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UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

1

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CASE NO. 08-CIV-80119-MARRA/JOHNSON

3

4 [REDACTED],

5 Plaintiff,

6 -vs- VOLUME I OF II

7 [REDACTED] EPSTEIN,

8 Defendant.

9

10 Related cases:

11 08-80232, 08-08380, 08-80381, 08-80994

12 08-80993, 08-80811, 08-80893, 09-80469

13 09-80591, 09-80656, 09-80802, 09-81092

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16 VIDEO-CONFERENCED AND VIDEOTAPED DEPOSITION OF

17 [REDACTED]

18

December 4, 2009

10:25 - 5:00 [REDACTED]

19

20

[REDACTED]

21

22

23 Reported By:

24 Cynthia Hopkins, RPR, FPR

25 Notary Public, State of Florida

Prose Court Reporting

26

1 APPEARANCES:

2 On behalf of [REDACTED] [REDACTED]:

3 [REDACTED], ESQUIRE

4 [REDACTED]  
5 [REDACTED]  
6 [REDACTED]

7

8 On behalf of the Defendant, [REDACTED] Epstein:

9 ROBERT D. CRITTON, JR., ESQUIRE  
10 MARK T. LUTTIER, ESQUIRE  
11 BURMAN, CRITTON, LUTTIER & COLEMAN, LLP

12 [REDACTED]  
13 [REDACTED]  
14 [REDACTED]

15 ALSO PRESENT:

16 Jeffrey Epstein, via video conference

17 [REDACTED], Paralegal,  
18 [REDACTED], P.A.

19 Stan Sanders, Videographer  
20 Visual Evidence, Incorporated

21

22

23

24

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1 - - -

2 INDEX VOLUME I

3 - - -

4

5 WITNESS: DIRECT CROSS REDIRECT RECROSS

6

[REDACTED]

7

BY MR. LUTTIER 5

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E X H I B I T S

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EXHIBIT	DESCRIPTION	PAGE
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DEFENDANT'S NO. 1		11
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Plaintiff's Notice of Serving Second Amended Answers to Interrogatories		
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17

DEFENDANT'S NO. 2		29
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Answers of Interrogatories		
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DEFENDANT'S NO. 3		119
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First Amended Complaint		
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DEFENDANT'S NO. 4		254
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Plaintiff's Notice of Serving Third Amended Answers to Defendant's First Interrogatories		
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1 PROCEEDINGS

2 - - -

3 Deposition taken before Cynthia Hopkins,  
4 Registered Professional Reporter and Florida  
5 Professional Reporter, and Notary Public in and for  
6 the State of Florida at Large, in the above cause.

7 - - -

8 THE VIDEOGRAPHER: Today is the 4th day of  
9 December, 2009. The time is approximately  
10 10:25 in the morning. This is the videotape  
11 deposition of [REDACTED] -- did I  
12 pronounce it correctly?

13 THE WITNESS: Yeah.

14 THE VIDEOGRAPHER: -- in the matter of  
15 [REDACTED] No. [REDACTED] versus [REDACTED] Epstein. This  
16 deposition is being held at [REDACTED]  
17 [REDACTED] in West Palm Beach, Florida.

18 My name is Stan Sanders. I am the  
19 videographer representing Visual Evidence,  
20 Incorporated.

21 Will the attorneys please announce their  
22 appearances for the record.

23 MR. [REDACTED]: My name [REDACTED]. I am  
24 counsel on [REDACTED] behalf. With me is [REDACTED]  
25 [REDACTED], Paralegal.

5

1 MR. LUTTIER: My name is Mark Luttier, and  
2 I am here on behalf of the Defendant,  
3 Mr. Epstein.

4 Thereupon,

5 ( [REDACTED] )

6 Having been first duly sworn or affirmed, was  
7 examined and testified as follows:

8 THE WITNESS: Absolutely.

9 THE COURT REPORTER: Thank you.

10 DIRECT EXAMINATION

11 BY MR. LUTTIER:

12 Q. Would you please tell me your full name,  
13 ma'am.

14 A. [REDACTED].

15 Q. Ms. [REDACTED], have -- my name is Mark  
16 Luttier. I represent Mr. Epstein in this pending  
17 lawsuit that you have brought. Have you ever had an  
18 opportunity to be deposed before?

19 A. What does that mean?

20 Q. That's the process that we're about to  
21 engage in here is known as a deposition.

22 A. No.

23 Q. All right. I just want to explain sort of  
24 the rules to you so that you understand it. First  
25 of all, if you want to take a break at any time, if  
6

1 you want something to drink, have to go to the  
2 bathroom, just let me know.

3 MR. [REDACTED]: If it's of any help to you,  
4 [REDACTED] and I have had an opportunity to talk  
5 about the basic procedures involved.

6 MR. LUTTIER: Okay.

7 MR. [REDACTED]: And I don't think it's  
8 necessary --

9 MR. LUTTIER: Okay.

10 MR. [REDACTED]: -- for you --

11 MR. LUTTIER: All right.

12 MR. [REDACTED]: -- to go through that with  
13 her.

14 MR. LUTTIER: All right.

15 MR. [REDACTED]: But if you think there's a  
16 purpose --

17 MR. LUTTIER: No.

18 MR. [REDACTED]: -- of doing it anyway,  
19 obviously you have a right to do that.

20 BY MR. LUTTIER:

21 Q. Do you, do you understand the fact that  
22 you are under oath now?

23 A. Yes.

24 Q. And do you know what the significance of  
25 being under oath is?

7

1 A. Yes.

2 Q. And what is your understanding of the  
3 significance of being under oath?

4 A. Not to lie to you.

5 Q. Yeah, you have to tell the truth.

6 A. And God is watching me.

7 Q. In other words you understand you have to  
8 tell the truth about everything?

9 A. Yes. That would fall under not lying.

10 Q. And you understand there are civil and  
11 criminal consequences that could be attributed to  
12 making statements that are not true while under  
13 oath?

14 A. Yes.

15 Q. Okay. In this particular lawsuit, you've  
16 had an opportunity to discuss your claims with  
17 various other people, have you not?

18 A. One more time.

19 Q. You've had an opportunity before you came  
20 here today to discuss your various claims that  
21 you've made about Mr. Epstein with other people?

22 A. As in my attorneys?

23 Q. As in anybody.

24 A. I've only talked about it with my attorneys.

25 Q. Okay. Did you have a conversation at any  
8

1 time prior to today with anyone from the state

2 attorney's office here in the Palm Beach County

3 State Attorney's Office?

4 A. Yes.

5 Q. Okay.

6 A. And the FBI.

7 Q. All right. Let's first talk about the

8 state attorney's office. Do you know with whom you

9 spoke?

10 A. I don't remember the name.

11 Q. Do you know if it was a man or a woman?

12 A. I have spoke to a man and a woman.

13 Q. How many times did you speak with someone

14 at the State Attorney's Office?

15 A. Once.

16 Q. And where did you speak with them?

17 A. In a building somewhere off of [REDACTED] of

18 here. I don't remember the name of the building.

19 Q. Do you know if it was at the State

20 Attorney's Office --

21 A. Yeah.

22 Q. -- across from the courthouse?

23 A. The United States Attorney's Office.

24 Q. Okay. Let me back up a little bit. Now

25 you mentioned the United States Attorneys?

9

1 A. That's --

2 Q. That would be someone associated with

3 what's known as the federal system. When I was  
4 asking you about the state attorney, that would be  
5 someone associated with the State of Florida.

6 A. I was at a building with United, it was the  
7 United State's State Attorney's Office.

8 Q. All right. And would that have been a  
9 building you say here on [REDACTED] somewhere?

10 A. Or [REDACTED]. It was somewhere in this  
11 vicinity of buildings. [REDACTED] not exactly sure where.

12 Q. Do you remember the name of either the man  
13 or the woman --

14 A. I do not.

15 Q. -- with whom you met. Did you have a  
16 separate meeting with someone from the Florida State  
17 Attorney's Office?

18 A. I don't remember.

19 Q. And the State Attorney's Office is located  
20 across the street from the courthouse downtown in  
21 West Palm Beach.

22 A. I don't remember.

23 Q. When you, when you -- and by the way, when  
24 you say you don't remember, is it your intent to  
25 indicate to me that you have no recollection whether  
10

1 it happened or didn't happen?

2 A. It's, I don't remember if that was the

3 building I was in.

4 Q. Okay. Do you recall having met with  
5 someone from the State of Florida, a prosecutor from  
6 the State of Florida as well as someone from the  
7 United States Attorney's Office?

8 A. Well, there was a lot of people there.

9 Q. This, now you're referring to the initial  
10 meeting that you talked to me about?

11 A. When I had the meeting, I believe, I'm not  
12 sure if it was -- I know it was the United States State  
13 Attorney's Office. It could have been State of Florida.  
14 There was a victim's advocate there and the FBI was  
15 there.

16 Q. Okay. So, we have a man and a woman that  
17 were associated with the, the State Attorney's  
18 Office, whether it was the U.S. Attorney or State  
19 Attorney, a victim's advocate and how many members  
20 from the FBI?

21 A. I was with one lady from the FBI.

22 Q. Do you, do you know her name?

23 A. I do not remember.

24 Q. Do you remember even the first name, first  
25 or last name?

11

1 A. I don't remember.

2 Q. Do you remember what race she was?

3 A. She was white. The Victim's Advocate lady,

4 she was black. I remember that.

5 Q. Do you remember her name?

6 A. No.

7 MR. LUTTIER: Let me hand you what we'll

8 mark as Exhibit No. 1 which purports to be a

9 document entitled Plaintiff's Notice of Serving

10 Second Amended Answers to Interrogatories.

11 Here's your copy.

12 THE WITNESS: Do I get a copy?

13 MR. LUTTIER: Yeah, I am going to get to

14 you. I'm just going to put a stamp on one.

15 BY MR. LUTTIER:

16 Q. Now, let me hand you Exhibit 1. And the

17 first question I have for you is if you will turn to

18 the last page; is that your signature?

19 A. Yes.

20 Q. All right. Now, if you will, on the last

21 page you have represented that these answers are

22 true and correct. I want to give you an opportunity

23 to flip through these answers and look at them.

24 A. Of where, the whole packet?

25 Q. Right. And tell me if there is anything

12

1 in these answers that is not correct or is

2 incomplete?

3 MR. [REDACTED]: I am going to object to the

4 question as compound, vague, and overly broad.

5 BY MR. LUTTIER:

6 Q. Let me give you a chance to look through

7 them. And my first question will be is there

8 anything that is inaccurate in these answers.

9 MR. [REDACTED]: Same objection. You can --

10 [REDACTED], unless I instruct you not to answer,

11 the objections that I am making are objections

12 that are being made so that the court can look

13 at them at a later time and decide whether the

14 question was appropriate.

15 You should answer the question regardless

16 of whether I raise an objection unless I tell

17 you not to. Okay?

18 THE WITNESS: I'm so confused.

19 MR. [REDACTED]: That's all right. Right now

20 you have been asked to look at these and to

21 determine whether there is any inaccuracy in

22 the answers that you swore to previously.

23 THE WITNESS: This is what me and you did,

24 right? Then it all should be correct unless

25 somebody else messed with it. Excuse me.

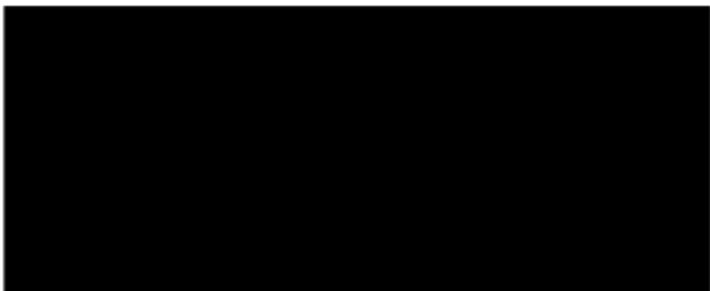
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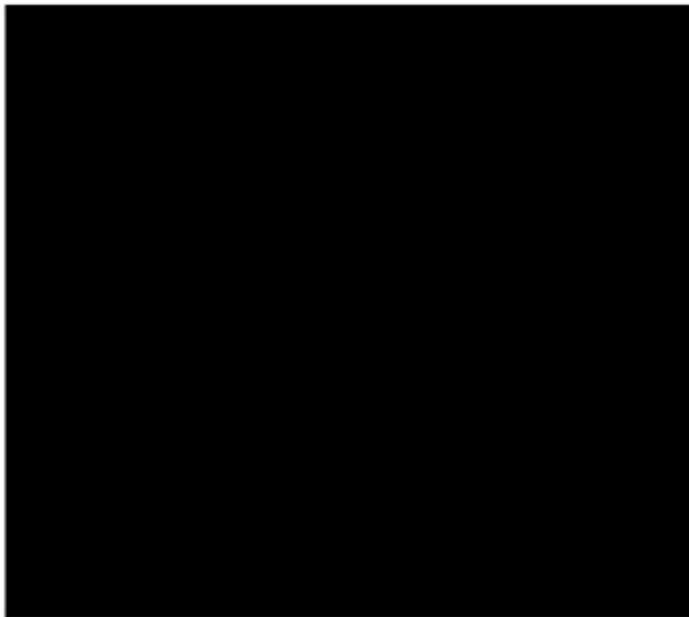
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MR. [REDACTED]: Is the absence of signature that you are referring to Page 15?

MR. LUTTIER: No, I have got it on this one.

MR. [REDACTED]: Well, okay.

MR. LUTTIER: But I have got it, and it may be that, it may be that that's what I was looking at.

THE WITNESS: I was --

MR. LUTTIER: But I can tell you there is another set coming.

THE WITNESS: Referring to [REDACTED] [REDACTED] [REDACTED]

[REDACTED] --

MR. [REDACTED]: Yes, [REDACTED]?

THE WITNESS: For [REDACTED] [REDACTED] [REDACTED] it says I was paid \$100. I was given the amount of \$300.

5 I wasn't given the extra \$100 for bringing her,  
6 and I gave her \$100 out of my money because he  
7 said she was fat.

8 MR. LUTTIER: Okay, now --

9 MR. [REDACTED]: Okay .

10 BY MR. LUTTIER:

11 Q. -- you're referring to your answer to  
12 Interrogatory 23?

13 MR. [REDACTED]: On Page 14, correct.

14 [REDACTED] was just clarifying that response.

15 MR. LUTTIER: Okay. And your  
16 clarification that [REDACTED] [REDACTED] [REDACTED] is an  
17 individual that you brought to Mr. home --  
18 Mr. Epstein's home and --

19 THE WITNESS: I was not given the extra  
20 money for bringing her.

21 BY MR. LUTTIER:

22 Q. Okay. So you got paid zero for bringing  
23 her?

24 A. Yes.

25 Q. Okay.

15

1 A. I got paid \$300 for me going, but was not  
2 given the extra hundred for bringing her.

3 Q. So, you got 300 for going. You went on  
4 this occasion, but you were not given any extra  
5 money?

6 A. The extra money. yes.

7 Q. And you brought Ms. [REDACTED] [REDACTED] on that  
8 occasion?

9 A. Yeah.

10 Q. Okay. And then you're indicating that  
11 what you did was even though you only got paid 300,  
12 you took 100 of your 300 and gave it to [REDACTED] [REDACTED]  
13 [REDACTED]?

14 A. Yes.

15 Q. Okay. Any other corrections to any of  
16 your answers to interrogatories?

17 A. So far that's -- I don't see any.

18 Q. Okay.

19 A. That was the only thing.

20 Q. Let's then turn to, I'm going to reference  
21 your answer to Interrogatory No. 5 which starts --

22 A. What page --

23 Q. On Page 3, which asks you to give,  
24 identify anybody that you believe has information  
25 pertaining to this suit. And I want to --  
16

1 A. Pertaining to what?

2 Q. To this, to this claim.

3 A. Okay.

4 Q. I will refer to it sometimes as your claim  
5 or to this lawsuit that you brought against

6 Mr. Epstein?

7 A. Okay.

8 Q. And by the way, I am sure Mr. [REDACTED]  
9 explained this to you, and you are doing a fine job,  
10 any time I ask you a question and you're not sure  
11 what I'm asking or you need me to explain it, just  
12 ask me to, and I will be happy to explain it to you.

13 A. Yeah.

14 Q. Okay? Now, let me draw your attention  
15 over to Page No. 10?

16 A. Well, what was the point of going to Page  
17 No. 3?

18 Q. Well, Page No. 3 is the list, starts with  
19 a list of names of the people that you gave that you  
20 said had information concerning this claim. Okay.  
21 And I want to now call your attention to Witness  
22 Number 31 which is found on Page 10.

23 A. I don't understand what you just said.

24 Q. If you would turn to Page 10, you will see  
25 a Number 31. See that Number 31 [REDACTED]

17

1 A. Uh-huh.

2 Q. And it indicates that he is an attorney  
3 with the Department of Justice which would be the  
4 U.S. Attorney. Is, does that name refresh your  
5 recollection as to whether or not he was the  
6 individual with whom you met from the U.S.

7 Attorney's Office?

8 MR. [REDACTED]: Let, let's make sure we  
9 understand exactly what this answer is. The  
10 information provided is information that was in  
11 the possession or control of [REDACTED]. And  
12 obviously some of these names were not provided  
13 by [REDACTED] but were gathered through the  
14 investigation conducted by her attorneys. And  
15 we were obliged to disclose that information as  
16 her lawyers in response to this interrogatory.

17 So, to suggest to [REDACTED] that this  
18 information originated with her would be  
19 incorrect.

20 MR. LUTTIER: I wasn't suggesting  
21 anything.

22 MR. [REDACTED]: Okay.

23 MR. LUTTIER: I was just referring to the  
24 fact that she gave us in an answer to  
25 interrogatory that [REDACTED] [REDACTED] is someone  
18

1 that she said she believed had knowledge about  
2 the case, and the address she gave reflects he  
3 is from the U.S. Department of Justice.

4 BY MR. LUTTIER:

5 Q. And my question is, seeing that name, does  
6 that refresh your recollection as to whether or not

7 he was the individual --

8 A. I don't remember.

9 Q. -- with whom you met when you say you met

10 with the --

11 A. There was more --

12 Q. -- U.S. Attorney?

13 A. -- than four people in the room, so their

14 names, I can't remember.

15 Q. Okay. So it doesn't refresh your memory

16 looking at this?

17 A. No.

18 Q. All right. Look at the next witness which

19 is 32. Do you see the name [REDACTED] [REDACTED], M.S.W.?

20 A. What does M.S.W. stand for?

21 Q. I imagine it's Master of Social Work.

22 Does that refresh your recollection as to whether or

23 not that was the victim advocate with whom you met?

24 A. Yes, I remember [REDACTED].

25 Q. Okay. And that would be the person that

19

1 you previously identified as the victim advocate

2 that was at this meeting?

3 A. Uh-huh.

4 Q. That's a yes?

5 A. I believe so.

6 Q. If you will turn to the next page, Page

7 11, Number 34, there is a name [REDACTED] [REDACTED]?

8 A. Yeah.

9 Q. Does that name -- do you recognize that

10 name --

11 A. Yes.

12 Q. -- as being the person with whom you met,

13 and that would have been, was that the woman from

14 the U.S. Attorney's Office with whom you met on this

15 occasion that you described?

16 A. I just remember the last name [REDACTED].

17 Q. As being the women that was present for

18 this meeting that you had with the U.S. Attorney?

19 A. Yes.

20 Q. Now, in reviewing these names, do you, do

21 you recognize any name in the list that you have

22 given me in response to this interrogatory that is

23 indicative of the man from the U.S. Attorney's

24 Office?

25 A. Were does indicative mean?

20

1 Q. That is the person, the man with whom you

2 met at the U.S. Attorney's Office.

3 A. Okay. Ask me the question one more time now

4 that I know what the meaning of that word is.

5 Q. You, you said that when you met with the

6 U.S. Attorney's Office there was one man and one

7 woman from the U.S. Attorney's Office. You have now

8 said that Ms. [REDACTED] was the woman.

9 A. I remember --

10 Q. I call your attention to this list of  
11 names you gave me. Can you point out to me which  
12 individual, if he's listed, was the man with whom  
13 you met at that meeting?

14 A. And I told you I don't remember the name.

15 Q. All right. And, and is it, do you know  
16 that the person --

17 A. It could be possible --

18 Q. -- that's listed --

19 A. That's his name, yes. I don't know. I said I  
20 don't know, so...

21 Q. Do you, in looking through this list, can  
22 you identify the person that you described as the  
23 woman from the FBI?

24 A. And now I lost my page. I'm upset. I'm  
25 sorry. What page were we on?

21

1 Q. Well, we happen --

2 A. I just --

3 Q. The last page we were on is Page 11, but  
4 feel free to look at all of the names?

5 A. Okay. I do not see the lady-from-the-FBI's  
6 name.

7 Q. Do you have that information anywhere?

8 And by that I mean even if it's not on the answers

9 to interrogatories, do you someplace have the  
10 information as to the name of the woman from the FBI  
11 that was present at the meeting?

12 A. No, but if somebody did and showed me the  
13 name, I would definitely remember because it was a weird  
14 name.

15 Q. All right. So, I want you to take your  
16 time to look at those lists, that list of witnesses  
17 that starts on Page 3 and carefully look at them and  
18 tell me if you recognize --

19 A. That's what I am doing --

20 Q. -- the name.

21 A. I don't see that lady's name.

22 Q. Do you know if you have that person's name  
23 anywhere?

24 A. No. You asked me that already.

25 Q. Other than a man and a woman from the U.S.  
22

1 Attorney's Office, one of whom you identified as  
2 Ms. [REDACTED], Ms. [REDACTED], the victim advocate, and  
3 the lady from the FBI, was anyone else present for  
4 this meeting that you had with the U.S. Attorney?

5 A. Yes, and I don't know their name.

6 Q. Who else, who else, who were they that  
7 were present, even if you don't know their names?

8 A. I don't know. They were --

9 Q. I just, from what agency were they  
10 associated?

11 A. I don't remember.

12 Q. Were there, was there any lawyer there?

13 A. I don't remember.

14 Q. Was there any lawyer there on your behalf?

15 A. No.

16 Q. Did you take anyone to the meeting with  
17 you?

18 A. No.

19 Q. How many other people were there? You've  
20 identified five thus far, plus yourself.

21 A. I believe it was five then.

22 Q. So, you now --

23 A. I was just about to count them.

24 Q. So, you now have identified for me

25 everyone that was there?

23

1 A. I believe so.

2 Q. What was discussed at this meeting?

3 A. The incident between me and Jeffrey Epstein.

4 Q. Which incident is that?

5 A. The incident why we're here now.

6 Q. Are you referencing a single isolated  
7 incident?

8 A. I am talking about the whole situation of all

9 the times I've been there, what happened.

10 Q. Do you know approximately when this  
11 meeting occurred? We can start with the year.

12 A. I don't remember the year. It's, it was a  
13 couple of years ago. Actually it was about, I think it  
14 was a couple years ago, as a couple not as in two. It  
15 was longer than that.

16 Q. Is there anything that will refresh your  
17 memory as to when it happened?

18 A. That's what I am trying to think about.

19 Q. Did you make a note of it, for example?

20 A. My mom would know.

21 Q. Why would she know?

22 A. Because I called her and told her the FBI was  
23 at our house.

24 Q. Was where, at her house?

25 A. Was at the house, yeah. The FBI came to the  
24

1 house.

2 Q. Was this before this meeting that you had  
3 with the U.S. Attorney?

4 A. It was before that meeting, yes.

5 Q. Okay. So, you've had to two meetings with  
6 the FBI?

7 A. I had the meeting when they first came and  
8 knocked on the door and asked me if I know who  
9 Mr. Epstein was.

10 Q. Okay.

11 A. And then they were at the meeting with the  
12 United States people, attorney people. But my mom would  
13 remember.

14 Q. Okay. Let's go back then. Let's talk  
15 about what we'll describe as the first meeting with  
16 the FBI. You say they came to your house?

17 A. Yes.

18 Q. Where was this house located?

19 A. [REDACTED] West Palm Beach  
20 Florida [REDACTED].

21 Q. I take it you were living there at the  
22 time?

23 A. Yeah.

24 Q. Was anyone else living with you at that  
25 time at that residence?

25

1 A. My brothers, my mother.

2 Q. All three of your brothers?

3 A. And I believe it was my daughter's father was  
4 living with me then too.

5 Q. That would be Mr. [REDACTED]?

6 A. Yes.

7 Q. Do you recall when that meeting took  
8 place?

9 A. I just said no. I said my mom would  
10 approximately know approximately when it happened.

11 Q. How many members of the FBI came to meet  
12 with you on that occasion?

13 A. Two, a man and a woman.

14 Q. Were --

15 A. And I do not recall the names.

16 Q. Looking at this list of witnesses that you  
17 gave me in these answers to interrogatories which  
18 have been marked as Exhibit 1, do you recognize the  
19 name of either of these --

20 A. And I said no.

21 Q. Well, actually I haven't asked you the  
22 question yet. So, do you recognize the name of any  
23 of these individuals as being the FBI agents that  
24 came to your house at [REDACTED]?

25 A. And I said no. I already knew you were going  
26

1 to ask me that. That's why I said no.

2 Q. And was it two men or a man and a woman or  
3 two woman?

4 A. A man and a woman.

5 MR. [REDACTED]: You already asked that  
6 question, and you were told it was a man and a  
7 woman.

8 BY MR. LUTTIER:

9 Q. And did they meet with you on that  
10 occasion?

11 MR. [REDACTED]: You already asked that  
12 question.

13 MR. LUTTIER: Who, was any--

14 MR. [REDACTED]: [REDACTED] said that a man a  
15 woman came to see her and she was there. So  
16 there obviously was a meeting.

17 BY MR. LUTTIER:

18 Q. Did you meet inside the house or outside  
19 the house?

20 A. Outside the house.

21 Q. Was there anyone else present besides you  
22 and these two persons from the FBI?

23 A. No.

24 Q. Did anyone make any notes during this

25 meeting, the first meeting --

27

1 A. The FBI people did.

2 Q. Do you know whether or not you, anything  
3 you said was recorded? And by that I mean like with  
4 a tape recording.

5 A. Not at that present time, no. It was recorded  
6 when we went to the United States place.

7 Q. And was it recorded by via tape recorder,  
8 was there a court reporter there like we have here?

9 A. No, it was on tape recorder.

10 Q. Have you ever been provided with a  
11 transcript, that is a paper writing that reflects

12 what was said at the meeting that was recorded?

13 A. No.

14 Q. Have you ever asked for it?

15 A. No. I didn't know I could have.

16 Q. Were you under oath at the meeting that

17 was recorded?

18 A. I don't believe so.

19 Q. Did you --

20 A. I, I probably was.

21 Q. Whether you under oath or not, did you

22 tell them the truth at that meeting?

23 A. Yeah.

24 Q. Did you tell the FBI the truth when they

25 came to your house?

28

1 A. Yes. I have no absolutely no reason to lie

2 about this situation.

3 Q. Other than the meeting when the FBI came

4 to your house and when you met with the U.S.

5 Attorney that you have described thus far, have you

6 had any other contact with the FBI?

7 A. No.

8 Q. Have you had any other contact with anyone

9 from the U.S. Attorney's Office?

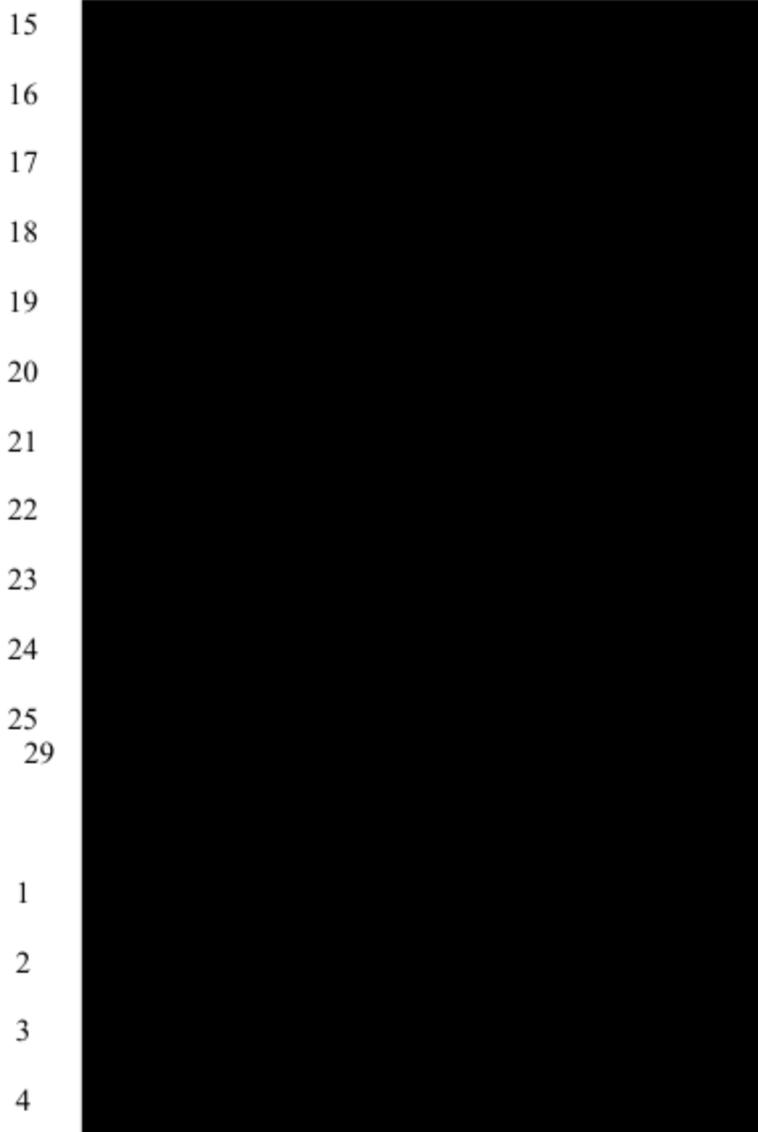
10 A. No.

11 MR. LUTTIER: Let's mark this as

12 Exhibit 2.

13 THE WITNESS: Is this mine to keep?

14 MR. LUTTIER: Yeah.



5 (Defendant's Exhibit No. 2 was marked for  
6 identification.)

7 THE WITNESS: Sorry about that. Like  
8 that, right? Okay. I'm sorry now.

9 BY MR. LUTTIER:

10 Q. Okay. Now I have handed you what has been  
11 marked as Exhibit No. 2 which is a document that is  
12 entitled Notice of Serving Answers to

13 Interrogatories.

14 A. Okay.

15 Q. And this is similar to Exhibit 1 which was  
16 supplemental interrogatories; that is they are  
17 written questions that were submitted to you. If  
18 you turn to Page 19, is that your signature?

19 A. Yes.

20 Q. Now, I notice that your signature here  
21 does not purport to be a representation under oath  
22 that the answers are true and correct?

23 A. That what?

24 Q. I notice that your signature on Page 19  
25 does no purport to represent that your answers are  
30

1 true and correct?

2 MR. [REDACTED]: We will stipulate that it is  
3 indeed a representation that --

4 MR. LUTTIER: Okay. Good enough.

5 MR. [REDACTED]: -- [REDACTED] answers are  
6 true and correct.

7 BY MR. LUTTIER:

8 Q. If you will turn to Page 18, please. You  
9 will notice in answer to Interrogatory 23, you state  
10 that you were interviewed by the FBI and a State  
11 Attorney. In that answer, are you referring to two  
12 separate interviews?

13 A. That would be Number 22.

14 Q. Correct.

15 A. Not 23.

16 MR. [REDACTED]: You did say 23.

17 MR. LUTTIER: Okay. I'm sorry.

18 THE WITNESS: Now, okay. So, now what was

19 the question?

20 BY MR. LUTTIER:

21 Q. You answered in answer to

22 Interrogatory 22, that you were interviewed by the

23 FBI and a State Attorney?

24 A. Yeah.

25 Q. Are you referring now to two separate

31

1 meetings or --

2 A. One.

3 Q. All right. And is the reference in this

4 answer to the meeting that you've described thus

5 far?

6 A. Okay. Listen. The FBI came to my house one

7 time. And then at this meeting the FBI and the State

8 Attorneys were there.

9 Q. Okay.

10 A. So, there was two meetings with the FBI: One

11 when they came to my house and then one when the State

12 Attorney was there and one in that building somewhere

13 around here.

