to  
5 fleece unsuspecting investors out of millions and  
6 millions of dollars, so, though unfortunately I  
7 would like to answer every one of your questions  
8 today my attorneys have counseled me that today I  
9 must assert my Sixth Amendment, Fifth Amendment  
10 and Fourteenth Amendment rights under the U.S.  
11 Constitution. Though I believe you know I would  
12 like to answer those questions, although today I  
13 must assert those rights or risk having my  
14 attorneys resign.

15 Q Tell the jury how you know [REDACTED]  
16 [REDACTED].

17 MR. [REDACTED] Form move to strike.

18 MR. [REDACTED] Move to strike my  
19 question?

20 MR. [REDACTED] (Nods.)

21 MR. [REDACTED] What basis?

22 \*\* MR. [REDACTED]: Do I have to state a  
23 basis? Usually I'm just required to state  
24 "form."

25 MR. [REDACTED] You have done more than

1           that today.

2           MR. [REDACTED]: If I went on a diatribe of  
3           explaining, you know, what's confusing,  
4           compound and relevant, then you would blame  
5           for testifying for the witness. So I just  
6           move to strike the question.

7           MR. [REDACTED] Make sure you mark that  
8           somewhere on this transcript, somehow.

9           Q   Tell the jury how you know [REDACTED]  
10          [REDACTED]?

11          MR. [REDACTED] Move to strike.

12          A   I intend to respond to all relevant  
13          questions regarding this lawsuit. However, at  
14          the present time my attorneys have counseled me  
15          that I cannot provide answers to any questions  
16          relevant to this lawsuit and must accept their  
17          advice or risk losing my Sixth Amendment right to  
18          effective representation. Accordingly, I assert  
19          my Fifth Amendment, Sixth Amendment and  
20          Fourteenth Amendment right under the U.S.  
21          Constitution.

22          Q   Isn't it true that you brought her to  
23          this country when she was underage and made her  
24          your sex slave, and you've bragged about this?

25          MR. [REDACTED]: Form, argumentative,

1 compound, harassing and calls for  
2 speculation.

3 A I intend to respond to all relevant  
4 questions regarding this lawsuit; however, at the  
5 present time my attorneys have counseled me that  
6 I cannot provide answers to any questions  
7 relative to this lawsuit and I must accept this  
8 advice or risk losing my Sixth Amendment right to  
9 effective representation. However, I would like,  
10 so I'm clear, the question was, did I bring her  
11 here? Specifically --

12 Q Your answer is fine.

13 A Okay.

14 Q Is it true that you demanded numerous  
15 underage minor females to have sex with [REDACTED]  
16 [REDACTED] inside your home while you watched,  
17 masturbating?

18 MR. [REDACTED]: Same objections.

19 A You have to repeat the question.

20 Q Isn't it true that you have ordered  
21 several underage minor females to have sex with  
22 [REDACTED] [REDACTED] in your home while you watched,  
23 masturbating?

24 MR. [REDACTED]: Same objections.

25 A The current U.S. Attorney has described

1 your firm, Mr. [REDACTED] as a criminal enterprise  
2 involved in mail fraud, wire fraud, money  
3 laundering and, in fact, fabricating multiple  
4 cases of a sexual nature against me, others, in  
5 order to fleece unsuspecting investors in South  
6 Florida out of millions and millions of dollars.

7           Unfortunately, though I would like to  
8 answer each one of your questions here today, my  
9 attorneys have advised me I must assert my Sixth  
10 Amendment, Fourteenth Amendment and Fifth  
11 Amendment right under the U.S. Constitution,  
12 although I believe you know I would like to  
13 answer your questions, but at this moment I must  
14 assert those rights or risk having my attorneys  
15 resign.

16           Q   Isn't it true that with each of these  
17 underage minor females that were brought to your  
18 house, your method of sexually exploiting them  
19 was nearly identical; is that correct?

20           MR. [REDACTED]:   Objection, argumentative,  
21 confusing, overbroad and vague.

22           A   I don't even understand the question.

23           Q   Okay.  When a 14 or 15-year old would be  
24 led into your bedroom, you would appear from the  
25 shower first, usually naked; is that correct?

1           MR. [REDACTED] Objection, argumentative,  
2           assumes facts not in evidence, and  
3           harassing.

4           A    I intend to respond to all relevant  
5           questions regarding this lawsuit; however, today  
6           my attorneys have advised me that I cannot  
7           provide answers to any questions relevant to this  
8           lawsuit and must accept their advice or risk  
9           losing my Sixth Amendment right to effective  
10          representation. Accordingly, therefore, I must  
11          assert my Constitutional rights -- the Fifth  
12          Amendment, Sixth Amendment and Fourteenth  
13          Amendments to the U.S. Constitution.

14          MR. [REDACTED]: Can we go off the record for  
15          a second?

16          MR. [REDACTED] If it is necessary.

17          MR. [REDACTED]: Yes, let's go off the  
18          record.

19          THE VIDEOGRAPHER: Going off the video  
20          record at 12:35 p.m.

21          (Pause in the proceedings.)

22          THE VIDEOGRAPHER: Back on the video  
23          record 12:44 p.m.

24          MR. [REDACTED] Can you tell me what my  
25          last question is?

1 THE COURT REPORTER: Certainly.

2 (The record was read.)

3 Q After appearing from the shower naked,  
4 you would order the underage minor female to  
5 disrobe; isn't that true?

6 MR. [REDACTED]: Same objections. Form.

7 A I intend to respond to all relevant  
8 questions regarding this lawsuit; however, at the  
9 present time my attorneys have counseled me I  
10 cannot provide answers to any questions relevant  
11 to this lawsuit and must accept their advice or  
12 risk losing my Sixth Amendment right to effective  
13 representation.

14 Q You would then order them to, or order  
15 her to begin providing you a massage; is that  
16 correct?

17 MR. [REDACTED]: Form.

18 A I intend to respond to all relevant  
19 questions regarding this lawsuit and I would like  
20 to answer each and every one of your questions  
21 today, Mr. [REDACTED] however, my attorneys have  
22 told me that I cannot do that today unless and I  
23 must assert my Sixth Amendment, Fifth Amendment  
24 and Fourteenth Amendment rights under the U.S.  
25 Constitution or risk losing my counsel.

1       Therefore, I'm going to assert those rights as  
2       guaranteed by the Fifth Amendment, Sixth  
3       Amendment and Fourteenth Amendment.

4           Q    You would then roll over and continue  
5       with masturbating; is that correct?

6           MR. [REDACTED]:   Form.

7           A    I intend to respond to all relevant  
8       questions regarding this lawsuit.  It is -- it is  
9       my understanding that the current U.S. Attorney  
10      has described your law firm as a criminal  
11      enterprise, yours and Mr. Jaffe's firm, as a  
12      criminal enterprise and part of the largest fraud  
13      in Florida's history, fabricating malicious cases  
14      of a sexual nature against me and others, in  
15      order to fleece investors out of millions of  
16      dollars, through bogus schemes including  
17      conspiracy to -- excuse me -- to commit mail  
18      fraud, wire fraud and money laundering, so though  
19      I would like to answer each and every one of your  
20      questions here today, my attorneys have counseled  
21      me I cannot, and must assert my Fifth, Sixth and  
22      Fourteenth Amendment rights under the U.S.  
23      Constitution.

24          Q    You would then rub the underage minor  
25      female's vagina and/or insert your fingers into

1 her vagina; is that correct?

2 MR. [REDACTED]: Form.

3 A I intend to respond to all relevant  
4 questions regarding this lawsuit. Unfortunately,  
5 today my attorneys have advised me I cannot, must  
6 assert my rights under the U.S. Constitution,  
7 under the Fifth Amendment and Sixth amendment and  
8 Fourteenth amendments of the U.S. Constitution,  
9 especially since your firm has been described as  
10 a criminal enterprise by the current U.S.  
11 Attorney perpetrating one of the largest frauds  
12 in South Florida's history, fleecing investors  
13 out of millions of dollars by fabricating  
14 malicious cases, malicious cases of a sexual  
15 nature against people like me and others.

