

1 50 years old?

2 MR. [REDACTED]: I'm going to object once
3 again. We are getting way too argumentative
4 with the questioning. The questioning is
5 compound. It is speculative and it is also
6 harassing. Whether or not this deposition
7 video, thereof is played in front of a jury
8 is a question of fact, and it will be
9 determined by a judge pursuant to a motion
10 in limine, various portions thereof may or
11 may not be played, so having placed those
12 objections on the record I'm going to
13 instruct Mr. Epstein not to answer that
14 question.

15 MR. [REDACTED]: Mr. [REDACTED] I don't know if
16 you watched the 13 hours of harassing
17 questions to [REDACTED], that she sometimes
18 invoked her Fifth Amendment rights, I
19 understand the adverse advice that would be
20 given and she was made to answer these
21 questions and these exact same questions
22 were asked of her, in fact, I'm using the
23 phraseology from Mr. [REDACTED] I'm not
24 trying to harass him.

25 Q I'm simply asking him to explain to the

1 jury. If you're saying it didn't happen, if
2 you're saying it did happen, explain to the jury
3 why you did it. That's all I want to hear. I'm
4 being respectful about this.

5 MR. [REDACTED]: In an effort to keep a clean
6 record be respectful to the to the court
7 reporter rather than having a diatribe back
8 and forth between you and myself, I'll move
9 to strike your last statement as
10 irrelevant. Let's move on.

11 Q Is it true, Mr. Epstein, you were born
12 January 20, 1953?

13 A Yes.

14 Q Where?

15 A New York.

16 Q Where in New York?

17 A Brooklyn.

18 Q Did you go to high school there?

19 A Yes, sir.

20 Q Where?

21 A Lafayette High School.

22 Q After high school did you attend
23 college?

24 A Yes.

25 Q Where was that?

1 A New York.

2 Q What college did you attend?

3 A Cooper Union.

4 Q Sorry, I didn't hear.

5 A Cooper Union.

6 Q Did you get a degree from Cooper Union?

7 A No, sir.

8 Q How many years were you in college?

9 A I believe, two.

10 Q What did you study?

11 A Physics.

12 Q Why did you leave college early?

13 A I intend to respond to all relevant
14 questions regarding this lawsuit, however, at the
15 present time my attorneys have counseled me that
16 I cannot provide answers to questions that may be
17 relevant to this lawsuit, so accordingly I assert
18 my constitutional rights as guaranteed by the
19 Fifth, Sixth and Fourteenth Amendment.

20 Q Are you invoking your Fifth Amendment
21 rights as to why you left college, is it safe
22 then to presume that that answer you believe
23 would incriminate you in some way?

24 MR. [REDACTED]: I'm going to move to strike,
25 speculative, argumentative, harassing.

1 Calls for a legal conclusion, and I know
2 exactly what you're trying to do here, Mr.
3 ██████████, is lace the record with questions
4 that would ultimately give you an adverse
5 inference at any potential trial of this
6 matter, so having put that on the record,
7 I'm going to instruct him not to answer that
8 question, based upon his Fifth, Sixth and
9 Fourteenth Amendment rights to the United
10 States Constitution.

11 MR. ██████████ With all due respect you
12 cannot invoke his Fifth Amendment rights,
13 your attorneys instructed me in that fact --

14 MR. ██████████: He can.

15 MR. ██████████ That ██████████ Had to do it
16 herself, so, I would like to hear it from
17 Mr. Epstein.

18 Q Can we assume you're invoking your Fifth
19 Amendment rights as to why you left college
20 early, that that answer you feel would
21 incriminate you?

22 MR. ██████████: Once again, move to strike
23 for the same reasons.

24 You can answer.

25 A I've already answered the question.

1 I'll restate the answer. I would like to
2 respond, intend to respond, and would like to
3 respond to all questions today. However, counsel
4 has advised me I must take the Fifth, Sixth and
5 Fourteenth Amendment right under the U.S.
6 Constitution.

7 Q After college where were you employed?

8 A You know, I would like to respond to all
9 your questions today, however, on advice of
10 counsel, I intend to take the Fifth, Sixth and
11 Fourteenth Amendment rights provided by the
12 United States Constitution or risk losing my
13 counsel's representation.