14 Q. All right.

15 A. Does that help you?

16 Q. Yep.

17 A. Okay. Good.

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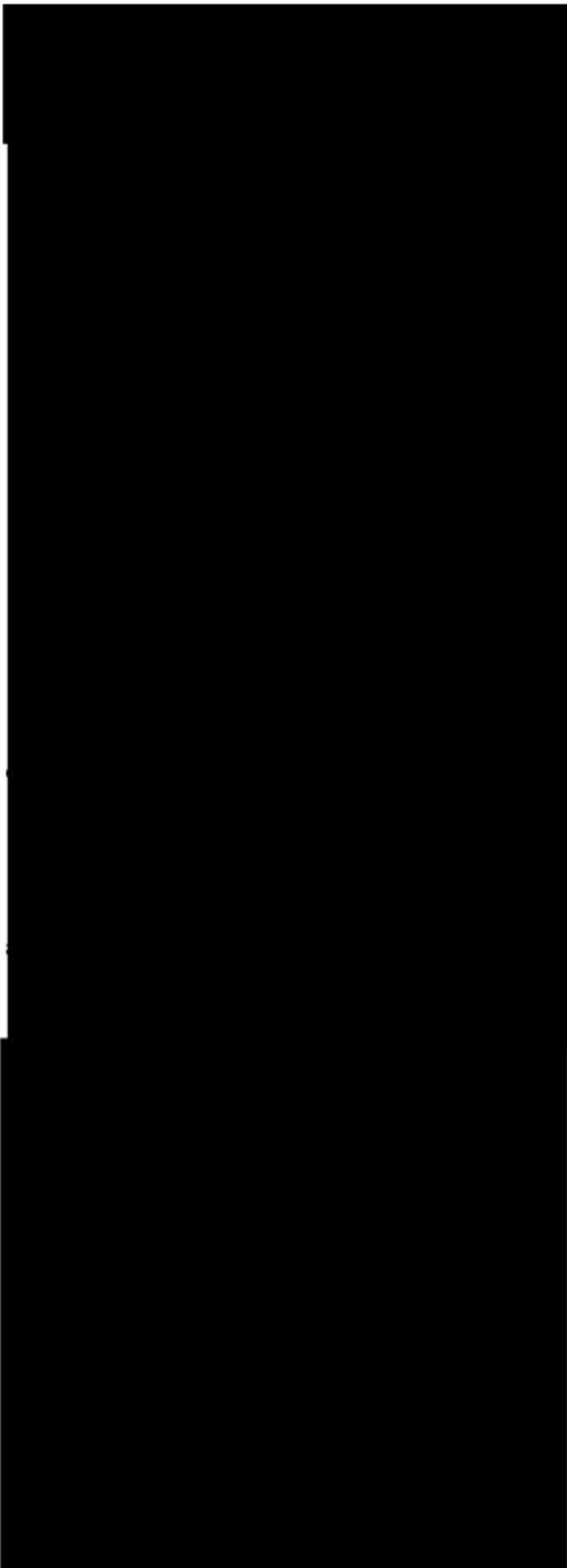
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14 BY MR. LUTTIER:

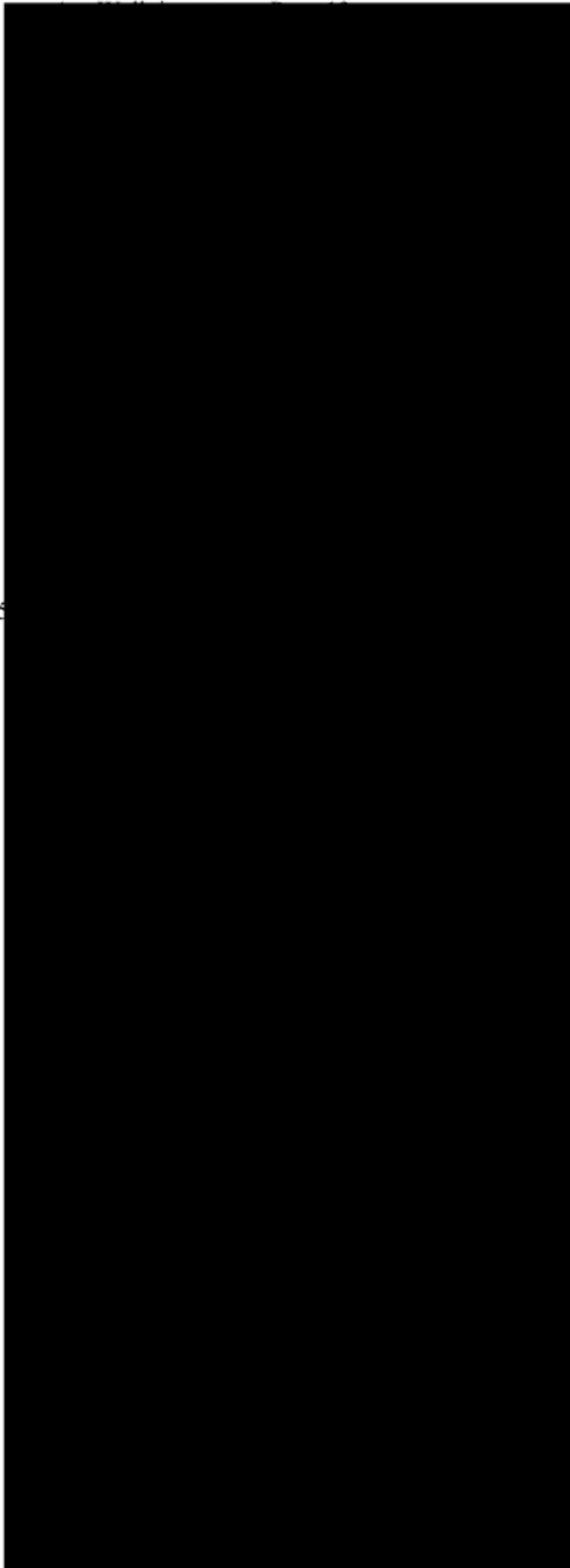
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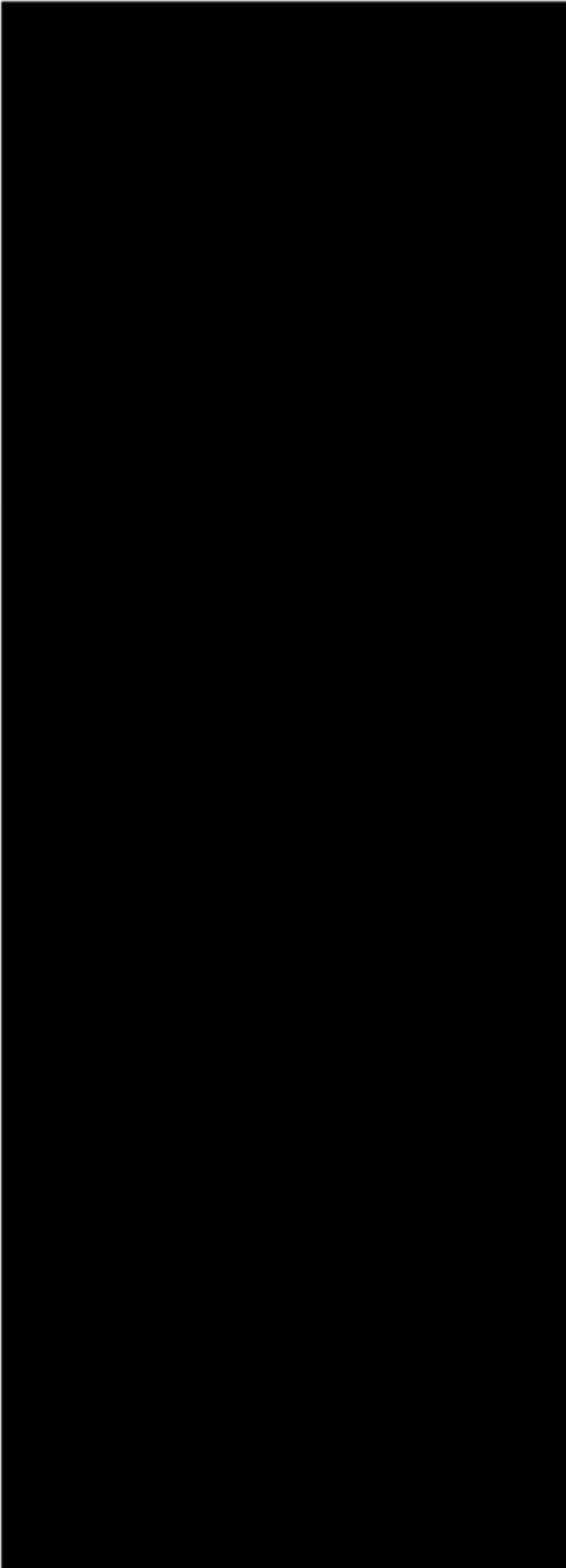
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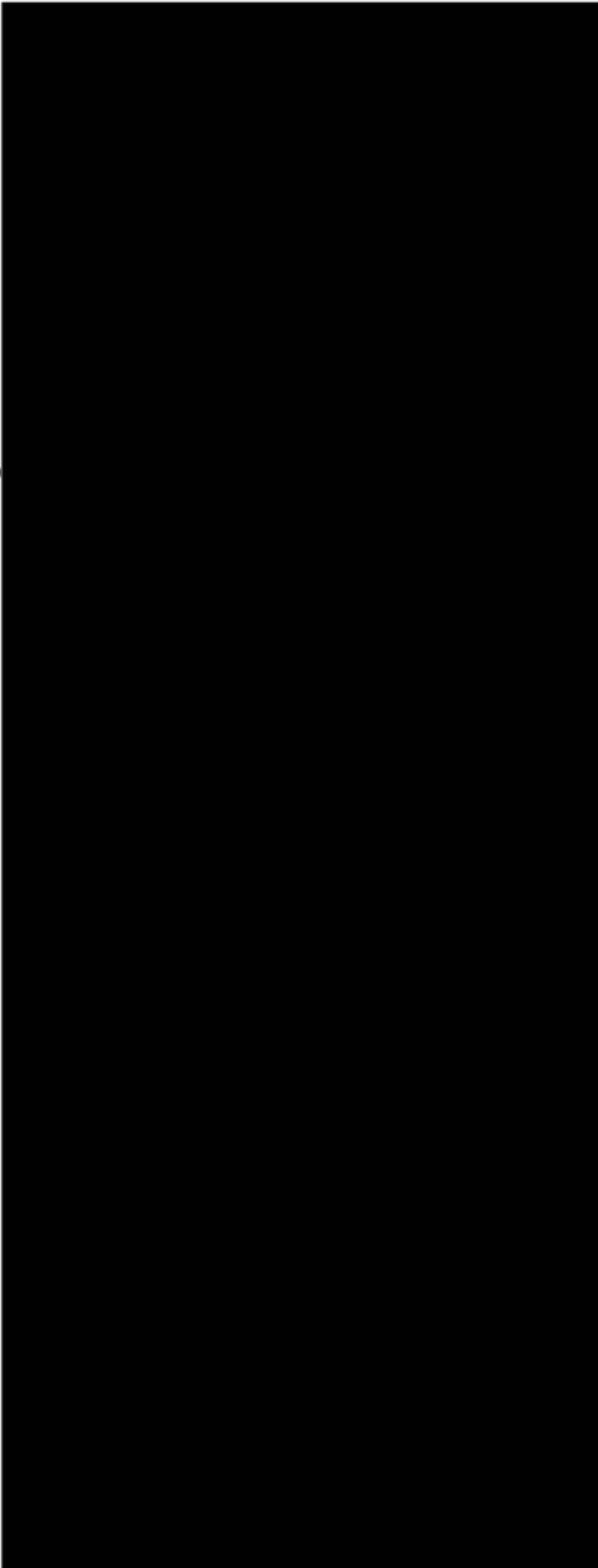
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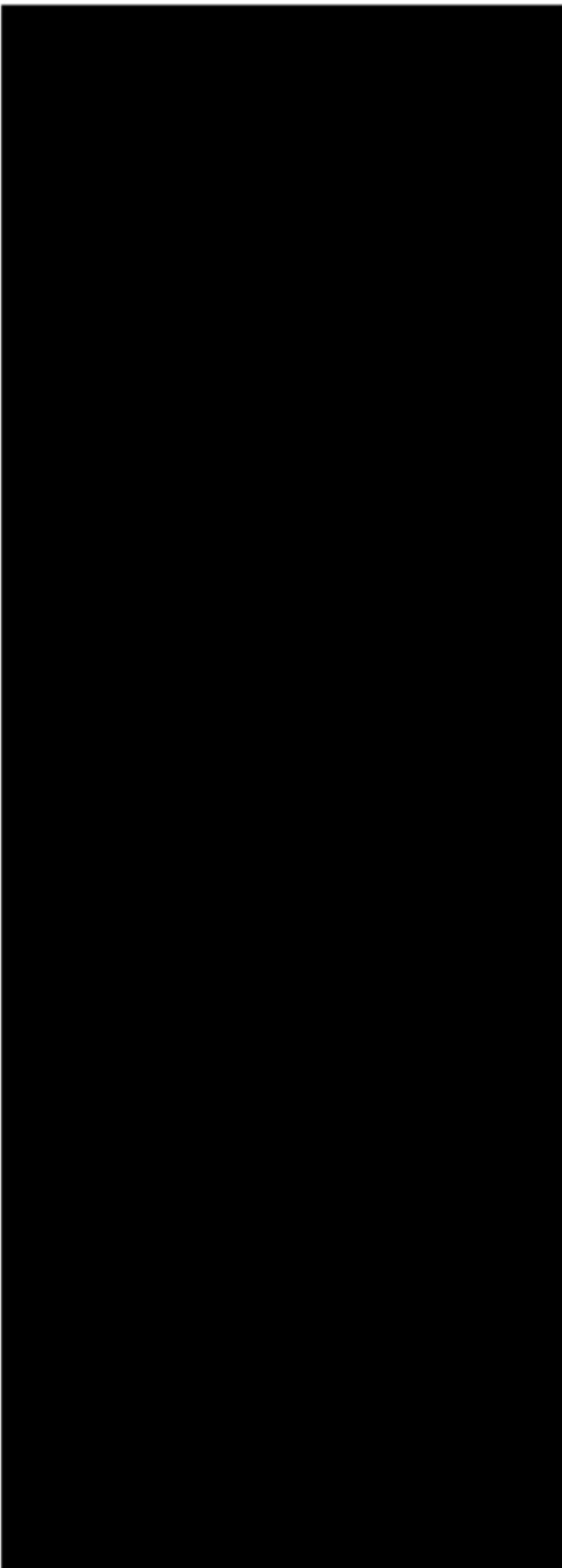
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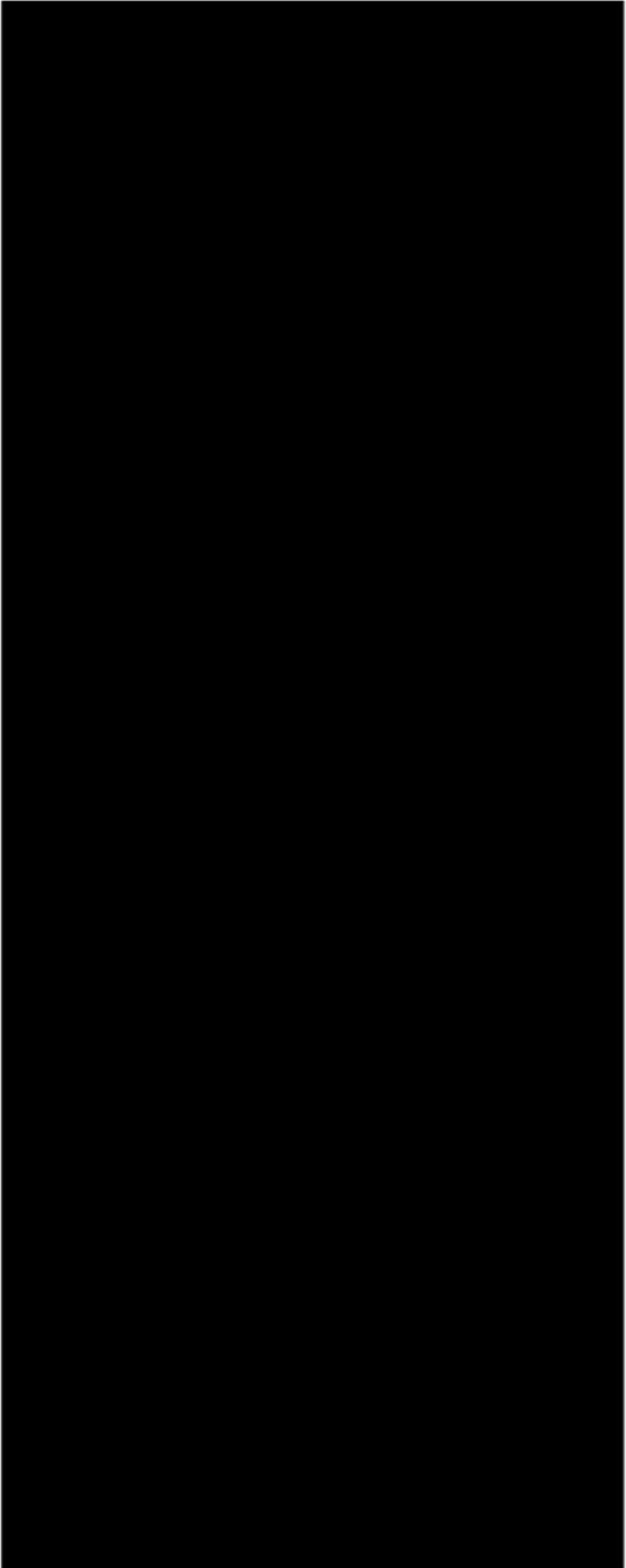
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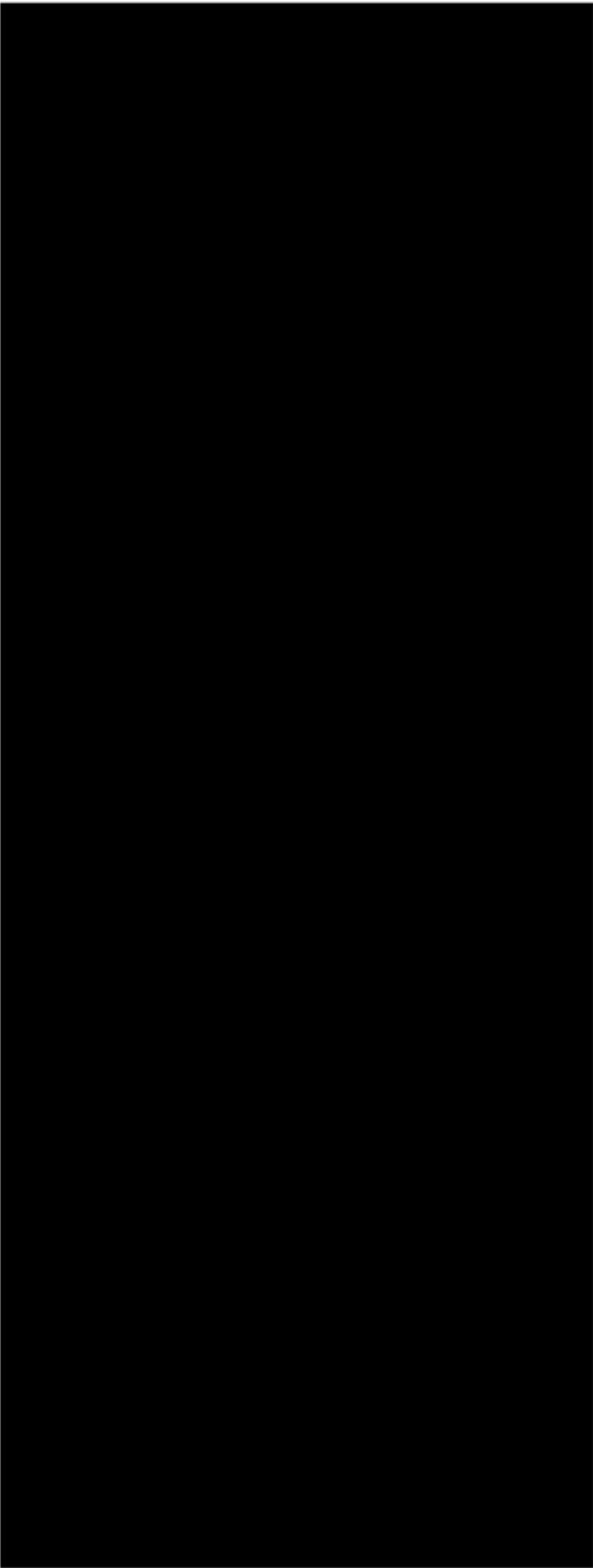


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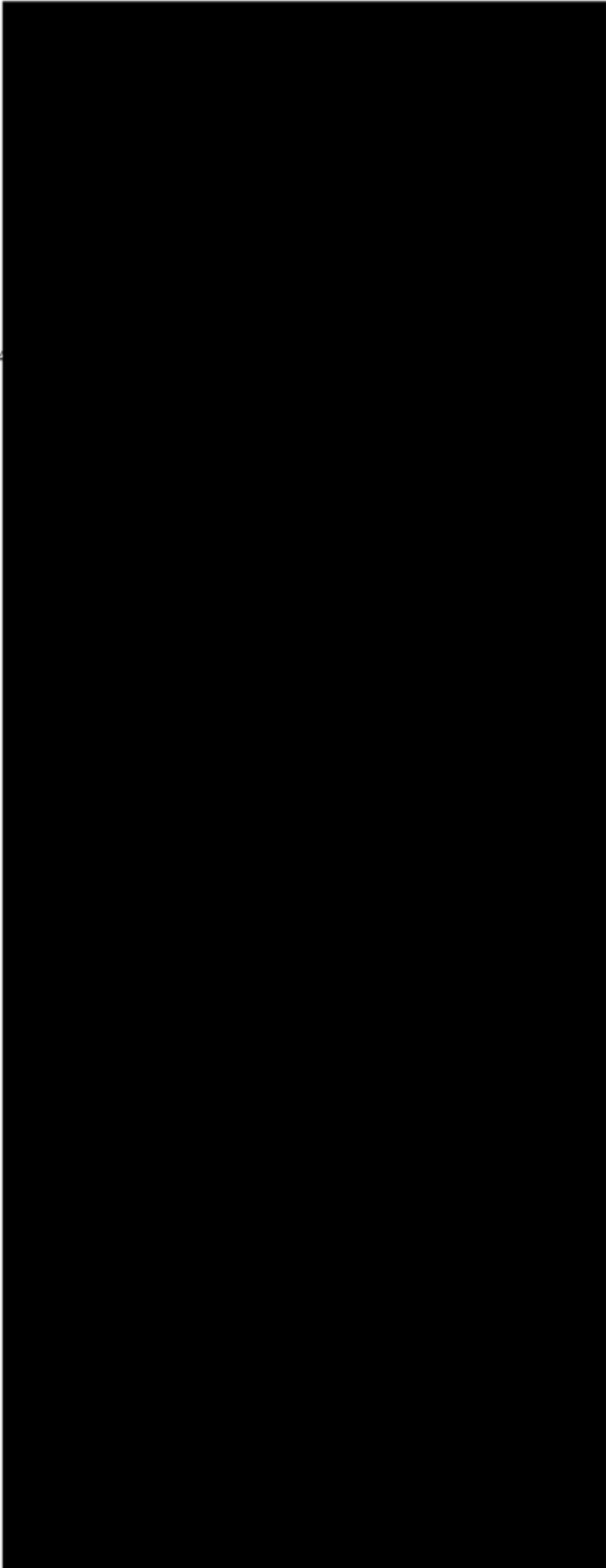


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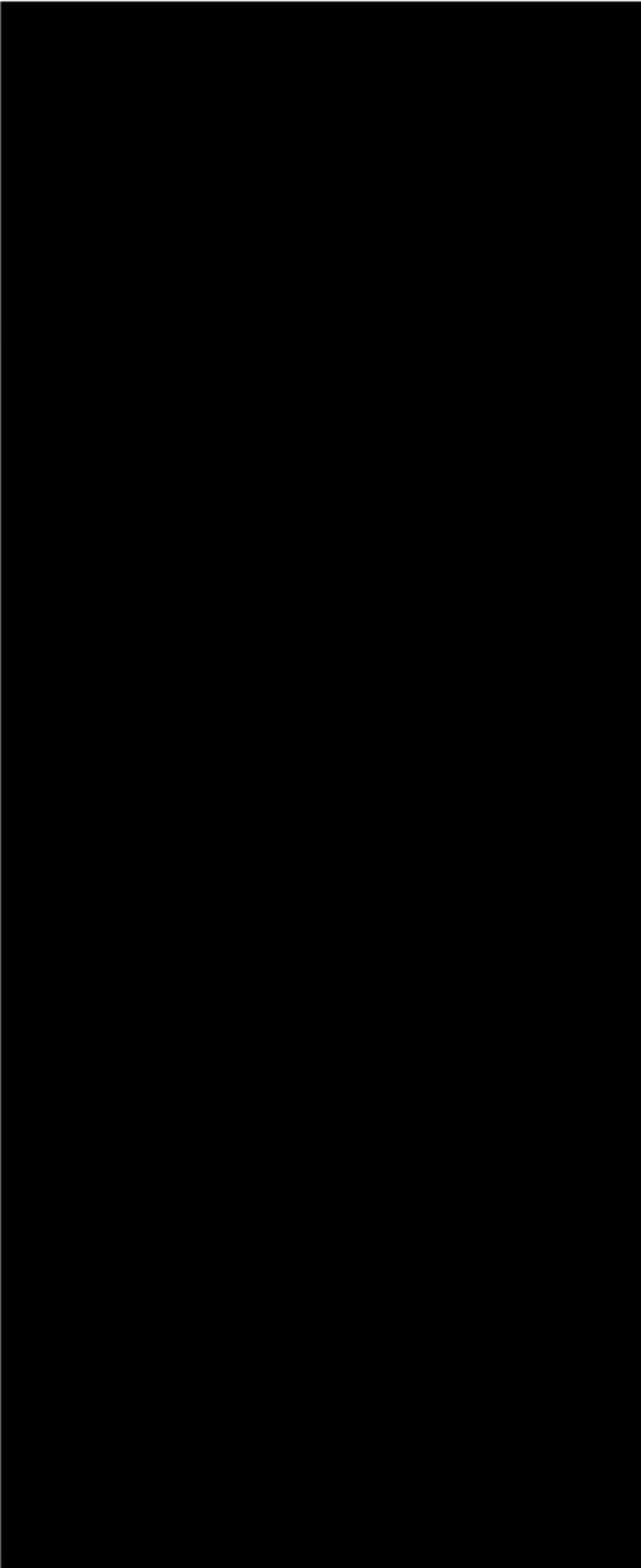


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21 THE VIDEOGRAPHER: Going off the record at

22 11:09.

23 (A brief recess was held.)

24 THE VIDEOGRAPHER: We're back on the

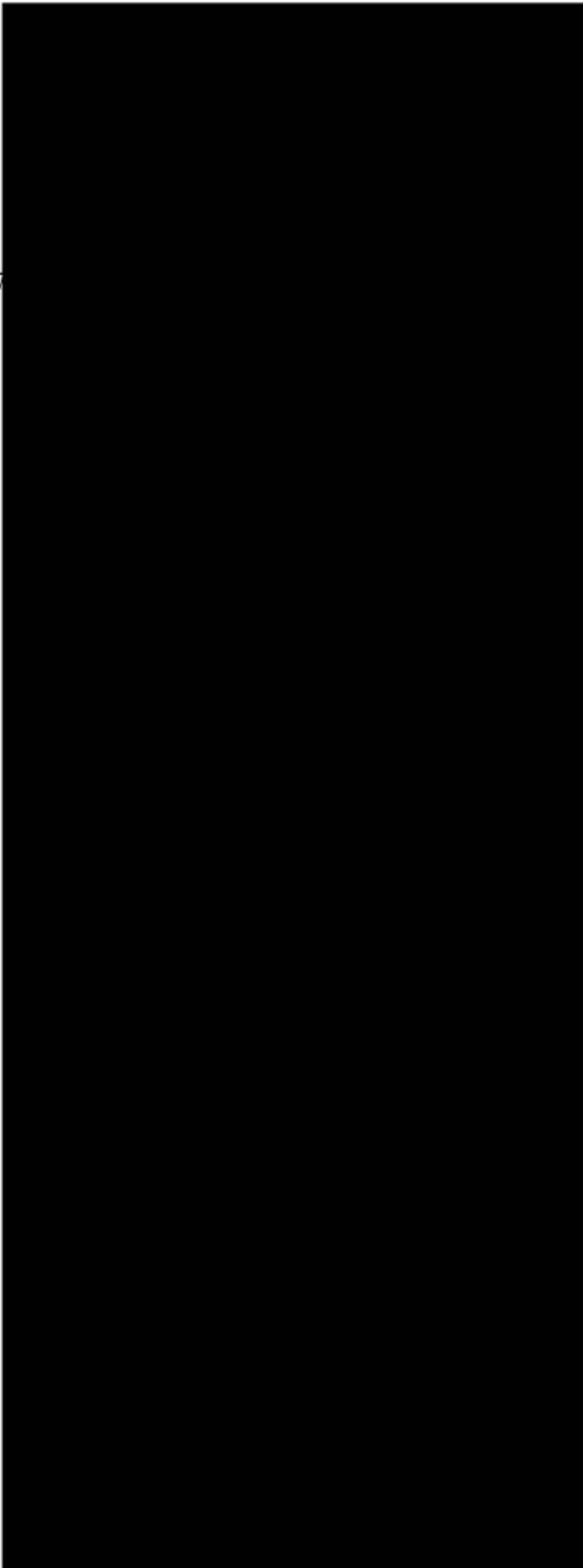
25 record at 11:18.