16 Q With many of these underage minors you  
17 would use vibrators on them; is that correct?

18 MR. [REDACTED]: Form.

19 A I would like to respond to that question  
20 as I would like to respond to all your other  
21 questions today. However, my attorneys have  
22 counseled me that I must assert my Sixth  
23 Amendment rights, my Fifth Amendment rights and  
24 my Fourteenth Amendment rights under the U.S.  
25 Constitution.

1 Q And with many of these underage minors,  
2 you would give and/or receive oral sex from them;  
3 is that correct?

4 MR. [REDACTED]: Form.

5 A I intend to respond to all relevant  
6 questions regarding this lawsuit, and I would  
7 like to answer each and every one of your  
8 questions; however, my attorneys have counseled  
9 me that today I must assert my Sixth Amendment,  
10 Fifth Amendment and Fourteenth Amendment rights  
11 under the U.S. Constitution, especially since  
12 your firm has been described by the current U.S.  
13 Attorney as perpetrating one of the largest  
14 frauds in Florida -- in Florida's history, by  
15 fabricating malicious cases of a sexual nature  
16 against me and others.

17 Q In June of 2008 you pled guilty to a  
18 couple of felonies, right?

19 MR. [REDACTED]: Form, vague and confusing.

20 A Again?

21 Q In June of 2008, you pled guilty to two  
22 felonies; is that correct?

23 MR. [REDACTED]: Same objection.

24 A Yes.

25 Q And what were those felonies that you

1       pled guilty to?

2           A    Solicitation of prostitutes, not  
3   underage prostitutes but simply prostitutes.  
4   Solicitation of prostitutes and one count of  
5   procuring a minor for underage sex.

6           Q    You have taken the Fifth as to questions  
7   related to many of these underage minors, but the  
8   underage minors that were the victims in the  
9   cases where you pled guilty, were [REDACTED]; is that  
10   one of them?

11           MR. [REDACTED]   Form, mischaracterizes the  
12   witness's testimony.  Calls for a legal  
13   conclusion?

14           A    Again.

15           Q    What was the name of the any of the  
16   underage minors that were the subject of the  
17   criminal charges to which you pled guilty?

18           A    I don't know.

19           Q    So, tell me about those charges.  What  
20   were the allegations of those charges?

21           MR. [REDACTED]:  Form.

22           A    Solicitation of prostitution, not  
23   underage prostitution... Prostitution.

24           Q    Were the victims or the prostitutes, as  
25   you would say, were they minors?

1 MR. [REDACTED]: Form.

2 A I pled guilty to solicitation of  
3 prostitution.

4 Q Okay, so tell me what those cases were  
5 about. What happened?

6 MR. [REDACTED]: Form again.

7 A I... (Witness shrugs.) I can't tell you  
8 any more than that.

9 Q You don't know what you pled guilty to?

10 A I just told you --

11 MR. [REDACTED]: Object to the form, asked and  
12 answered.

13 Q Do you know what you pled guilty to, the  
14 facts?

15 A Solicitation of prostitution.

16 Q I understand that that's the charge.  
17 What were the underlying facts? What did you do,  
18 did you pull up in a car, talk to the person, did  
19 they come over to your house, how did you get  
20 them, those kinds of things. Tell the jury what  
21 were the underlying facts about the charges you  
22 pled guilty to?

23 MR. [REDACTED]: Object to the form. Move to  
24 strike.

25 A I don't know.

1 Q You don't know what you pled guilty to?

2 A I pled guilty to solicitation of  
3 prostitution, not underage prostitution, but  
4 prostitution.

5 Q My understanding from reading the court  
6 files that one of these females was [REDACTED] Do you  
7 know who that is?

8 A I intend to respond to all relevant  
9 questions in this lawsuit. However, at the  
10 present time my attorneys have counseled me that  
11 I cannot provide answers to any of these  
12 questions today. So accordingly, I must assert  
13 my constitutional rights under the Fifth, Sixth  
14 and Fourteenth Amendments of the U.S.  
15 Constitution.

16 Q You're aware [REDACTED] is somebody that  
17 alleges she was at your house on more than 100  
18 occasions; is that true?

19 MR. [REDACTED]: Form.

20 A Can you repeat the question, sir?

21 Q Are you aware that [REDACTED] is a female that  
22 alleges that when she was underage, she was at  
23 your house on more than 100 occasions?

24 MR. [REDACTED]: Form, predicate.

25 A I intend to respond to all relevant

1 questions to this lawsuit, Mr. [REDACTED] However,  
2 today my attorneys have counseled me that I must  
3 respond by invoking my Fifth Amendment right, my  
4 Sixth Amendment right and my Fourteenth Amendment  
5 right under the U.S. Constitution or risk losing  
6 them as my attorneys, so therefore I must assert  
7 those rights.

8 Q You understand that her complaint was  
9 that Epstein turned [REDACTED]

10 [REDACTED]  
11 [REDACTED] [REDACTED] Stated Epstein [REDACTED]  
12 [REDACTED]  
13 [REDACTED]  
14 [REDACTED]  
15 [REDACTED]

16 Are you aware of those allegations?

17 MR. [REDACTED]: Form, predicate.

18 A I'm sorry, did you say there is a  
19 complaint?

20 Q In the incident report that led to a  
21 charging document, that led to a charge that you  
22 have pled guilty to. Are you aware of that  
23 information coming from [REDACTED]?

24 MR. [REDACTED]: I'm sorry, Mr. [REDACTED] what  
25 are you reading from?

1           MR. [REDACTED] The 87-page Palm Beach  
2 Police Department incident report where  
3 there are numerous underage females  
4 describing their interaction with Mr.  
5 Epstein at his house. I'm reading  
6 specifically from page 41 related to [REDACTED],  
7 who was one of the victims he pled guilty  
8 to.

9           MR. [REDACTED]: Is that the same document  
10 that you're seeking production of, in this  
11 same exact case?

12          MR. [REDACTED] I don't know what you're  
13 talking about. This is something from the  
14 State Attorney's file.

15          MR. [REDACTED]: Okay. Sorry. What's the  
16 question?

17          Q Are you aware of that allegation? What  
18 I just read to you.

19          A I would like to answer that question,  
20 but, however, today my attorneys have advised me  
21 I must assert my Fifth Amendment, Sixth Amendment  
22 and Fourteenth Amendment rights under the U.S.  
23 Constitution.

24          Q Assuming your attorneys have advised you  
25 but because of Res Judicata, double jeopardy, you

1 cannot be charged for any crimes that you have  
2 already pled guilty to relating to [REDACTED], so I  
3 would like you to explain to the jury, in your  
4 words, or your version of the story, what was  
5 your interaction with [REDACTED] at your house when she  
6 was a minor?

7 MR. [REDACTED]: Object to the form as  
8 worded. Could disclose attorney/client  
9 communications.

10 A I intend to respond to all relevant  
11 questions regarding this lawsuit. I would like  
12 to answer each of your questions today, however,  
13 my attorneys have counseled me that I may not.  
14 They've advised me that I must assert my Fifth  
15 Amendment, Sixth Amendment and Fourteenth  
16 Amendment rights under the U.S. Constitution.  
17 Therefore, if I don't, I risk losing their  
18 counsel. Therefore, I must assert those rights  
19 here today, Mr. [REDACTED]

20 Q Are you aware that [REDACTED] Advised police  
21 that [REDACTED]

22 [REDACTED]  
23 [REDACTED]  
24 [REDACTED]

25 MR. [REDACTED] Objection, relevance,

1 argumentative, compound, harassing.

2 A This was who?

3 Q The question is, are you aware [REDACTED]?

4 A [REDACTED]

5 The current U.S. Attorney, since he has  
6 described your firm as a criminal enterprise and  
7 part of one of the largest frauds in Florida's  
8 history by fabricating, fabricating, malicious  
9 cases of a sexual nature against people like me  
10 and others, and fleecing investors out of  
11 millions of dollars by using means described in  
12 the complaint against your firm, including mail  
13 fraud, wire fraud, money laundering; I'm afraid  
14 today, though I would like to answer each one of  
15 your questions, my attorneys have counseled me  
16 that I must not, I must assert my Sixth  
17 Amendment, Fifth Amendment and Fourteenth  
18 Amendment rights under the U.S. Constitution, and  
19 I believe you know I would like to answer those  
20 questions. I must assert those rights or risk  
21 losing my attorney's representation.

