



1 APPEARANCES:  
2 On behalf of the Plaintiffs in related cases  
3 Nos. 08-80069, 08-80119, 08-80232, 08-80380,  
4 08-80381, 08-80993, 08-80994:  
ADAM HOPWITZ ESQUIRE

1 PROCEEDINGS  
2 ---  
3 THE VIDEOGRAPHER: We're back on the record at  
4 12:19 p.m. This marks the beginning of tape 2.



1 you first went to Mr. Epstein's home in the latter part  
 2 of your junior year, which would have been sometime  
 3 April, May of 2004?  
 4 A. When I first went there?  
 5 Q. Yes, ma'am.  
 6 A. No.  
 7 Q. Okay, what is it now?  
 8 MR. HOROWITZ: Form.  
 9 THE WITNESS: Why did you try to trick me like  
 10 that when I told you --  
 11 BY MR. CRITTON:  
 12 Q. I'm not trying to trick you. You have said  
 13 about 19 different things. I'm going to ask a clean  
 14 question so maybe we can get a clean answer from you  
 19 end of my sophomore year or the beginning of my junior  
 20 year. I don't really remember the exact dates.  
 21 Q. If it was the end of your sophomore year, that  
 22 would have put it sometime in 2003, right?  
 23 A. Yes.  
 24 Q. Okay. If it was the beginning of your junior  
 25 year, it still would have been sometime in '03, but you

1 would have now been 16 years old, correct?  
 2 A. Yes.  
 3 Q. Whereas if it was the latter part of your  
 4 sophomore year, you would have been 15?  
 5 A. Yes.  
 6 Q. So the complaint, Exhibit 1, where it says you  
 7 first went in 2004, that's not true, correct?  
 8 MR. HOROWITZ: Object to form.  
 9 BY MR. CRITTON:  
 10 Q. Well, let me go back to it again.  
 11 Paragraph nine where it says "In or about 2004  
 12 Jane Doe, then approximately 16 years old, fell into  
 13 Mr. Epstein's -- fell into Epstein's trap and became one  
 14 of his victims." Okay?  
 15 The first time you were there now you are  
 16 saying would have been in '03?  
 17 MR. HOROWITZ: Form.  
 18 BY MR. CRITTON:  
 19 Q. Right?  
 20 A. The end of my sophomore year, that's 2003,  
 21 yes.  
 22 Q. You tell me, okay? Please. Don't let me lead  
 23 you in that. You tell me what the end of your sophomore  
 24 year would have been, what year.  
 25 A. Yes, if it was the end of 2003.

1 Q. Okay, I'm asking you. I'm don't want to trick  
 2 you here. I just want to make certain that you  
 3 understand --  
 4 A. No, that's fine. I just wish we could move  
 5 past this.  
 6 Q. Then in paragraph 14 the allegation is that  
 7 you -- and I'm paraphrasing -- is that you returned on  
 8 many occasions to Mr. Epstein's home over a period of 18  
 9 to 24 months, right?  
 10 A. Yes.  
 11 Q. All right. So 18 to 24 months would be  
 12 another year and a half to two years, which would now  
 13 be, based on what you are testifying today, would have  
 14 been sometime in '03 through sometime in '05. right?  
 19 don't remember how many months exactly. I don't -- but  
 20 if you go by this, then yes.  
 21 Q. Okay.  
 22 A. I don't remember, I don't recall dates, and  
 23 I'm sorry, like I don't remember the first time I went  
 24 there, I don't remember the date when I first went  
 25 there. I don't remember the month. I just remember

1 being in gym class with H.R. was the first time.  
 2 Q. Then if I go to your answers to  
 3 interrogatories, which are Exhibit 2, question 15, where  
 4 it says "Plaintiff" -- this is your answer under oath,  
 5 okay? There is no lawyer.  
 6 In fact, the only lawyers that were there were  
 7 Ms. Arbour, paralegal and now lawyer. So you are  
 8 certainly not -- well, let me strike that.  
 9 When you answered these interrogatories, you  
 10 did them in conjunction as reflected in answer number  
 11 one with Ms. Arbour, who was a paralegal for the  
 12 Mermelstein & Horowitz firm, correct?  
 13 A. Yes.  
 14 Q. You weren't scared, were you?  
 15 A. No.  
 16 Q. You weren't dazed?  
 17 A. No.  
 18 Q. You weren't confused?  
 19 A. No.  
 20 Q. You had good presence of mind, you had the  
 21 ability to think about the question as long as you  
 22 wanted to, true?  
 23 MR. HOROWITZ: Form.  
 24 THE WITNESS: Yes.  
 25

1 BY MR. CRITTON:

2 Q. All right. And at least in this answer under  
3 oath you said, "Plaintiff went to defendant's estate  
4 approximately eight to ten times during her junior and  
5 senior years of high school, from 2004 and 2005."