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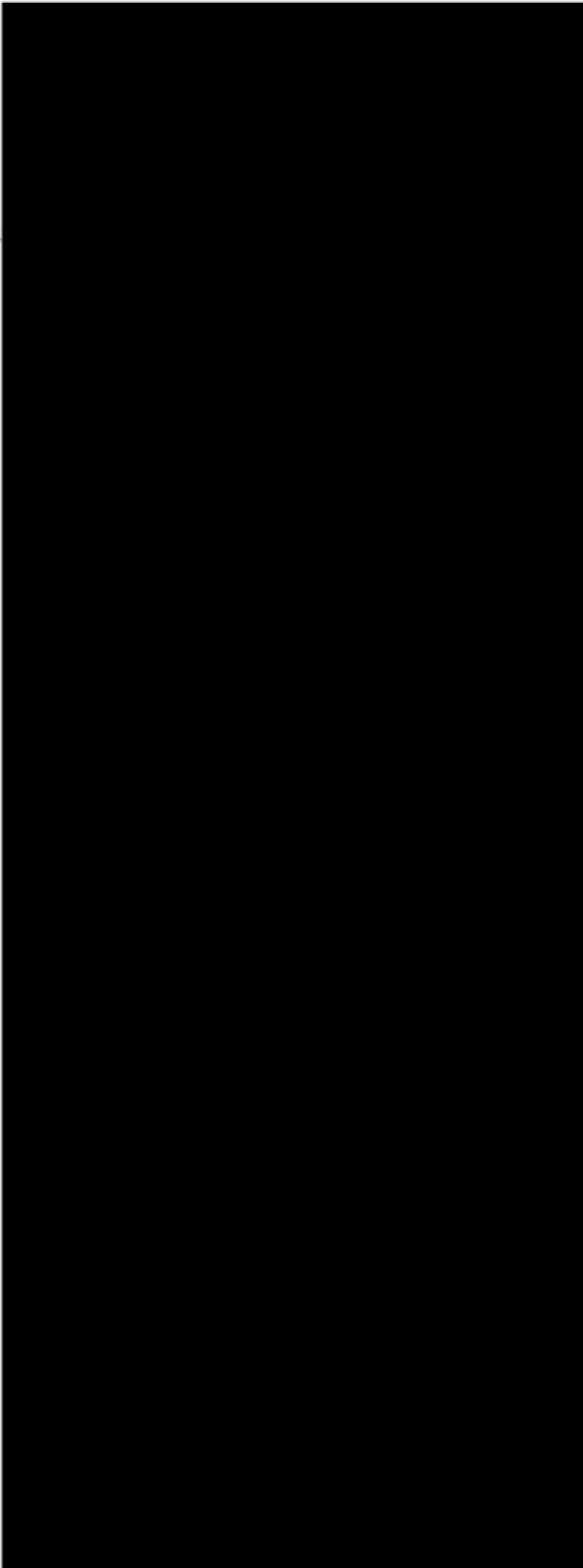
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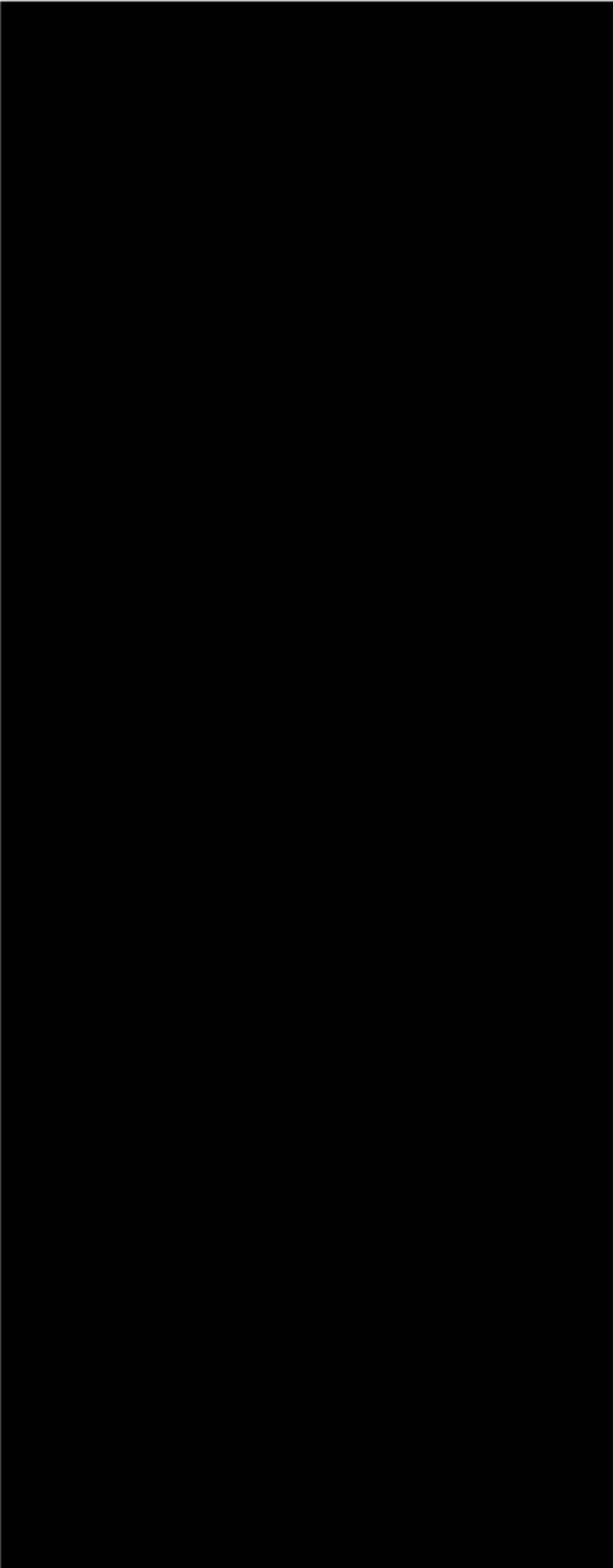
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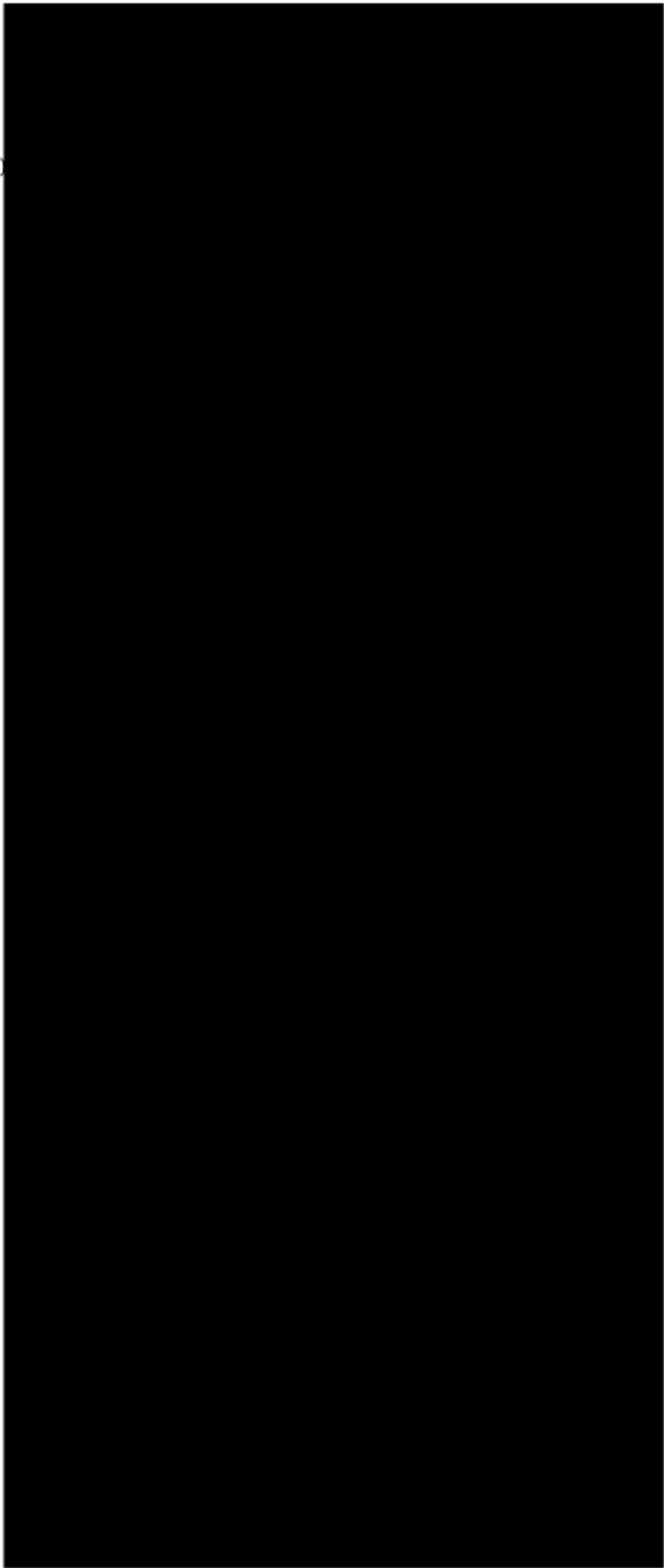
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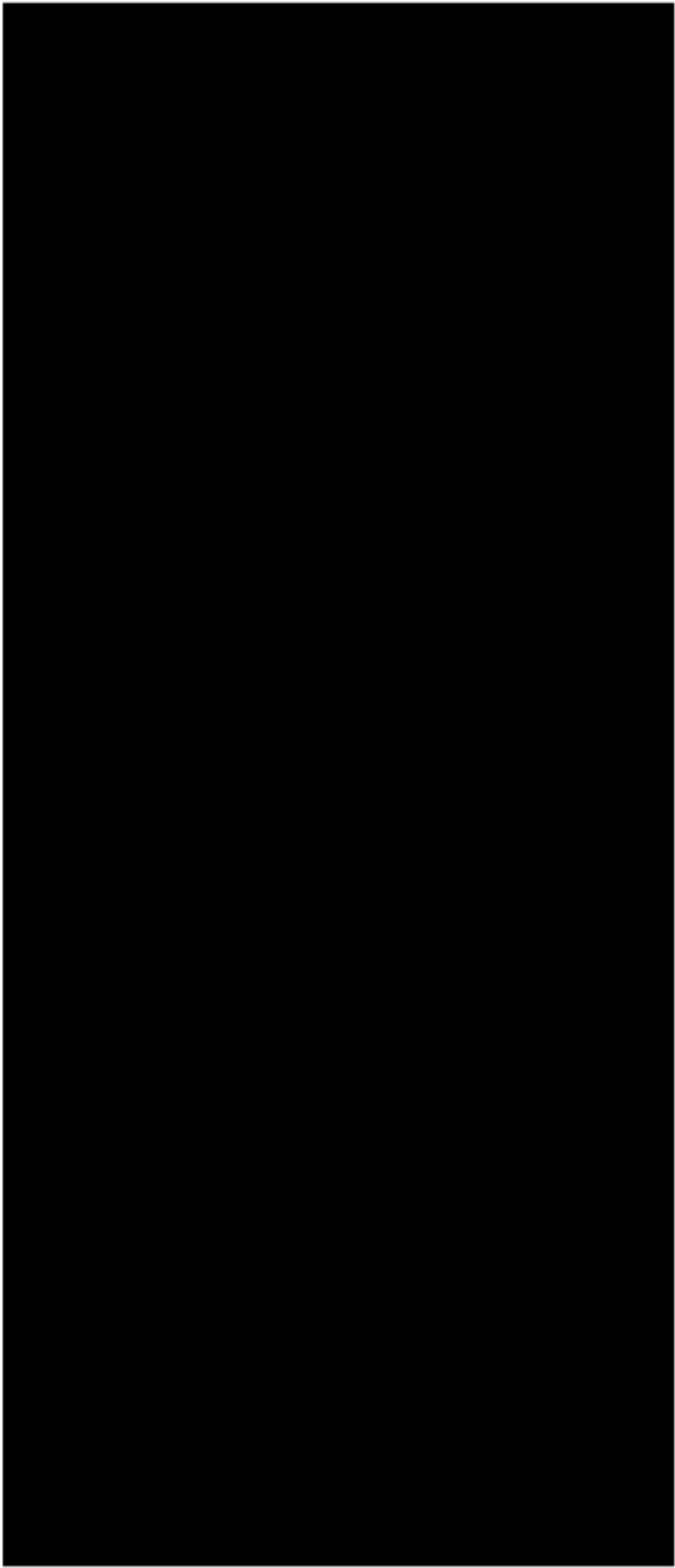
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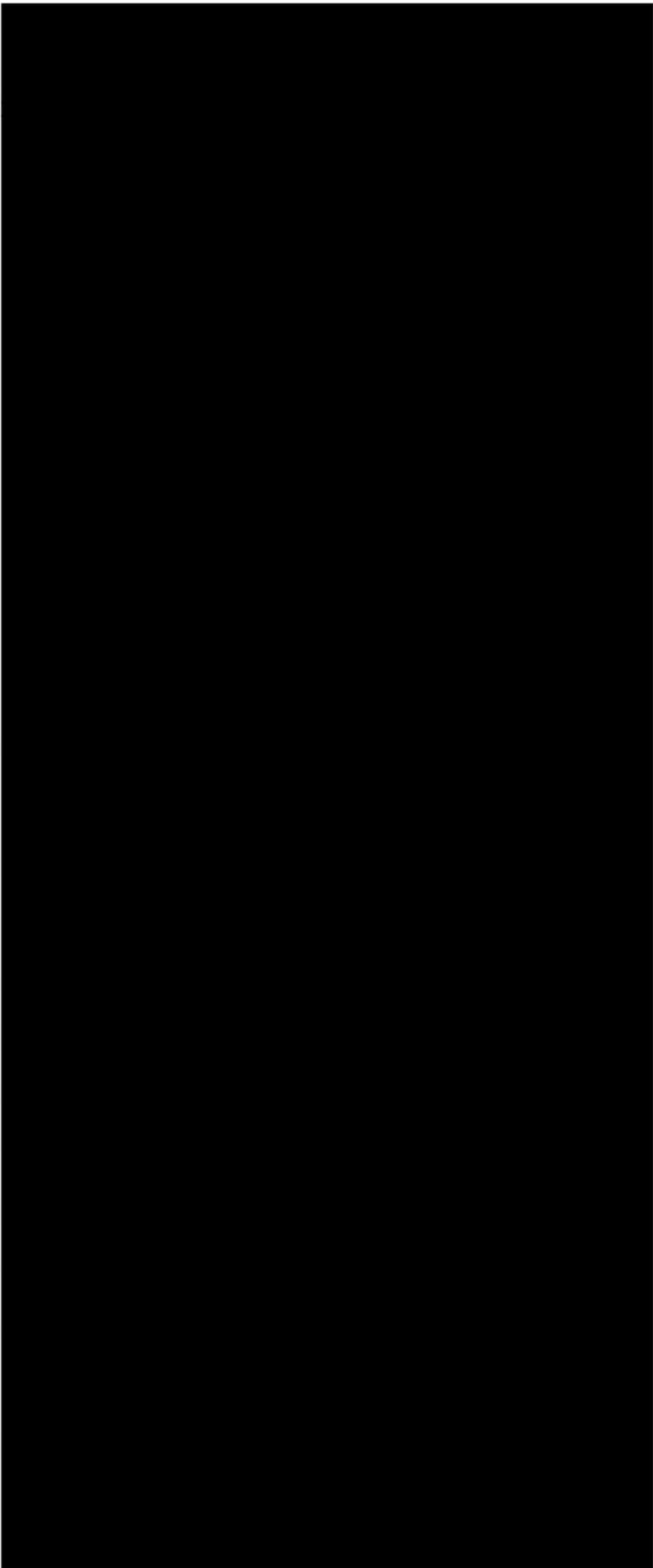
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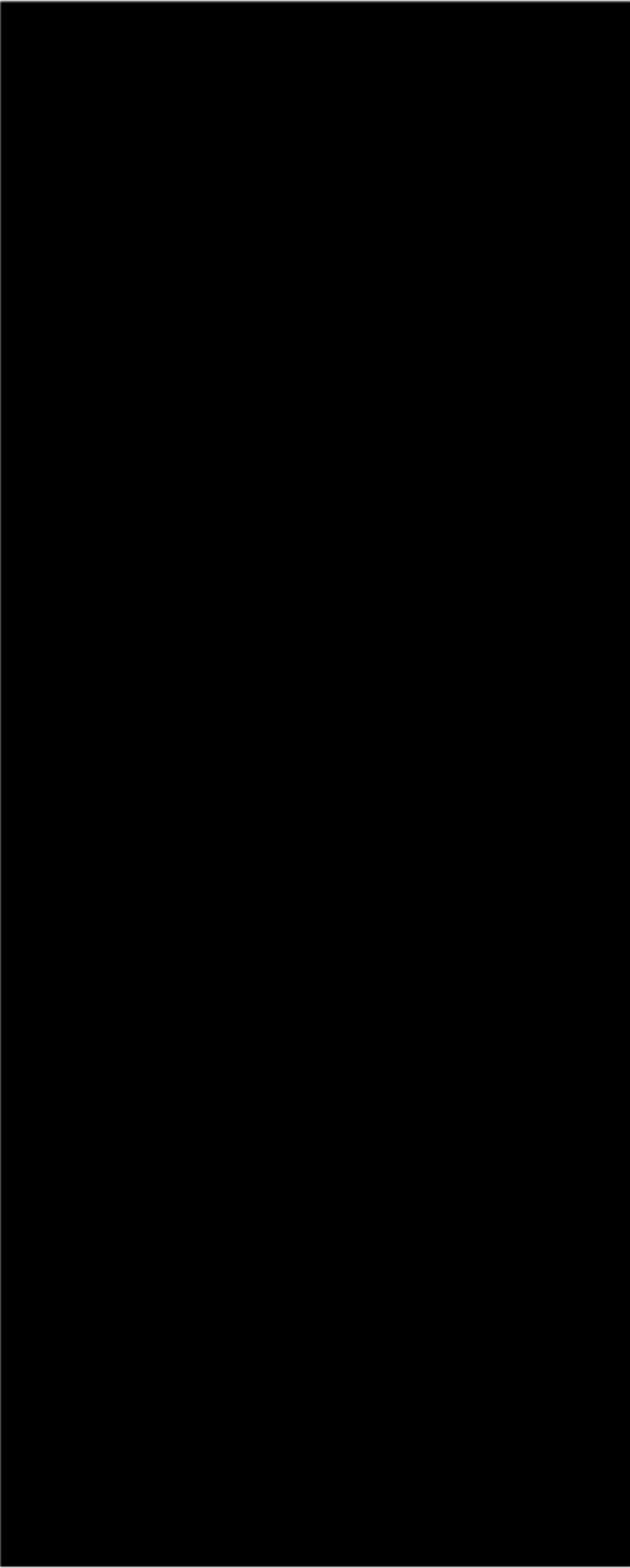
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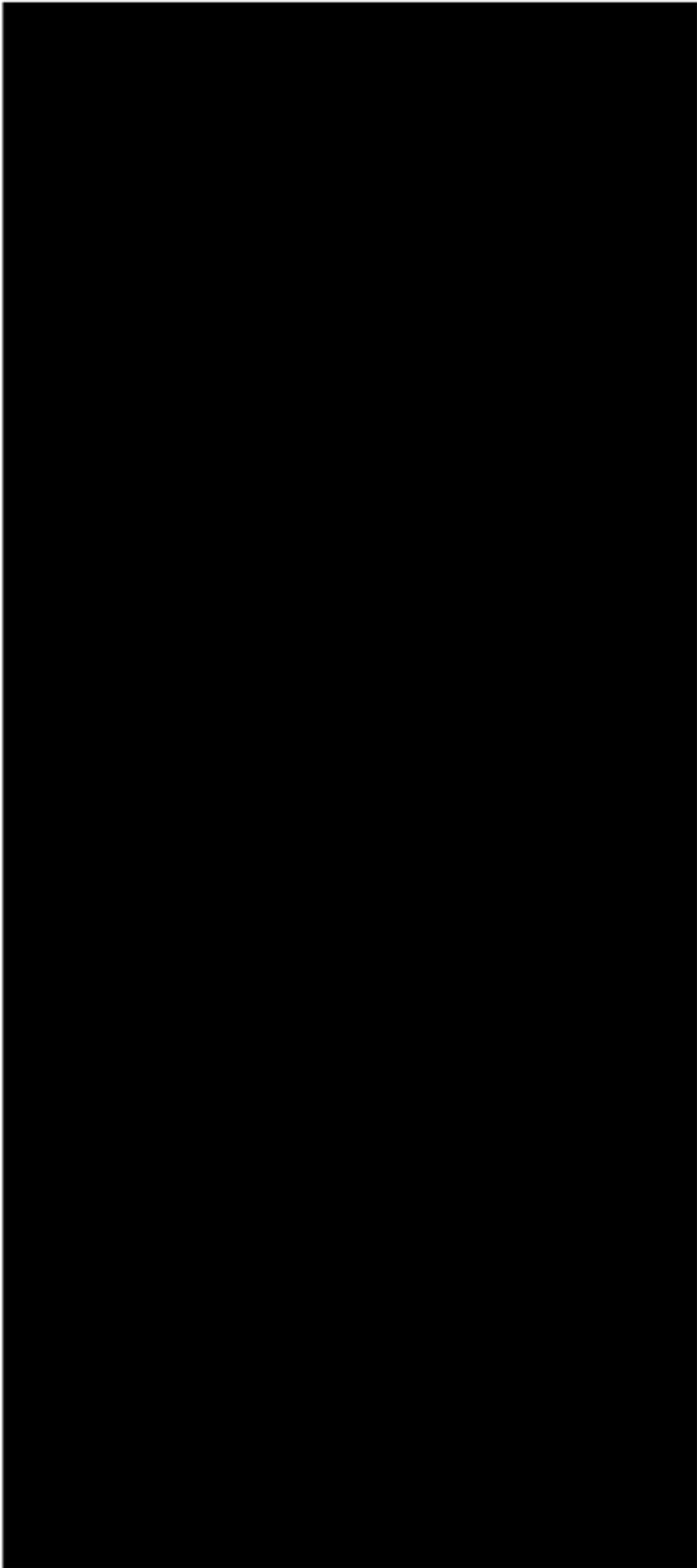
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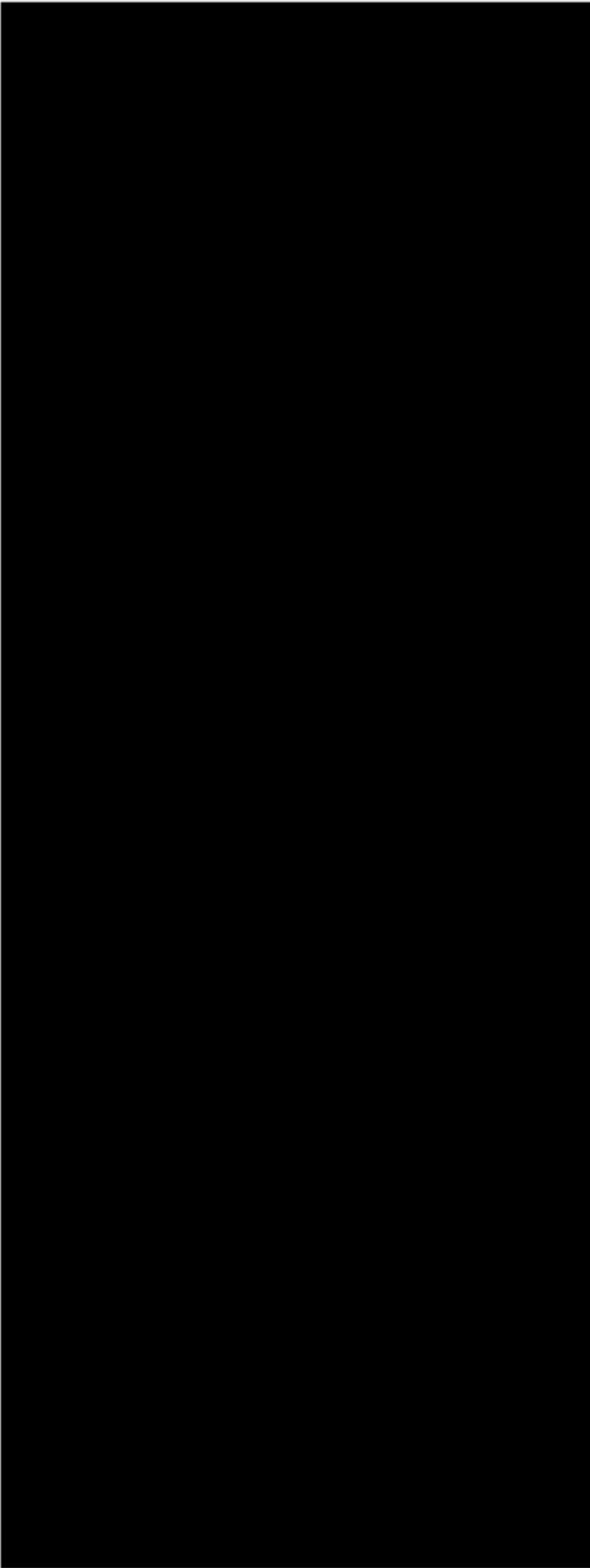
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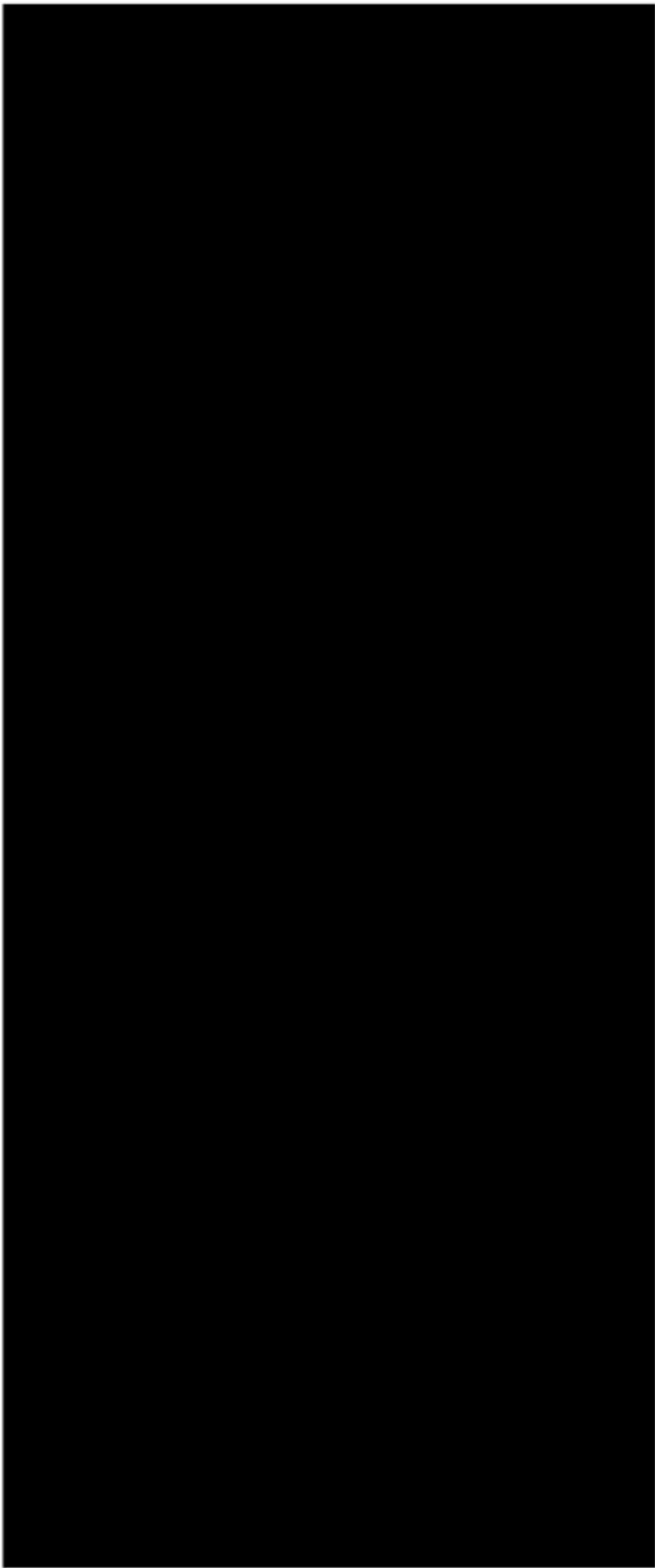
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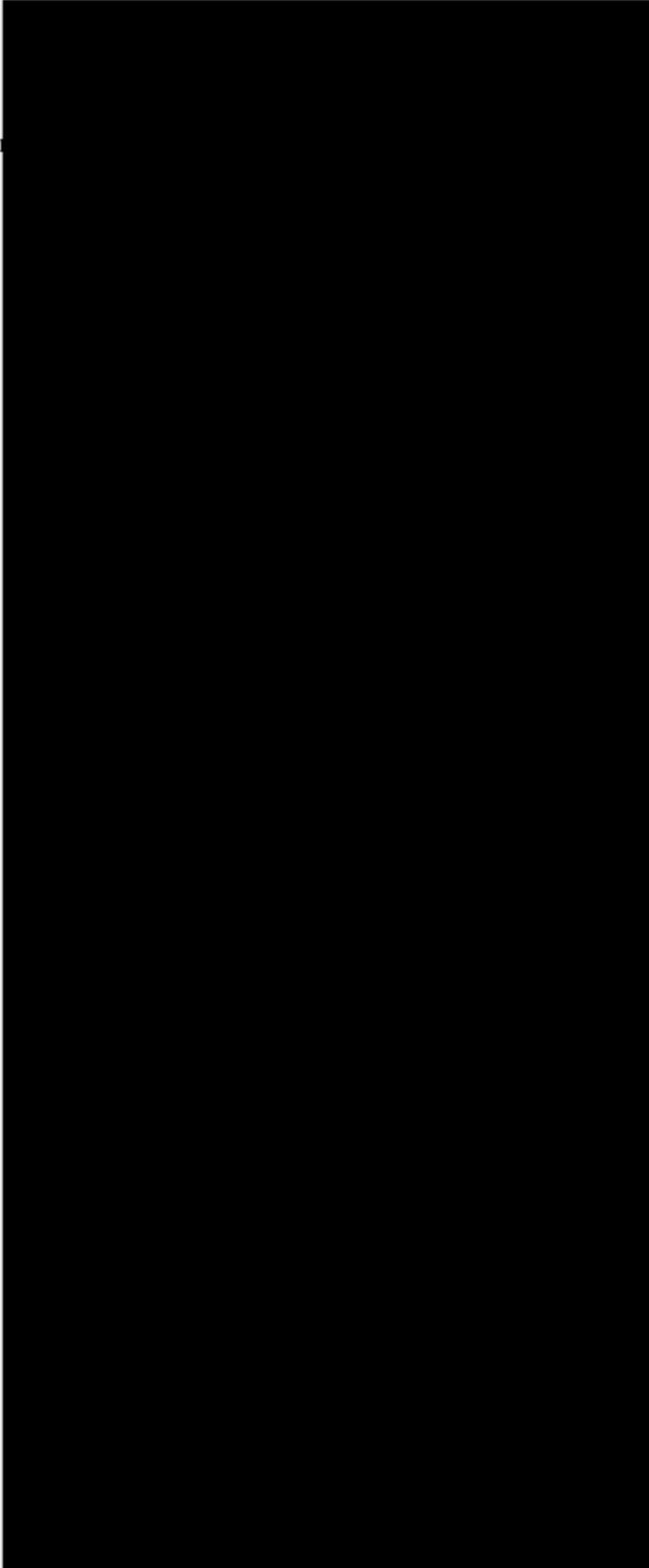
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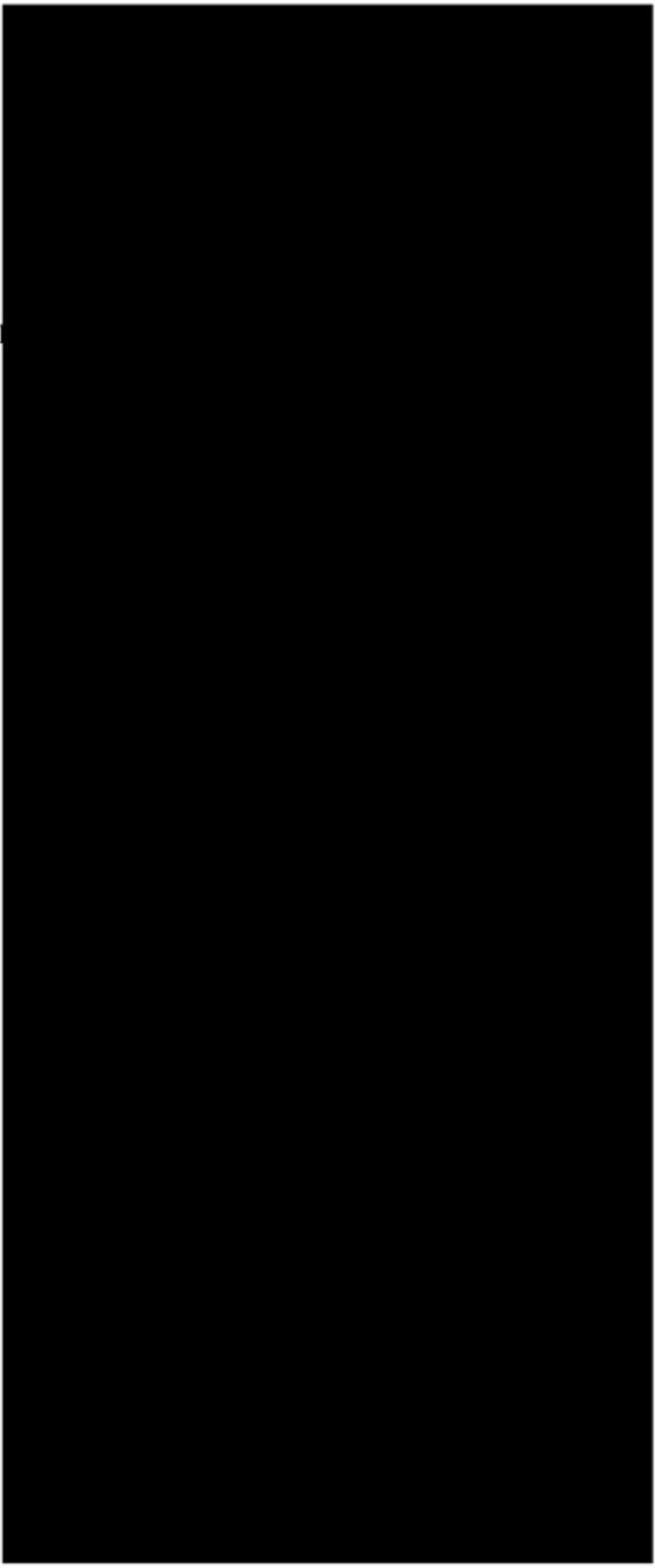
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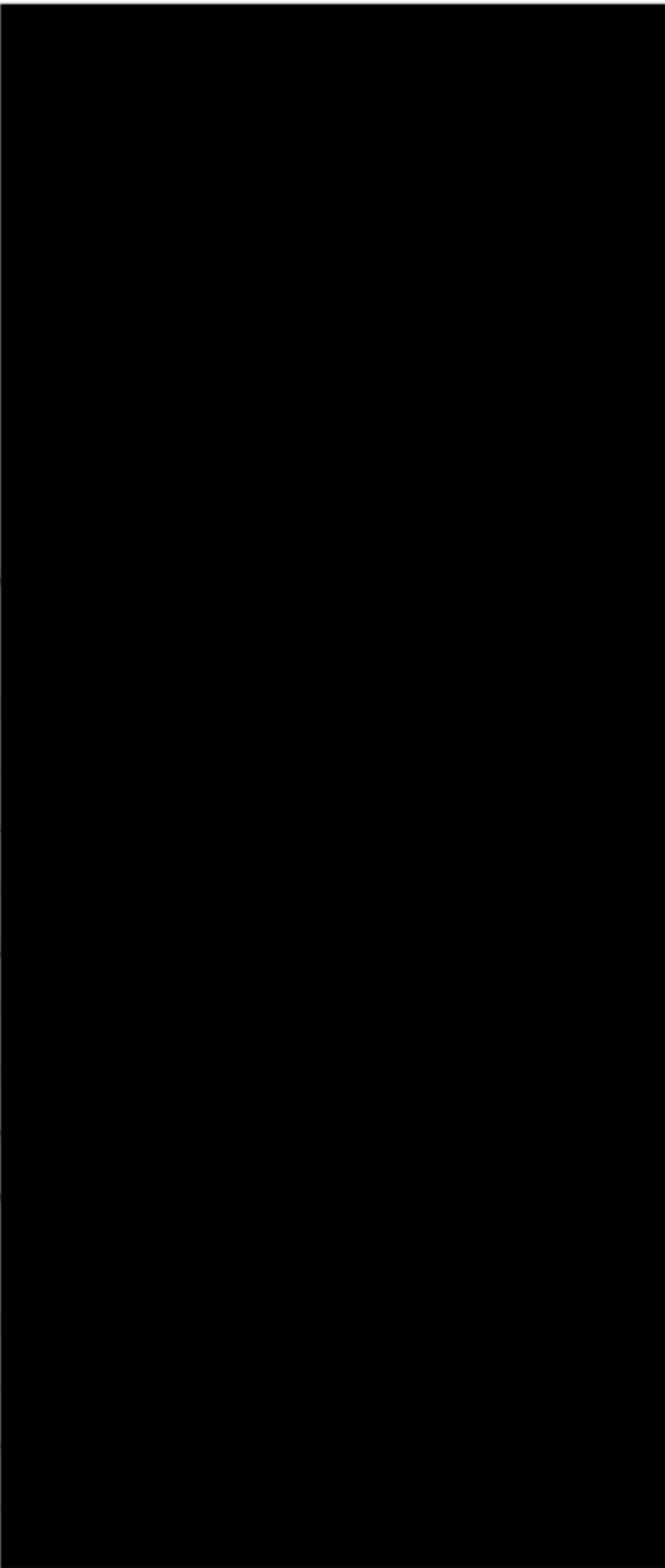
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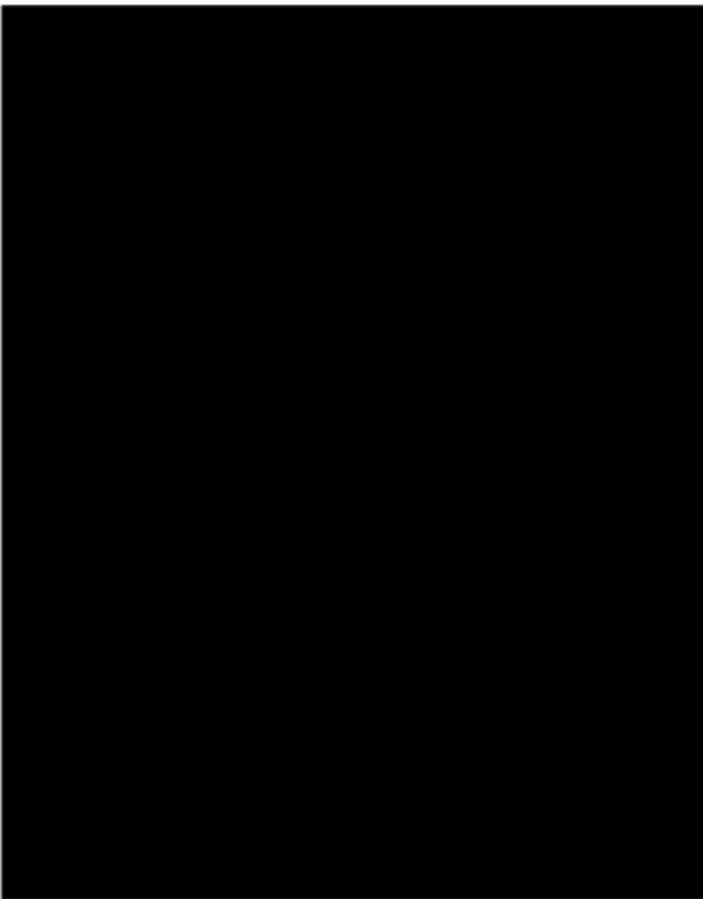
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14 BY MR. LUTTIER:

15 Q. You -- one of your claims in this case is  
16 that as a result of your meetings with Mr. Epstein,  
17 you have incurred medical expenses. Are you aware  
18 that that's one of your claims?

