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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

2

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

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5

JANE DOE,

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Plaintiff,

7

vs.

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JEFFREY EPSTEIN, et al.,

9

Defendants.

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DEPOSITION OF [REDACTED]
Volume 1 of 1
Pages 1 through 138
Videotaped

15

16

17

Monday, March 15, 2010
10:13 a.m. - 12:42 p.m.

18

U.S. Legal Support

19

515 East Las Olas Boulevard, 3rd Floor
Fort Lauderdale, Florida 33301

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21

22

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

23

24

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0002

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APPEARANCES:

2

ON BEHALF OF THE PLAINTIFF:

3

FARMER, JAFFE, WEISSING, EDWARDS,
FISTOS & LEHRMAN

4

425 North Andrews Avenue
Suite 2

5

Fort Lauderdale, Florida 33301-3268

6

7

8

[REDACTED]
BY: BRADLEY EDWARDS, ESQ.

9

10

11

ON BEHALF OF THE DEFENDANT JEFFREY EPSTEIN:

12

BURMAN, CRITTON, LUTTIER &
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15

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17

13 BY: MICHAEL J. PIKE, ESQ.
14 ON BEHALF OF OTHER PLAINTIFFS IN RELATED CASES:
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17 Miami, Florida 33160

18 BY: STUART S. MERMELSTEIN, ESQ.
19

20 ON BEHALF OF THE WITNESS:
21 ROBBINS, TUNKEY, ROSS, AMSEL,
RABEN & WAXMAN, P.A.
22 2250 Southwest Third Avenue
4th Floor
23 Miami, Florida 33129

24 BY: ALAN S. ROSS, ESQ.
25 Also Present: Sean McGuire, Videographer
U.S. Legal Support

0003

1 I N D E X

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0004

1 Videotaped deposition taken before JANET L.

2 McKINNEY, Registered Professional Reporter, Florida
3 Professional Reporter, Certified LiveNote Reporter and
4 Notary Public in and for the State of Florida at Large
5 in the above cause.

6 (Whereupon, Witness's Exhibit 1 was marked for
7 identification.)

8 VIDEOGRAPHER: We are now on the video record.
9 Today is Monday, the 15th day of March, 2010. The
10 time is 9:13 a.m. (sic). We are here at 515 East
11 Las Olas Boulevard, 3rd Floor, Fort Lauderdale,
12 Florida, for the purpose of taking the videotape
13 deposition of [REDACTED] taken in Case Number
14 08-CIV-80893, Jane Doe v. Jeffrey Epstein, et al.

15 The court reporter is Janet McKinney; the
16 videographer is Sean McGuire, both of U.S. Legal
17 Support.

18 Will counsel and all present please introduce
19 yourself and the court reporter will swear the
20 witness.

21 MR. EDWARDS: Brad Edwards. I represent the
22 plaintiff, Jane Doe also "Jane Doe"; EW, "EW"; LM,
23 "LM".

24 MR. MERMELSTEIN: Stuart Mermelstein. I
25 represent Jane Doe Numbers 2 through 8.

0005
1 MR. PIKE: Michael Pike on behalf of Jeffrey
2 Epstein.

3 MR. ROSS: And good morning, my name is Alan
4 Ross. I represent the witness, [REDACTED]

5 THE REPORTER: Would you raise your right
6 hand, please.

7 Do you solemnly swear or affirm the testimony
8 you're about to give will be the truth, and nothing
9 but the truth, so help you God?

10 THE WITNESS: I do.

11 MR. ROSS: Before the deposition begins and in
12 an effort to streamline the process of getting
13 through this deposition on behalf of the witness we
14 have had marked as Witness Exhibit Number 1 an
15 August 31, 2007 letter from the United States
16 Attorney's Office addressed to [REDACTED] through
17 her then counsel, [REDACTED] which is called a
18 target letter identifying her as a target of a
19 federal Grand Jury investigation in the Southern
20 District of Florida and outlining a number of
21 offenses that were the subject matter of
22 investigation.