14 Q Isn't it true that you were a teacher at
15 the Dalton School in New York after college?

16 A Again, I would like to respond to all
17 your questions; however, my attorneys have
18 counseled me that I cannot provide answers to any
19 questions today regarding to this lawsuit so I
20 must accept their advice or risk losing my Sixth
21 Amendment right to effective representation.
22 Accordingly, I assert my Constitutional rights as
23 guaranteed by the Fifth, Sixth and Fourteenth
24 Amendment of the constitution.

25 Q Mr. Epstein, did you have sex with any

1 underage students while teaching at the Dalton
2 School?

3 A Could you repeat that?

4 Q Yes. Did you have sex with any underage
5 students while teaching at the Dalton School in
6 New York?

7 A Mr. [REDACTED] your firm has been
8 described by the U.S. Attorney as one of the
9 largest -- as a criminal enterprise, perpetrating
10 one of the largest frauds in Florida's history.
11 It has been reported that your firm fabricated
12 multiple cases against me and others in order to
13 fleece unsuspecting investors out of millions and
14 millions of dollars.

15 Unfortunately at this time in response
16 to your question, my attorneys have advised me I
17 must assert my Fifth Amendment, Sixth Amendment
18 and Fourteenth Amendment rights, though I believe
19 you know I would like -- really like to answer
20 your questions but at this time I must assert
21 those rights or have my attorneys resign.

22 MR. [REDACTED] Mr. [REDACTED] I think you know
23 he has a couple of options here. He can
24 answer questions or he can invoke his Fifth
25 Amendment rights. This nonresponsive

1 verbiage regarding the RRA law firm is not
2 one of the options, it's inappropriate in
3 the deposition and I would ask you to
4 instruct your client not to obstruct this
5 process any further. I am not going to
6 terminate the deposition. I want it to
7 finish, but obviously this is going to be
8 the subject matter of some motion in the
9 courts and you know the judges will not
10 appreciate this. I would like to just move
11 this process along by eliminating that
12 portion of his answer. I understand what he
13 is saying. I get it, but that's not
14 something responsive to any of the questions
15 and I think you know it is inappropriate.

16 MR. [REDACTED]: I think the deponent is
17 answering the questions. If you believe the
18 responses are inappropriate and feel you can
19 take it up with the Court with the motion
20 you are speaking of, as you've done then you
21 can, as you've done several times before.

22 Q After leaving the Dalton School, is it
23 true that you began working as a money manager at
24 Bear Stearns?

25 A I intend to respond to all your

1 questions regarding this lawsuit at some relevant
2 time, however, at the present time my attorneys
3 have counseled me that I cannot provide answers
4 to any questions relevant to this lawsuit. Since
5 the U.S. Attorney has described your law firm as
6 a criminal enterprise, Mr. [REDACTED] and a part of
7 the largest fraud in Florida's history, I am
8 going to assert my Sixth Amendment, Fifth
9 Amendment and Fourteenth Amendment rights to the
10 U.S. Constitution.

11 Q Isn't it true that while you were
12 working at Bear Stearns you were already engaging
13 in sex with underage minors?

14 A Again, I believe you know the answers to
15 those questions, but --

16 Q Yes.

17 A .May I finish?

18 Q I do.

19 MR. [REDACTED]: Move to strike. Let the
20 witness --

21 Q Sure --

22 MR. [REDACTED]: Let the witness answer your
23 question.

24 MR. [REDACTED] I would love for him to
25 finish the questions.

1 MR. [REDACTED]: Mr. [REDACTED] as you know
2 there are serious Fifth, Sixth and
3 Fourteenth Amendment constitutional rights
4 at issue here, and the witness is attempting
5 to answer your questions to the best of his
6 ability, despite how laced they are with
7 adverse inference presumptions.

8 MR. [REDACTED] I don't want the adverse
9 inferences. I want the answers, that's it.
10 I don't want the adverse inferences.

11 MR. [REDACTED]: Having said that, please
12 allow the witness to answer to answer the
13 question.

14 A Can you please repeat the question?

15 Q Isn't it true while working at Bear
16 Stearns you were already engaging in sex with
17 underage minor females?

18 A As your firm has been described by the
19 U.S. Attorney, as a criminal enterprise, using
20 some of the cases fabricated against me,
21 personally, I would like to answer that question
22 today; however, upon advice of counsel I must
23 assert my Fifth, Sixth and Fourteenth Amendment
24 rights under the U.S. Constitution or, in fact,
25 risk losing their representation.

1 Q At some point in time while at Bear
2 Stearns you met and managed the money for a
3 fellow named [REDACTED], correct?