22 Q Do you know [REDACTED]?

23 A Spell it, please.

24 Q I don't know how to spell her name, but  
25 do you know a [REDACTED]? I don't know that she would

1 have ever spelled her name for you.

2 MR. [REDACTED] Form, move to strike.

3 Q Her name is "[REDACTED]"

4 A I intend to respond to all relevant  
5 questions regarding this lawsuit. However, at  
6 the present time my attorneys have counseled me  
7 that I may not provide answers today, though I  
8 would like to, and I must, in fact, take their  
9 advice or risk losing their representation, so  
10 therefore, I must assert those rights under the  
11 U.S. Constitution.

12 Q Do you know the names of any of the  
13 females that you allegedly solicited for  
14 prostitution and pled guilty to?

15 MR. [REDACTED]: Relevance.

16 A Sitting here today, no, I do not.

17 Q You asked me to spell [REDACTED]'s name.  
18 That's somebody that your attorneys took her  
19 deposition about a year and a half ago. Does  
20 that help to refresh your recollection as to who  
21 [REDACTED] is?

22 A I would like to answer that question but  
23 today, according to my attorneys, I must assert  
24 my Fifth Amendment, Sixth Amendment and  
25 Fourteenth Amendment rights under the U.S.

1 Constitution. I must accept their advice or risk  
2 losing my Sixth Amendment right to effective  
3 representation, Mr. [REDACTED] so though I would  
4 like to answer the question, today I must assert  
5 those rights.

6 Q There is another victim, her name is  
7 [REDACTED], that was listed as one of the females at  
8 your house and you pled guilty to the  
9 solicitation of.

10 I would like to ask you if you remember  
11 her?

12 MR. [REDACTED] Form, confusing, compound.

13 A [REDACTED]?

14 Q I don't know her first time, initial "[REDACTED]"  
15 last name is "[REDACTED]"

16 MR. [REDACTED]: Same objection.

17 A I intend to respond to all relevant  
18 questions regarding this lawsuit. However, at  
19 the present time my attorneys have counseled me  
20 that I cannot provide answers to any questions  
21 relevant to this lawsuit, and I must accept their  
22 advice or risk losing my right to effective  
23 representation. Therefore, though I would like  
24 to answer the questions, I must assert those  
25 rights.

1 Q With each case that results in a  
2 charge --

3 THE WITNESS: Excuse me, is there some  
4 water?

5 THE VIDEOGRAPHER: Off the record?

6 MR. [REDACTED]: Stopping again?

7 THE WITNESS: Can I get some water? Mr.  
8 Jaffe, can you pass some water?

9 THE VIDEOGRAPHER: There is no water  
10 here.

11 THE WITNESS: Sorry.

12 Q With each conviction, charge, or with  
13 each charge that leads to a conviction, there are  
14 facts and circumstances that lead up to that plea  
15 of guilty.

16 MR. [REDACTED]: Form.

17 Q What are the facts and circumstances  
18 that led to you pleading guilty to the two  
19 felonies that you've described?

20 MR. [REDACTED]: Form, overbroad, compound,  
21 confusing, calls for a legal conclusion.

22 A I would like to respond to that  
23 question. I would like to respond to that  
24 question, but today my attorneys have advised me  
25 I must assert my Fifth Amendment, Sixth Amendment

1 and Fourteenth Amendment rights to the U.S.  
2 Constitution or risk losing effective  
3 representation. Accordingly, I must assert my  
4 rights as guaranteed by the Constitution.

5 Q Just so you are clear, since your  
6 attorney made it an objection that it was  
7 unclear, then you invoked your Fifth Amendment  
8 rights --

9 A Sorry.

10 Q I'm talking about the cases where you  
11 already pled guilty and you can't be charged  
12 again. What were the facts and circumstances  
13 that led up to you pleading guilty to these  
14 felonies?

15 A I've answered the question.

16 MR. [REDACTED]: Same objection, asked and  
17 answered.

18 THE VIDEOGRAPHER: Counsel.

19 (Indicating five minutes left on tape.)

20 MR. [REDACTED] Okay.

21 Q Just so the jury understands, these  
22 three females that were the subject of the guilty  
23 pleas in State Court, were procured by your  
24 method of having underage minor females locate  
25 other underage minor females and bring them to

1 your house; isn't that correct?

2 MR. [REDACTED] Objection, argumentative,  
3 compound, harassing, assumes facts not in  
4 evidence. I move to strike.

5 A You have to repeat the question.

6 Q Okay, [REDACTED], [REDACTED], [REDACTED] are all people  
7 that were, at the time you engaged in sexual  
8 activity with them, were underage and were  
9 brought by other underage minor females; is that  
10 true?

11 MR. [REDACTED]: Same objections incorporated  
12 as well as motion to strike.

13 A I don't understand -- I'm sorry, I don't  
14 understand the question.

15 Q Isn't it true that you used underage  
16 minor females to bring other underage minor  
17 females to your house for sex?

18 MR. [REDACTED]: Asked and answered.

19 A (Witness shrugs.)

20 MR. [REDACTED]: Way earlier on.

21 MR. [REDACTED] He doesn't understand the  
22 question --

23 MR. [REDACTED]: You can answer the question.

24 Q I'm going through the progression.

25 MR. [REDACTED]: You can answer, but it is

1           asked and answered.

2           A    As your firm, Mr. [REDACTED] and Mr.  
3    Jaffe's has been described by the U.S. Attorney  
4    as perpetrating one of the largest frauds in  
5    South Florida's history by crafting malicious  
6    cases of a sexual nature against people like me  
7    and others, in order to fleece, using bogus  
8    schemes, in the U.S. Attorney's words, investment  
9    schemes. Unfortunately, though I would like to  
10   answer every one of your questions if I'm able,  
11   my attorneys have advised me I must assert my  
12   Sixth Amendment, Fourteenth Amendment and Fifth  
13   Amendment rights under the U.S. Constitution.  
14   Therefore, at the moment I cannot answer that  
15   question.

16          Q    The acts related to your guilty plea  
17   occurred at your Palm Beach house; is that  
18   correct?

19          MR. [REDACTED]:    Form.

20          A    Again, sorry.

21          Q    If you were soliciting prostitutes, it  
22   wasn't out on the street, it wasn't at a hotel.  
23   These were girls that you solicited to be  
24   prostitutes at your house in Palm Beach,  
25   correct?

1           MR. [REDACTED]: Objection, relevance,  
2           argumentative. Calls for speculation as  
3           worded and assumes facts not in evidence.

4           A    Though I would like to answer that  
5           question, my attorneys today have advised me I  
6           cannot answer you today, and they've advised me I  
7           must assert my Sixth Amendment, Fifth Amendment  
8           and Fourteenth Amendment rights under the U.S.  
9           Constitution. Otherwise I risk losing their  
10          representation. So, accordingly I must assert  
11          those rights, Mr. [REDACTED] and Mr. Jaffe.

12          Q    In what county did you plead guilty to  
13          these felony offenses?

14          A    Palm Beach County.

15          Q    These were crimes that occurred here in  
16          Palm Beach County?

17          MR. [REDACTED]: Form.

18          Q    Is that correct?

19          A    ... I pled guilty in Palm Beach County.

20          Q    Isn't it true that you kept a calendar  
21          or schedule --

22                THE VIDEOGRAPHER: I have to change the  
23          tape.

24          MR. [REDACTED] Change it.

25                THE VIDEOGRAPHER: Off the video record

1 1:05 p.m.

2 (Pause in the proceedings.)

3 THE VIDEOGRAPHER: Back on the video  
4 record 1:15 p.m.

5 Q Mr. Epstein, as it relates to the  
6 charges you pled guilty to, are you saying today  
7 that those females that you interacted with  
8 sexually, were prostitutes prior to meeting you?