6 Right?

7 A. Uh huh.

8 Q. Yes?

9 A. Yes.

10 Q. Okay. Now you said you also gave -- well, let  
11 me strike that. Let me stay with the police statement

1 Q. And now you are saying that may not be right,  
2 I may have lied to them, right?

3 A. Yes.

4 Q. All right. So you told them you went to  
5 Mr. Epstein's home the first time with H.R.

6 Was that true?

7 A. Yes.

8 Q. Why did you tell them that?

9 A. Because that was the first time I went.

10 Q. But why did you, if you were confused and  
11 scared, why didn't you just tell the police you never

1 with regard to 2004-2005 time period, but you are saying  
2 at least it's right with regard to the number of times  
3 you went; is that correct?

4 A. I said I don't remember the exact dates and  
5 years.

6 Q. Well, if it's 2004 and 2005, it would be at  
7 the end of your junior year, latter part of your junior  
8 year into your senior year, correct?

9 A. Yes.

10 Q. All right. So, and I thought you told me five  
11 minutes ago that that time period was not correct, or  
12 now you are not so sure again.

13 MR. HOROWITZ: Form.

14 THE WITNESS: I told you that I didn't  
15 remember the dates. And I do remember going there  
16 from eight to ten times, but I don't remember the  
17 exact dates of when I started going there.

18 BY MR. CRITTON:

19 Q. Okay. That's my question to you is you don't  
20 remember the exact dates, but at least that part of the  
21 interrogatory where it says the number of times you  
22 went, you think that's maybe accurate?

23 A. Yes, it is accurate.

24 Q. Eight to ten times, okay. Well, you told the  
25 police, the Palm Beach Police Department when you were

1 interviewed that you only went two times, didn't you?

2 A. Yes, I already admitted that I did not tell  
3 them the whole truth.

4 Q. I know. Well, what I'm trying to do is figure  
5 out how many things you told them that may have been  
6 true, that is -- well, let me strike that.

7 I'm trying to find out now from looking at the  
8 police report what you told them may have been true  
9 versus what was not true or might be a half truth or  
10 something that you omitted. That's what I'm trying to  
11 do here, okay?

12 A. Okay.

13 Q. Do you understand that?

14 A. Yes.

15 Q. All right. So we know it's your testimony now  
16 that you lied to them about your age. Did you lie to  
17 them about the number of times you went to Mr. Epstein's  
18 home, they being the Palm Beach Police Department?

19 A. I told you I didn't tell them all the times I  
20 went. I only told them two.

21 Q. Well, you told them you went only two times?

22 A. Yes.

23 Q. Is that a lie?

24 A. I told you yes. I told you at the very  
25 beginning.

1 Q. The first time you went, you went with H.R.,  
2 right?

3 A. Yes.

4 Q. Let me get back to my question. They seemed  
5 to know that you were at Mr. Epstein's home, that is,  
6 the police officers?

7 A. Yes.

8 Q. Because they had seen your car there?

9 A. Yes.

10 Q. All right. And so if your car was there, I  
11 assume you don't let other people drive your car  
12 generally?

13 Let me ask this question. Did you ever let  
14 any other person drive your car to Mr. Epstein's home?

15 A. No.

16 Q. Okay. So you in each of those instances would  
17 have had to make the voluntary decision that you were  
18 going to go to Mr. Epstein's home, right?

19 A. Yes.

20 Q. All right. So you told them on the first  
21 occasion you went with H.R., right?

22 A. Yes.

23 Q. And what did you tell them who H.R. was?

24 A. She was a friend in high school.

25 Q. All right. So you went with H.R. She was a

1 friend. She was a good friend at the time?