23 As a result of that, it is anticipated that
24 some of the questions that may be asked during the
25 course of this deposition she may invoke her Fifth

0006
1 Amendment privilege against self-incrimination.
2 And in order to streamline this we've agreed prior
3 to beginning this that she will simply answer "I

SUBJECT TO PROTECTIVE ORDER PARAGRAPHS 7, 8, 9, 10, 15, and 17

4 refuse to answer." The parties will understand and
5 the record will reflect that she is invoking her
6 Fifth Amendment privilege against
7 self-incrimination.
8 If there is some other privilege,
9 attorney-client privilege or some other objection
10 that I may have to a question, I'll specifically
11 state it. But her answer "I refuse to answer" will
12 be on Fifth Amendment grounds if that's acceptable
13 to everyone.
14 MR. EDWARDS: It's acceptable.
15 MR. MERMELSTEIN: It's acceptable.
16 MR. PIKE: Acceptable.
17 MR. ROSS: Okay. Madam court reporter has
18 already marked the exhibit, and I'll leave that
19 with her.
20 MR. EDWARDS: Okay.
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22
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0007

1 THEREUPON:
2 [REDACTED]
3 having been first duly sworn or affirmed, was examined
4 and testified as follows:
5 DIRECT EXAMINATION
6 BY MR. EDWARDS:
7 Q. Can you tell us your full -- full name.
8 A. [REDACTED].
9 Q. At some point in time you were known as
10 [REDACTED] is that correct?
11 A. Correct.
12 Q. And when did that change?

13 [REDACTED]
14 [REDACTED]
15 [REDACTED]
16 [REDACTED]
17 [REDACTED]
18 [REDACTED]
19 [REDACTED]

20 Q. When were you married?
21 A. [REDACTED]
22 Q. Okay. What's your date of birth?
23 A. [REDACTED]
24 Q. [REDACTED]
25 A. Yes.

0008

1 Q. And who are you married to?

2 A. [REDACTED]
3 [REDACTED]
4 [REDACTED]
5 [REDACTED]

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A. Correct.

Q. And why?

A.

Q. And who was the connection at
that invited you?

Q. Well, you can continue.

A. Yes.

Q. So in order to come to the United States you
needed to get a work visa?

A. I was invited actually just to kind of get a
feeling if I will be suitable. So I came on a business
tourist visa which is, I believe, B1/B2.

8 Q. Okay. And where did you first go when you
9 came to the United States, what state?
10 A. Florida.
11 Q. And what city in Florida?
12 A. Miami.
13 Q. And what did you do for your two weeks when
14 you first arrived in Miami, Florida?
15 A. I do not recall.
16 Q. Okay. But did you do any modeling?
17 A. Well, like I would see some photographers, the
18 agency would send me like on all calls to see
19 photographers to kind of introduce me as a model.
20 Q. And why did you make the decision to go with
21 [REDACTED] in the United States when you already were
22 modeling in --
23 A. Um-hum.
24 Q. -- Europe?
25 A. Well, you know, just to expand it was
0011
1 something that I did. And I decided to take a year off
2 after I graduated from high school and -- you know,
3 just to expand the modeling -- the modeling
4 possibilities, opportunities.
5 Q. Where did you graduate from high school?
6 A. In [REDACTED]
7 Q. What year?
8 A. [REDACTED]
9 Q. And do you have any college? Have you gone to
10 college after that?
11 [REDACTED]
12 [REDACTED]
13 [REDACTED]
14 Q. When did you get your associate's degree from
15 [REDACTED]
16 A. [REDACTED]
17 Q. And you're pursuing a bachelor's degree right
18 now?
19 A. Yes.
20 Q. From where?
21 A. [REDACTED]
22 Q. In what?
23 A. [REDACTED]
24 Q. How long have you been in the [REDACTED]
25 program?
0012
1 A. Since fall [REDACTED]
2 Q. And when do you expect to graduate?
3 A. Fall [REDACTED]
4 Q. Are you a full-time student or part-time?
5 A. I'm a full-time student at this time.
6 Q. When you first arrived in Miami, Florida in
7 [REDACTED] did you decide during that two weeks that
8 you were going to stay permanently?
9 A. No.

10 Q. Okay. Did you go back to [REDACTED]
11 A. Yes, I have. I have -- I went back for
12 Christmas.
13 Q. Okay. Poor question. Going back to [REDACTED] I'm
14 trying to just understand how it was that -- you came
15 over here on a two-week business visa, but eventually
16 you ended up staying for a longer period of time,
17 correct?
18 A. Right.
19 Q. Okay. And how did that come about, just tell
20 me?
21 A. Well, I got romantically involved with my
22 current husband and so when -- you know, we just
23 started dating, we got engaged, and that's how, you
24 know, our relation evolved -- evolved, and eventually,
25 you know, I got married and -- and stayed.