9 A I'm saying I pled guilty to the  
10 solicitation of prostitution.

11 Q Right, and you would certainly agree  
12 that that would require yourself and one other  
13 individual for that act of prostitution,  
14 correct?

15 MR. [REDACTED]: Form. Also calls for a legal  
16 conclusion.

17 A I pled guilty to solicitation of  
18 prostitution.

19 Q Are you saying that those females that  
20 were the victims, at least listed as victims by  
21 the State, were prostitutes prior to meeting  
22 you?

23 MR. [REDACTED]: Form. Vague. Irrelevant?

24 A I pled guilty to solicitation of  
25 prostitution.

1 Q Do you have any remorse for your  
2 actions --

3 MR. [REDACTED]: Form.

4 Q -- against these victims that led to  
5 your plea of guilty?

6 MR. [REDACTED]: Form, argumentative.

7 A I pled guilty to solicitation of  
8 prostitution, not underage prostitution, simply,  
9 prostitution.

10 Q Are you saying now that the subjects of  
11 that, which were called victims, were not  
12 underage when you engaged in sex with them?

13 MR. [REDACTED]: Form, argumentative,  
14 speculation, assumes facts not in evidence,  
15 as well as mischaracterizes the witness's  
16 testimony.

17 A I pled guilty to solicitation of  
18 prostitution, not underage prostitution,  
19 solicitation of prostitution.

20 Q I was under the impression you pled  
21 guilty to a second degree felony, that being  
22 procuring a minor for the purposes of  
23 prostitution.

24 A That's correct.

25 Q So a minor is somebody under the age of

1 18, and I'm asking for the guilty plea related to  
2 that count; are you at all remorseful for your  
3 interactions with that minor?

4 MR. [REDACTED] Same objections.

5 A What minor?

6 Q The charge is procuring a minor. You  
7 tell me. Who was that minor?

8 A I don't know.

9 Q You were never told during the State  
10 Attorney's prosecution of you, who this person  
11 was?

12 A No.

13 Q Why did you plead guilty to a felony  
14 charge that resulted in you going to jail,  
15 without even knowing who the victim was?

16 MR. [REDACTED]: Form. That question calls  
17 for attorney/client information, and  
18 therefore, I'm going to instruct him not to  
19 answer that.

20 Q If it has anything to do with any  
21 conversations with your attorney, I don't want to  
22 know. I'm just going off of the plea colloquy  
23 between you and the Judge, where you understood  
24 the charges and have been advised and apprised of  
25 the charges and you still willingly, willfully

1     pled guilty to the charges. I'm taking now that  
2     you're saying, you don't even know what those  
3     charges were about?

4             MR. [REDACTED]     What was the question? I  
5     don't know the question on the table now.

6             Q     Who was the minor?

7             A     I don't know.

8             Q     You were never told the name or initials  
9     of that minor victim by the State Attorney's  
10    Office or the prosecutor?

11            A     Not that I recall.

12            Q     Just so the jury understands, this  
13    method of paying underage minor females to bring  
14    you other underage minor females for sex, is  
15    something that you do in New York, and New  
16    Mexico, Florida, everywhere, not just West Palm  
17    Beach; isn't that right?

18            MR. [REDACTED]:     Again, form, compound, again  
19    assumes facts not in evidence.  
20    Argumentative and harassing, and moreover,  
21    we have already been down this road before  
22    in separate related questions that have  
23    already been asked and answered.

24            A     I would like to respond to each one of  
25    your questions; however, today my attorneys have

1 advised me I cannot and they've advised me I must  
2 assert my Sixth Amendment right, my Fifth  
3 Amendment right and my Fourteenth Amendment right  
4 under the U.S. Constitution, therefore, that's  
5 what I'm going to do.

6 Q Where is the calendar or schedule of  
7 your underage sex appointments?

8 MR. [REDACTED]: Form, speculation.

9 A You said where is...

10 MR. [REDACTED]: "Again."

11 Q Where is the calendar or schedule that  
12 [REDACTED] [REDACTED] kept for you for your appointments  
13 for sex with underage females?

14 MR. [REDACTED]: Same objection.

15 Q If there is not one, you can tell me  
16 there is not one.

17 A I would like to answer each one of your  
18 questions today. However, I have been advised by  
19 counsel that I must assert my Fifth Amendment,  
20 Sixth Amendment and Fourteenth Amendment rights  
21 under the U.S. Constitution or risk losing their  
22 representation. Therefore, I'm going to have to  
23 assert those constitutional rights, though I  
24 would like to answer that question.

25 Q Are you still in possession of the

1 computers that were taken from your house prior  
2 to the execution of the search warrant?

3 A Again. Am I still...?

4 Q Are you still in possession of the  
5 computers that were removed from your house just  
6 prior to the execution of the search warrant?

7 A I intend to respond to all relevant  
8 questions regarding this lawsuit. However, at  
9 the present time my attorneys have counseled me I  
10 cannot respond to any questions that may be  
11 relevant to this lawsuit, no matter how much I  
12 might want to. I must accept this advice or risk  
13 losing my Sixth Amendment right to  
14 representation. Therefore, I must assert my  
15 rights under the Fifth, Sixth and Fourteenth  
16 Amendments of the U.S. Constitution.

17 Q Who is it that removed those computers  
18 from your house prior to the execution of the  
19 search warrant?

20 MR. [REDACTED]: Objection, predicate.

21 A I intend to respond to all relevant  
22 questions regarding this lawsuit. However, at  
23 the present time my attorneys have counseled me  
24 that I cannot provide answers to any questions  
25 that may be relevant to this lawsuit, no matter

1       how much I would like to, and I must accept their  
2       advice or risk losing their representation.

3       Accordingly, therefore, I would have to assert  
4       those rights, Mr. [REDACTED]

5           Q    It is my understanding, through  
6       information and belief, it is my understanding  
7       that this computer system contained the complete  
8       list of names of underage minor females with whom  
9       you engaged in sexual activity; is that correct?

10       A    You're --

11           MR. [REDACTED]:  Objection.

12       A    -- you're asking for my understanding?

13       Q    No --

14       A    Are you asking me to tell you what your  
15       understanding is?

16       Q    Did the computers that were removed from  
17       your home just prior to the execution of the  
18       search warrant contain the complete list of  
19       underage minor females with whom you engaged in  
20       sexual activity?

21           MR. [REDACTED]:  Form.

22       A    Though I would like to answer that  
23       question, like all your other questions here  
24       today, unfortunately my attorneys have counseled  
25       me that I'm going to have to assert my Sixth

1 Amendment, Fifth Amendment and Fourteenth  
2 Amendment rights under the U.S. Constitution. I  
3 point -- excuse me. I would point out that your  
4 firm was described by the current U.S. Attorney  
5 as a criminal enterprise involved in money  
6 laundering, creating and fabricating malicious  
7 cases of a sexual nature against people like me  
8 and others, in order to fleece local investors  
9 out of millions of dollars.

10 I believe the senior partner of that  
11 firm currently sits in jail. Unfortunately  
12 though I would like to answer all of your  
13 questions, today my attorneys have counseled me I  
14 must assert my rights under the Sixth Amendment,  
15 Fourteenth Amendment and Fifth Amendment of the  
16 U.S. Constitution.

17 Q Isn't it true, you and [REDACTED] [REDACTED] and  
18 Ghislaine Maxwell and [REDACTED] [REDACTED] operated  
19 as an organized criminal enterprise designed to  
20 sexually exploit minor?

21 MR. [REDACTED]: Objection, argumentative,  
22 speculation, calls for a legal conclusion  
23 and continues to assume facts not in  
24 evidence.

25 A Though I would like to answer that

1 question, Mr. [REDACTED] like most of your other  
2 questions here today... and hopefully will get to  
3 do so at some point, my lawyers have advised me I  
4 must today assert my constitutional rights under  
5 the Sixth Amendment, Fifth Amendment and  
6 Fourteenth Amendment of the U.S. Constitution and  
7 I must accept their advice or risk losing  
8 effective representation.