19 A. Medical expenses?

20 Q. Yes.

21 A. Because I have Baker Acted myself due to  
22 instability from the trauma of Mr. Epstein.

23 Q. And where did you Baker Act yourself?

24 A. [REDACTED]

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Q. And did you tell the individuals at  
the reason you were Baker Acting  
yourself was because of --

A. It was depression. I never spoke about  
Mr. Epstein with anybody.

Q. So, the physicians that treated you at  
would not know anything about Mr. Epstein,  
correct?

A. No. I told them I was depressed.

Q. And why were you depressed? Why did you  
tell them you were depressed when you went to  
?

A. Because I was.

Q. But didn't tell them that it had anything  
to do with Mr. Epstein, correct?

A. Correct.

Q. As a matter of fact before you filed this  
lawsuit, you never told anyone that you were ever  
depressed because of anything that Mr. Epstein did?

A. My mother.

Q. When did you first tell her that you were  
depressed because of Mr. Epstein?

A. Probably after I have seen Mr., after I

2 stopped seeing Mr. Epstein.

3 Q. When would, when is it that you would have  
4 told her? Because you, according to your complaint  
5 you stopped seeing Mr. Epstein in August of [REDACTED] and  
6 it's now December of '09.

7 A. Well, throughout the years.

8 Q. You can't remember a specific time that  
9 you first told her?

10 A. I don't write down dates and times of -- I  
11 talk to my mom. When you talk to your mom, do you write  
12 down dates?

13 Q. Are there --

14 MR. [REDACTED]: Don't you want to answer  
15 that question?

16 BY MR. LUTTIER:

17 Q. You were requested to produce your medical  
18 bills that you claim you incurred as a result of  
19 your interactions with Mr. Epstein and none have  
20 been produced. Do you have any?

21 A. I've done what?

22 Q. You were asked to give us copies of any  
23 medical bills you claim you incurred because of  
24 Mr. Epstein and we haven't received anything. Do  
25 you have any such bills?

63

1 A. I don't know what -- I'm confused.

2 Q. Did you go, when you went to [REDACTED]

3

4 A. I don't have the bills presently in my purse  
5 or anything.

6 Q. Did you pay any money --

7 A. Did I what?

8 Q. Did you pay for any services rendered to  
9 you [REDACTED]?

10 A. I didn't pay them, no.

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19 [REDACTED] I never told them I was  
20 there because of the, the abuse by Mr. Epstein. I just  
21 I just --

22 (Mr. Critton entered the deposition room.)

23 THE WITNESS: Who is this man walking in? •

24 MR. LUTTIER: He's a lawyer.

25 MR. [REDACTED]: That is another defense  
64

1 lawyer. That's Mr. Critton, and, and he is a  
2 partner in the same law firm.

3 THE WITNESS: Of them?

4 MR. [REDACTED]: Yeah.

5 MR. LUTTIER: Other than your --

6 MR. CRITTON: Thanks for the welcome.

7 MR. LUTTIER: Other than your claim --

8 MR. [REDACTED]: Hello, Robert.

9 MR. CRITTON: Hi, [REDACTED].

10 BY MR. LUTTIER:

11 Q. -- your claim that you admitted yourself,  
12 that you Baker Acted yourself at [REDACTED],  
13 what other medical expense do you claim you incurred  
14 as a result of anything that had to do with  
15 Mr. Epstein?

16 A. I don't know.

17 Q. Have you ever been treated by any  
18 physician as a result of anything that had to do  
19 with Mr. Epstein other than when you claim you Baker  
20 Acted yourself at [REDACTED]?

21 A. Your question is so confusing to me because I  
22 feel like you keep asking it in different forms, and I  
23 keep telling you the same answer and I'm -- you're  
24 confusing the crap out of me.

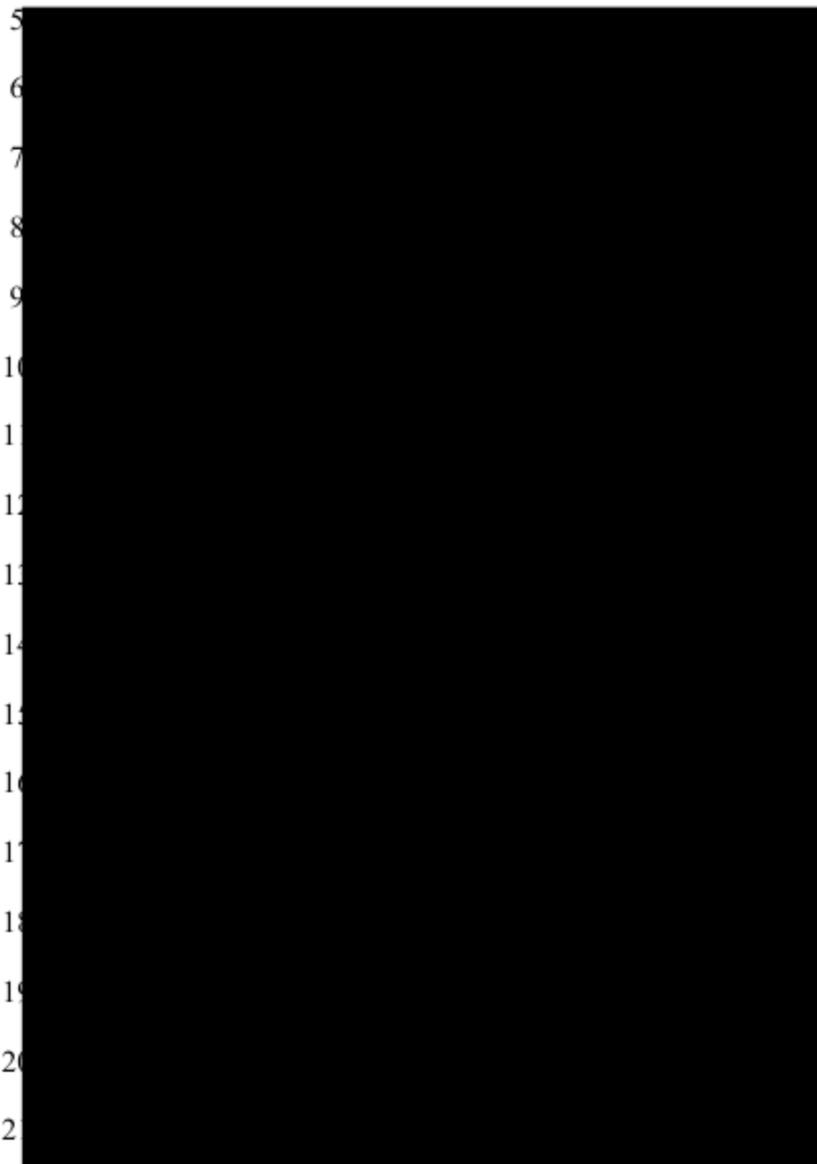
25 Q. Have you gone to any doctor --

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1 A. Other than [REDACTED], no.

2 Q. Okay -- as result of anything having to do  
3 with Mr. Epstein?

4 A. And I -- no.



22 Q. Okay. You claim in your amended complaint  
23 that you have lost some sort of wages as a result of  
24 your dealings with Mr. Epstein. Are you aware of  
25 that?

66

1 A. I don't know what that means.

2 Q. That you lost income because of your  
3 relationship or dealings with Mr. Epstein.

4 A. Yeah, I have problems socially with certain  
5 people.

6 Q. Well, let's talk about specifically lost  
7 earnings. What earnings, that is wages, did you  
8 lose because of any dealings you had with  
9 Mr. Epstein?

10 A. I have a very hard time working around older  
11 men or in specific situations.

12 Q. What situations would those be?

13 A. I don't trust anybody and I don't feel safe in  
14 some places.

15 Q. Well, you say you don't trust anybody?

16 A. Well, I don't trust men.

17 Q. What -- any kind of particular kind of men  
18 or just any --

19 A. Older men.

20 Q. And what's your definition of "older"?

21 A. Above 40.

22 Q. Okay. Did you have some sort of  
23 employment in the past with men over 40 that you've  
24 now lost or cannot, can no longer pursue because of  
25 your dealings with Mr. Epstein?

67

1 A. Like if you work in restaurants. I'm, I'm  
2 confused.

3 Q. And what --

4 A. I am totally confused.

5 Q. Why can't you work in a restaurant as a  
6 result of having had interactions with Mr. Epstein?

7 A. I don't like places where men stare at me. It  
8 makes me feel uncomfortable.

9 Q. But, in fact, after you saw Mr. Epstein,  
10 after you quit going to Mr. Epstein, you worked at  
11 numerous places where --

12 A. I have.

13 Q. -- men saw you, correct?

14 A. Yes.

15 Q. And you have made as much as a thousand  
16 dollars a night --

17 A. Yes.

18 Q. -- going out with people, men that are  
19 over 40, have you not?

20 A. Yes, that's true.

21 Q. When before you met Mr. Epstein did you  
22 ever earn a thousand dollars a night?

23 A. No, it was after.

24 Q. Never did, correct?

25 A. It was after.

68

1 Q. So, would you agree with me that after  
2 that point in time that you stopped seeing  
3 Mr. Epstein you actually earned more money than you  
4 had ever earned before in your life?

5 A. Yes.

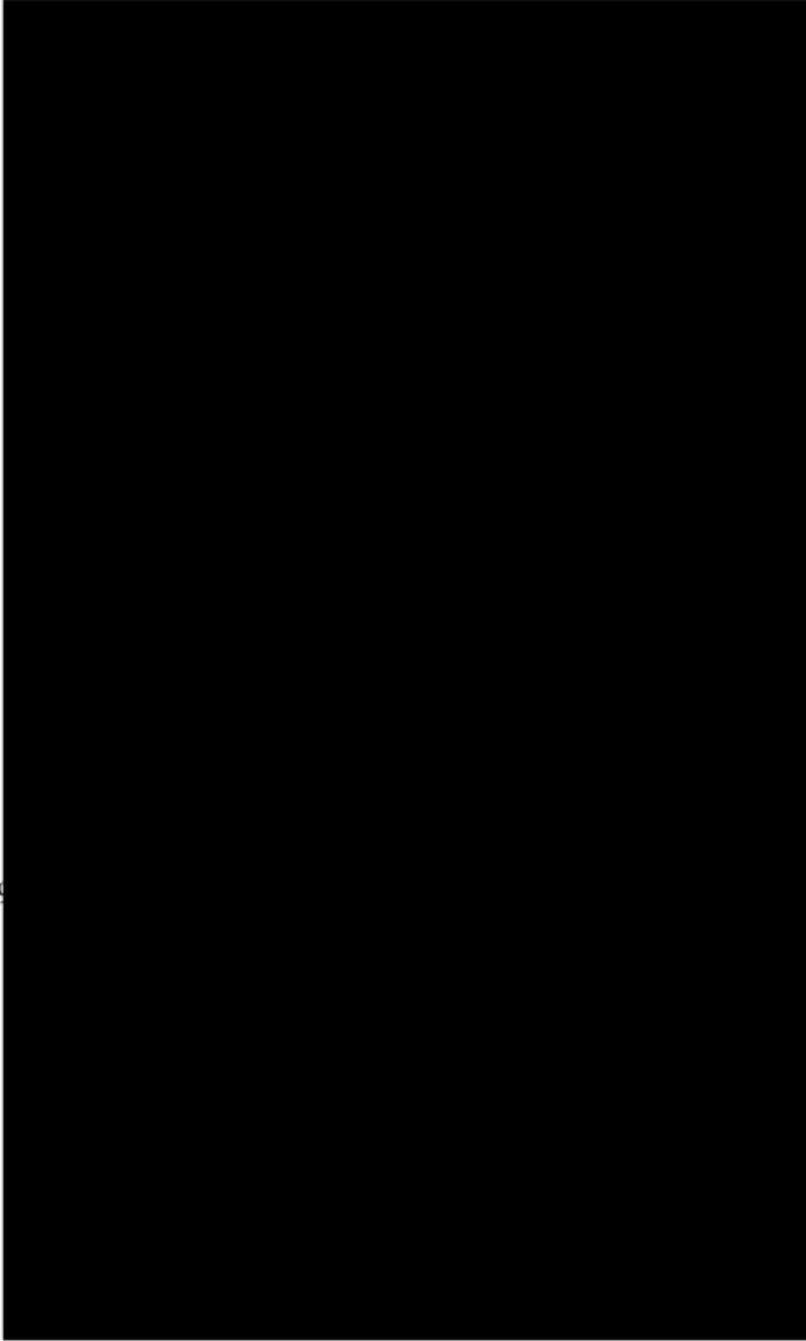
6 Q. Would you agree with me, therefore, that  
7 your earning potential and your earning ability had  
8 increased and not decreased?

9 A. I suppose.

10 Q. And, by the way, when you were earning a  
11 thousand dollars a night, who were you working for?

12 A. I was working for an escort service.

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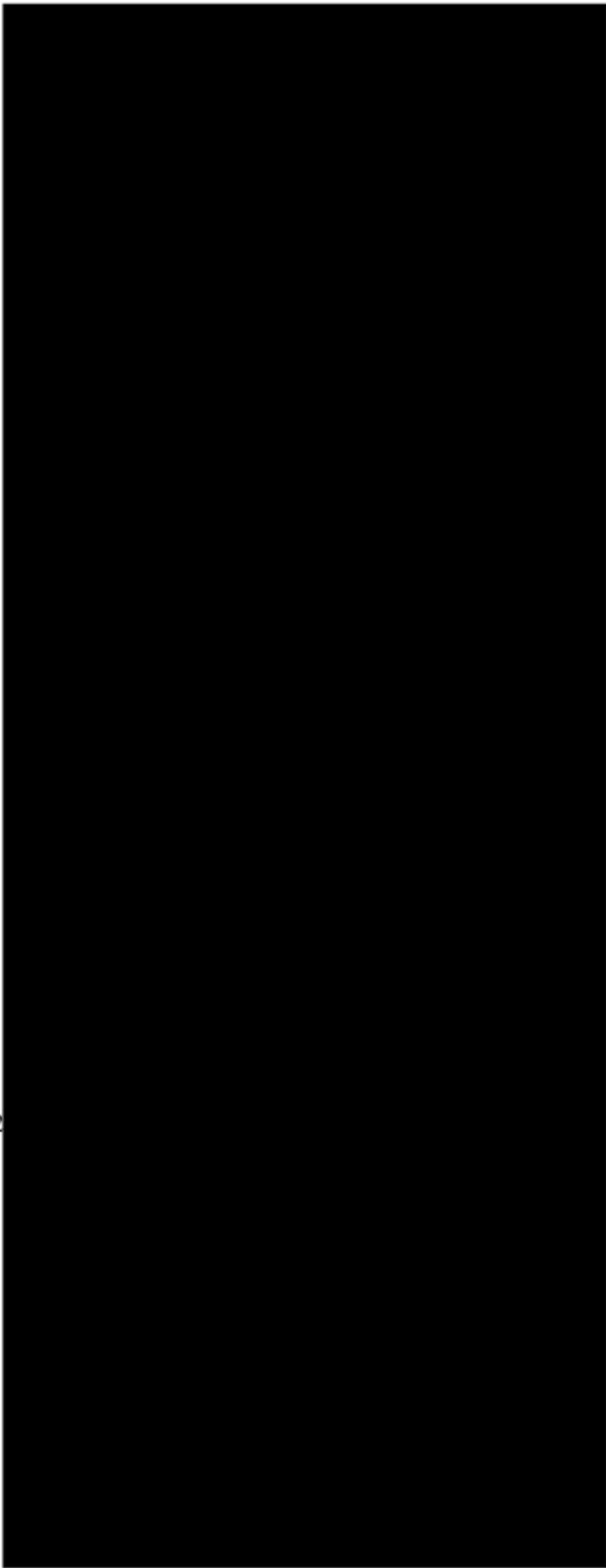
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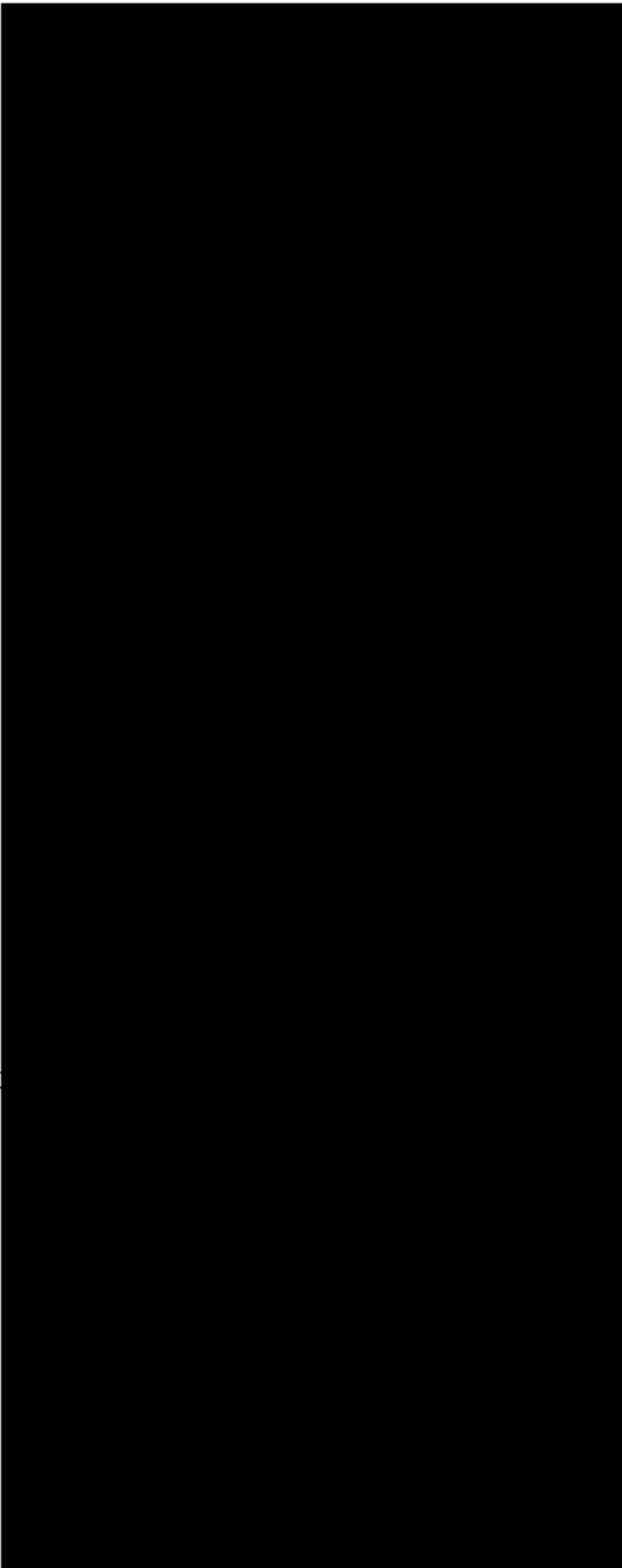


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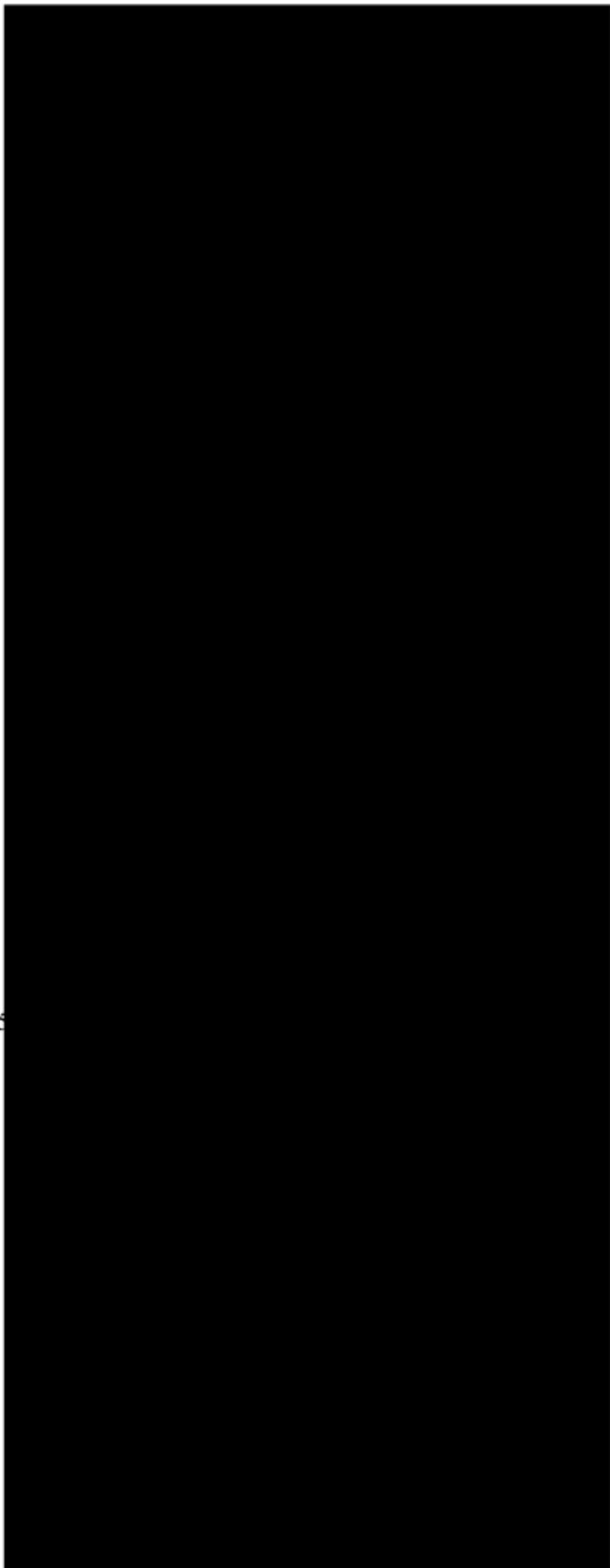
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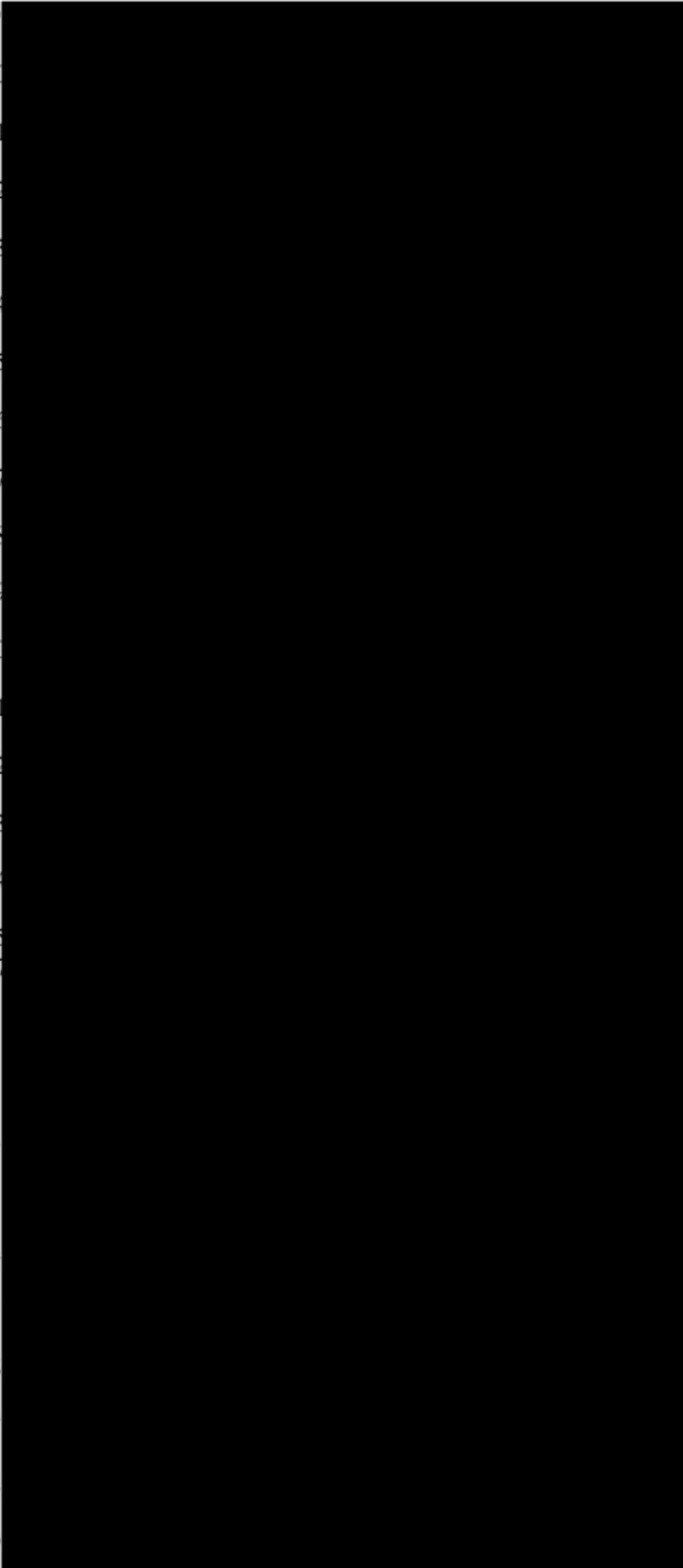
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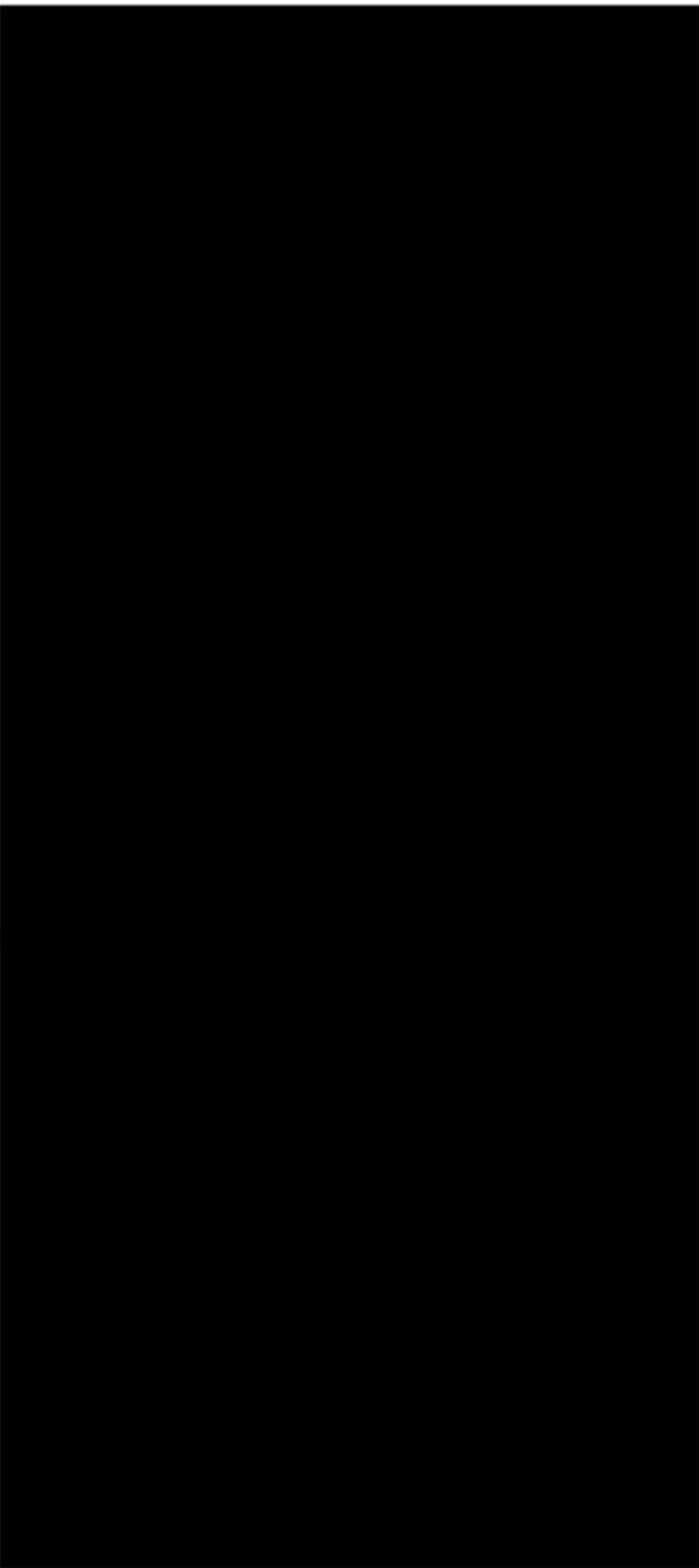
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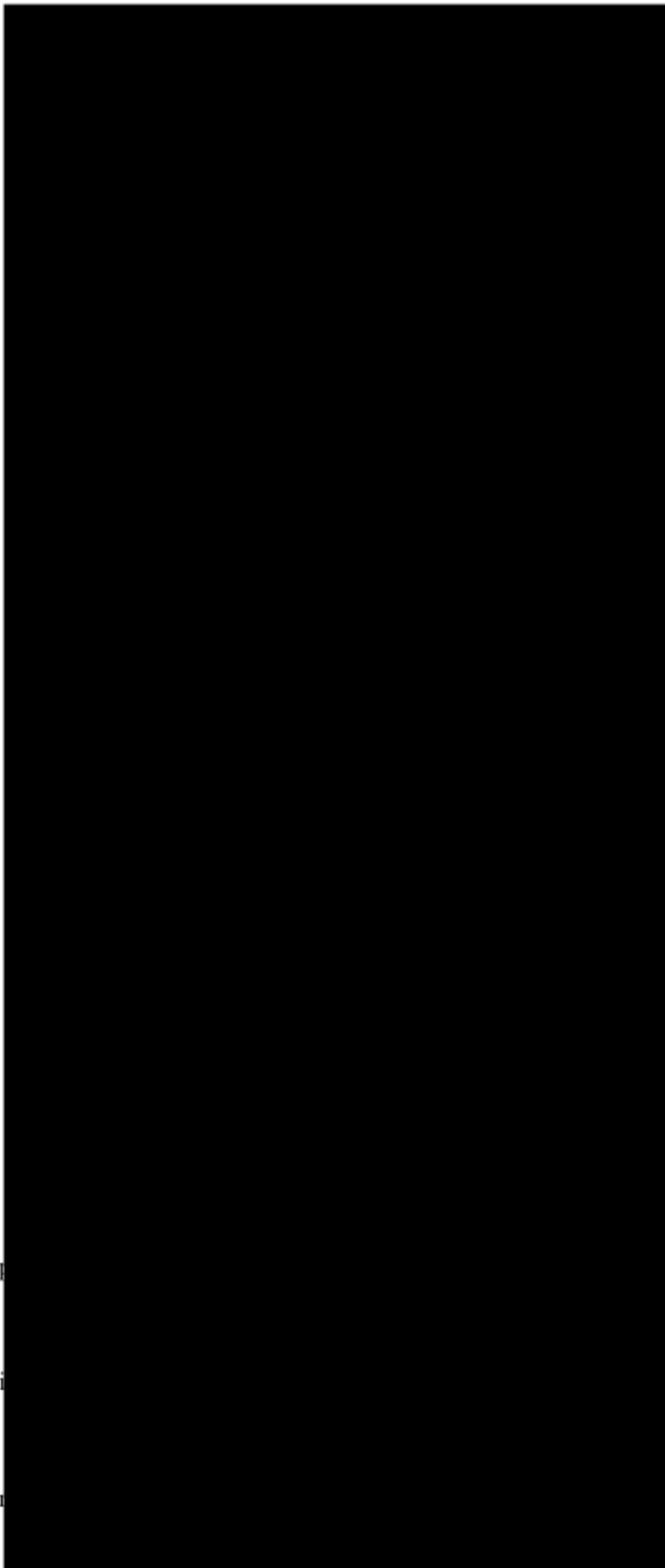
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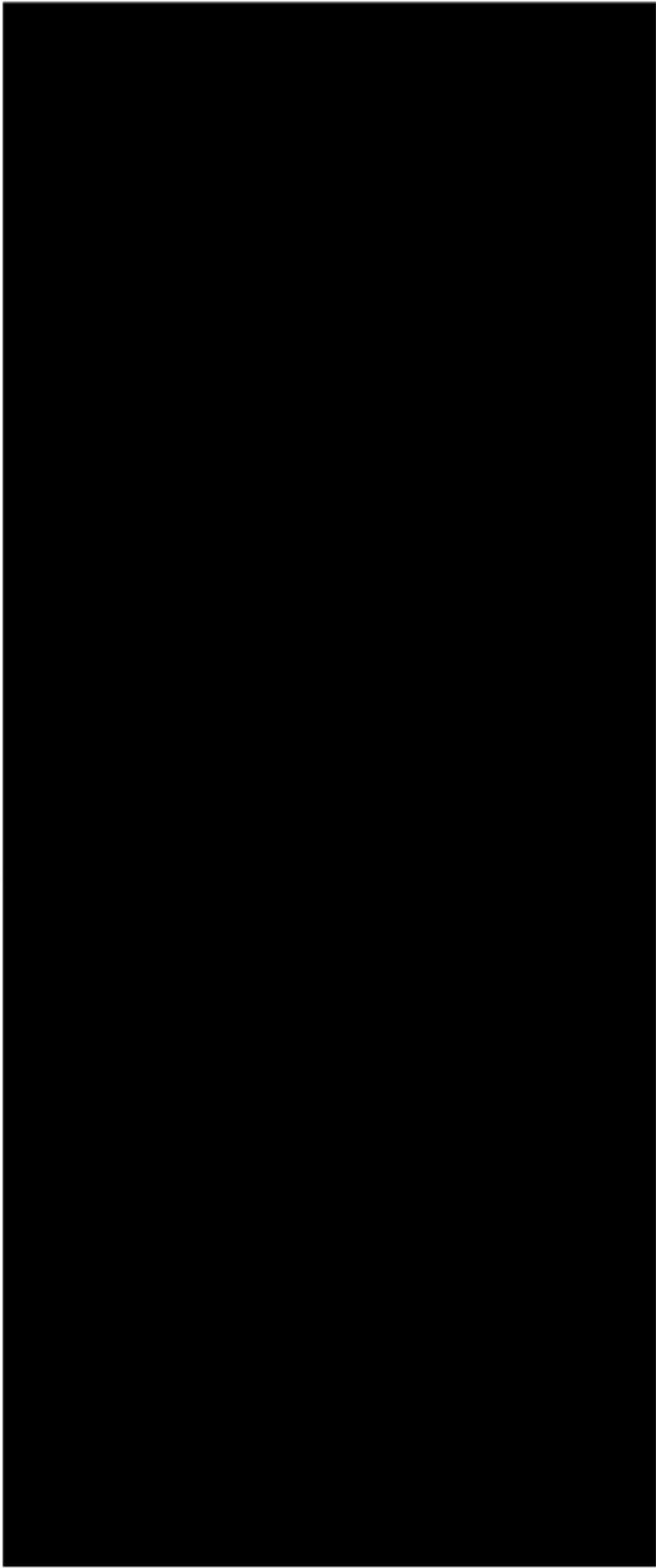