4 A Again, I would like to answer all
5 questions relevant to this lawsuit, but today I
6 must assert my Fifth Amendment, Sixth Amendment
7 and Fourteenth Amendment right to the U.S.
8 Constitution.

9 Q In fact, I read in another deposition of
10 yours that you do not consider yourself to be
11 homosexual, correct?

12 A (No response.)

13 Q You've answered that question before,
14 correct?

15 A Correct.

16 Q Do you consider yourself to be
17 bisexual?

18 A No.

19 Q In any event, you did develop a sexual
20 relationship with [REDACTED] at some point in
21 time; is that true?

22 A No.

23 Q Did you have a business relationship
24 with Mr. [REDACTED]?

25 A I intend to respond to all relevant

1 questions. I would like to answer most of your
2 questions, Mr. [REDACTED] today, however,
3 especially since your firm has been described by
4 the United States Attorney in South Florida as a
5 criminal enterprise purported to -- purported to
6 have put -- pulled off the largest fraud in
7 Florida's history, I would like to answer it,
8 however, my attorneys here today counseled me I
9 must assert my Fifth, Sixth and Fourteenth
10 Amendment right under the U.S. Constitution,
11 therefore I'm going to do that.

12 Q Are you saying because [REDACTED]
13 [REDACTED] [REDACTED] was determined to be a criminal
14 enterprise or somebody was running a criminal
15 enterprise out of that law firm, that is the
16 reason why you are not going to answer these
17 questions today? You linked that together in
18 that answer. I just want to make sure I'm
19 understanding that right?

20 A I'm going to take the Fifth -- I intend
21 to respond to all relevant questions today. I
22 would like to respond; unfortunately my attorneys
23 have counseled me I can't, I must assert my
24 Fifth, Sixth and Fourteenth Amendment rights
25 under the U.S. Constitution.

1 Q Because other law firms have asked very
2 similar questions and you haven't responded to
3 any of theirs either. I just want to understand
4 what the relationship between [REDACTED]
5 [REDACTED] [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] [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 [REDACTED]'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. [REDACTED] 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. PIKE: Can you spell that, for the
15 record?

16 MR. [REDACTED] No.

17 MR. PIKE: Or for the court reporter?

18 A No.

19 Q You don't know the name?

20 A No. Could you spell it?

21 Q (Witness shrugs.)

22 A Okay.

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

1 day for sex?

2 MR. [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]'s firm, had nothing to do with
9 Rothstein, Rosenfeld, Adler. 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 L.M. 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 L.M.'s claim -- was
6 involved in the filing of L.M.'s claim,
7 motions -- I'm sorry, do you want to tell me what
8 it was then? Would you like to tell me the
9 firm's involvement in this lawsuit, since we will
10 be here the rest of the day?

11 Q Answer the question.

12 A All right.

13 The U.S. Attorney has described that
14 firm as a criminal enterprise perpetrating one of
15 the largest frauds in Florida's history against
16 unsuspecting investors, fleecing them out of
17 millions of dollars by creating, crafting and
18 fabricating fellacious (sic) sexual claims
19 against people like me and others, so
20 unfortunately, though I would like to answer your
21 questions, Mr. [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, L.M.,
24 in this matter.

25 A I would like to answer that question, I

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

14 Q Isn't it true that you forced [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. [REDACTED] 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. [REDACTED] 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 [REDACTED]; 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. [REDACTED] called [REDACTED]?

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, [REDACTED], 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] 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. [REDACTED] 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]
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 [REDACTED], 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 she was [REDACTED]

22 [REDACTED] [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 [REDACTED], 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 [REDACTED]'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. [REDACTED].

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

1 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 [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 [REDACTED] 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 [REDACTED]

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 [REDACTED]. However, on advice of counsel I have to
13 assert my Sixth Amendment, Fifth Amendment and
14 Fourteenth Amendment rights under the U.S.
15 Constitution, or risk losing my right to
16 effective representation. So accordingly I must
17 assert those rights as guaranteed by the Sixth,
18 Fifth and Fourteenth amendments.

19 Q When she was a 14-year old girl, she was
20 taken into your bedroom and you ordered her to
21 take her clothes off; is that correct?

22 MR. [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 ordered her

1 to take her clothes off; 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 she begin to give you a massage while she
17 was naked and you were naked; 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 you received a massage from her
4 while she was naked and you were naked?

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] 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.