9 Q And as part of that organization you  
10 developed code terms such as "Work" or "Massage"  
11 as opposed to engage in sex with minors; is that  
12 true?

13 MR. [REDACTED]: Form, argumentative,  
14 speculation, harassing, assumes facts not in  
15 evidence.

16 A Can you... you...?

17 Q You developed code terms such as you --

18 A "You" me?

19 Q Yes, you, would ask these girls if they  
20 would like to give you a massage or work for you,  
21 rather than asking them to do what was going to  
22 be done, which is engage in sexual activity with  
23 you; isn't that true?

24 MR. [REDACTED]: Same objections.

25 A Are you asking if I developed code

1 words? Is that the question?

2 Q Right. Code words.

3 A I would like to respond to that  
4 question, but unfortunately today my attorneys  
5 told me I have to respond by taking -- invoking  
6 my Sixth Amendment, Fourteenth Amendment and  
7 Fifth Amendment rights of the U.S. Constitution,  
8 or risk losing my amendment right to effective  
9 representation. Accordingly I assert my  
10 Constitutional rights as guaranteed by those  
11 amendments.

12 Q What did it mean within your  
13 organization when someone, some underage minor  
14 female was coming over to work for you?

15 MR. [REDACTED]: Form.

16 A What did it mean?

17 Q Right, what did it mean? What did it  
18 mean to you was going to happen when an underage  
19 minor female would either call to work or [REDACTED]  
20 [REDACTED] would tell you this person was coming to  
21 work for you at a specific time?

22 MR. [REDACTED]: Objection, vague,  
23 speculative, assumes facts not in evidence.

24 A I would like to answer that question, as  
25 most of your other questions today. However,

1 today my attorneys have counseled me that I must  
2 invoke my Sixth Amendment, Fourteenth Amendment  
3 and Fifth Amendment right, or risk -- and if I  
4 don't, I risk losing them as my attorneys so,  
5 therefore, I must assert those rights.

6 Q You're laughing as if my questions are  
7 ludicrous right now but you're aware that there  
8 were trash pulls from your home where there were  
9 message pads, messages taken by various employees  
10 of yours, where these terms, "Massage," "Work"  
11 were used in conjunction with underage minor  
12 females coming over to your house, weren't you?

13 MR. [REDACTED]: Same objections, form, as  
14 well. Move to strike, and also assumes  
15 facts not in evidence. Lack predicates.

16 Q You're aware of the trash pull and the  
17 message pads, correct?

18 MR. [REDACTED]: Same objections.

19 Do you have any documents with you here  
20 today that you speak of?

21 MR. [REDACTED] No, but at this point in  
22 time in the trial, they will already about  
23 in evidence.

24 A I'm aware of a trash pull? What's a  
25 "trash pull"? I'm sorry.

1 Q Are you aware of -- I'll ask it of you  
2 this way: When [REDACTED] [REDACTED] would take a phone  
3 message for you, what did she write it down  
4 with?

5 MR. [REDACTED]: Form.

6 A The question makes no sense to me,  
7 sorry.

8 Q If another employee of yours were to  
9 answer the telephone, be it your housekeeper,  
10 housemanager, would answer the phone, take a  
11 message for you and write it down so that you  
12 could read it later, what would that message be  
13 written on?

14 A Most likely paper.

15 Q Okay, is that paper typically in the  
16 form of a message pad that has a carbon copy  
17 sheet to the back?

18 A No.

19 Q You're unfamiliar with the documents  
20 that I'm talking about, that being a message pad  
21 that informs you as to who called, the time they  
22 called and the purpose for calling?

23 MR. [REDACTED]: For purposes of the question  
24 you're specifically talking about a message  
25 pad, nothing related to what you're defining

1 as a trash pull, just what someone takes as  
2 a message at Mr. Epstein's home and --

3 A Do I know what a message pad is?

4 Q No. In your home, do you typically have  
5 your housekeeper, housemanager, or somebody else,  
6 when they take a message for you, write on a  
7 specific pad that informs you as to who is  
8 calling, the time they are calling and the  
9 purpose for their calling, and there is a carbon  
10 copy sheet evidencing that message?

11 MR. [REDACTED]: Objection, asked and  
12 answered.

13 Q You know what I'm talking about?

14 A I know what a message pad is.

15 Q Do you use them commonly in your home or  
16 did you back prior to your arrest?

17 A I would like to answer that question,  
18 but today my attorneys have advised me I have to  
19 assert my Fifth Amendment, Sixth Amendment and  
20 Fourteenth Amendment rights under the U.S.  
21 Constitution, so therefore, I'm going to do that  
22 or I risk losing their representation.

23 Q Is my question to you confusing? Do you  
24 know what I'm talking about?

25 MR. [REDACTED]: Form.

1 A Not specifically, no.

2 Q Okay.

3 The information --

4 A Is there something you have to show me,  
5 so I know what you're talking about?

6 Q I don't have it to show you today, but  
7 if the information and evidence that I have  
8 learned through this process is accurate and  
9 correct, it would seem a foregone conclusion that  
10 you and I would be on the same page, at least  
11 about this document, so --

12 A Okay.

13 Q -- if we are going to get to a point you  
14 tell me "This document doesn't exist" or "I don't  
15 know what you're talking about," okay, that's  
16 fine, but that's something we can hash out.

17 Here is my question: When a  
18 housekeeper/housemanager would take a message for  
19 you from any caller, is there a specific message  
20 pad that has a carbon copy located near your  
21 telephone, for them to write down the name of the  
22 caller, the purpose for the call and the time  
23 called?

24 MR. [REDACTED] Form.

25 Q Is that something you're familiar with?

1           A    I would like to respond to that  
2 question.  Today my attorneys have counseled me I  
3 must assert my Sixth Amendment, Fifth Amendment  
4 and Fourteenth Amendment right under the U.S.  
5 Constitution.

6           Q    You're invoking your Fifth Amendment  
7 right is not that you understand the question.  
8 You understand my question and are electing to  
9 invoke your Fifth Amendment rights; is that  
10 correct?

11          A    Yes.

12          Q    When [REDACTED] [REDACTED] or a housekeeper or  
13 housemanager, whoever happened to be employed at  
14 the time, would take messages, what form would  
15 you normally or typically receive them in?

16          A    (Witness shrugs.)

17          MR. [REDACTED]   Same objections.

18          A    I don't understand the question.

19          Q    When a caller would call the home,  
20 housemanager or housekeeper or [REDACTED] [REDACTED], I  
21 don't know what you would call her, assistant,  
22 would answer the phone, and take a message for  
23 you so that you would know who called, what would  
24 they typically write down the message on so that  
25 you would have it?

1 MR. [REDACTED] Objection. Object to the  
2 form, lacks predicate. You have not  
3 established anything here today relative to  
4 a housekeeper or housemanager or the like.  
5 Um... And I'm trying to understand the  
6 question. But --

7 MR. [REDACTED] Really?

8 MR. [REDACTED]: -- it lacks predicate.

9 MR. [REDACTED] This will play well.

10 A Piece of paper.

11 Q Normally they would write it down on a  
12 piece of paper and give it to you?

13 A I didn't say that.

14 Q Have you ever been given a message that  
15 is ripped out of a message pad that has a carbon  
16 copy to it?

17 A [REDACTED] I see. Okay. I intend -- I would  
18 like to answer that question, but today my  
19 attorneys have advised me I must respond by  
20 invoking my Sixth Amendment right, my Fifth  
21 Amendment right and my Fourteenth Amendment  
22 rights under the U.S. Constitution. Though I  
23 would like to answer these questions, accordingly  
24 I must assert those rights or I risk losing my  
25 representation here today.

1 Q Between the years 2002 and 2005, who was  
2 your house manager?

3 A (No response.)

4 Q If there is more than one, tell us  
5 that.

6 A The question is unclear. I'm sorry.

7 Q Okay, let me start with between 2002 and  
8 2005, did you employ a housemanager?

9 MR. [REDACTED]: Form.

10 A Where?

11 Q At your Palm Beach home.

12 A I intend to respond to all relevant  
13 questions here today, Mr. [REDACTED] Hopefully we  
14 will get some. But my attorneys have advised me  
15 that today I must invoke my Sixth Amendment,  
16 Fifth Amendment and Fourteenth Amendment rights  
17 under the U.S. Constitution; or risk losing them  
18 as counsel. So today I have to assert those  
19 privileges.