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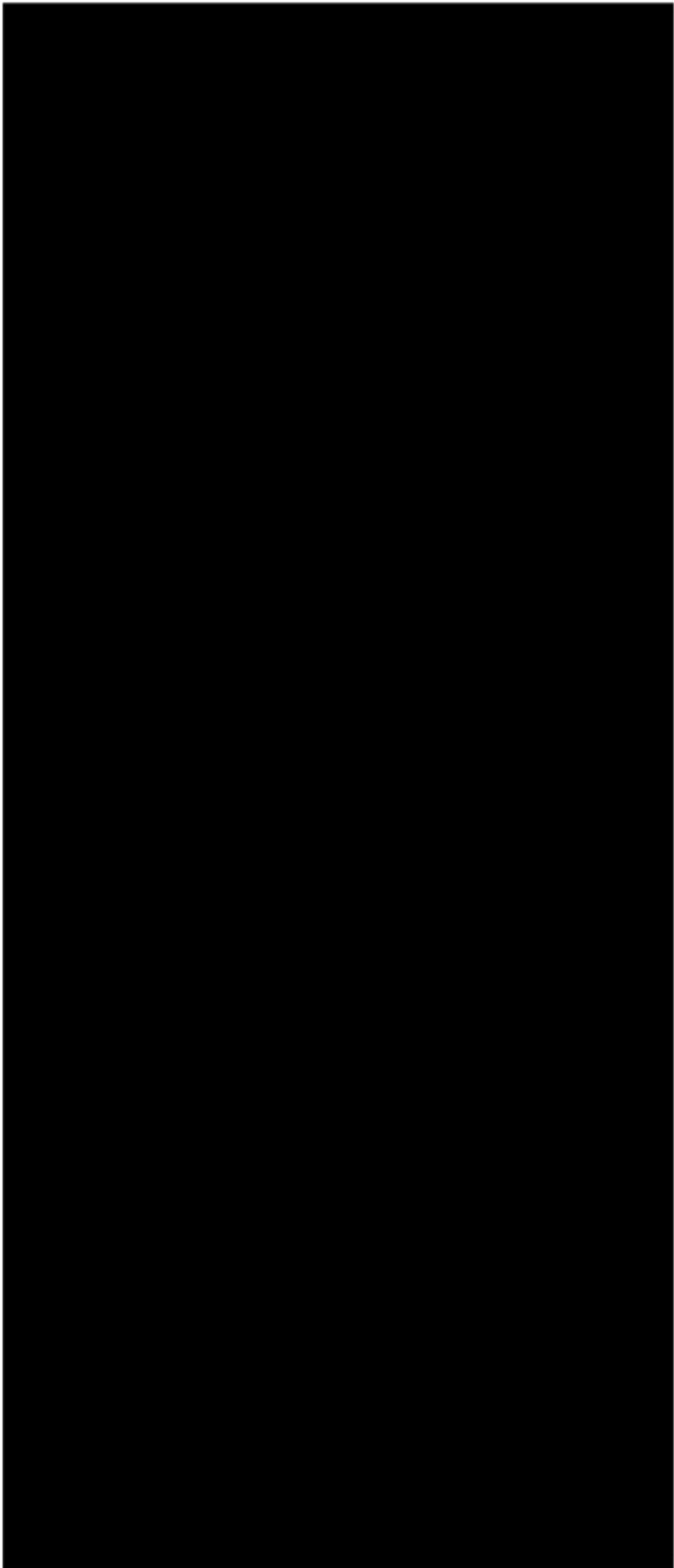
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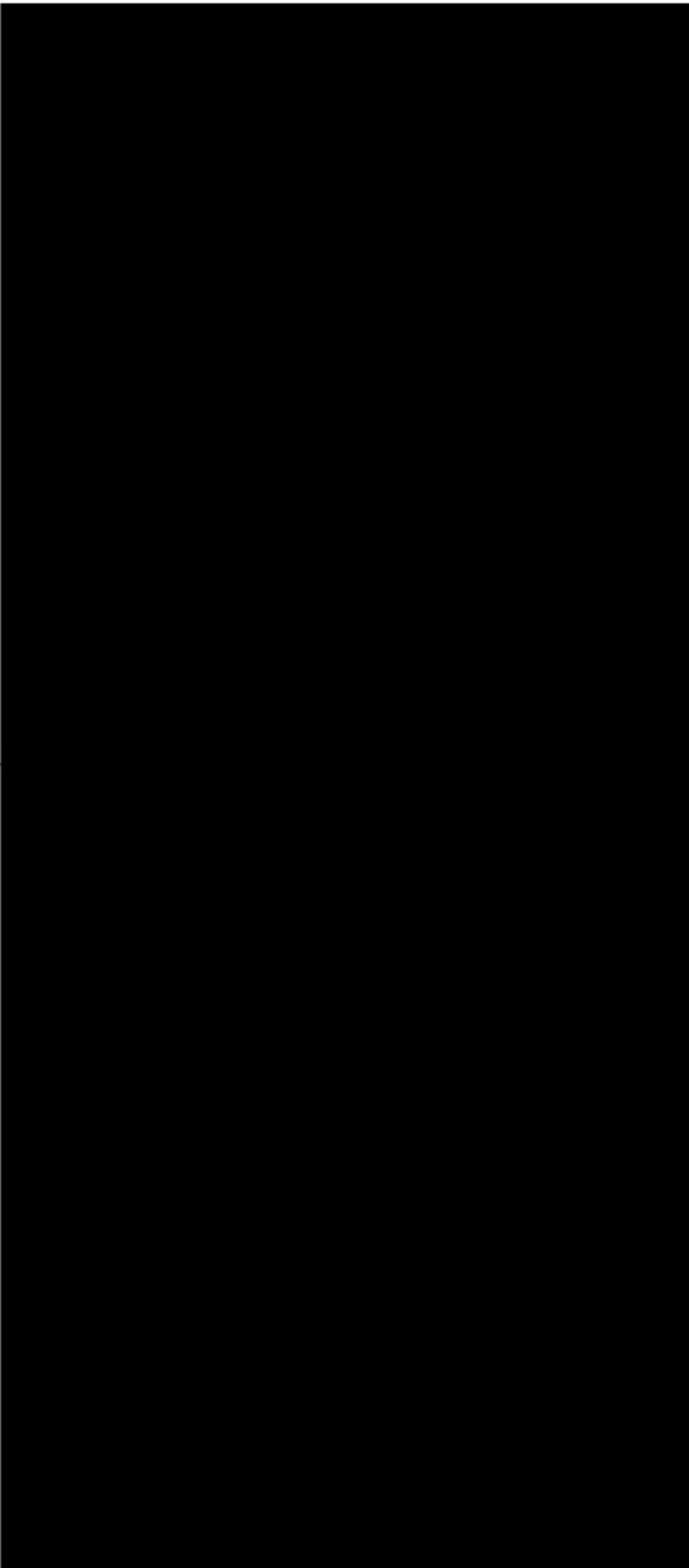
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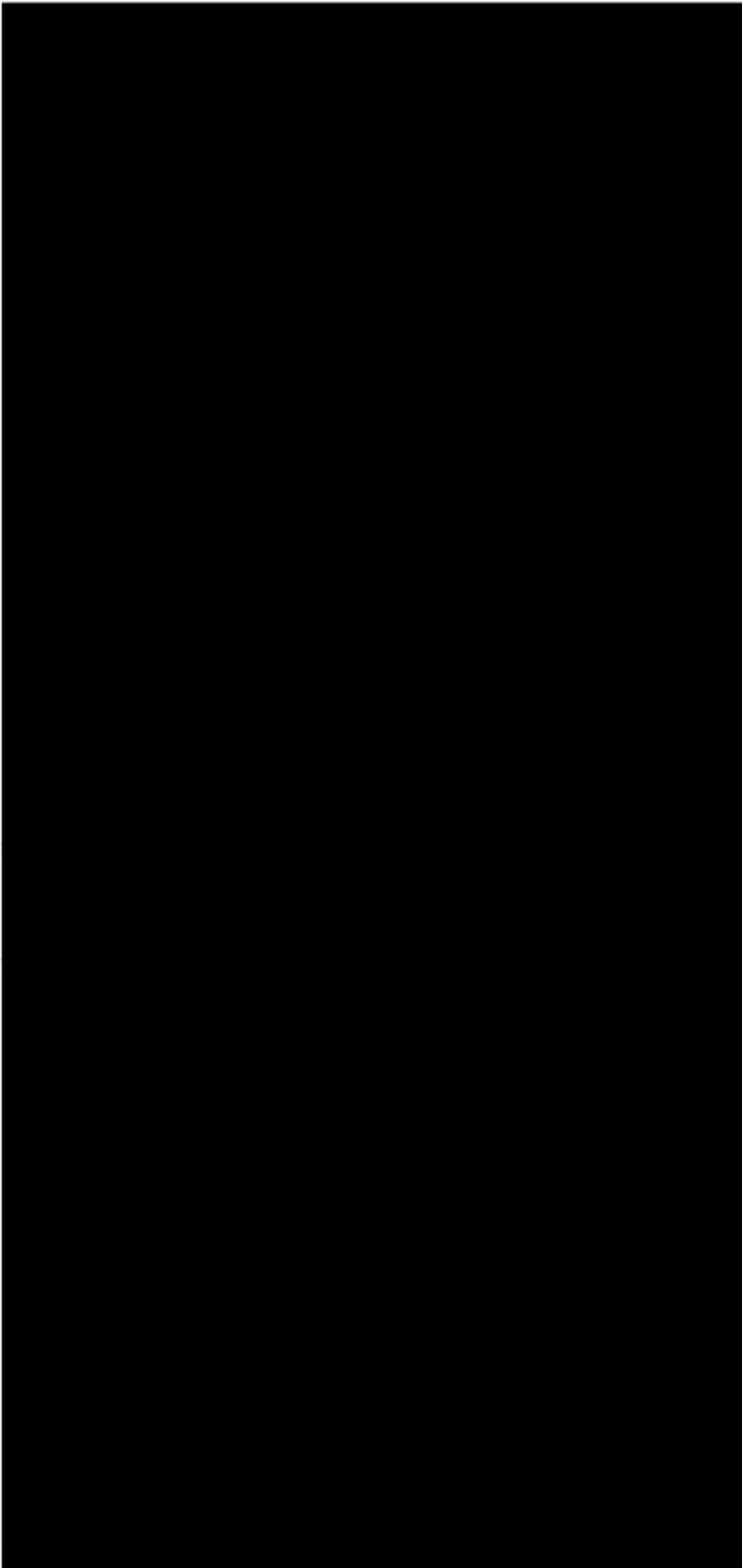
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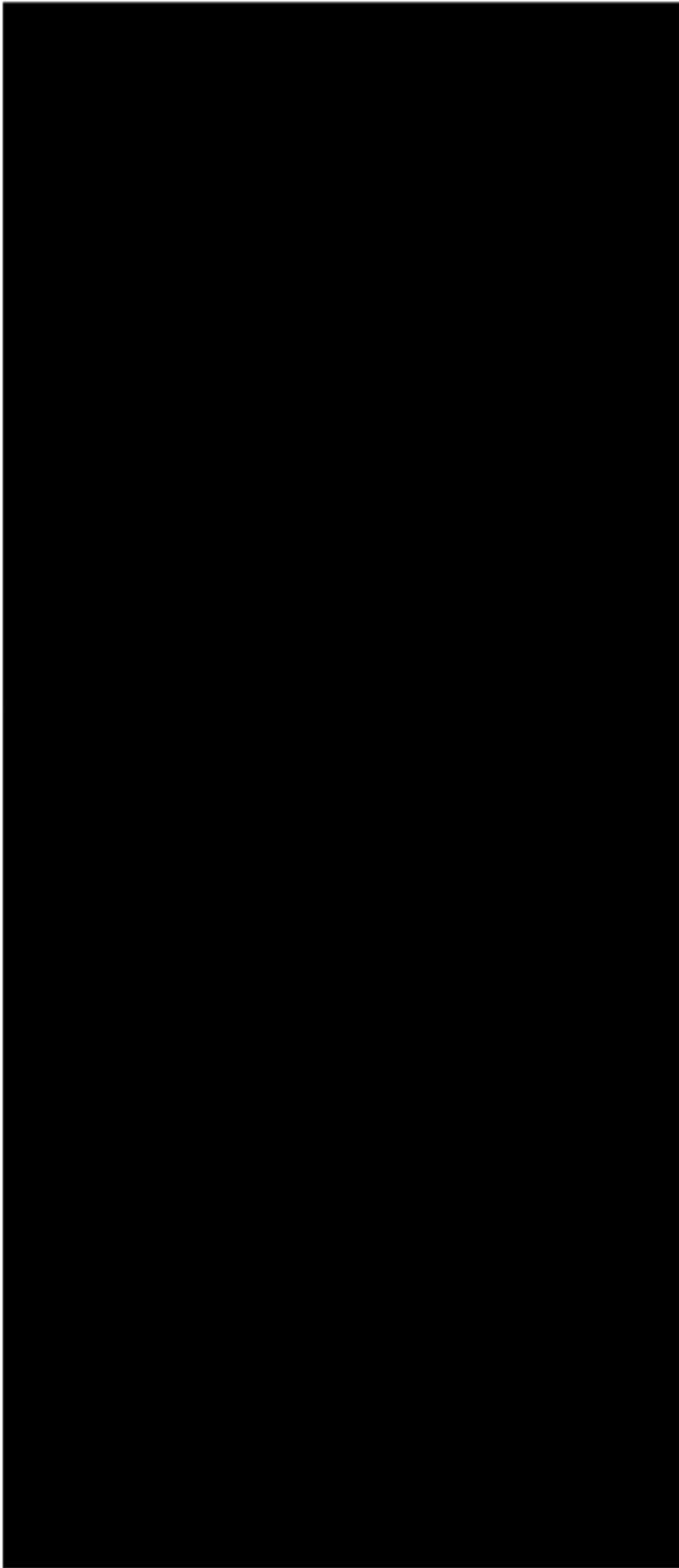