0013
1 Q. Okay. And since coming to the United States
2 have you always lived in Miami, Florida?
3 A. No.
4 Q. All right. Where else have you lived in the
5 United States?
6 A. New York.
7 Q. Where in New York?
8 A. Manhattan.
9 Q. What was the address in Manhattan where you
10 lived?
11 MR. ROSS: I'm going to advise you to invoke
12 privilege.
13 A. I refuse to answer.
14 Q. Okay. Have you -- are you familiar with an
15 address at 301 East 66th Street in New York?
16 A. I refuse to answer.
17 MR. PIKE: May we take a break for a second?
18 May I speak with you?
19 MR. ROSS: Sure.
20 VIDEOGRAPHER: Off the record, 10:22 a.m.
21 (Recess taken at 10:22 a.m.)
22 (Deposition resumed at 10:23 a.m.)
23 VIDEOGRAPHER: On the record, 10:23 a.m.
24 MR. ROSS: Brad, let me just interrupt for a
25 moment.

0014
1 MR. EDWARDS: No problem.
2 MR. ROSS: Just to be sure, when the witness
3 answers "I refuse to answer" to be clear the full
4 statement that she's not saying for the sake of
5 saving time is that she's invoking her Fifth
6 Amendment right against self-incrimination. Just
7 to be clear.
8 MR. EDWARDS: That's what I've understood all
9 along.
10 MR. MERMELSTEIN: That's what I understood.
11 MR. ROSS: Okay, fine. Go ahead.

12 MR. EDWARDS: This is just for the sake of
13 brevity --
14 MR. ROSS: Exactly.
15 MR. EDWARDS: -- and let's move it on.
16 BY MR. EDWARDS:
17 Q. All right. So I'm going to ask the question
18 again, I don't remember whether you'd responded yet,
19 but are you familiar with the address in Manhattan
20 301 East 66th Street in New York?
21 A. I refuse to answer.
22 Q. Okay. How long did you live in -- well, what
23 was the first address that you lived in in Miami?
24 A. [REDACTED]
25 [REDACTED]
0015
1 Q. South Shore. Okay.
2 A. Um-hum.
3 Q. Have you ever had your deposition taken
4 before?
5 A. No.
6 Q. Okay. You're doing very well so far. There's
7 a couple rules I didn't explain but mainly because
8 you're doing very well. I just have to wait for you to
9 finish your answer; you have to wait for me to finish
10 my question. We have one court reporter. She can only
11 take down one of us. Give us an answer that we all
12 understand. Nodding of the head or shaking the head
13 are easy to do and I get what you're saying, but she
14 doesn't. Ah-ha or un-ah are things that are commonly
15 said. They look the same on paper.
16 If I ask a bad question which could happen, as
17 already happened and probably will again, just tell me
18 "I don't understand the question," I'll ask it again --
19 A. Okay.
20 Q. -- all right?
21 And I'm assuming that's the address, [REDACTED]
22 [REDACTED] where you began living in fall of
23 2002?
24 A. Correct.
25 Q. How long did you live at that address?
0016
1 A. I'm sorry, I don't understand your question.
2 Q. How long did you live at the [REDACTED]
3 [REDACTED] address that you moved into in the fall in 2002?
4 A. Well, since -- since I came I lived there, I
5 always stayed there whether being in Miami traveling
6 back and forth, and I live currently at this address.
7 Q. Okay. What was the first time that you moved
8 from that address to live elsewhere?
9 A. I do not recall.
10 Q. Okay. I know that you told me you lived in
11 New York City and we're not going to discuss -- I'm
12 assuming you're not going to answer a lot of questions
13 about New York City, but at what time period did you

14 move there? Was it right after you got here two weeks,
15 a year later? I'm just trying to get a year as to when
16 you moved to New York?

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

19 A. I refuse to answer.

20 Q. Okay. Do you know a guy by the name of Jean
21 Luc Brunel?

22 A. I refuse to answer.

23 Q. Where are your parents?

24 A. They're in [REDACTED]

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

0017

1 have they come to the United States?

2 A. Yes, they have visited me.

3 Q. Have they ever met Jeffrey Epstein?

4 A. I refuse to answer.

5 Q. Have they ever met Jean Luc Brunel?

6 A. I refuse to answer.

7 Q. Where are you currently employed?

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

10 Q. Are you also still in the modeling business
11 though?

12 A. No, I'm not.

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

15

16

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

18 A. I wanted -- I always kind of knew that it's
19 something that I'm going to be doing and I just decided
20 to go and pursue a college degree.