20 Q Do you know [REDACTED]?

21 A I intend to respond to all relevant  
22 questions regarding this lawsuit. However, at  
23 the present time no matter how much I would like  
24 to answer that question, I cannot, because my  
25 counsel -- the attorneys have told me that I have

1 to invoke my Sixth Amendment, Fifth Amendment and  
2 Fourteenth Amendment or, in fact, risk losing  
3 their representation. Therefore, I'm going to  
4 have to assert my rights under those.

5 Q [REDACTED] is a female that was born in [REDACTED]  
6 of [REDACTED].

7 A Is that a question?

8 Q Not yet. When is the first time that  
9 you met her?

10 MR. [REDACTED]: Objection, speculation.

11 MR. [REDACTED] That assumes that he did  
12 meet her; is that what you're saying?

13 MR. [REDACTED]: Your question assumes --

14 MR. [REDACTED] He met her?

15 MR. [REDACTED]: -- exactly what he just said  
16 which hasn't been established on the record  
17 yet pursuant to the appropriate Florida  
18 Rules of Civil Procedure and the Evidence  
19 Code. Lacks predicate.

20 A That being said, I would like to answer  
21 that question, but today my attorneys have  
22 counseled me that I cannot, and they've advised  
23 me I must assert my Sixth Amendment right, my  
24 Fourteenth Amendment right, and my Fifth  
25 Amendment right under the U.S. Constitution.

1 THE WITNESS: Can you throw me one of  
2 the suckey candies, please

3 Thank you.

4 MR. [REDACTED] (Handing candy.)

5 THE WITNESS: Appreciate it.

6 Q Isn't it true you met [REDACTED] for the first  
7 time in July or August of 2002 just before her  
8 fourteenth birthday?

9 MR. [REDACTED]: Same objections.

10 A You know, your firm has been accused by  
11 the U.S. Attorney of perpetrating one of the  
12 largest frauds in South Florida history by  
13 crafting sexually charged lawsuits against people  
14 like me and others in order to fleece  
15 unsuspecting investors here in South Florida out  
16 of millions of dollars. The firm of you and Mr.  
17 Jaffe. The U.S. Attorney described it as bogus  
18 schemes contrived by your firm.

19 I would like to answer every one of your  
20 questions here today; however, my attorneys have  
21 counseled me that I may not, and have advised me  
22 that I have to invoke my Sixth Amendment, Fifth  
23 Amendment and Fourteenth Amendment rights under  
24 the U.S. Constitution. Therefore, that's what I  
25 will do, otherwise I risk losing their

1 representation.

2 Q Isn't it true [REDACTED] as a 13 or 14-year  
3 old girl was taken to your house by another  
4 underage minor female, that being [REDACTED]

5

6 MR. [REDACTED]: Form.

7 THE WITNESS: Tissue, please.

8 MR. [REDACTED] (Handing tissue.)

9 A I would like to answer that question  
10 like all the other questions you've asked me here  
11 today, but today my attorneys have counseled me  
12 that I have to invoke my Sixth Amendment right,  
13 my Fifth Amendment right and Fourteenth Amendment  
14 rights under the U.S. Constitution; therefore  
15 that's what I will do.

16 Q Do you know who [REDACTED] is,  
17 right, she had a lawsuit against you previously?

18 MR. [REDACTED]: Form.

19 A Again the last name?

20 Q [REDACTED]

21 A Could you spell it for me?

22 Q Well, the pseudonym that she used in her  
23 lawsuit against you alleging similar facts to  
24 those alleged in [REDACTED] versus Jeffrey Epstein was  
25 [REDACTED] versus Jeffrey Epstein.

1 A And now the question?

2 Q You know who she is, correct?

3 MR. [REDACTED]: Form.

4 A I would like to answer that question  
5 here, Mr. [REDACTED] but unfortunately today my  
6 attorneys have counseled me I must invoke my  
7 Fifth Amendment, Sixth Amendment and Fourteenth  
8 Amendment rights under the U.S. Constitution, and  
9 if I don't, I risk losing their representation,  
10 therefore I must assert those rights.

11 Q When I asked you about [REDACTED] or [REDACTED]  
12 [REDACTED] you sat there for a while thinking hard  
13 about whether or not you knew them. Do you  
14 remember either [REDACTED] or [REDACTED]?

15 MR. [REDACTED]: I move to strike counsel's  
16 statement because the statement as worded  
17 assumes facts certainly not in evidence. It  
18 is argumentative, speculates as to what is  
19 "thinking hard," and, counsel, I don't  
20 understand the question on the table,  
21 combined with your narrative. If you could  
22 repeat the question?

23 MR. [REDACTED] Sure.

24 Q I'm asking if during this questioning  
25 process, has it refreshed your recollection as to

1 who [REDACTED] is or do you really have no idea who  
2 that is?

3 MR. [REDACTED]: Form. Asked and answered.

4 Q Do you remember [REDACTED]?

5 A Are you going to ask one question?  
6 Which question would you like answered first?

7 Q Do you remember [REDACTED]?

8 A I would like to answer that question. I  
9 would like to answer that question today; however  
10 my attorneys today have advised me that I must  
11 assert my Fourteenth Amendment, Fifth Amendment  
12 and Sixth Amendment rights under the U.S.  
13 Constitution, no matter how much I would like to  
14 answer these questions. So unfortunately, I'm  
15 going to assert those rights.

16 Q When you first met [REDACTED], isn't it true  
17 that she was just about to begin her ninth grade  
18 year in high school?

19 MR. [REDACTED]: Same objections. Form.

20 A I believe her testimony in front of the  
21 FBI, in a sworn deposition says something else,  
22 but I don't recall exactly what. I don't have  
23 any recollection.

24 Q Of [REDACTED]

25 MR. [REDACTED]: Form.

1           A    You asked the question when I met her, I  
2 think, if I met her.

3           Q    You have no recollection as to when you  
4 met her?

5           A    I don't have recollection if I ever met  
6 her. I just told you, I did read her FBI  
7 statement, so I know what she has said and it is  
8 not what you've just represented to me.

9           Q    Your only knowledge of any interaction  
10 you may have had with [REDACTED] is derived from an FBI  
11 statement that she gave; is that true?

12          A    I believe what you just represented she  
13 said was not what she had sworn to.

14          Q    I'm not asking what she said. I'm  
15 asking do you independently remember if she was  
16 entering into her ninth grade year of high school  
17 when you met her? Independent of anything you've  
18 read.

19          MR. [REDACTED]: All right, let me just move  
20 to strike the... Diatribe between Mr.

21 [REDACTED] and Mr. Epstein. I'm confused as to  
22 what question is on the table now.

23          MR. [REDACTED] Okay.

24          Q    Independent of anything you've ever  
25 read --

1           A    Okay.

2           Q    -- do you remember meeting [REDACTED], just  
3 before she entered into her ninth grade year in  
4 high school?

5           A    I would like to answer that question,  
6 however my attorneys today have advised me that  
7 though her own statements are contradictory to  
8 what you just said, her sworn statements to the  
9 FBI contradict what you just said. I have to  
10 invoke my Sixth Amendment, Fifth Amendment and  
11 Fourteenth Amendment rights to the U.S.  
12 Constitution.

13          Q    Just a few minutes ago when you asked  
14 when you met her, you said, "I don't know if I've  
15 ever met her," so is that your testimony, that  
16 you don't know if you ever met [REDACTED]?

17          A    My testimony is very clear. I must  
18 assert the rights my attorneys have asked me to  
19 assert today, though her testimony under oath to  
20 the FBI is not what you represented it to be, to  
21 me, and the ladies and gentlemen of the jury who  
22 are watching this, hopefully.