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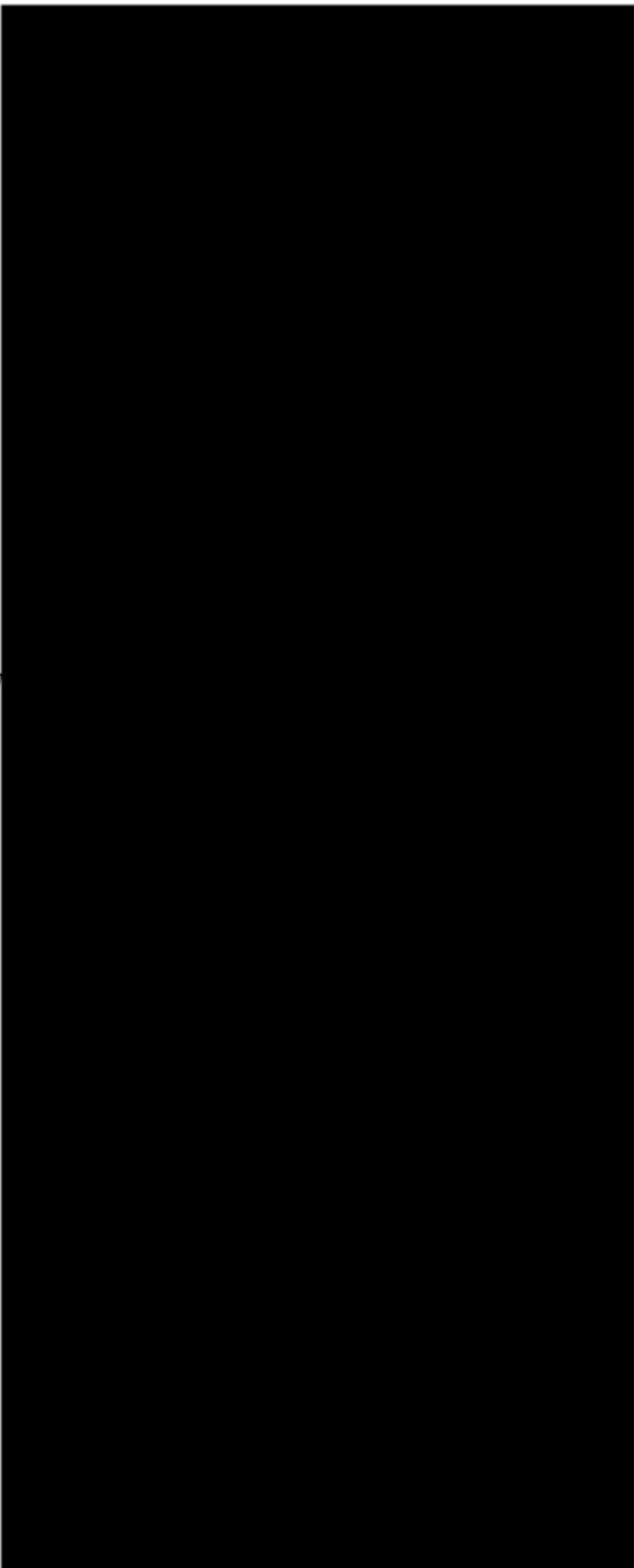
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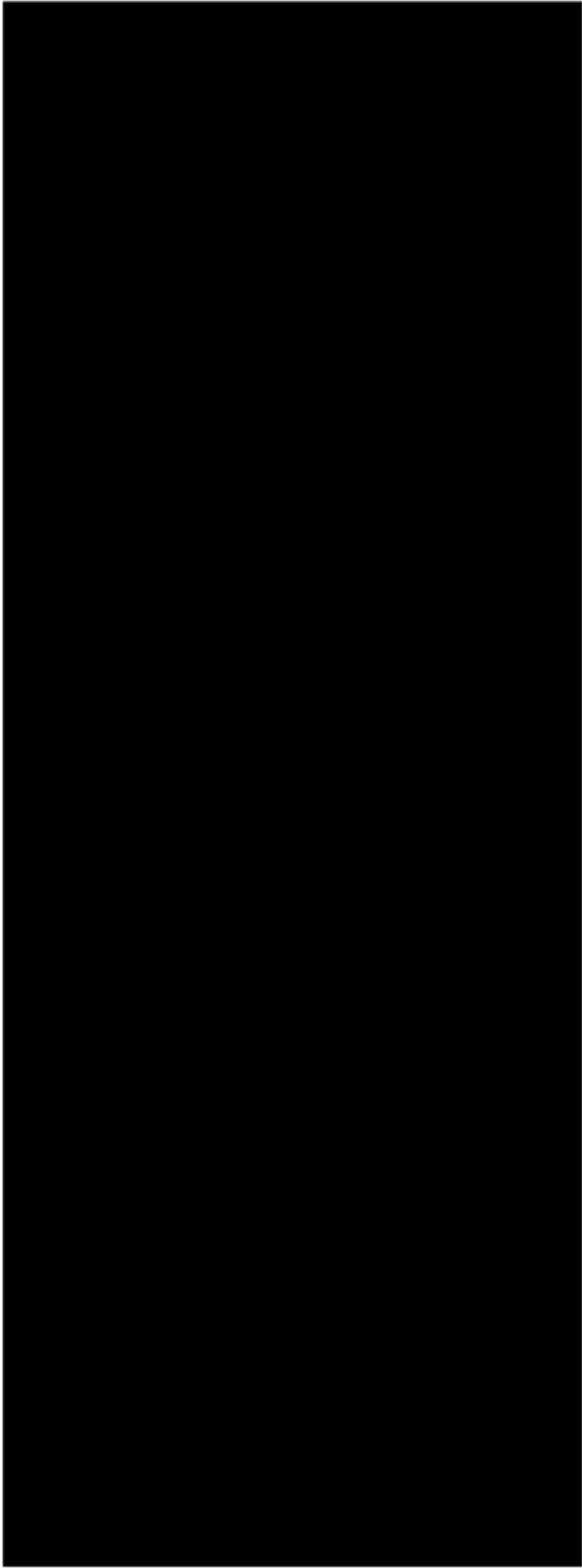
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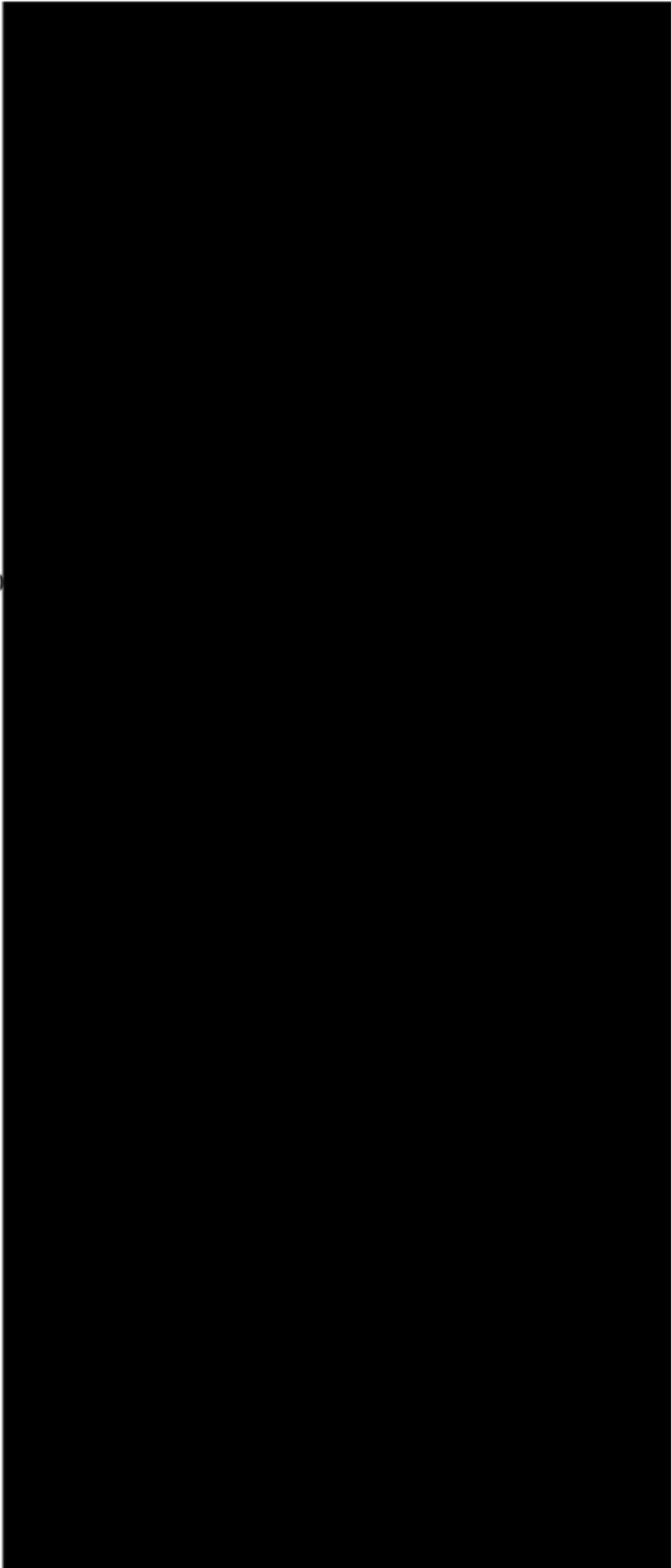
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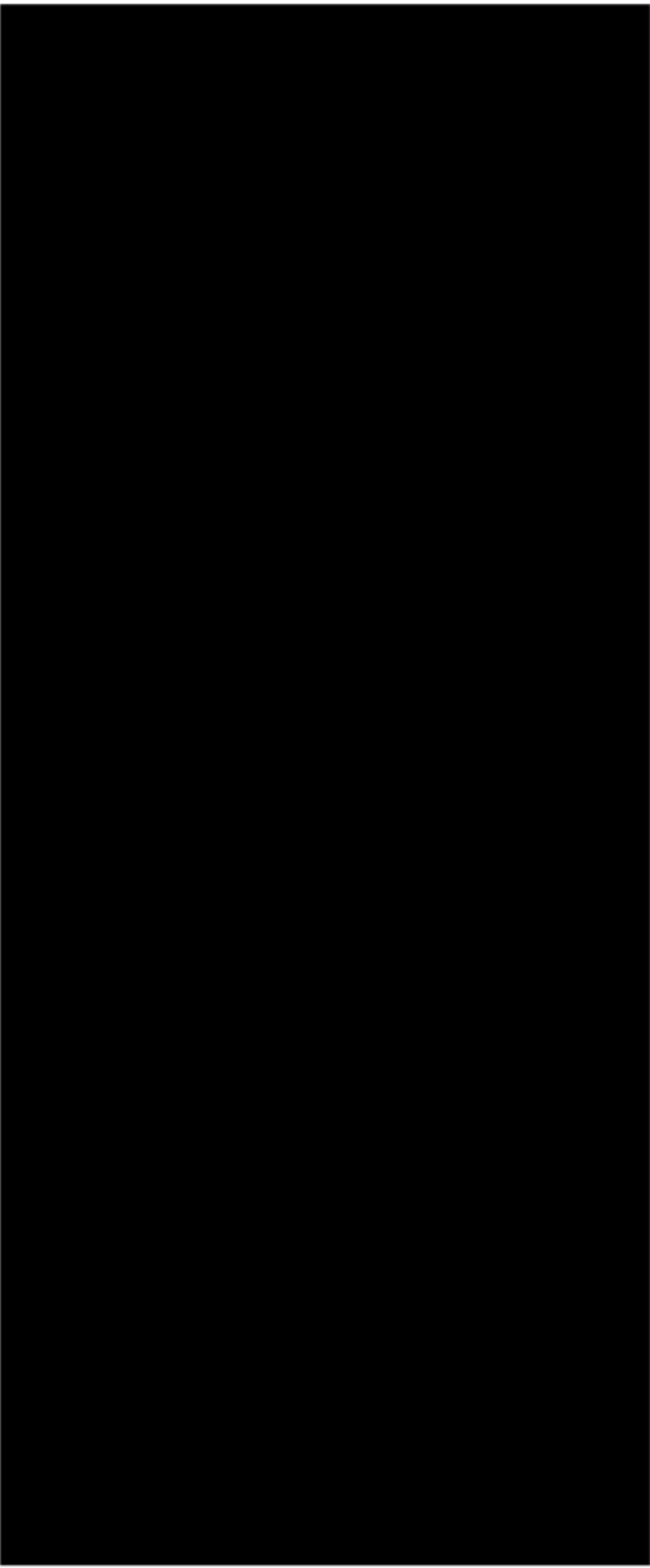
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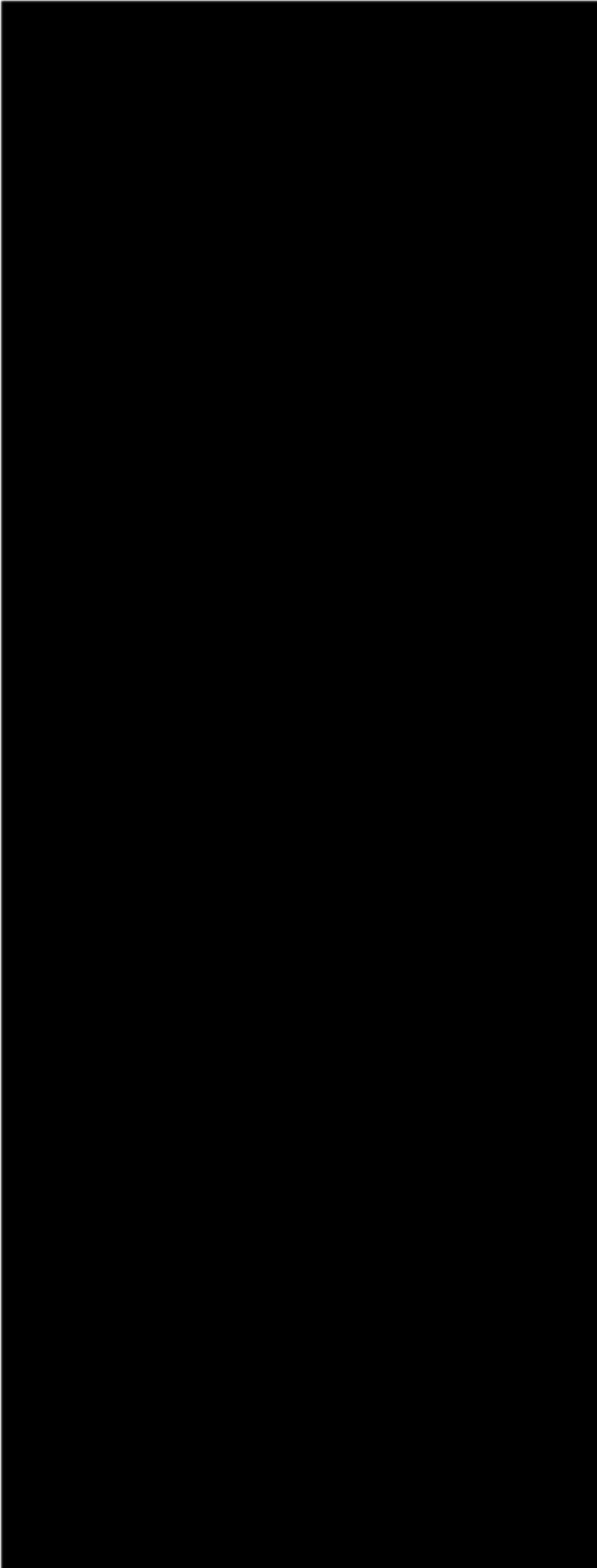
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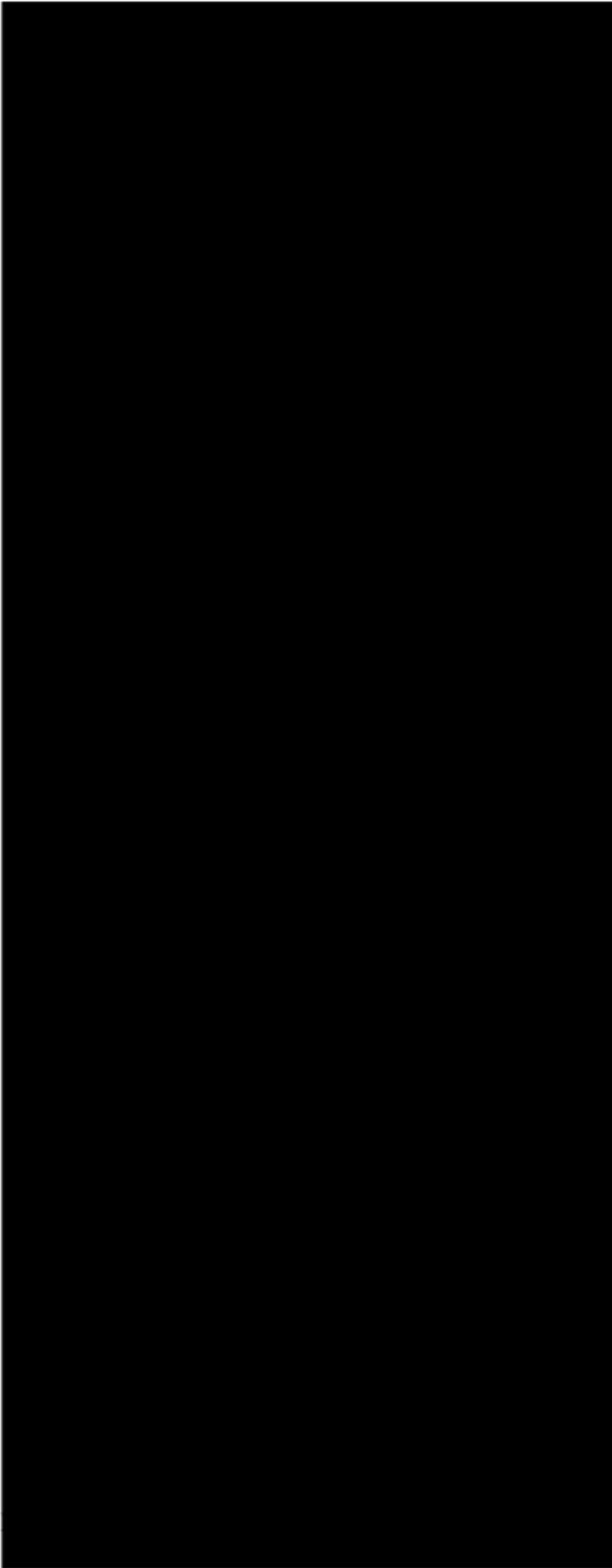
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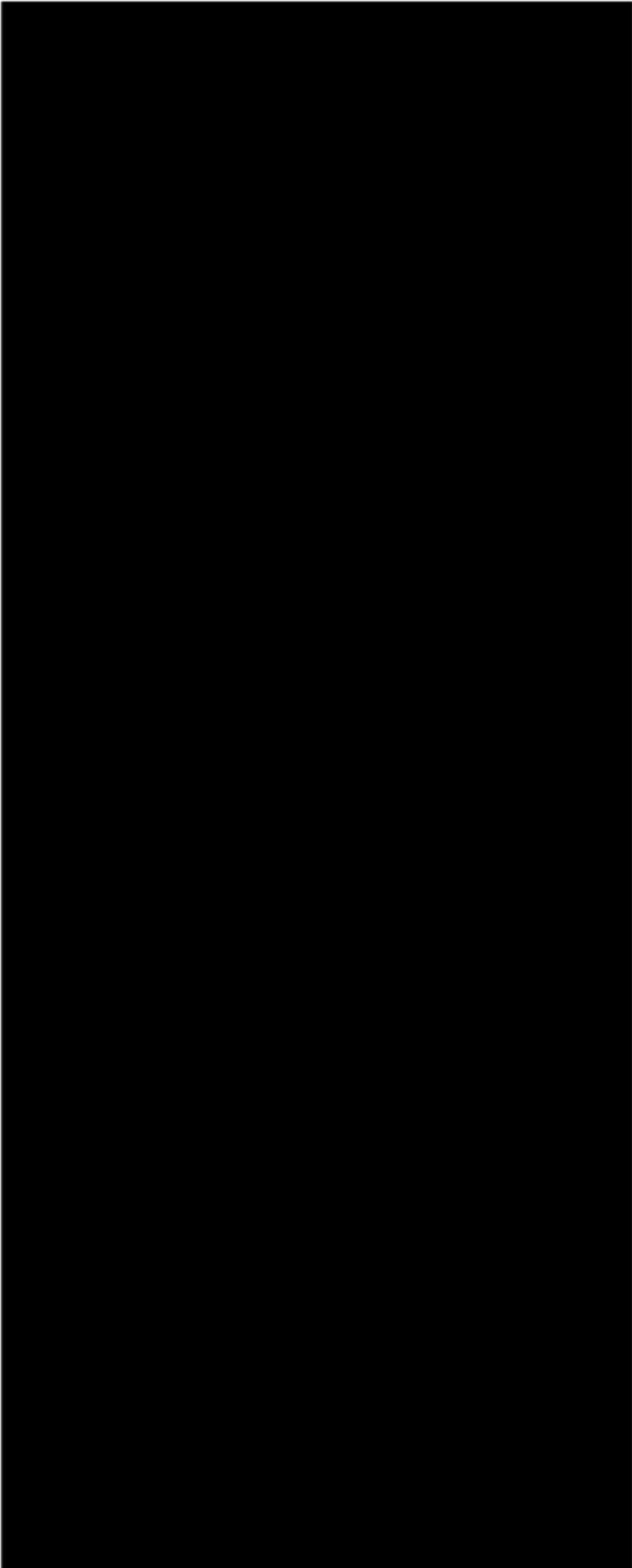
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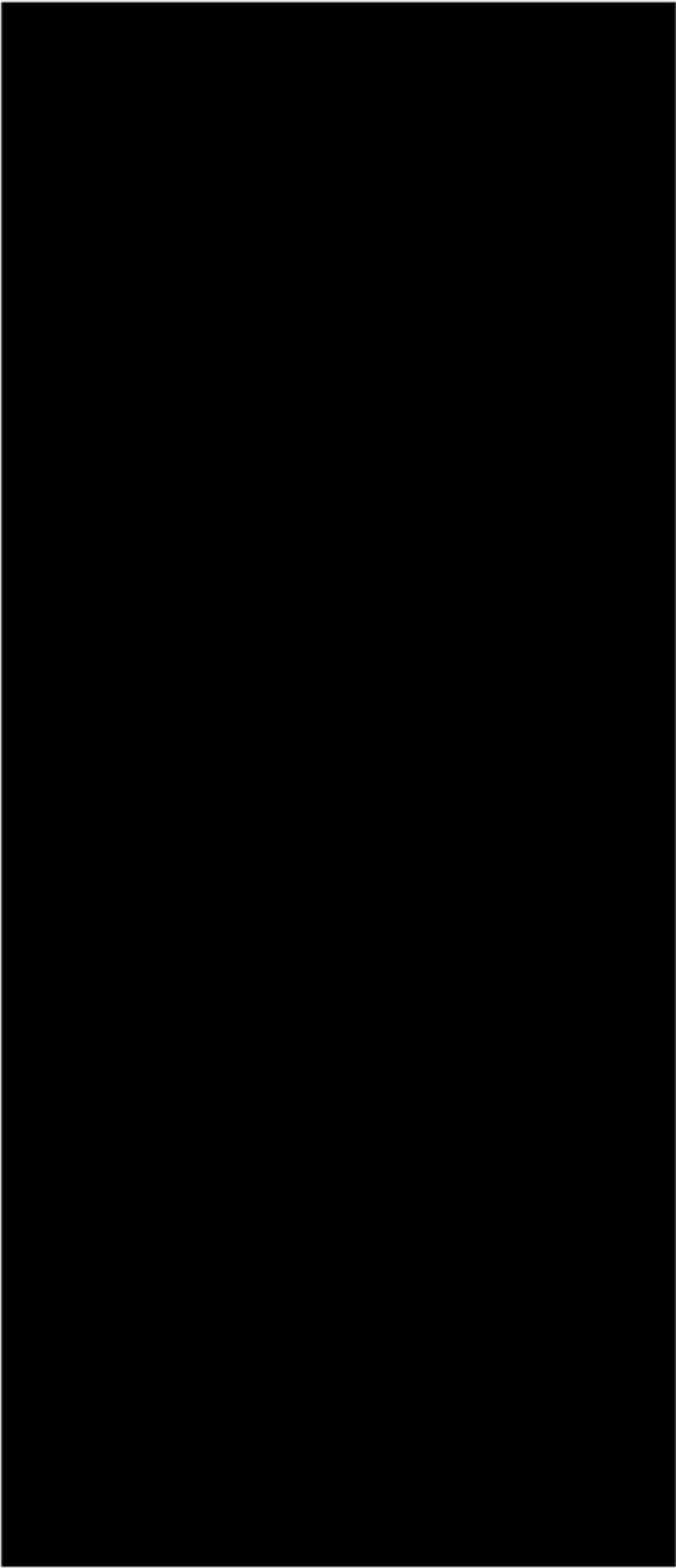
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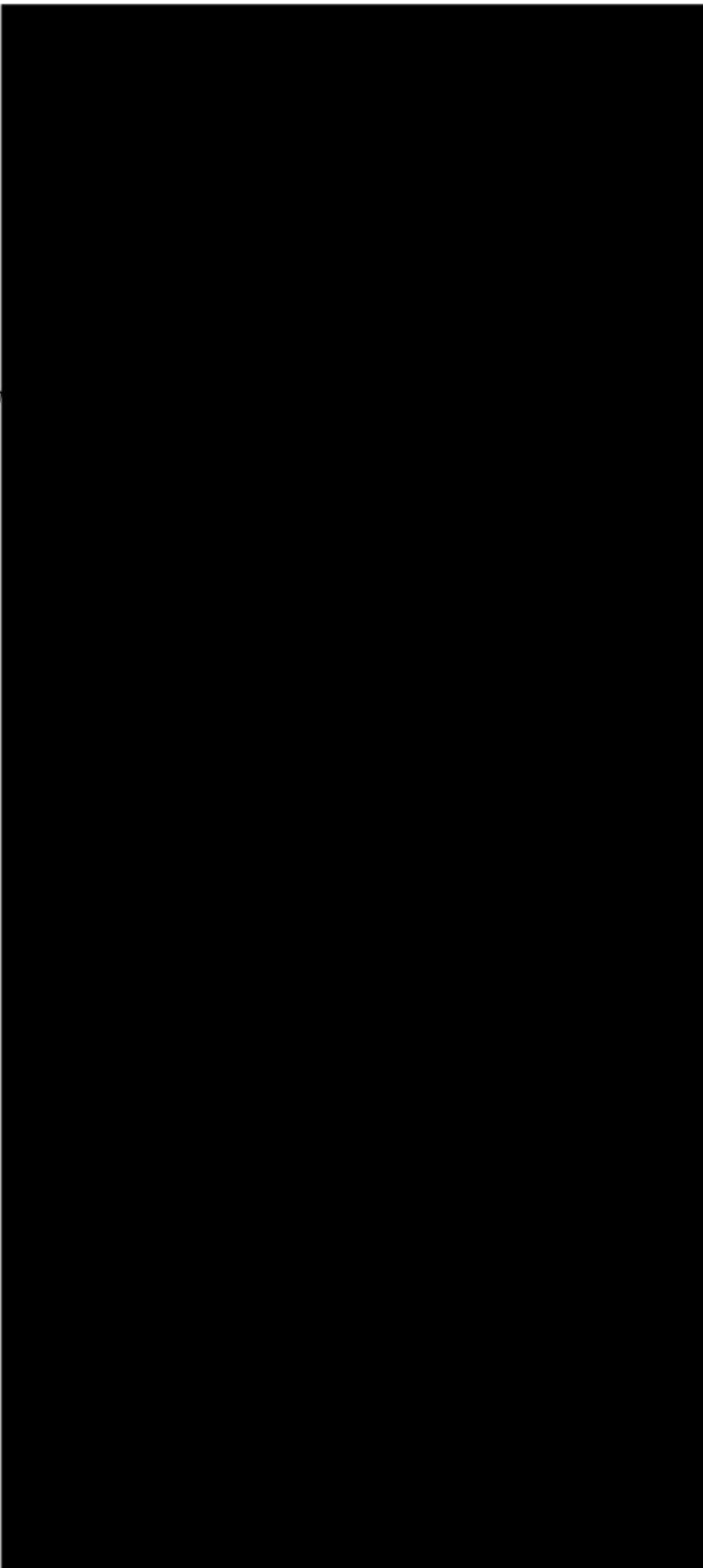
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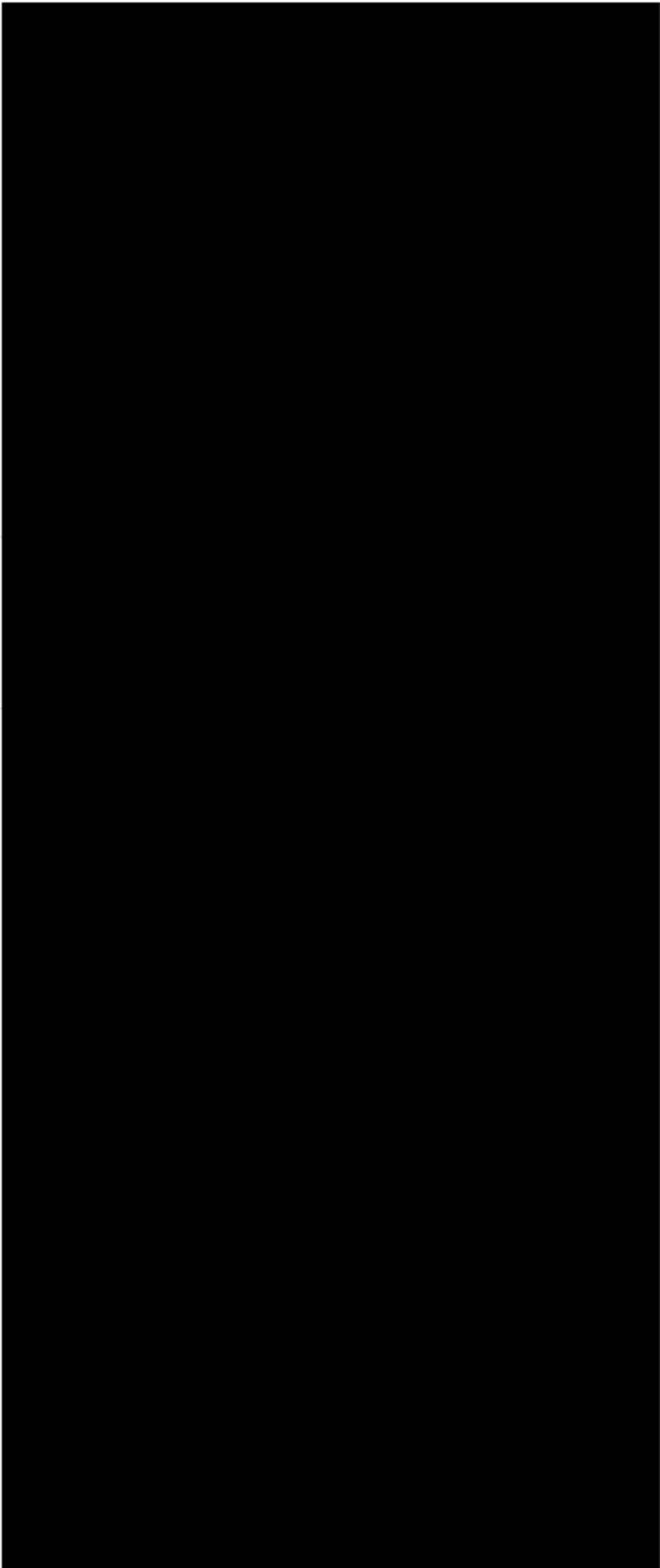
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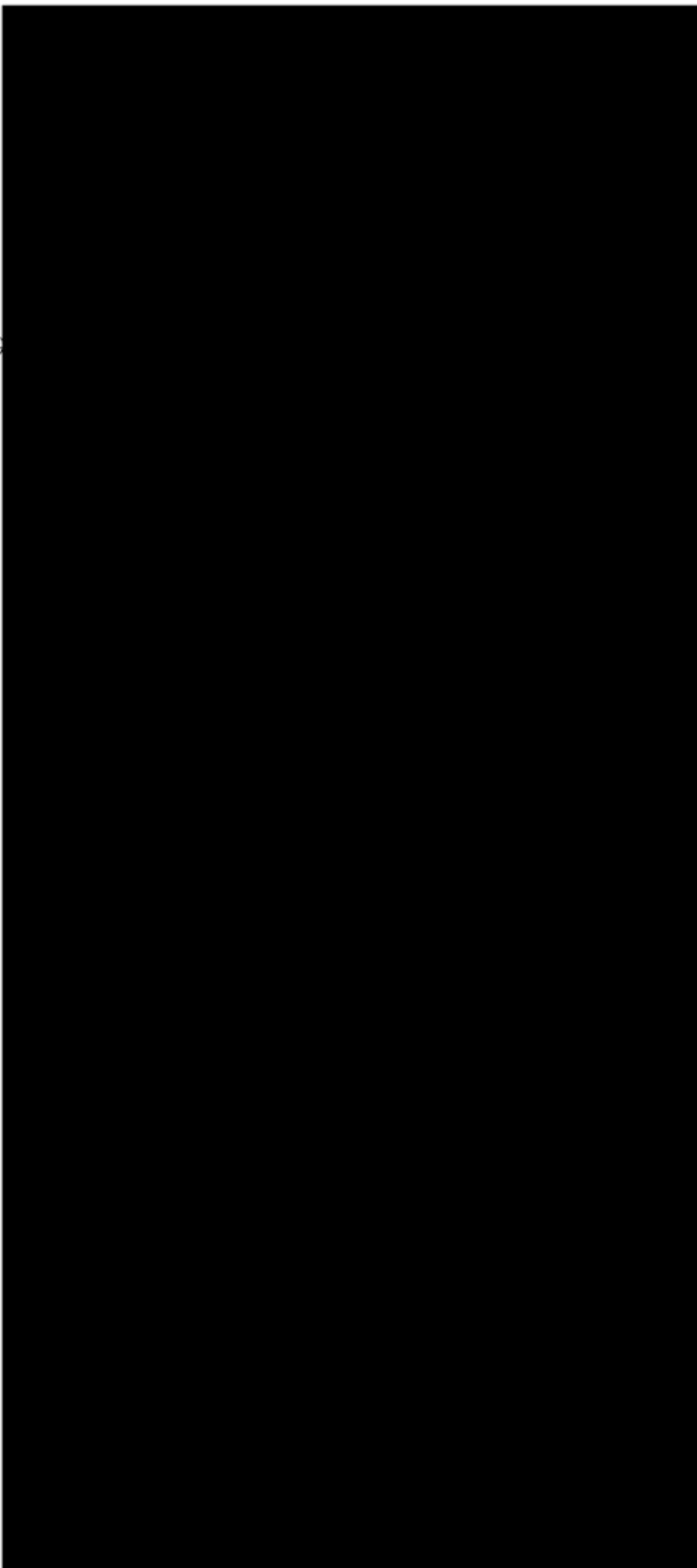
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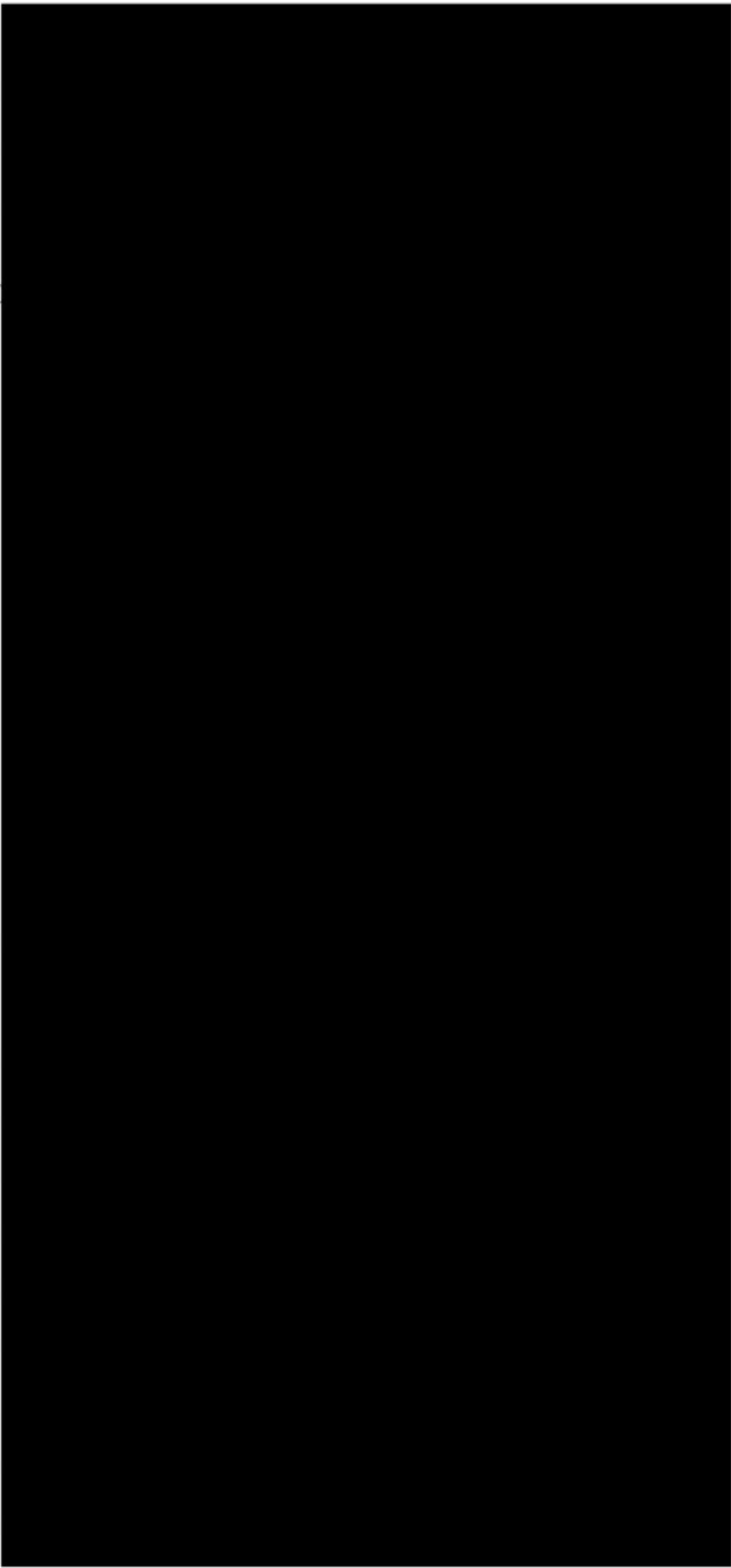
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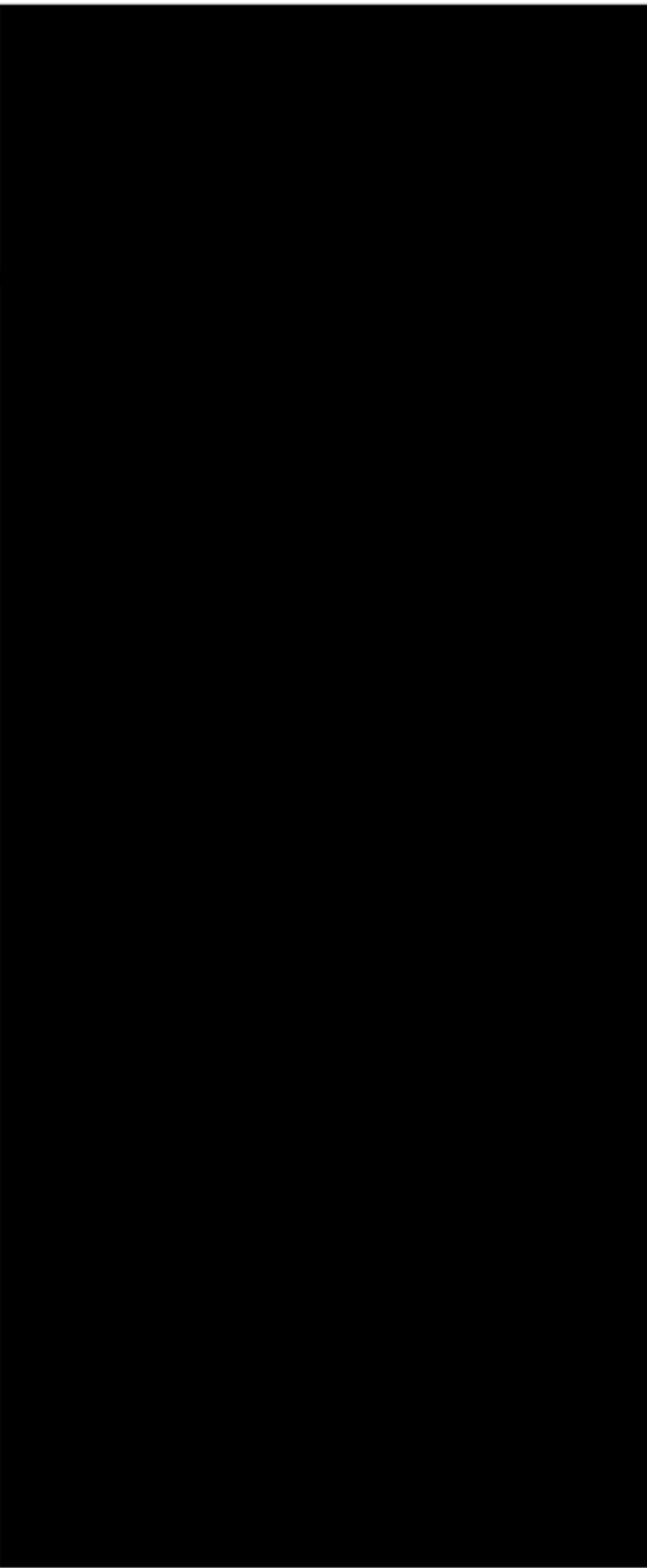
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9 Q. When did you, other than the cocaine you  
10 shot up, when was the first time you used cocaine?

11 A. The first time that Jeffrey Epstein paid me  
12 enough money to afford it.

13 Q. When was that?

14 A. When I first started seeing him.

15 Q. On the first occasion that you ever saw  
16 Mr. Epstein?

17 A. A couple occasions after I started seeing him.

18 Q. Does that mean the third time you saw  
19 Mr. Epstein?

20 A. I'm not exactly sure of the exact time.

21 Q. And where did you obtain the cocaine that

22 you took for the first time?

23 A. None of your business.

24 MR. [REDACTED]: We'll stipulate that it was

25 not from Mr. Epstein.

103

1 THE WITNESS: No, it was not from

2 Mr. Epstein.

3 BY MR. LUTTIER:

4 Q. And would you also agree that Mr. Epstein

5 didn't tell you to go get it? Mr. Epstein didn't

6 tell you to go get cocaine, did he?

7 A. No.

8 Q. Mr. Epstein never gave you any drugs, did

9 he?

10 A. No.

11 Q. Mr. Epstein never told you to take any

12 drugs, did he?

13 A. No, but Mr. Epstein knew I was taking drugs.

14 Q. And how did Mr. Epstein know you were

15 taking drugs?

16 A. Because I told him.

17 Q. And what did you tell him?

18 A. I told him that I was under the influence of

19 cocaine.

20 Q. And when did you tell him that?

21 A. When I was at his house.

22 Q. And when was that?

23 A. I don't remember the exact date.  
24 Q. Which occasion was it that you were at his  
25 house that you told him you were under the influence  
104

1 of cocaine?

2 A. I don't remember.

3 Q. And was this on one occasion?

4 A. What, that I had gone to his house under the  
5 influence?

6 Q. That -- no, that you told him that you  
7 were under the influence of cocaine.

8 A. No, there, there was more than one occasion  
9 where I have told him.

10 Q. It was your choice to take cocaine before  
11 you went to Mr. Epstein's house?

12 A. Anything to mind alter myself not to be there.

13 Q. You did that voluntarily, that is you took  
14 whatever drugs you took before you went to

15 Mr. Epstein's?

16 A. Yeah.

17 Q. You bought them with money that you had;  
18 is that right?

19 A. From Mr. Epstein, yes.

20 Q. Well, you didn't keep track of the money  
21 that you got, right?

22 A. Well, I wasn't receiving income from any other

23 person, so --

24 Q. And were you doing this cocaine with your

25 boyfriend?

105

1 A. At the time, yes.

2 Q. And that was Mr. [REDACTED] [REDACTED]?

3 A. [REDACTED], yes.

4 Q. [REDACTED]. And were you and he doing cocaine

5 away from Mr. Epstein; that is you did it when you

6 weren't at Mr. Epstein's house?

7 A. Yes. But I have done cocaine at Mr. Epstein's

8 house also.

9 Q. When did you do cocaine at Mr. Epstein's

10 house?

11 A. On some occasions while I was there.

12 Q. What occasions were those?

13 A. I don't recall the dates and times.

14 Q. What, where at his house were you doing

15 cocaine?

16 A. I would excuse myself and go to the bathroom.

17 Q. And who was in the bathroom when you were

18 doing this cocaine?

19 A. Myself.

20 Q. And, and what form of cocaine were you

21 using?

22 A. Powder.

23 Q. And did you tell anyone you were taking

24 cocaine?

25 A. Mr. Epstein knew I was high.

106

1 Q. Did you tell Mr. Epstein that you had gone  
2 in the bathroom in his house and snorted cocaine?

3 A. Not, per se, in that form.

4 Q. Did you tell him that you were using drugs  
5 in his house?

6 A. No.

7 Q. He never told you to use drugs in his  
8 house, did he?

9 A. No, he never told me to.

10 Q. He never gave you alcohol in his house,  
11 did he?

12 A. No.

13 Q. Did you ever have sexual intercourse with  
14 Mr. Epstein?

15 A. No.

16 Q. Do you know what I mean by sexual  
17 intercourse, or do I need to go through the various  
18 acts?

19 A. Oh, I am pretty sure I know what sexual  
20 intercourse is being I have two children.

21 Q. Well, I just want to make sure we're clear  
22 about some things. Did Mr. Epstein ever insert his  
23 penis into any part of your body at all?

24 A. I just said that I've never had sexual  
25 intercourse with Mr. Epstein and that I knew what sexual  
107

1 intercourse was, and I said no. So, for you to explain  
2 to me what it was unnecessary.

3 Q. Okay. Do you just want to answer my  
4 question now, ma'am?

5 A. I did four times. I said no.

6 MR. LUTTIER: Would you read back the  
7 question I asked? I need an answer to my  
8 question.

9 MR. [REDACTED]: We will stipulate that the  
10 answer to that question is no.

11 BY MR. LUTTIER:

12 Q. Okay. Did you ever perform any sexual act  
13 of any kind or nature whatsoever on Mr. Epstein  
14 ever?

15 A. Now, you could define, give me a definition of  
16 what that would be, because I've never -- giving him a  
17 blow job, I've never had sex with him. I did squeeze  
18 his nipples or whatever while he was masturbating  
19 himself.

20 Q. Any other, did you ever perform any other  
21 sexual act on Mr. Epstein? And by, when I say  
22 other, I'm not acknowledging that squeezing  
23 someone's nipples is a sexual act. But it seems  
24 that you're defining it as such; is that right? Do

25 you think that's a sexual act?  
108

1 MR. [REDACTED]: Well, [REDACTED] asked you for  
2 a definition and --

3 MR. LUTTIER: Well, actually what we  
4 have --

5 MR. [REDACTED]: -- and described to you --

6 MR. LUTTIER: Okay. We'll do this --

7 MR. [REDACTED]: -- what she did.

8 BY MR. LUTTIER:

9 Q. We'll do this, did you ever perform oral  
10 sex, that is put Mr. Epstein's penis in your mouth?

11 A. Did I not just tell you --

12 Q. Ma'am, you said you needed me to  
13 explain --

14 THE WITNESS: Could I ask if you could  
15 read back that I told him that I never gave him  
16 a blow job and never had sex with him.

17 MR. LUTTIER: Now, I am going to explain  
18 it to you. We're going to make sure we're  
19 clear, ma'am, because I know you want to be  
20 specific. Okay.

21 THE WITNESS: I was specific with you.

22 THE COURT REPORTER: One at a time.

23 BY MR. LUTTIER:

24 Q. Did you ever masturbate Mr. Epstein?

25 A. No.  
109

1 Q. Did you ever touch Mr. Epstein's penis --

2 A. No.

3 Q. -- in any way?

4 A. No, no.

5 Q. Did you ever penetrate with any part of  
6 your body any part of Mr. Epstein's body?

7 A. Besides touching his nipples, no.

8 Q. Did you ever do anything physically to  
9 Mr. Epstein other than give him a simple massage?

10 A. Squeezed his nipples.

11 Q. Was that part of the massage?

12 A. No.

13 Q. Okay. So other than squeeze his nipples  
14 and give him a massage, did you do anything else  
15 physically to Mr. Epstein?

16 A. No.

17 Q. Did Mr. Epstein ever make you do anything  
18 that you didn't want to do ever?

19 A. Make me do anything I didn't want to do.

20 Q. Force you to do something you didn't want  
21 to do, ever?

22 A. Probably squeeze his nipple.

23 Q. And why do you say he made you do that and  
24 you didn't want to do it? Did you tell him -- well,  
25 first of all, did he ask you to squeeze his nipples?

1 A. Yes.

2 Q. Did you tell him you didn't want to do  
3 that?

4 A. Yes.

5 Q. And what did he say when you said that?

6 A. It would help him go faster or whatever.

7 Q. And did you then do it?

8 A. Yes, I did.

9 Q. Did you refuse to do it and say, no, I  
10 don't want to do that?

11 A. Yes, I did refuse; and yes, I still did it.

12 Q. Well, did you do it voluntarily then?

13 A. Obviously.

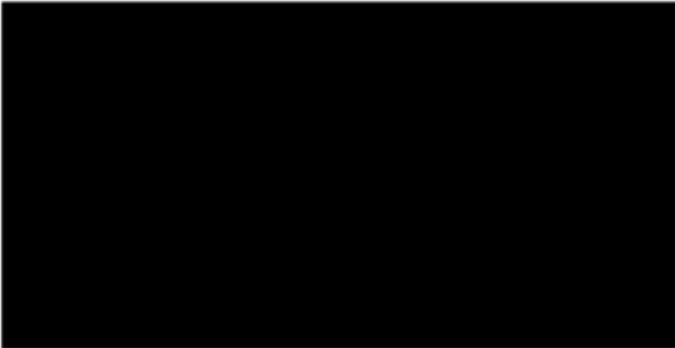
14 Q. All right. Were there ever any other  
15 things ever that Mr. Epstein asked you to do that  
16 you refused to do?