21 Q. Okay. Is it something that you ever plan to
22 go back to, modeling?

23 A. No.

24 Q. Are you involved at all with the modeling
25 industry?

0018

1 A. No.

2 Q. I mean, helping to recruit models, helping
3 others to recruit models, anything like that?

4 A. No.

5 Q. Do you ever -- do you currently talk to
6 Mr. Brunel?

7 A. I refuse to answer.

8 Q. When is the last time that you talked to
9 Jeffrey Epstein?

10 A. I refuse to answer.

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

13 A. I refuse to answer.

14 Q. Do you know someone by the name of [REDACTED]

15

16 A. I refuse to answer.
17 Q. Do you know a person named [REDACTED]
18 A. I refuse to answer.
19 Q. Did Jeffrey Epstein have anything to do with
20 you moving to New York City?
21 A. I refuse to answer.
22 Q. Did you ever live in a place in New York City
23 owned or controlled by Jeffrey Epstein?
24 A. I refuse to answer.
25 Q. Are you familiar with the modeling agency MC
0019 Squared?
1 A. I refuse to answer.
2 Q. Do you know of underage females being
3 transported into this country to work for the modeling
4 agency MC Squared?
5 A. I refuse to answer.
6 Q. Do you know of those underage females being
7 given work visas and staying at the 301 East 66th
8 Street address?
9 A. I refuse to answer.
10 Q. Can you say whether you have observed
11 Mr. Brunel or Mr. Epstein engaging in sex with underage
12 females?
13 A. I refuse to answer.
14 Q. Do you know where Mr. Brunel lives?
15 A. I refuse to answer.
16 Q. Is it true that Mr. Brunel stays in the 301
17 East 66th address frequently with underage females?
18 A. I refuse to answer.
19 Q. At what point were you hired to work for
20 Mr. Epstein?
21 MR. PIKE: Form.
22 MR. EDWARDS: You can still answer the
23 question. Mr. Pike is making a legal objection.
24 A. I refuse to answer.
25
0020
1 Q. And how did -- how did it come about that you
2 began working with Jeffrey Epstein?
3 MR. PIKE: Form.
4 A. I refuse to answer.
5 Q. What did Jeffrey Epstein pay you in salary?
6 MR. PIKE: Form.
7 A. I refuse to answer.
8 Q. What was the time period that you worked for
9 him?
10 A. I refuse to answer.
11 Q. Why did you stop working for him?
12 MR. PIKE: Form.
13 A. I refuse to answer.
14 Q. What initially were you hired to do?
15 A. I refuse to answer.
16 MR. PIKE: Form.
17 Q. Has Jeffrey Epstein ever paid you to stay

SUBJECT TO PROTECTIVE ORDER PARAGRAPHS 7, 8, 9, 10, 15, and 17

18 quiet or keep quiet about what went on in his house?
19 MR. PIKE: Form.
20 A. I refuse to answer.
21 Q. Have you talked to [REDACTED]
22 [REDACTED] about the things that went on in Jeffrey
23 Epstein's house?
24 MR. PIKE: Form.
25 A. I refuse to answer.

0021
1 Q. Did you sign a confidentiality agreement with
2 Jeffrey Epstein?
3 A. I refuse to answer.
4 MR. PIKE: Form.
5 Q. Did that confidentiality agreement outline
6 what you should say to authorities should he be caught
7 with underage females?
8 MR. PIKE: Form.
9 A. I refuse to answer.
10 Q. Is there another book or manual or written
11 memorialization of what you, as an employee of Jeffrey
12 Epstein, should do if confronted by law enforcement?
13 MR. PIKE: Form.
14 A. I refuse to answer.
15 Q. Are you invoking your Fifth Amendment right
16 because you believe you could be prosecuted?
17 MR. ROSS: Invoke.
18 A. I refuse to answer.
19 Q. Are you also invoking because you're scared to
20 testify against Jeffrey Epstein?
21 MR. PIKE: Form.
22 A. I refuse to answer.
23 Q. When did you first learn that Jeffrey Epstein
24 had a sexual obsession for underage females?
25 A. I refuse to answer.