23               MR. [REDACTED]: Form.

24          Q    We will get into that.

25          A    Okay.

1 Q When you first came into the room today,  
2 didn't you look at me and say "I like [REDACTED]" Isn't  
3 that the statement that you made to me?

4 MR. [REDACTED]: Form. Move to strike.

5 A I don't believe I said that.

6 Q What is it that you believe you did say  
7 referencing [REDACTED] when you sat down in that seat  
8 prior to the cameras rolling?

9 MR. [REDACTED]: Form. Counsel, I was here  
10 during that whole time and I don't recall  
11 any such statement.

12 MR. [REDACTED]: You weren't in the room.

13 A I don't remember. I don't know.

14 Sorry.

15 Q So is it your testimony right now that  
16 you did not say to me "I like [REDACTED]"?

17 A That's --

18 MR. [REDACTED]: Objection.

19 A -- that's correct.

20 Q Do you like [REDACTED]?

21 MR. [REDACTED]: Form, predicate, and  
22 relevance.

23 A I would like to answer all your  
24 questions here as I've... tried to do my best,  
25 however, my attorneys have advised me that I must

1     assert my Sixth Amendment, Fourteenth Amendment  
2     and Fifth Amendment rights under the U.S.  
3     Constitution.

4           Q    When you first met [REDACTED], isn't it true  
5     that you knew she was an economically  
6     disadvantaged girl that needed money?

7           MR. [REDACTED]:  Objection, speculation,  
8     assumes facts not in evidence, and it is  
9     argumentative as worded.

10          A    I would like to answer all your  
11     questions here today, Mr. [REDACTED] and Mr.  
12     Jaffe.  However, on advice of counsel I have to  
13     assert my Sixth Amendment, Fifth Amendment and  
14     Fourteenth Amendment rights under the U.S.  
15     Constitution, or risk losing my right to  
16     effective representation.  So accordingly I must  
17     assert those rights as guaranteed by the Sixth,  
18     Fifth and Fourteenth amendments.

19          Q    When she was a 14-year old girl, she was  
20     taken into your bedroom and you [REDACTED]  
21     [REDACTED] is that correct?

22          MR. [REDACTED]:  Objection, vague, confusing.  
23     As to "her," I'm not quite sure who you...

24          Q    When [REDACTED] was a 14-year old girl, she  
25     was taken up to your bedroom and you [REDACTED]

1 [REDACTED] isn't that true?

2 MR. [REDACTED]: Objection, speculation, and  
3 assumes facts not in evidence. Lacks  
4 predicate.

5 A Though once again what you've just  
6 represented to me is a total contradiction to the  
7 FBI sworn statement that I read of [REDACTED], I must  
8 unfortunately respond by asserting the rights  
9 demanded by my attorneys today, which is my Sixth  
10 Amendment, Fifth Amendment and Fourteenth  
11 Amendment right against -- sorry, given by the  
12 U.S. Constitution, though her testimony is  
13 exactly -- does not purport in any way to what  
14 you've just said.

15 Q And when [REDACTED] was 14 years old, you  
16 ordered [REDACTED]

17 [REDACTED] isn't that true?

18 MR. [REDACTED]: Same objections.

19 A Sorry, you have to repeat the question  
20 for me.

21 Q When [REDACTED] was a 14-year old girl --

22 A Right. Yes?

23 Q -- you laughed and said, "right" about  
24 what?

25 A I didn't hear the first part of your

1 question. Now I understood it.

2 Q When [REDACTED] was a 14-year old girl, wasn't  
3 it true that [REDACTED]

4 [REDACTED]

5 MR. [REDACTED] Objection, speculation,  
6 assumes facts not in evidence, lacks  
7 predicate.

8 A I understand that your firm has been  
9 accused by the U.S. Attorney of South Florida,  
10 perpetrating one of the largest frauds in  
11 Florida's history, by crafting malicious,  
12 sexually charged allegations against people like  
13 me. I understand [REDACTED]'s testimony is not what  
14 you've just described, though she swore to the  
15 FBI... under oath. Though I would like to answer  
16 your questions here today, my attorneys have  
17 advised me I may not. I must assert my Sixth,  
18 Fifth and Fourteenth Amendment rights under the  
19 U.S. Constitution or risk losing their  
20 representation.

21 THE WITNESS: Restroom break.

22 MR. [REDACTED] Excuse me?

23 THE WITNESS: Restroom break.

24 MR. [REDACTED] Stopping again?

25 THE WITNESS: Yeah.

1 THE VIDEOGRAPHER: Going off the video  
2 record 1:49 p.m.

3 THE WITNESS: Thank you.

4 (Pause in the proceedings.)

5 THE VIDEOGRAPHER: Back on the video  
6 record 2:04 p.m.

7 Q Mr. Epstein, when [REDACTED] was a 14-year old  
8 girl, isn't it true that [REDACTED]

9 [REDACTED]

10 [REDACTED]

11 A I believe I've answered that question,  
12 didn't I?

13 Q I don't remember where we left off,  
14 that's why.

15 MR. [REDACTED]: Form, argumentative,  
16 speculation. It is compound and assumes  
17 facts not in evidence and has been asked and  
18 answered. But we did take a break, so you  
19 can respond.

20 (Counsel addressing Mr. Epstein.)

21 A The current U.S. Attorney has described  
22 your law firm as a criminal enterprise involved  
23 in fabricating sexually charged cases against  
24 people like me in order to fleece unsuspecting  
25 investors out of millions of dollars. He used

1 words like "bogus schemes."

2           Unfortunately at this time in response  
3 to your questions, though I would like to answer  
4 each and every one, I'm going to have to, on  
5 advice of counsel, assert my Sixth Amendment,  
6 Fifth Amendment and Fourteenth Amendment rights  
7 under the U.S. Constitution, though I would like  
8 to answer those questions.

9           Q   While [REDACTED] was a [REDACTED] 14-year old girl  
10 [REDACTED] [REDACTED]  
11 [REDACTED] isn't that  
12 true?

13           MR. [REDACTED] Same objections,  
14 argumentative, speculation, harassing,  
15 assumes facts not in evidence and lacks  
16 predicate.

17           A   I asked her to [REDACTED]?

18           Q   [REDACTED]?

19           A   I believe her own sworn testimony  
20 contradicts that statement. However, I would  
21 like to answer all your questions here today, but  
22 my attorneys advised me, at least today, Mr.  
23 [REDACTED] I must take my constitutional privileges  
24 of the Sixth Amendment, Fifth Amendment and  
25 Fourteenth Amendment, keeping in mind that your

1 firm, of you, Mr. [REDACTED] and Mr. Jaffe's firm  
2 has been accused by the U.S. Attorney of  
3 perpetrating one of the largest frauds in  
4 Florida's history by crafting sexually charged  
5 lawsuits against people like me, to fleece from  
6 local people millions of dollars.

7 Q And during this message by [REDACTED], [REDACTED]  
8 [REDACTED] isn't that  
9 true?

10 MR. [REDACTED] Same objections?

11 A Unfortunately, though I would like to  
12 answer each one of your questions here today, my  
13 attorneys have counseled me today at least, I  
14 have to assert my Fifth Amendment, Sixth  
15 Amendment and Fourteenth Amendment rights under  
16 the U.S. Constitution, otherwise I risk losing  
17 their effective representation, and the fact that  
18 your firm has been accused of fabricating these  
19 malicious lawsuits to fleece investors out of  
20 millions of dollars, as described by the U.S.  
21 Attorney here in South Florida as a criminal  
22 enterprise involved in mail fraud, money  
23 laundering... Unfortunately I would like to  
24 answer each question, but I can't today.

25 Q Isn't it true that while you were

1

2

3

MR. [REDACTED]: Objection, argumentative.

4

Speculation. It is harassing. It assumes

5

facts not in evidence. The question

6

continues to lack predicate, and I also

7

believe the question has been asked and

8

answered sometime ago.