2 A. I don't remember if she was a good friend. I  
3 think we were fighting. Me and her like would fight a  
4 lot and then make up. So I don't remember if we were  
5 good friends at the time or just friends.

6 Q. Okay. Good friend is someone you trust, have  
7 [REDACTED]  
8 with your name, but would you consider a good friend  
9 someone that you would feel very comfortable with and  
10 you could trust?

11 A. Yes.

12 Q. Okay. And if it was just a friend, maybe you  
13 would trust and maybe you wouldn't?

14 A. Yes.

15 Q. So you go with H.R., who you have now  
16 described as a friend, someone you might trust or not  
17 trust, right?

18 A. Yes.

19 Q. To Mr. Epstein's home. Again, I'm going to  
20 get into details later.

21 So you go to Mr. Epstein's home the first  
22 time, and what happens, or what did you tell the police,  
23 your best recollection?

24 A. I just remember I told them that I went there  
25 and I saw the cooks there, I saw [REDACTED]

1 I just remember that I, like I told them how I  
2 went upstairs and I did the massage. And I don't think  
3 I went into detail with them about what happened.

4 Q. So -- I'm sorry.

5 MR. HOROWITZ: Go ahead.

6 THE WITNESS: I don't remember going into  
7 detail with them about what happened.

8 And then I also remember going once with F.E,  
9 and I think I told them about that or S.V.

10 Honestly, I don't --

11 BY MR. CRITTON:

12 Q. So I'm clear, at least you told the police  
13 officers, your best recollection of what you told the  
14 police officers, the first time you went to  
15 Mr. Epstein's home, you went there with H.R., you met  
16 the cook, you met [REDACTED]?

17 A. Yes.

18 Q. Do you know who [REDACTED] is?

19 A. Yes.

20 Q. Who is [REDACTED]?

21 A. Jeffrey's assistant.

22 Q. And how do you know that?

23 A. Because she is the one that would call me  
24 every time she wanted me to come there, and she would  
25 always be there doing, making calls. She would call

1 with Jeffrey Epstein by phone?

2 A. I don't remember.

3 Q. Can you cite any instances to me where you  
4 think that maybe you spoke with him or you just have no  
5 recollection of having spoken with him?

6 A. I don't remember if he ever called me or  
7 didn't call me, honestly. I remember talking to [REDACTED].

8 Q. Have you ever texted Mr. Epstein or has he  
9 ever texted you?

10 A. No.

11 Q. Have you ever spoken or communicated through a  
12 computer in any way with Mr. Epstein, either he to you  
13 or you to him?

14 A. No.

15 Q. Would it be a correct statement that the only  
16 conversations that you have ever had with Mr. Epstein  
17 would have been at Mr. Epstein's home?

18 MR. HOROWITZ: Form.

19 THE WITNESS: Well, as to what I can remember,  
20 yes.

21 BY MR. CRITTON:

22 Q. Well, again, you are here under oath. You  
23 knew you were going to be deposed?

24 A. Yes.

25 Q. So at least as you sit here today thinking

1 other girls too.

2 So I assume that she was his assistant. She  
3 also told me about how to set up the massage table and  
4 other things like that.

5 Q. How do you know [REDACTED] called other females?

6 A. I know because they told me.

7 Q. Who is the they?

8 A. Jane Doe 4.

9 Q. Jane Doe 4?

10 A. Uh huh.

11 Q. Yes?

12 A. And L.A., yes.

13 Q. L.A. who?

14 A. L.A.

15 Q. Okay. Jane Doe 4 and L.A., are they still  
16 friends of yours?

17 A. Yes.

18 Q. Good friends of yours?

19 A. Jane Doe 4 is, yes.

20 Q. How about L.A., what's her status these days?

21 A. Just a friend.

22 Q. Would it be a correct statement that you have  
23 never spoken with Mr. Epstein by phone?

24 A. I don't remember.

25 Q. As you sit here today, have you ever spoken

1 back over the time that you knew Mr. Epstein, it's your  
2 best recollection as you sit here today that you have  
3 never spoken with him except at his home; is that true?