17 A. No.

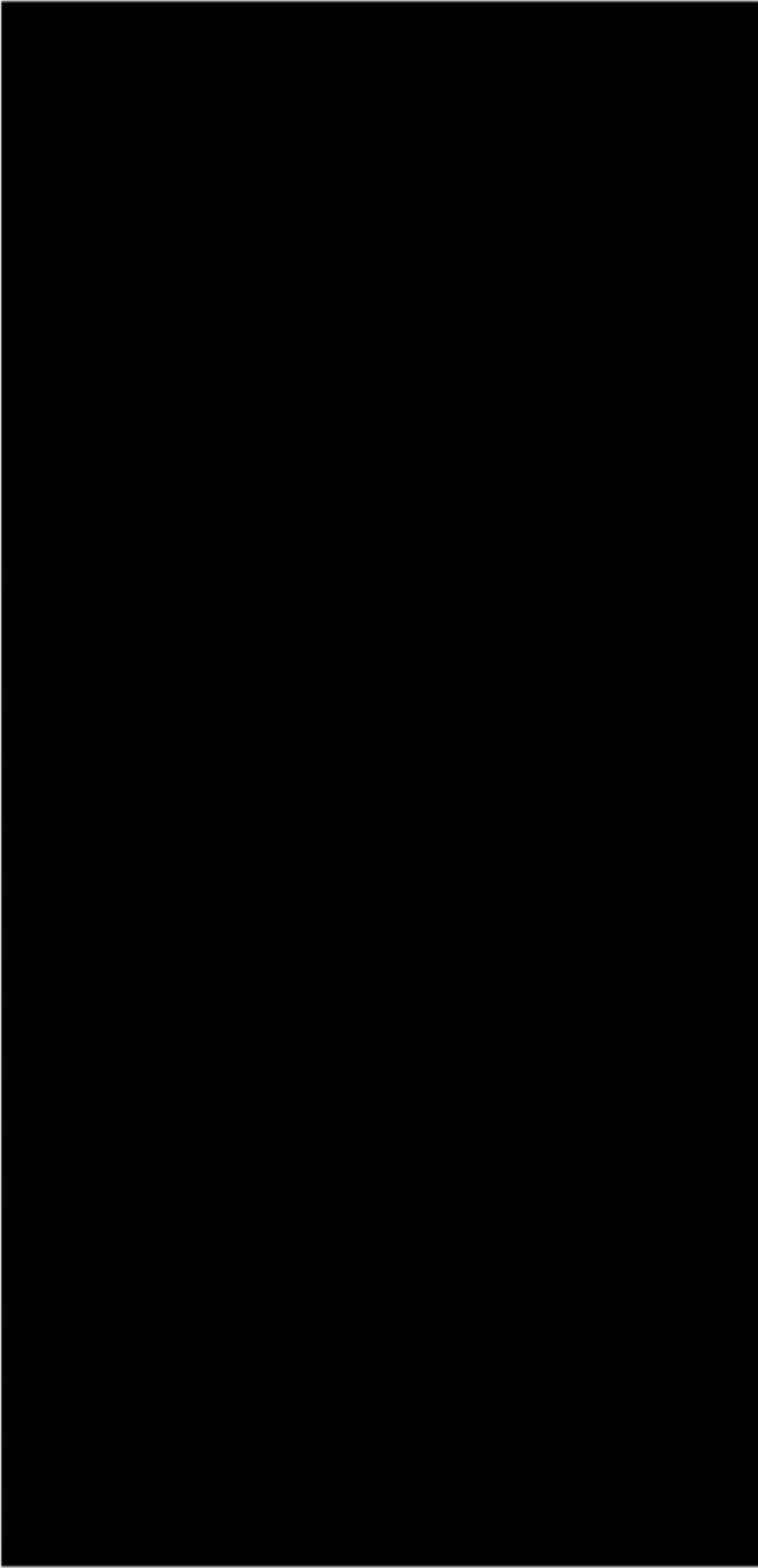
18 Q. Is it a true statement then that  
19 Mr. Epstein never forced you to do anything?

20 A. I guess no.

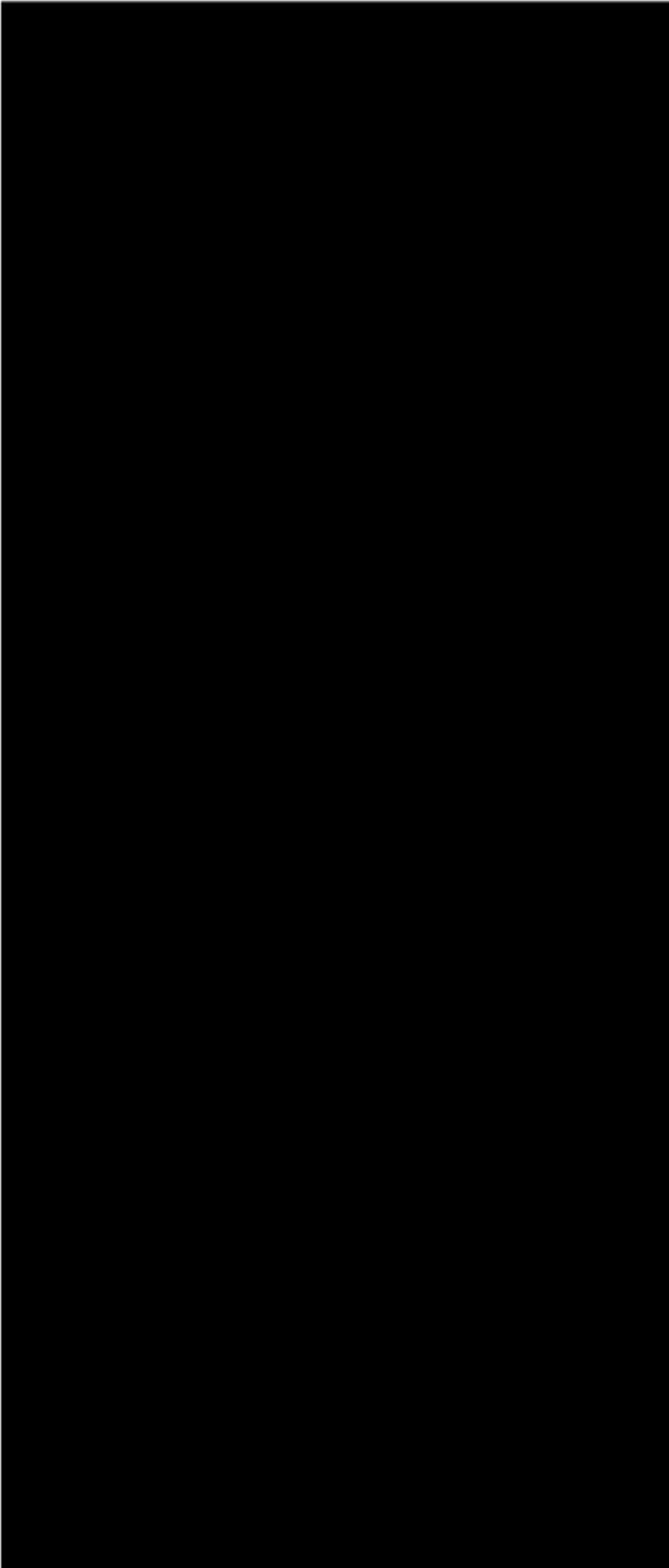
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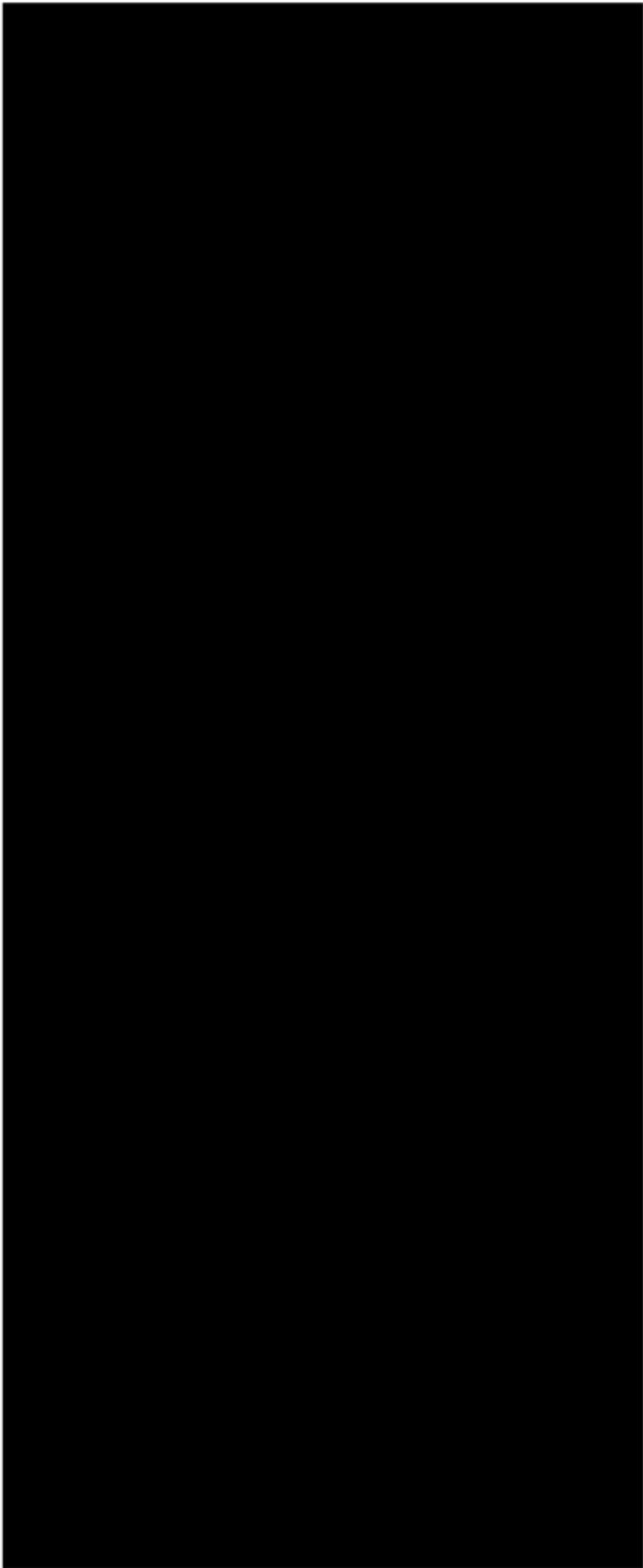
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10 Q. When did you first make an acquaintance or  
11 meet Mr. Epstein?

12 A. When [REDACTED] brought me over there.

13 Q. And who is [REDACTED]?

14 A. A friend of mine who has disappeared.

15 Q. What is [REDACTED]'s last name?

16 A. I don't remember.

17 Q. And when you say she brought you over  
18 there, what is the "there" that you are referring  
19 to?

20 A. To Mr. Epstein's.

21 Q. And where is that?

22 A. It was at Palm, it was on Palm Beach.

23 Q. Are we talking about a condominium, an  
24 apartment, or --

25 A. 358 Albrillo Way.

115

1 Q. And when was it that your friend, [REDACTED]

2 [REDACTED], brought you to Mr. Epstein's at 358

3 Albrillo Way?

4 A. What you do you mean when was it?

5 Q. What date?

6 A. I don't know the date

7 Q. Do you have any record at all anywhere of

8 the date that you first went?

9 A. No.

10 Q. In your complaint you allege that the

11 first time you went was in May or June of [REDACTED]. Are

12 you aware of that?

13 A. Yes, I remember it was spring going into

14 summer.

15 Q. Is there any other basis upon which you

16 concluded that you first went to Mr. Epstein's in

17 May or June of [REDACTED] other than your recollection

18 that it was sometime in the spring?

19 A. No.

20 Q. Is there any other fact or circumstances

21 upon which you relied when you alleged that you

22 first went to Mr. Epstein's in May or June of [REDACTED]?

23 A. One more time. I'm sorry.

24 Q. Any other fact or circumstance that you

25 relied upon when you alleged that you first went to

116

1 Mr. Epstein's in either May or June of [REDACTED] other --

2 A. I don't --

3 Q. -- than it was the spring?

4 A. I don't understand.

5 Q. How did you know it was May or June of

6 [REDACTED] when the first time that you went to

7 Mr. Epstein?

8 A. Oh, because I remember the weather.

9 Q. That's it. That's the sole basis upon

10 which you allege that you first went to

11 Mr. Epstein's in May or June of [REDACTED]?

12 A. Yeah.

13 Q. Did you ever keep any kind of record of

14 your occasions that you went to Mr. Epstein's?

15 A. No.

16 Q. Did you have any communication at all with

17 Mr. Epstein himself before you went to his house for

18 the first time when [REDACTED] [REDACTED] [REDACTED] took you there?

19 A. No, I didn't even know he existed.

20 Q. Did you ever personally see, that is

21 face-to-face, Mr. Epstein anyplace other than at 358

22 Albrillo, Palm Beach, Florida?

23 A. No.

24 Q. And I mean that from the time you first

25 went there when your friend [REDACTED] [REDACTED] [REDACTED] talked

117

1 to you until the last time you went there.

2 A. I have only seen him at that house.

3 Q. Right. Which means you haven't run into  
4 him out in town or any other place?

5 A. No.

6 Q. The only time you ever did it is when you  
7 went to his house?

8 A. Yes.

9 Q. Have, have you ever traveled anyplace  
10 with -- Mr. Epstein ever take you anyplace?

11 A. No.

12 Q. Anyplace you know, in town, for example,  
13 Palm Beach?

14 A. No.

15 Q. Ever take you to concerts?

16 A. He paid for me to go to a concert.

17 Q. Did you ever, did you ever travel outside  
18 of Palm Beach County with him?

19 A. No.

20 Q. Never traveled anywhere with him at all,  
21 right?

22 A. No.

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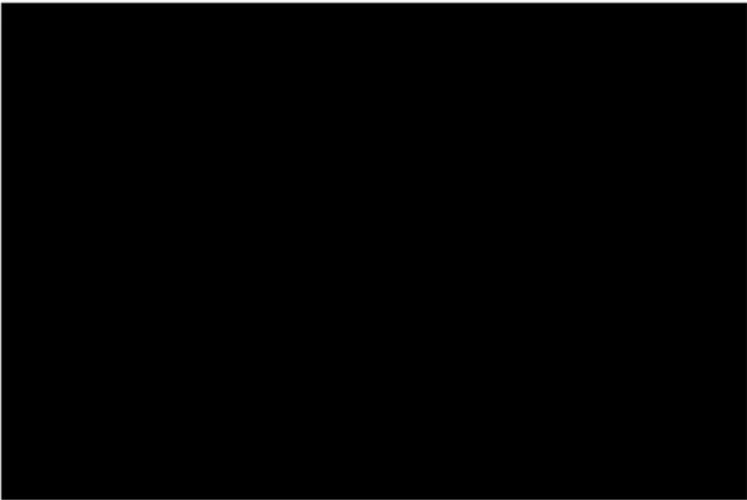
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10 Q. Okay. Let me ask, let me ask you a  
11 different question. Did you have access to a  
12 computer before you went to see Mr. Epstein for the  
13 first time?

14 A. Yeah.

15 Q. All right. Did you ever communicate with  
16 Mr. Epstein via computer; that is, did you ever use  
17 the computer?

18 A. No.

19 Q. Did you ever e-mail him any messages?

20 A. No.

21 Q. Did you ever receive any e-mails from him?

22 A. No.

23 Q. Did you ever fax anything to him?

24 A. No.

25 Q. Did you ever receive any faxes from him?

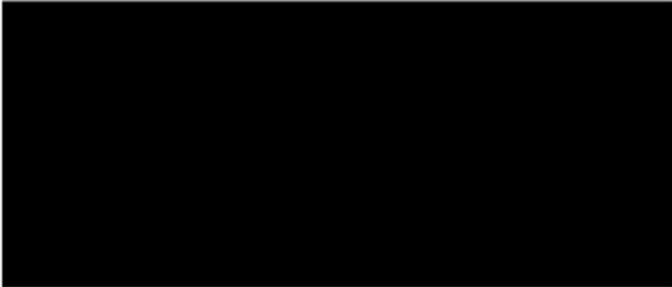
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1 A. No.

2 MR. LUTTIER: I think they have to change

3 the tape.

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THE VIDEOGRAPHER: Off the record at

12:29.

(A brief recess was held.)

THE VIDEOGRAPHER: We're back on the  
record at 12:40.

MR. LUTTIER: What exhibit are we on?

THE COURT REPORTER: Three.

MR. LUTTIER: Let me have that marked  
as 3.

THE WITNESS: Exhibit 3. Thanks.

BY MR. LUTTIER:

Q. Ma'am, what I've, what I've given you is a  
document that's been marked as Exhibit 3. That is a  
copy of the First Amended Complaint which you filed  
in this case. And I am giving it to you so that it  
is available to you if you want to consult it at any  
time during the deposition.

I will probably ask you some specific

1 questions about it, in which case I will refer you  
2 to the appropriate portion. You don't have to read  
3 it now but I want to make sure you're aware it's

4 available to you if you want to consult it. All

5 right?

6 A. Okay.

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24 BY MR. LUTTIER:

25 Q. Did you -- have you ever had a phone

121

1 conversation directly with Mr. Epstein?

2 A. About what?

3 Q. About anything?

4 A. Yeah.

5 Q. Not, not somebody at Mr. Epstein's house

6 but Mr. Epstein himself?

7 A. Yes.

8 Q. Do you recall on how many occasions you

9 have had phone conversations with him?

10 A. More than twice.

11 Q. Do you have any, are you able to estimate

12 anything more accurate than just more than twice?

13 A. No.

14 Q. From, from your estimate that it was more

15 than twice, would it be a correct statement that it

16 was infrequent that you had a direct phone

17 conversation with Mr. Epstein?

18 A. What is infrequent, like not all the time?

19 Q. Yeah.

20 A. Yeah.

21 Q. Would it be less than a dozen times?

22 A. Yeah.

23 Q. Okay. Do you recall as you sit here today

24 the substance of any of your conversations with

25 Mr. Epstein, the direct ones that you had?

122

1 A. Oh, instead of somebody else calling me to ask

2 me to come over, he called himself.

3 Q. I am just, yeah, my -- the questions I am

4 now asking you concern themselves strictly with

5 phone conversations where you were one part of the  
6 conversation; Mr. Epstein himself was the other  
7 party. Do you understand that?

8 A. Yeah.

9 Q. Okay. All right. Do you remember the  
10 substance of any direct phone conversation you ever  
11 had with Mr. Epstein?

12 A. I don't understand.

13 Q. Do you remember the specifics about what  
14 he said or what you said?

15 A. About when he got me concert tickets, he  
16 called me and asked me if I wanted to go.

17 Q. Okay. And do you know approximately when  
18 that conversation happened?

19 A. I don't remember.

20 Q. Do you recall any other direct phone  
21 conversation with Mr. Epstein other than when he  
22 called you about concert tickets?

23 A. He told me he would be sending me lingerie  
24 from New York.

25 Q. Do you recall any other phone conversation  
123

1 directly with Mr. Epstein?

2 A. No.

3 Q. So, other than these two phone  
4 conversations that you had with Mr. Epstein, was  
5 there any other occasion that you and he were on the

6 phone together?

7 A. I don't remember.

8 Q. That is you don't remember any other?

9 A. Yeah.

10 Q. On, on the occasion that he called and  
11 asked you about concert tickets, was Mr. Epstein at  
12 his house in Palm Beach?

13 A. I'm not sure.

14 Q. Do you know where he was?

15 A. I don't. He was either in New York or in Palm  
16 Beach.

17 Q. Do you know where he was?

18 A. I just said no.

19 Q. Okay. On the conversation when he called  
20 and said he would be sending you lingerie, do you  
21 know where Mr. Epstein was?

22 A. Unh-unh. No.

23 Q. On each of those occasions, who placed the  
24 call; that is, did he call you or did you call him?

25 A. He called me.

124

1 Q. Were there ever occasions that you called  
2 Mr. Epstein directly, whether or not you talked to  
3 him, where you placed a call trying to get  
4 Mr. Epstein?

5 A. Yes.

6 Q. And how often did that happen?

7 A. More than four.

8 Q. And for what reason were you placing calls  
9 to try to get Mr. Epstein?

10 A. To go over there to see him.

11 Q. Were you seeking the opportunity to go  
12 over and massage him and get paid?

13 A. Yes.

14 Q. And on these occasions that you called to  
15 see if you could go over there and give him a  
16 massage, did you talk to him or did you talk to  
17 others at his house?

18 A. I talked to [REDACTED] or Maxwell. I have also  
19 talked to -- I don't know if it's the cook or somebody  
20 else that was there that took phone messages.

21 Q. Other than the four occasions when you  
22 placed calls to Mr. Epstein's home looking to come  
23 over and perform massages for money, were there any  
24 other times that you attempted to contact  
25 Mr. Epstein ever?

125

1 A. No.

2 Q. Other than the two times that Mr. Epstein  
3 called you, once about concert tickets and once  
4 about lingerie, to the best of your knowledge were  
5 there, was there ever any other time that  
6 Mr. Epstein attempted to contact you?

7 A. Not that I know of. I mean, I don't think it

8 was him. No, I don't remember it.

9 Q. Okay. What, do you recall what phone  
10 number you used when you tried to call Mr. Epstein?

11 A. The Palm Beach phone, phone numbers.

12 Q. It would be the number at his house?

13 A. Yes.

14 Q. To be distinguished from a phone number  
15 for example, for a cellphone?

16 A. House numbers.

17 Q. Okay. According to your first amended  
18 complaint, Paragraph 195, the last time you saw

19 Mr. Epstein was August of [REDACTED].

20 A. What page are you on?

21 Q. It would be Page 84. Is that correct?

22 A. Yeah.

23 Q. All right. So, for purposes of this case,  
24 the total period of time that you had any

25 interaction with Mr. Epstein was between May of [REDACTED]  
126

1 and August of [REDACTED]?

2 A. Uh-huh.

3 Q. That is another way of saying it is the  
4 first time you went is May of [REDACTED] and the last time  
5 you went was August of [REDACTED]?

6 A. Yeah.

7 Q. Didn't know Mr. Epstein at all prior to  
8 May of ■■■, and had no contact with him after August  
9 of ■■■?

10 A. Correct.

11 Q. On any occasion that you have described  
12 where you had a phone conversation with Mr. Epstein,  
13 was anyone else on the line to the best of your  
14 knowledge?

15 A. No.

16 Q. For example, you didn't have someone on  
17 the extension of the phone where you were?

18 A. No.

19 Q. And to the best of your knowledge nobody  
20 was on his end of the phone call?

21 A. No.

22 Q. You never had a discussion with him on a  
23 speaker phone, for example?

24 A. No, not to my awareness.

25 Q. Did you ever record --  
127

1 A. No.

2 Q. -- any of your --

3 A. No.

4 Q. Let me -- did you ever record any of your  
5 communications with Mr. Epstein?

6 A. No.

7 Q. And by that I would mean it could be a

8 tape recording, could be you making notes. You

9 never did anything like that?

10 A. No.

11 Q. All right. Have you told me in this

12 deposition now everything that you can remember

13 about your direct phone conversations with

14 Mr. Epstein?

15 A. Yes.

16 Q. When you said that Mr. Epstein called you

17 about concert tickets, was he, was he asking you to

18 go with him to the concert or just asking if you

19 wanted tickets to the concert?

20 A. If I wanted the tickets to the concert.

21 Q. And did you take the tickets?

22 A. Yes.

23 Q. All right. Would you, would you say that

24 during the period from May of [REDACTED] to August of [REDACTED]

25 Mr. Epstein was good to you?

128

1 A. Yes.

2 Q. He was polite?

3 A. Yes.

4 Q. Never forced you to do anything you didn't

5 want to do?

6 A. Yes.

7 Q. Did he help you with your self-esteem?

8 A. No.

9 Q. Did he attempt to build you up and make  
10 you feel good about yourself?

11 A. Yeah.

12 Q. Did he ever attempt to make you not feel  
13 good about yourself?

14 A. He didn't try to make me not feel good about  
15 myself.

16 Q. He never demeaned you in any way when you  
17 were with him?

18 A. No.

19 Q. Did he ever --

20 MR. [REDACTED]: [REDACTED] --

21 MR. LUTTIER: Strike you --

22 MR. [REDACTED]: I think you're going to need  
23 to sit up because of the video camera, it's  
24 going to be difficult for anybody to understand  
25 your responses. Okay. Thank you.

129

1 BY MR. LUTTIER:

2 Q. Did he ever, did he ever strike you ever,  
3 hit you?

4 A. No.

5 Q. You know what the phrase domestic violence  
6 means?

7 A. Yes.

8 Q. Did he ever commit an act of domestic

9 violence against you?

10 A. No.

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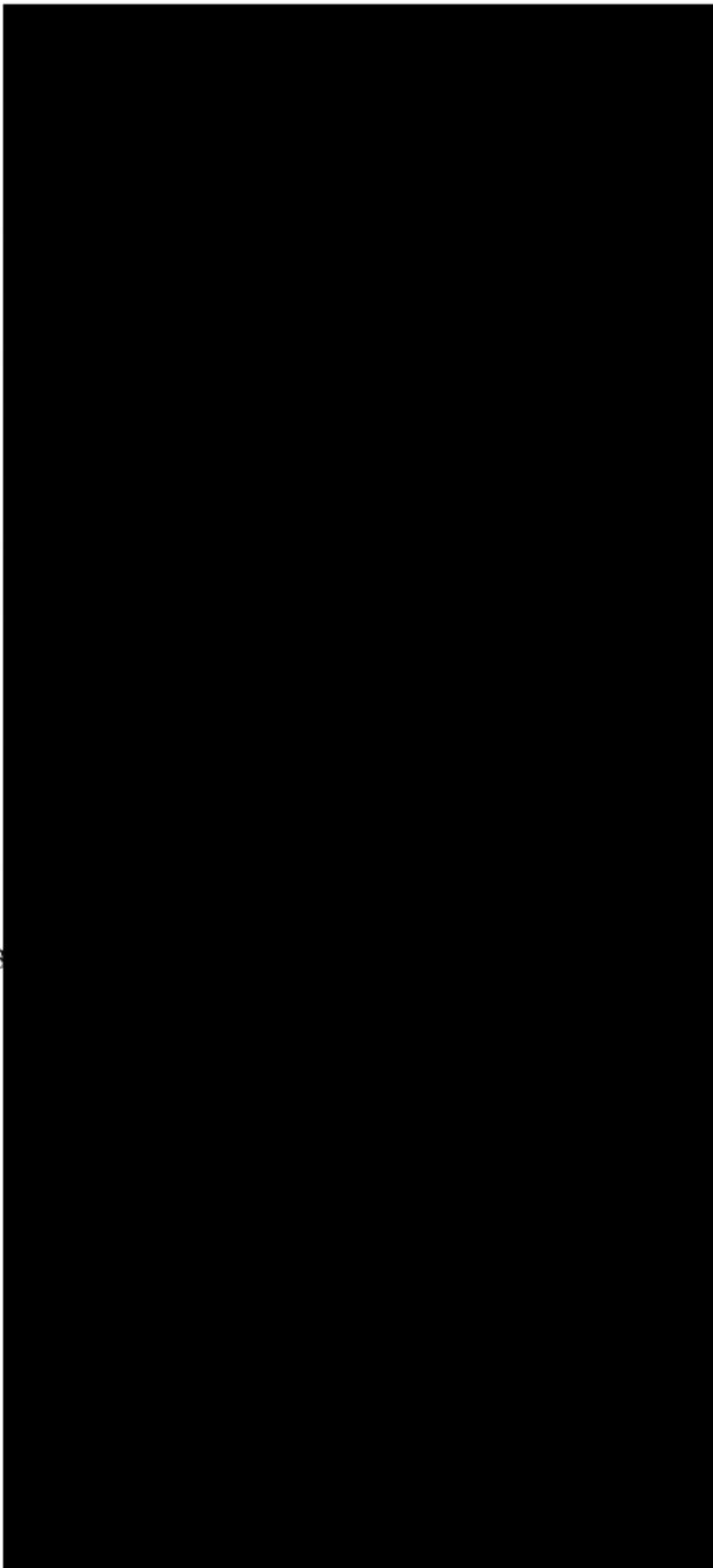
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1 Q. It's just, you know, a question that we  
2 have to ask. Did, did Mr. Epstein ever threaten you  
3 in any manner?

4 A. No.

5 MR. CRITTON: I'm sorry. I didn't hear  
6 that.

7 THE WITNESS: I said no.

8 BY MR. LUTTIER:

9 Q. Did he ever give you any kind of a

10 substance to ingest or otherwise do anything that  
11 caused you, for example, to lose consciousness?

12 A. Not to my awareness, no.

13 Q. He never attempted to drug you in any  
14 manner, did he?

15 A. Not to my awareness, no.

16 Q. Never even offered you any drugs, correct?

17 A. Correct.

18 Q. What -- when you would go to  
19 Mr. Epstein's, would you and he converse?

20 A. Conversate?

21 Q. Would you talk with him while you were  
22 giving him massages?

23 A. Yeah.

24 Q. What types of things did you talk to  
25 Mr. Epstein about?

132

1 A. He wanted to put me in massage school.

2 Q. Was that something you were interested in?

3 A. I was.

4 Q. And did you indicate to Mr. Epstein you  
5 had an interest in going to massage school?

6 A. Yes.

7 Q. And what did Mr. Epstein tell you about  
8 that?

9 A. He sent me a book, Massage for Dummies. And

10 he was going to put me in school for it if I really  
11 wanted to do it.

12 Q. And did you indicate to him whether you  
13 really wanted to do it?

14 A. Yes, I really wanted to do it, but I never,  
15 he -- I never went to school for it.

16 Q. Did you ever ask him if, if he would pay  
17 for you to be enrolled in school?

18 A. He told me he would.

19 Q. All right. So he said he would be willing  
20 to, but you had made the decision you didn't want to  
21 go forward with it?

22 A. I wasn't old enough to.

23 Q. Okay. Anything else that Mr. Epstein  
24 offered to do for you?

25 A. He wanted to send me on vacation somewhere but  
133

1 I was too young to go. My mom wouldn't have let me go  
2 out of the country.

3 Q. Did you ever represent to Mr. Epstein at  
4 any time what your age was?

5 A. Yes.

6 Q. When did you first represent to  
7 Mr. Epstein what your age was?

8 A. When I was going to turn 14, I accidentally said  
9 I was going to be 14. And his response was, don't let  
10 anybody know how old you are.

11 Q. Well, you -- we've established that you

12 first went to him in May or June of [REDACTED].

13 A. I was 13.

14 Q. Right? You were 15 the, right?

15 A. In [REDACTED]?

16 Q. Yeah.

17 A. No. Was I 15?

18 Q. What day -- yeah, maybe my math is wrong.

19 Mr. [REDACTED] will correct me. You were born in [REDACTED]?

20 A. Yeah.

21 Q. Okay. If I add 15 years to [REDACTED] I think I

22 get to [REDACTED], unless there is someone here that says

23 my math is wrong.

24 MR. LUTTIER: Mr. [REDACTED], do you agree

25 with me that it's [REDACTED]?

134

1 MR. [REDACTED]: I am going to let you do

2 your own math. When the appropriate time comes

3 to correct you --

4 MR. LUTTIER: Okay.

5 MR. [REDACTED]: -- you can be sure that I

6 will do that.

7 BY MR. LUTTIER:

8 Q. All right. Well, if we add [REDACTED] and we

9 add 15 years to it, we get to [REDACTED]; do you agree

10 with that?

11 A. I guess, yeah.

12 Q. Okay. All right. So, that would make you

13 15 when you went to Mr. Epstein's the first time,

14 wouldn't it?

15 A. I thought it was 14.

16 Q. But you agree with the math?

17 A. I don't know. I didn't watch you do your

18 math.

19 Q. Okay. All right. You allege in your

20 complaint two incidents in each month from late,

21 late May or early June of [REDACTED] through August of [REDACTED]

22 that you went to Mr. Epstein. In fact, you, you

23 don't have a specific record of when you actually

24 went to Mr. Epstein; is that right?

25 A. That's right.

135

1 Q. You -- and this is, this complaint only

2 contains what you, your estimate is of when you

3 actually went, correct?

4 A. Right.

5 Q. Might have gone fewer times; might have

6 gone more times?

7 A. I know I went over 100 times.

8 Q. How do you know you went over 100 times?

9 Did you count?

10 A. Because I was there.

11 Q. Do you have some place that you recorded

12 it?

13 A. No.

14 Q. You added it up and got to 100?

15 A. No.

16 Q. So, that's just an estimate on your  
17 behalf?

18 A. Yes.

19 Q. You allege in your complaint that you went  
20 twice a month for every month between June of [REDACTED]  
21 and August of [REDACTED]. Do you know whether or not  
22 Mr. Epstein was, in fact, in Palm Beach every month  
23 between June of [REDACTED] and August of [REDACTED]?

24 A. I don't know.

25 Q. Do you know whether or not Mr. Epstein was  
136

1 gone from Palm Beach County --

2 A. I didn't --

3 Q. -- for substantial periods of time during  
4 the period from June of [REDACTED] to August of [REDACTED]?

5 A. I know that he'd go back and forth to  
6 different places, but when he was in Palm Beach, I would  
7 get a phone call.

8 Q. Do you know whether or not it was any  
9 continuous period of time when he was not in Palm  
10 Beach County between June of [REDACTED] and August of [REDACTED]?

11 A. I don't know. I would get a phone call when

12 he was in Palm Beach.

13 Q. Would you -- but you would agree that if

14 he wasn't in Palm Beach, you didn't see him?

15 A. Correct.

16 Q. And you would agree that it's, that it's,

17 that it's possible that Mr. Epstein was gone during

18 periods of time that you claim you went to see him?

19 A. I can't claim anything if I don't know.

20 Q. You would agree with me that you cannot

21 recall the specifics of each visit that you had at

22 Mr. Epstein's home?

23 A. I don't remember the times and dates, but I

24 can tell you everything that happened while I was there.

25 Q. In your complaint in each count you allege

137

1 that you went to Mr. Epstein's at his request?

2 A. Uh-huh.

3 Q. In fact Mr. Epstein himself did not

4 contact you on each occasion and request you to

5 come, did he?

6 A. No. He would have [REDACTED] or Maxwell call me.

7 Q. Well, there were also occasions when no

8 one from Mr. Epstein called, but rather you called

9 Mr. Epstein's and asked to go?

10 A. Yes.

11 Q. And that was because you wanted to go and

12 earn some money, correct?

13 A. Yes.

14 Q. On each occasion that you went to

15 Mr. Epstein's, you went there voluntarily, correct?

16 A. Yes.

17 Q. On each occasion that you went to

18 Mr. Epstein's whatever acts you performed, you

19 performed them voluntarily, correct?

20 MR. [REDACTED]: Excuse me. Let me state for

21 the record that there is no allegation of any

22 physical coercion. There is no allegation that

23 any third party compelled [REDACTED] to engage in

24 those acts in which she engaged with

25 Mr. Epstein.

138

1 It is our contention that [REDACTED] was

2 legally incapable of consenting to the sexual

3 misconduct in which Mr. Epstein engaged as a

4 consequence of her minority. So, maybe that

5 helps to narrow your questioning down some.

6 MR. LUTTIER: All right. So, you will

7 stipulate that neither Mr. Epstein nor anyone

8 else forced [REDACTED] against her will to perform

9 any act; it's simply your position that given

10 her age, she could not have consented to those

11 acts?

12 MR. [REDACTED]: That's correct.

13 MR. LUTTIER: Okay.

14 MR. [REDACTED]: She was, she was bribed to  
15 engage in that conduct; that is, she was paid  
16 very large sums of money and she engaged in  
17 those acts without having the legal capacity to  
18 consent as a consequence of the large sums of  
19 money that were offered to her as well as other  
20 gifts.