9

A Though I would like to answer each one

10

of your questions today, Mr. [REDACTED] my counsel

11

has told me I cannot answer any questions that

12

may be relevant to this lawsuit. The fact that

13

your firm has been accused of major fraud, the

14

largest fraud in South Florida history, by the

15

U.S. Attorney calling your firm a criminal

16

enterprise involved in money laundering -- I

17

believe it is racketeering, but I could be

18

wrong... Monetary transactions via fraud, mail

19

fraud, conspiracy -- sorry -- I would like to

20

answer your questions but today on advice of

21

counsel, I am going to have to assert my rights.

22

Q Isn't it true also that while [REDACTED] was a

23

14-year old female, you [REDACTED]

24

25

[REDACTED]?

1 MR. [REDACTED]: Same objections incorporated?

2 A Again, the question?

3 Q Isn't it true that during this sexual  
4 massage, while you were -- that you [REDACTED]

5 [REDACTED]

6 [REDACTED]

7 MR. [REDACTED] Objection, argumentative,  
8 speculation. It is compound. It is vague.  
9 It assumes facts not in evidence and lacks  
10 predicate.

11 A Though I would like to answer that  
12 question with specificity and detail today, no  
13 matter how much I would like to, my attorneys  
14 have advised me I cannot. They advised me I must  
15 assert my Fifth Amendment, Sixth Amendment and  
16 Fourteenth Amendment rights under the U.S.  
17 Constitution or potentially lose effective  
18 representation, so therefore, I will assert those  
19 rights.

20 Q Isn't it true that the ritual that I'm  
21 describing occurred with [REDACTED], approximately 100  
22 times when she was between the ages of 13 and 16?

23 MR. [REDACTED] Same objections, with the  
24 additional objection of vague and  
25 confusing.

1           A    Since your firm has been involved --  
2    according to the U.S. Attorney in crafting these  
3    fraudulent lawsuits in order to fleece local  
4    investors, and the fact that I believe in [REDACTED]'s  
5    sworn statements, that's what you've just alleged  
6    at least is totally contradicted by your client's  
7    own sworn statements, though I would like to  
8    answer these questions today, my attorneys have  
9    advised me I may not and advised me I must assert  
10   my Fifth, Sixth and Fourteenth Amendment rights  
11   under the U.S. Constitution or potentially risk  
12   losing effective representation.

13           Q    In addition to the sexual abuse directed  
14    against [REDACTED] that I've just described, isn't it  
15    true that you also paid her money to bring you  
16    more than 50 other underage minor females for you  
17    to similarly abuse?

18           MR. [REDACTED]:   Same objections.

19           A    Though I believe in her own sworn  
20    testimony to the U.S. government that she  
21    contradicts those assertions, and I'm sure maybe  
22    you'll have some explanation at trial, but the  
23    ladies and gentlemen of the jury should know  
24    about your firm being accused by the U.S.  
25    Attorney of perpetrating one of the largest

1 frauds in U.S. history by crafting malicious  
2 lawsuits of a sexual nature in order to fleece  
3 investors out of millions of dollars, local  
4 investors; and though I would like to answer your  
5 questions in detail today, Mr. [REDACTED] and Mr.  
6 Jaffe, my counsel says I may not and have asked  
7 me to assert those rights, which I must  
8 unfortunately.

9 Q You keep bringing up this fraud of the  
10 former law firm known as [REDACTED]  
11 [REDACTED] in response to my questions, so I would  
12 like you to tell the jury at this time which  
13 allegation are you now saying is fraudulent or  
14 untrue, that's been made by [REDACTED]?

15 MR. [REDACTED]: Form, confusing, compound,  
16 and irrelevant.

17 MR. [REDACTED] Only made irrelevant by  
18 his answers.

19 MR. [REDACTED]: Same objections.

20 Q Do you understand the question?

21 A No.

22 Q You made reference to -- in response to  
23 my questions about what you did sexually to

24 [REDACTED] --

25 A Yes, sir?

1 Q -- you have responded with these fraud  
2 allegations against the firm of [REDACTED]  
3 [REDACTED] I want you to tell the jury  
4 which allegations that [REDACTED] is making against you  
5 are you disputing at this time or calling a fraud  
6 or calling untrue?

7 MR. [REDACTED] Confusing, compound and -- if  
8 the court reporter would read back Mr.  
9 Epstein's response, I think you will see the  
10 way you just phrased the question  
11 mischaracterizes his testimony. Because --  
12 well, I'll keep it there unless you want me  
13 to go further. You want me to go further?

14 MR. [REDACTED] No, I want him to go  
15 further.

16 MR. [REDACTED]: Mischaracterizes the  
17 witness's testimony.

18 A [REDACTED]'s own statements contradict every  
19 one of your allegations that you've made to me  
20 today, as a hypothetical. In her own words. And  
21 you -- and the potential reasons this concerns me  
22 is the fact that the law firm that represented  
23 [REDACTED] and two others have been accused by the U.S.  
24 Attorney of fraudulently producing cases against  
25 me and others, to fleece investors in what he's

1 described as one of the largest frauds in South  
2 Florida's history. So, it concerns me. It is a  
3 factor in the way I'm thinking about answering.  
4 Sorry.

5 Q Each time that you [REDACTED]  
6 [REDACTED] or [REDACTED] you paid  
7 her \$200; is that correct?

8 MR. [REDACTED]: Objection, argumentative,  
9 speculative, harassing. It assumes facts  
10 not in evidence, and with regard to this  
11 line of questioning, the Court has already  
12 ruled that the demeanor in which you're  
13 presenting this question is improper, and  
14 harassing, so if you would --

15 MR. [REDACTED] I'm very comfortable with  
16 the demeanor right now, Mr. [REDACTED]. These are  
17 just the facts of the lawsuit. The facts  
18 are outrageous and I understand that, but  
19 they have to be asked.

20 MR. [REDACTED] Maybe the demeanor and tone  
21 of your question is laced in a manner that  
22 it is proper for the video, but the content  
23 of the question is the same exact harassing  
24 question that was deemed by the Judge to be  
25 argumentative. I'm not saying that he's not

1 going to answer your question.

2 MR. [REDACTED] Okay.

3 MR. [REDACTED]: Or that you don't know what  
4 his answer will be, but what I'm saying is:  
5 could you rephrase the question?

6 Q Answer that question. I'll work on  
7 rephrasing it for you at some point.

8 A Sorry, I forgot what the question is by  
9 now.

10 Q Isn't it true that each time that you  
11 interacted with [REDACTED] sexually, meaning [REDACTED]  
12 [REDACTED] or [REDACTED],  
13 that you paid her \$200 each time?

14 MR. [REDACTED]: Form.

15 THE WITNESS: Sorry?

16 MR. [REDACTED] Form. Go ahead.

17 A I would like to answer each one of your  
18 questions here today. However, my attorneys have  
19 counseled me that today I have to assert my Fifth  
20 Amendment, Sixth Amendment and Fourteenth  
21 Amendment rights under the U.S. Constitution and  
22 I'm cognizant of the fact that your firm has  
23 crafted these malicious lawsuits, it has been  
24 reported that the lawsuits are of a sexual  
25 nature, in order to fleece investors, so though I

1 would like to answer those questions, Mr.

2 [REDACTED] and Mr. Jaffe, today I must keep my  
3 counsel's advice.

4 Q Isn't it true that for each underage  
5 minor that [REDACTED] brought to you for the purposes  
6 of you engaging in sexual activity, you paid her  
7 \$200?

8 MR. [REDACTED]: Objection, speculation.  
9 Compound question, and it assumes facts not  
10 in evidence. Therefore lacks predicate.

11 A Though I would like to answer that  
12 question, as most of your other questions here  
13 today, Mr. [REDACTED] I intend to respond,  
14 hopefully at some point to all of your questions,  
15 but today my attorneys have advised me I must  
16 invoke my Sixth Amendment, Fifth Amendment and  
17 Fourteenth Amendment right under the U.S.  
18 Constitution.

19 Q Over the course of relatively a roughly  
20 three years, isn't it true that you touched or  
21 fondled [REDACTED] in a sexual manner on more than 50  
22 occasions?

23 MR. [REDACTED]: Objection, argumentative.  
24 Calls for speculation. It is overbroad,  
25 confusing and vague, and it assumes facts