4 A. My best recollection, yes.

5 Q. You have never, and would it also be true that  
6 you never saw Mr. Epstein other than at his home?

7 A. I saw him on the beach before jogging with  
8 [REDACTED] where he came over and said hi to me.

9 Q. Were you on the beach at the time?

10 A. Yes.

11 Q. Who were you there with?

12 A. I forget. Just one of my girlfriends.

13 Q. You used to go to Palm Beach beach, the beach  
14 in Palm Beach from time to time?

15 A. Yes.

16 Q. From the time you were a young girl up  
17 probably even through now?

18 A. Uh huh, yes.

19 Q. All right. So one time you saw him on the  
20 beach with [REDACTED] he said hello to you?

21 A. Yeah, he came over and said hi and asked me  
22 how I was. And he just said he was jogging. He had his  
23 jogging outfit on.

24 Q. Is that the extent of the conversation?

25 A. From what I can remember. I don't know, it

1 was like a long time ago. I don't --  
 2 Q. And you talked to him?  
 3 A. Yes.  
 4 Q. He said "Hi, how are you?"  
 5 A. Uh huh.  
 6 Q. Yes?  
 7 A. Yes.  
 8 Q. And did you, was that after you stopped going  
 9 to Mr. Epstein's house or during the time that you were  
 10 going to Mr. Epstein's house that you saw him jogging on  
 11 the beach?  
 12 A. I don't exactly remember when it was. I think  
 13 it was when I was still going.  
 14 Q. Okay. So the only time that you've ever  
 15 spoken with Mr. Epstein outside of his home would have  
 16 been the one time you saw him out jogging on the beach  
 17 and you were at the beach over in Palm Beach, correct?  
 18 MR. HOROWITZ: Form.  
 19 THE WITNESS: Yeah, I thought I saw him in Key  
 20 West once, but I wasn't sure that was him. But  
 21 yeah, other than that, yes.  
 22 BY MR. CRITTON:  
 23 Q. Okay. You have never traveled with  
 24 Mr. Epstein?  
 25 A. No.

1 Q. And Mr. Epstein has never flown you or asked  
 2 you to travel anyplace, has he, where you traveled?  
 3 A. No.  
 4 Q. That's correct?  
 5 A. Yes.  
 6 Q. All right. First time, at least what you told  
 7 the police officers, your best recollection is that you  
 8 went over there with H.R., you went upstairs, and you  
 9 gave Mr. Epstein a massage, correct?  
 10 A. Yes.  
 11 Q. Okay. And during the course of the massage,  
 12 you kept your clothes on, true?  
 13 A. I believe that's what I told them.  
 14 Q. All right. And you also told the police that  
 15 at no time did he try to touch you or did he touch you,  
 16 correct?  
 17 A. I told them that he did try to touch my butt.  
 18 Q. Okay. He did try?  
 19 A. Or he did, I think I said.  
 20 Q. What's the difference between trying and  
 21 touching?  
 22 A. I don't exactly remember the words I said. I  
 23 think I did tell them that he did.  
 24 Q. So it's now your testimony that you recall  
 25 telling the Palm Beach Police Department that he did

1 touch your buttocks, correct?  
 2 A. Yes.  
 3 Q. Okay. And that's all he touched was your  
 4 buttocks, correct?  
 5 MR. HOROWITZ: Form. Again, you are talking  
 6 about the conversation?  
 7 BY MR. CRITTON:  
 8 Q. Only what you told the Palm Beach police.  
 9 A. As to what I can remember, I'm not -- if you  
 10 could show me, I don't exactly remember.  
 11 Q. I'm asking your best recollection. I'm  
 12 looking at the police report.  
 13 A. Okay.  
 14 Q. Did you also tell the Palm Beach police that  
 15 at no time did he touch any of your private areas?  
 16 A. I don't remember telling them that he did.  
 17 Q. Okay. In fact, you told them he  
 18 specifically -- they asked you, did he touch, did he  
 19 touch you in your private area, in your vaginal area,  
 20 and you said no, correct?  
 21 A. Yes.  
 22 Q. And they asked you whether he had touched your  
 23 breast, and you said no, correct?  
 24 A. I don't remember.  
 25 Q. Again, whatever ultimately, whatever the