21 MR. CRITTON: Ain't going to work. He, in  
22 essence, he gave a speech.

23 MR. LUTTIER: Yeah, that, I move to strike  
24 that part. We were talking about a  
25 stipulation.

139

1 MR. [REDACTED]: You can move to strike  
2 anything you want to, but it's on the record.

3 MR. LUTTIER: Well, I move to strike it so  
4 if it gets played to the jury, it doesn't get  
5 played.

6 BY MR. LUTTIER:

7 Q. In each count of your complaint you allege  
8 that on the occasions that you went to Mr. Epstein's  
9 you were paid in excess of \$200. Do you know how  
10 much you were paid on each occasion?

11 A. Between 200 and \$300.

12 Q. How do you know which times you got paid  
13 200, and which times you got paid more than 200, if

14 you know?

15 A. I remember.

16 Q. Well, how many times were you paid 200?

17 A. I was paid \$200 two times and \$300 the rest.

18 Q. Is there a reason why in your complaint

19 you then alleged that after the two, first two

20 visits you were simply paid in excess of \$200 as

21 opposed to alleging you were paid 300?

22 A. What?

23 Q. In your complaint you just say you were

24 paid in excess of 200?

25 A. Where are you in this complaint, man?

140

1 Q. You can pick any page you want. I happen

2 to be looking at Page 84 but --

3 MR. [REDACTED]: Well, the form of the

4 question is improper. This an unverified

5 complaint. If you have a question about the

6 underlying facts, then you should ask the

7 question about the underlying facts. But a

8 reference to the complaint is not relevant or

9 material or reasonably calculated to lead to

10 the discovery of admissible evidence.

11 We would be happy to answer questions

12 about the underlying facts.

13 BY MR. LUTTIER:

14 Q. You, you -- were you ever paid less than  
15 \$200.

16 A. No.

17 Q. Have you ever told anyone you were paid  
18 less than \$200?

19 A. No.

20 Q. What did you do with the money that you  
21 were paid?

22 A. I bought things until I bought drugs.

23 Q. What kinds of things did you buy with the  
24 money?

25 A. Clothes, things for my mom, things for school.  
141

1 Q. Did you enjoy the things that you bought  
2 with the money?

3 A. Yeah.

4 Q. Did you want to -- after the first time  
5 you went to Mr. Epstein's, did you want to go back  
6 and continue to perform massages and earn money?

7 A. Yeah.

8 Q. What did you say, yes?

9 A. Yes.

10 Q. Did you enjoy the occasions when you went  
11 to Mr. Epstein's?

12 A. Yes. Like enjoyed collecting the money, yes.

13 Q. Well, you enjoyed what you were doing,  
14 didn't you? You enjoyed spending time with him?

15 A. Not exactly spending time with him. I enjoyed  
16 going to be able to collect that much money.

17 Q. Is it a fact that Mr. Epstein treated you  
18 better than many of your own acquaintances treated  
19 you?

20 A. No.

21 Q. Did he treat you better than your own  
22 boyfriends treated you?

23 A. No.

24 Q. You had boyfriends that, that beat you up,  
25 didn't you?  
142

1 A. Yeah, but that doesn't mean that he treated me  
2 better than my boyfriends treated me.

3 Q. Mr. Epstein ever beat you up?

4 A. No.

5 Q. You had a boyfriend that held a gun to  
6 your head, didn't you?

7 A. Yes.

8 Q. Mr. Epstein never did that?

9 A. No.

10 Q. Would you agree with me that Mr. Epstein's  
11 conduct towards you was better than your boyfriend's  
12 conduct towards you when he beat you up and held a  
13 gun to you?

14 A. I suppose, but Mr. Epstein never -- I don't

15 see how that would --

16 Q. Did you -- have you alleged in your  
17 complaint everything that occurred when you went to  
18 Mr. Epstein's?

19 MR. [REDACTED]: I'm going to object to the  
20 form of that question. It is vague, overly  
21 broad, ambiguous, and improper in its reference  
22 to the contents of the complaint. We'll be  
23 happy to answer any questions you may have  
24 regarding the underlying facts.

25 MR. LUTTIER: Well, my question stands.  
143

1 BY MR. LUTTIER:

2 Q. Did you allege everything that occurred --

3 MR. [REDACTED]: I am going to instruct --

4 MR. LUTTIER: -- when you were at  
5 Mr. Epstein's without going though every  
6 word --

7 MR. [REDACTED]: I am going to instruct  
8 [REDACTED] not to answer that question. It's  
9 really not susceptible of a response.

10 BY MR. LUTTIER:

11 Q. In your complaint -- all right. Let me,  
12 let me ask you about the first time that you went to  
13 Mr. Epstein's.

14 A. Uh-huh.

15 Q. Were you fully clothed during the entire

16 period of time that you were there?

17 A. No.

18 Q. For, for what period of time were you

19 fully clothed?

20 A. For the first half hour.

21 Q. Then what happened?

22 A. He asked me to take off my shirt.

23 Q. And what did you tell him?

24 A. Okay.

25 Q. Did you tell him you didn't want to?

144

1 A. Yeah.

2 Q. And what did he say?

3 A. I would get extra money if I did.

4 Q. Did you say you still didn't want to?

5 A. Yeah, but I also wanted the extra money.

6 Q. So he didn't, he didn't force you to do

7 it?

8 A. No, he bribed me to do it.

9 Q. Okay. And how much were you originally

10 going to get paid on the first occasion?

11 A. \$200.

12 Q. And what did he say to you about any

13 additional money?

14 A. That if I took off my shirt, he would give me

15 extra money. So therefore he bribed me into taking off

16 my clothes for money.

17 Q. So, how much did you get paid on the first  
18 visit?

19 A. \$300.

20 Q. So, your testimony earlier that the first  
21 two visits you only got two paid 200 is incorrect?

22 MR. [REDACTED]: That wasn't her testimony.  
23 I think you misunderstood her testimony.

24 MR. LUTTIER: Was it a form objection? It  
25 was what her testimony was, but I am not going  
145

1 to argue with you.

2 MR. [REDACTED]: I disagree. That's not the  
3 way I recall it, but the record is what the  
4 record is.

5 MR. LUTTIER: Yeah.

6 BY MR. LUTTIER:

7 Q. When you took your shirt off, did you have  
8 a bra on underneath?

9 A. Yes.

10 Q. Was it any different than going to the  
11 beach in a bathing suit?

12 A. I wasn't at a beach. I was at somebody's  
13 house.

14 Q. Was your bra any different than or did it  
15 cover less than your bathing suit top?

16 A. No. It covered more than my bathing suit top.

17 Q. Yeah. All right. So on the first  
18 occasion, other than taking off your shirt off when  
19 you had a bra underneath, were you otherwise  
20 dressed?

21 A. Yeah. I only had, I only had my jeans and a  
22 bra on.

23 Q. Okay.

24 A. Or my shorts. I was wearing shorts. I'm  
25 sorry.  
146

1 Q. On the -- and that was throughout the rest  
2 of the time you were there on the first occasion?

3 A. Uh-huh.

4 Q. On the second --

5 A. Yes.

6 Q. On the second occasion, were you fully  
7 dressed?

8 A. No.

9 Q. How were you dressed during the second  
10 occasion?

11 A. I was clothed up until I was wearing a bra and  
12 underwear.

13 Q. That is you started out to give this  
14 massage clothed?

15 A. Yes.

16 Q. And then you removed clothing?

17 A. Yes. He asked me if I would take off my  
18 clothes, and I told him I didn't feel comfortable  
19 getting naked like he wanted me to. So, I only, I  
20 stayed in my bra and underwear.

21 Q. So, did he specifically ask you to get  
22 naked?

23 A. Yeah.

24 Q. And you said you didn't want to?

25 A. Yeah.

147

1 Q. And he honored that wish?

2 A. Well, after he asked me for five minutes, and  
3 I told him no, yeah.

4 Q. Did you tell him that you would be willing  
5 to take your shirt and pants off and be in your  
6 underwear and your bra?

7 A. Yeah.

8 Q. And then you remained in that state of  
9 dress on the second occasion?

10 A. Yes.

11 Q. On the third occasion were you fully  
12 dressed?

13 A. No.

14 Q. How were you dressed the third occasion?

15 A. Well, I was fully dressed when I got there,  
16 yes.

17 Q. Okay. Did you -- were you fully dressed

18 throughout the massage?

19 A. I took off my bra that time.

20 Q. Did he ask you to take off your bra?

21 A. Yeah.

22 Q. And what did you say?

23 A. I, I, at first I didn't want to, and then I

24 did.

25 Q. Well, when you said you didn't want to,

148

1 did he make you take it off?

2 A. Well, he asked me. He kept asking me to.

3 Q. And you said no, right?

4 A. Yeah.

5 Q. And he honored that, your statement,

6 correct?

7 A. Yeah, but he kept asking me, so I did.

8 Q. He didn't offer you any more money, did

9 he?

10 A. No, but I wasn't going to get the money if I

11 didn't do it so did I it.

12 Q. Who, who -- why do you say you weren't

13 going to get the money?

14 A. Because he told me I wasn't.

15 Q. What exactly did he tell you?

16 A. He said, well, then, I'm not going to pay you.

17 Q. This is on the third visit?

18 A. So I said fine.

19 Q. Was anyone else present for this

20 conversation?

21 A. No.

22 Q. Okay. So you got \$300 on that occasion?

23 A. Yeah.

24 Q. And you were topless?

25 A. (Witness nods head.)

149

1 Q. On the fourth time that you went, were you

2 fully dressed?

3 A. I don't remember from, like -- I don't

4 remember the specific fourth, fifth, sixth, seventh,

5 eighth times I was there. So, if you're going to

6 continue on the fifth and the sixth and the seventh, I'm

7 not -- I don't remember so --

8 Q. Well --

9 A. I am trying to help you out here.

10 Q. Is it true that when you went, you

11 voluntarily removed your clothes?

12 A. He bribed me with money.

13 Q. Wait a minute. You, you told me that the

14 most you got was 300 and you got that by the third

15 visit, correct?

16 A. Yeah. So --

17 Q. So --

18 A. I guess, yes, it would be voluntarily I took

19 my clothes off.

20 Q. Were you -- did there come a time that  
21 when you went to give a massage, would you just go  
22 over there and take all your clothes off before you  
23 started the massage?

24 A. He asked me to take my clothes off.

25 Q. At the beginning of the massage?

150

1 A. Yeah.

2 Q. All right. And you said okay?

3 A. Yeah.

4 Q. Was there ever a time that you said, I  
5 don't want to, and he said, no, you have to?

6 A. Yeah, there were times where he said that.

7 Q. Okay. And did you not take them off?

8 A. No, I took them off.

9 Q. Well, when did he say you had to take your  
10 clothes off?

11 A. When he told me I have to take my clothes off.

12 Q. And, and but did you just remove your  
13 clothes, or did you say I don't want to?

14 A. I said I don't want to.

15 Q. Did you leave?

16 A. And he said, well, can you remove your  
17 clothes?

18 Q. And what you did say then?

19 A. I said I would prefer not to, but I did it

20 anyways.

21 Q. Okay. He didn't force you to do it

22 though?

23 A. If he -- he didn't physically take them off of

24 me, no.

25 Q. You could have left. Nothing prevented

151

1 you from leaving?

2 A. Right.

3 Q. You said that some friend of yours named

4 [REDACTED] [REDACTED] whose last name you can't remember,

5 took you there for the first time?

6 A. Yeah.

7 Q. How did you know this person, [REDACTED] [REDACTED]

8 [REDACTED]?

9 A. Through friends of mine.

10 Q. What friends?

11 A. My, my son's father, [REDACTED] [REDACTED], and his

12 friend. It was his friend, his friend's girlfriend.

13 Q. Okay. It was [REDACTED] -- [REDACTED] [REDACTED] [REDACTED]

14 was [REDACTED] friend girlfriend?

15 A. Yes.

16 Q. Who was [REDACTED] friend?

17 A. [REDACTED] [REDACTED].

18 Q. Did you know [REDACTED] [REDACTED] from

19 anyplace?

20 A. No. I knew him from [REDACTED]. [REDACTED] went to

21 school him.

22 Q. Okay. And this [REDACTED] [REDACTED] [REDACTED] was

23 [REDACTED] [REDACTED] girlfriend?

24 A. Yes.

25 Q. When did she -- how was it that she came

152

1 about taking you over to Epstein?

2 A. She asked me.

3 Q. And when did she ask you in relationship

4 to when you went?

5 A. What do you mean?

6 Q. Well, was it the day before you went that

7 she asked you?

8 A. No, it was the same day.

9 Q. So, was that the first time she asked you?

10 A. Yeah.

11 Q. So, the day that you went, sometime

12 earlier that day, she asked you if you wanted to do

13 what?

14 A. She didn't explain to me what was going to

15 happen. All she said was a friend of mine, we can go

16 over there. You give him a massage and he will pay.

17 Q. Did you know how old he was?

18 A. No.

19 Q. And did she tell you, did she tell you

20 anything about roughly how old he was?

21 A. She said he was older.

22 Q. Okay. And what did you understand that to  
23 mean?

24 A. He was older than me.

25 Q. And when you got there, you saw him,  
153

1 correct?

2 A. Yeah.

3 Q. Could have left at that point, right?

4 A. Oh, well, not exactly, because being that I  
5 that was her car and I didn't know where the hell I was.

6 Q. Did you tell [REDACTED] [REDACTED] [REDACTED] when you saw  
7 Mr. Epstein, stop, I don't want to do this.

8 A. No, because I didn't know I was going to have  
9 to remove any clothes.

10 Q. All right. Did she tell you anything  
11 other than you were going to go over and give a  
12 massage to an older man?

13 A. No.

14 Q. Certainly after the first time you knew  
15 what was involved, right?

16 A. Not exactly. I didn't know I was going to  
17 have to get naked in the future.

18 Q. Well, at the very first time after you  
19 left there, you knew what that incident involved  
20 because you just experienced it, right?

21 A. Well, he only -- he never forced me to take  
22 off my clothes other than -- yes, I took off my shirt  
23 and I stayed in my bra and my jeans.

24 Q. Right. My point is that after the first  
25 time, if you didn't want to, you could have simply  
154

1 said I am not going back under any circumstances,  
2 right?

3 A. Right, but --

4 Q. Okay. Now, when this [REDACTED] [REDACTED] [REDACTED]  
5 took you over, after you left did -- what did you  
6 tell her, if anything, about having been there?

7 A. I didn't really talk to her about it.

8 Q. Did [REDACTED] [REDACTED] [REDACTED] give you any kind of  
9 drug before you went there?

10 A. No.

11 Q. Did you give [REDACTED] [REDACTED] [REDACTED] any of the  
12 money that you received when you went there the  
13 first time?

14 A. No.

15 Q. Did [REDACTED] [REDACTED] [REDACTED] get paid to take you  
16 there the first time, do you know?

17 A. I have no idea.

18 Q. Did there, did you go with [REDACTED] [REDACTED]  
19 [REDACTED] on more than one occasion?

20 A. No.

21 Q. The second time you went did anybody take  
22 you there?  
23 A. No.  
24 Q. Have you ever told anyone that you went  
25 with [REDACTED] [REDACTED] or that [REDACTED] [REDACTED] [REDACTED] took  
155

1 you there on more than one occasion?

2 A. No.

3 Q. Had, did anyone else ever take you to

4 Mr. Epstein's, any other girl other than [REDACTED] [REDACTED]

5 [REDACTED]?

6 A. No.

7 Q. And why is it that, under, under what set

8 of circumstances did you go back to Mr. Epstein's

9 without going with [REDACTED] [REDACTED] [REDACTED]?

10 A. Because Mr. Epstein asked me for my phone  
11 number and I gave it to him and he called me for me to  
12 go over there.

13 Q. Did you and [REDACTED] [REDACTED] [REDACTED] ever have a  
14 disagreement about that fact?

15 A. No.

16 Q. Did you know that [REDACTED] [REDACTED] [REDACTED] was  
17 getting paid money take you there?

18 A. No.

19 Q. Did there come a time that you asked  
20 others to go to Mr. Epstein's?

21 A. Yes.

22 Q. And for how long had you been going to  
23 Mr. Epstein's before you asked someone else to go?  
24 A. Couple of months, more -- well, I can't -- a  
25 couple, more than two.  
156

1 Q. And at the point in time that you asked  
2 someone to go, had you, had you performed massages  
3 for Mr. Epstein totally nude?

4 A. Yes.

5 Q. What else had occurred during your  
6 massages with Mr. Epstein at the point in time that  
7 you asked others to go? Do you understand my  
8 question?

9 A. No.

10 Q. All right. You, you had been giving him  
11 massages in the nude, right?

12 A. Uh-huh.

13 Q. Anything else?

14 A. Has anything else happened while I was there?

15 Q. Up to that point in time involving you?

16 A. He had some girl eat me out and he had sex  
17 with her.

18 Q. And that was before you asked someone else  
19 to go?

20 A. Yeah.

21 Q. And do you recall when that was?

22 A. I don't remember the dates and times.

23 Q. Have you ever told anyone prior to today  
24 that that event occurred?

25 A. Besides my attorneys, no. Oh, and those  
157

1 people I talked to, the FBI and the state people.

2 Q. Do you remember me asking as there is  
3 nothing in your complaint about this. So, do you  
4 know why that would be?

5 MR. [REDACTED]: That's an improper question.  
6 You don't need to answer that.

7 MR. LUTTIER: Did you review --

8 MR. [REDACTED]: It's not required, it's not  
9 required to be in her complaint. The  
10 suggestion that it is improper. Questioning  
11 her about the contents of the complaint is  
12 improper.

13 MR. LUTTIER: If you want to tell her not  
14 to answer, that's fine. We don't need to go  
15 through it.

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

17 BY MR. LUTTIER:

18 Q. Did you read the complaint before it was  
19 filed?

20 A. Yeah, I read the complaint.

21 Q. Did you -- when you read the complaint did  
22 you notice there was anything missing from it?

23 A. No, I trust my attorneys. That's why they're  
24 my attorneys.

25 Q. Did you tell anyone, your lawyers or  
158

1 anybody else that there was, there were other facts  
2 and circumstances that weren't included --

3 MR. [REDACTED]: Don't answer that question.

4 That is obviously a privileged communication.

5 BY MR. LUTTIER:

6 Q. All right. When did this event happen  
7 where you say there was another girl involved?

8 A. I just told you I didn't know the dates and  
9 times.

10 Q. Well, you said that, correct me if I am  
11 wrong -- well, let me rephrase the question.  
12 Approximately how many months had you been going  
13 before you asked someone else, or took somebody else  
14 there?

15 A. I don't know. More than two months.

16 Q. More than two. Anything more specific?  
17 Could it have been a year?

18 A. Three, four, five, maybe even six months.

19 Q. All right. So, sometime within the first  
20 six months this event happened involving this other  
21 girl?

22 A. Yeah.

23 Q. All right. Tell me the facts and  
24 circumstances that occurred on that occasion  
25 starting with when you went to Mr. Epstein.  
159

1 A. I got there and some other girl came in and  
2 said she was going to help me. And -- or he came in and  
3 introduced me to her. He took a shower. She said she  
4 was going to help me do the massage. And the next thing  
5 I know, that's what was happening.

6 Q. Well, who was this person?

7 A. I don't remember her name. She was really  
8 pretty, though.

9 Q. Had you ever seen her before?

10 A. No. And I have never seen her again.

11 Q. Did she identify herself to you?

12 A. I don't remember her name.

13 Q. At the time did she introduce herself to  
14 you?

15 A. Yes.

16 Q. Did she say who she was?

17 A. Yes.

18 Q. What did she say?

19 A. I don't remember her name.

20 Q. Okay. Other than her name did she say --

21 A. She said hi, I'm -- and I am going to help you  
22 today.

23 Q. She didn't say, for example, I am the lawn

24 man here or something like that? She didn't  
25 identify what her status or position was, if any?  
160

1 A. I just told you no.

2 Q. Okay.

3 A. I just told you what she said to me.

4 Q. Okay. So, this, this, a girl is in the  
5 room. Mr. Epstein takes a shower. What occurs  
6 next?

7 A. I was standing there ready for him to like lay  
8 on the massage table. And she got down on her knees and  
9 started eating me out.

10 Q. Were you dressed at the time?

11 A. No, I was naked.

12 Q. Had you removed your clothes voluntarily  
13 at that point?

14 A. Yes.

15 Q. Was this other woman dressed?

16 A. No, she was naked too.

17 Q. When did she get naked in relationship to  
18 when you came in the room?

19 A. She came into the room and Mr. Epstein asked  
20 us to get naked and he got into the shower. So we were  
21 already naked by the time he got out of the shower.

22 Q. Okay. So, that, did that, the fact that  
23 this other girl was naked in the room cause you, did

24 you say anything like I want to leave or --

25 A. No.

161

1 Q. Did you ask her any questions?

2 A. No.

3 Q. Seem unusual to you?

4 A. No.

5 Q. Okay. Wasn't the first time you saw

6 another woman naked, right?

7 A. No.

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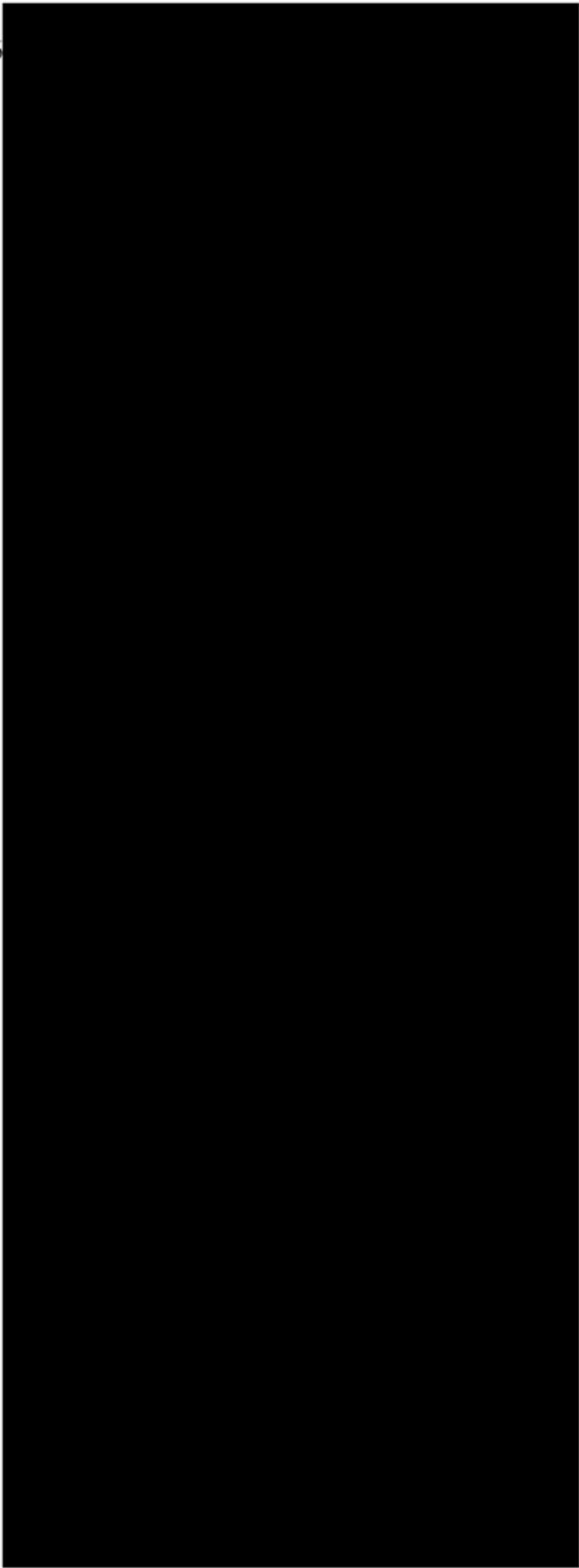
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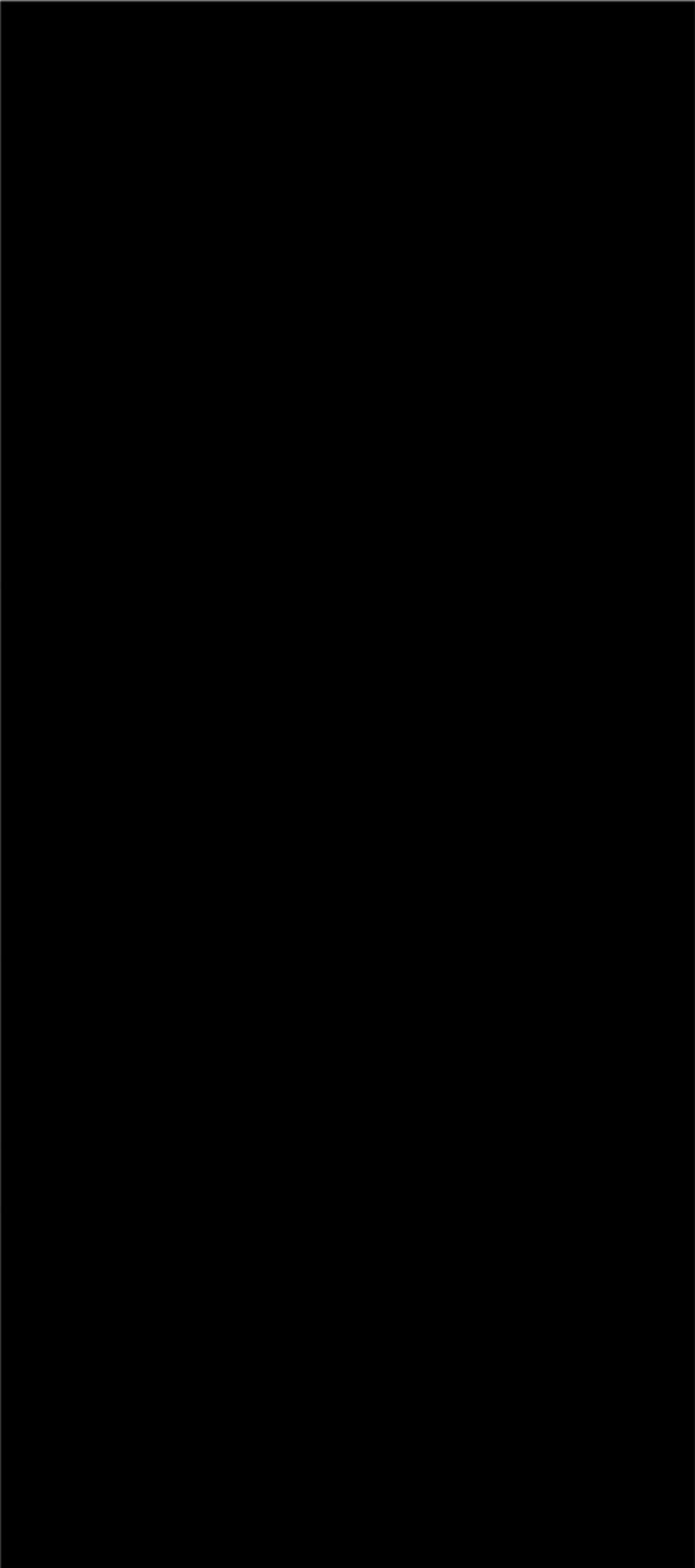
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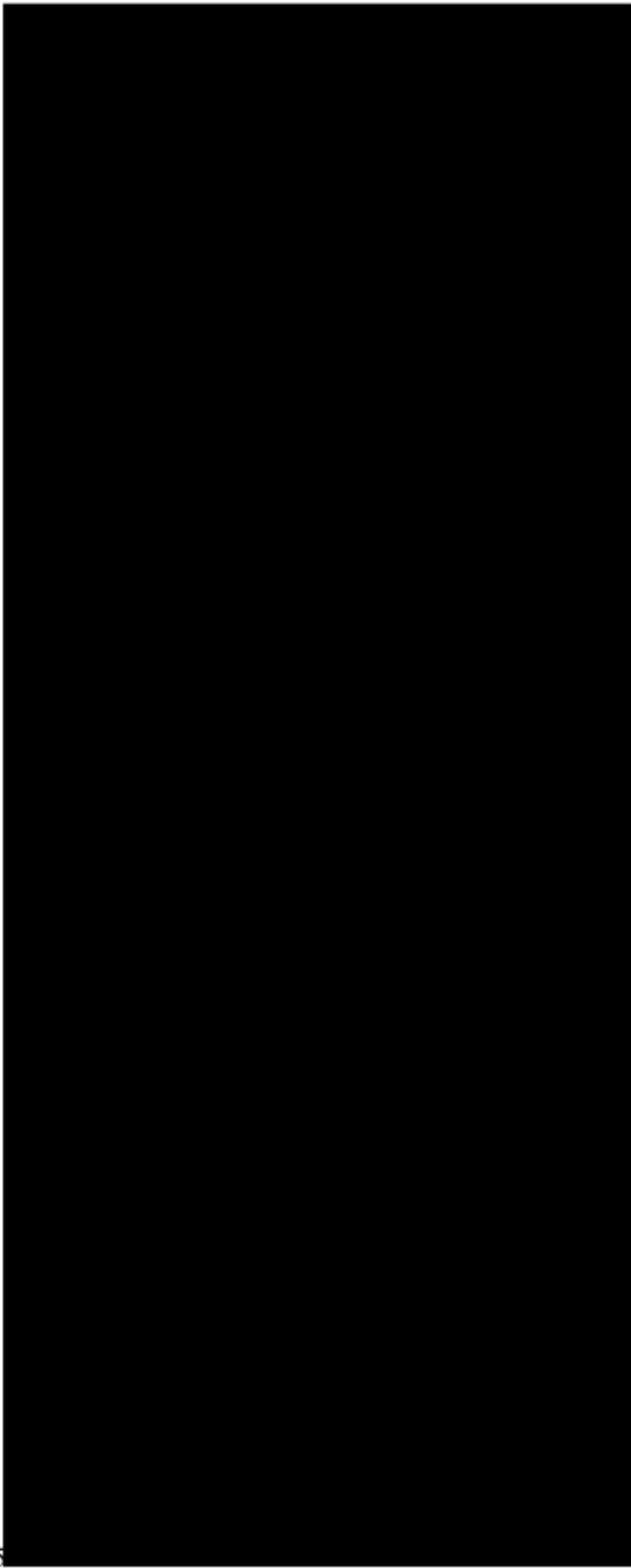
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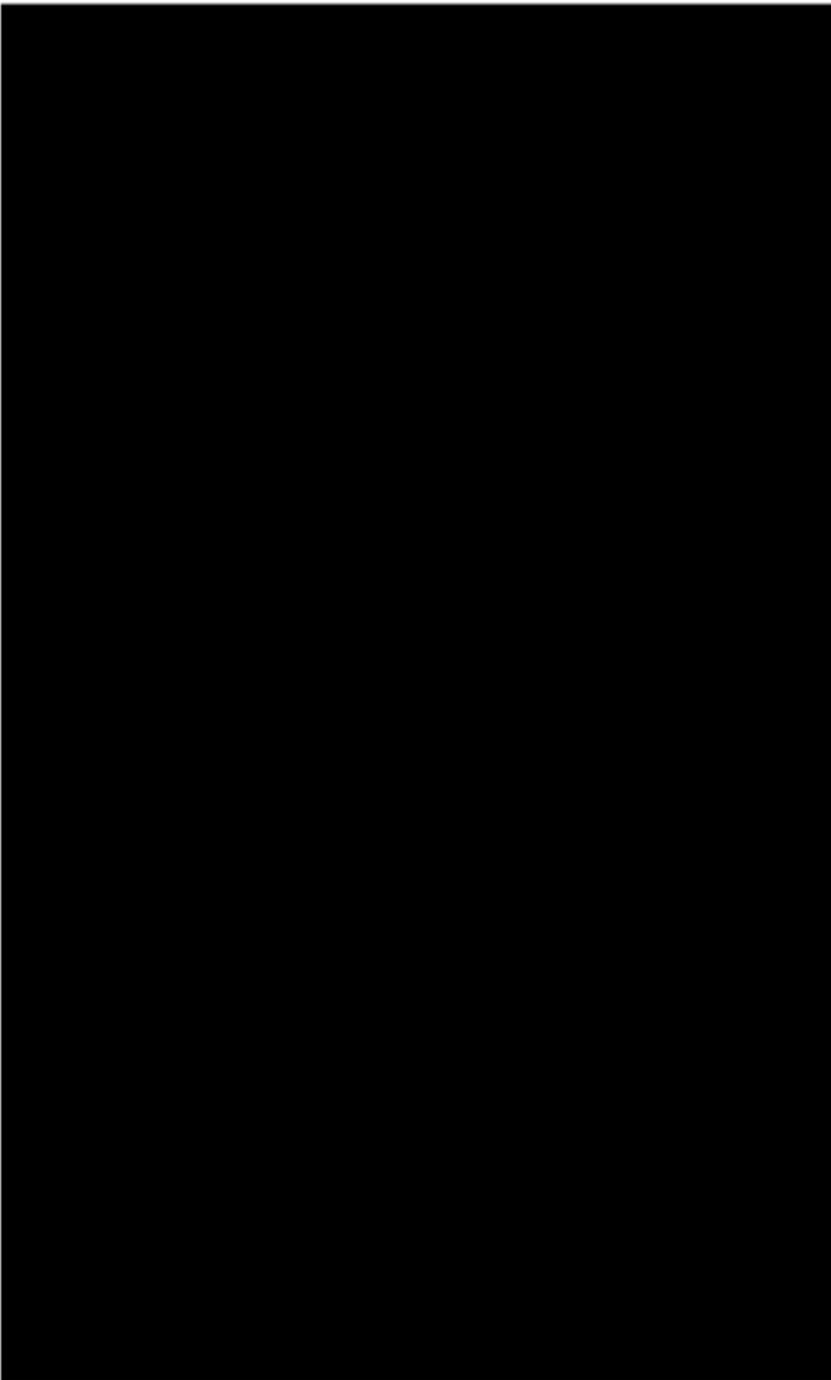
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