1 statement says, that's what you would have told them.  
 2 If I ask you to assume that that's at least  
 3 the information that they have is that he did not touch  
 4 you in any, quote, unquote, private area, that would be  
 5 accurate?  
 6 MR. HOROWITZ: Form.  
 7 THE WITNESS: Yes.  
 8 BY MR. CRITTON:  
 9 Q. That's what you had told them?  
 10 A. Yes.  
 11 Q. And you didn't touch him in any of his private  
 12 areas, did you?  
 13 MR. HOROWITZ: Form.  
 14 THE WITNESS: No.  
 15 BY MR. CRITTON:  
 16 Q. In fact, in any of the visits you ever went to  
 17 Mr. Epstein's home, you never touched him in his genital  
 18 area, did you?  
 19 A. No.  
 20 MR. HOROWITZ: Form. I'm sorry, I'm doing  
 21 this to have a clear record, because you seem to be  
 22 drifting between --  
 23 MR. CRITTON: I'm not drifting. I'm asking  
 24 specific questions.  
 25 MR. HOROWITZ: I understand, but you are







IN RE:  
INVESTIGATION OF  
JEFFREY EPSTEIN

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ADDENDUM TO THE NON-PROSECUTION AGREEMENT

IT APPEARING that the parties seek to clarify certain provisions of page 4, paragraph 7 of the Non-Prosecution Agreement (hereinafter "paragraph 7"), that agreement is modified as follows:

- 7A. The United States has the right to assign to an independent third-party the responsibility for consulting with and, subject to the good faith approval of Epstein's counsel, selecting the attorney representative for the individuals identified under the Agreement. If the United States elects to assign this responsibility to an independent third-party, both the United States and Epstein retain the right to make good faith objections to the attorney representative suggested by the independent third-party prior to the final designation of the attorney representative.
- 7B. The parties will jointly prepare a short written submission to the independent third-party regarding the role of the attorney representative and regarding Epstein's Agreement to pay such attorney representative his or her regular customary hourly rate for representing such victims subject to the provisions of paragraph C, infra.
- 7C. Pursuant to additional paragraph 7A, Epstein has agreed to pay the fees of the attorney representative selected by the independent third party. This provision, however, shall not obligate Epstein to pay the fees and costs of contested litigation filed against him. Thus, if after consideration of potential settlements, an attorney representative elects to file a contested lawsuit pursuant to 18 U.S.C. s 2255 or elects to pursue any other contested remedy, the paragraph 7 obligation of the Agreement to pay the costs of the attorney representative, as opposed to any statutory or other obligations to pay reasonable attorneys fees and costs such as those contained in s 2255 to bear the costs of the attorney representative, shall cease.









1 Q. Do you recognize yourself on page one?  
 2 A. Yes.  
 3 Q. Have you, during the time that you had a  
 4 MySpace page, have you, and Facebook, have you posted  
 5 pictures of yourself in swimsuits and various dresses,  
 6 gowns, garb that you had on at a particular time?  
 7 MR. HOROWITZ: Don't answer. Don't answer.  
 8 Don't answer. Don't answer.  
 9 Bob, you had to produce this stuff.  
 10 MR. CRITTON: I'm not asking her about this

1 A. Yes.  
 2 Q. Who is on the left?  
 3 A. My friend [REDACTED]  
 4 Q. Is she one of the ones that went to Chicago  
 5 with you?  
 6 A. Yes. Which one of my friends are you on  
 7 Facebook?  
 8 Q. On December 23rd, the very last page, that  
 9 would be your, that's your profile?  
 10 MR. HOROWITZ: Don't answer that. Don't

3 A. No.  
 6 Q. Turn to page seven if you would, please.  
 7 There is a picture on left-hand side under, there is a  
 8 top picture and then a second picture of two women.  
 9 Are you either one of those individuals or is  
 10 that an ad?  
 11 A. No, it's an ad.  
 12 Q. All right. In December, let's see, this is on  
 13 page three of five, it has two pictures on it. Looks  
 14 like you are in an airplane.  
 15 A. Yes.  
 16 Q. Is that accurate, you are on an airplane  
 17 there?  
 18 A. I wasn't on an airplane. There was an air  
 19 show. My friend Kevin is a pilot and we got to go  
 20 inside the planes, and I took a picture inside one of  
 21 the planes.  
 22 Q. Okay. And the next page, it has a picture of  
 23 two people, one on left is in a nurse's outfit, looks  
 24 like a Halloween party again, and someone on the right.  
 25 Is that you on the right?