0022
1 MR. PIKE: Form.
2 Q. Isn't it true that you have seen Jeffrey
3 Epstein sexually interacting with females as young as
4 12 years old?
5 A. I refuse to answer.
6 MR. PIKE: Form.
7 Q. Is it true that you have observed Jeffrey
8 Epstein's sexual obsession to include the age range 12
9 to 17?
10 MR. PIKE: Form.
11 A. I refuse to answer.
12 Q. Have you ever had sex with Jeffrey Epstein?
13 A. I refuse to answer.
14 MR. PIKE: Form.
15 Q. Have you ever been paid for sex with Jeffrey
16 Epstein?
17 MR. PIKE: Form.
18 A. I refuse to answer.
19 Q. Do you know if [REDACTED] had sex with

20 Jeffrey Epstein when she was underage?
21 MR. PIKE: Form.
22 A. I refuse to answer.
23 Q. What have you been told about Jeffrey
24 Epstein's sexual obsession with underage minor
25 children?
0023
1 MR. PIKE: Form.
2 A. I refuse to answer.
3 Q. Isn't it true that Jeffrey Epstein interacted
4 sexually with underage minors on an everyday basis?
5 MR. PIKE: Form.
6 A. I refuse to answer.
7 Q. And most of the time Mr. Epstein would
8 interact with underage minors at least two times a day;
9 is that true?
10 MR. PIKE: Form.
11 A. I refuse to answer.
12 Q. Can you explain to the jury how Mr. Epstein
13 would access new underage minor females for sex every
14 day?
15 MR. PIKE: Form.
16 A. I refuse to answer.
17 Q. How many assistants did Jeffrey Epstein hire
18 to bring him underage minor females for sex?
19 A. I refuse to answer.
20 MR. PIKE: Form.
21 Q. Were you one of those assistants that helped
22 to bring him underage minor females?
23 MR. PIKE: Form.
24 A. I refuse to answer.
25 Q. I know that the laws in [REDACTED] are probably
0024
1 different than they are here, but are you familiar with
2 the Florida Statutes that protect children against
3 sexual offenders or sexual predators?
4 MR. ROSS: Invoke.
5 A. I refuse to answer.
6 Q. Let me just read you the lewd or lascivious
7 molestation statute and then I'm going to ask you some
8 questions about it.
9 It says: "A person who intentionally touches
10 in a lewd or lascivious manner the breasts, genitals,
11 genital area or buttocks or the clothing covering them
12 of a person less than 16 years of age or forces or
13 entices a person under 16 years of age to so touch the
14 perpetrator, commits lewd or lascivious molestation, a
15 second degree felony."
16 After hearing that statute isn't that
17 something -- isn't that a crime that you know
18 Mr. Epstein to have committed on an everyday basis
19 while you were working for him?
20 MR. PIKE: Form.
21 A. I refuse to answer.

22 Q. And that's a statute that he violated with
23 more than 100 underage females; is that true?
24 MR. PIKE: Form.
25 A. I refuse to answer.

0025
1 Q. When did you become aware that Mr. Epstein was
2 a child molester?
3 MR. PIKE: Form.
4 A. I refuse to answer.
5 Q. Have you ever seen him with a female under the
6 age of 12?
7 MR. PIKE: Form.
8 A. I refuse to answer.
9 Q. Have you ever known Jeffrey Epstein to have
10 sex with an adult?
11 MR. PIKE: Form.
12 A. I refuse to answer.
13 Q. Does he -- is he sexually attracted to adults?
14 MR. PIKE: Form.
15 A. I refuse to answer.
16 Q. When was the first time you learned of
17 Mr. Epstein getting a massage from an underage minor
18 female?
19 MR. PIKE: Form.
20 A. I refuse to answer.
21 Q. I realize some of these questions may sound
22 repetitive but during this case we've learned of key
23 terms that different people on Mr. Epstein's let's say
24 payroll or inner circle recognize or talk about. So
25 when I talk about "massages", do you know what that
0026 term means?
1 MR. PIKE: Form.
2 A. I refuse to answer.
3 Q. Isn't "massage" the word that was told by
4 Jeffrey Epstein to all of his employees to refer to
5 whatever acts he engages in with underage females in
6 his bedroom?
7 MR. PIKE: Form.
8 A. I refuse to answer.
9 Q. At this point -- were you -- were you ever in
10 the bedroom with him when he was engaging in sexual
11 acts with underage females and calling them "massages"?
12 MR. PIKE: Form.
13 A. I refuse to answer.
14 Q. Did you ever participate in any of the sexual
15 acts that Jeffrey Epstein was having with underage
16 females?
17 MR. PIKE: Form.
18 A. I refuse to answer.
19 Q. Now, just so that the record is clear there is
20 not a single piece of evidence that ever indicates that
21 you were involved with underage females, I'm not even
22 implying that and I realize that you invoking it may --
23

24 may give the wrong light and that's not -- that's not
25 my intention, so -- but were you ever aware of [REDACTED]
0027
1 [REDACTED] participating in sex with underage females?
2 A. I refuse to answer.
3 Q. Have you read the police reports related to
4 the criminal investigation into Mr. Epstein?
5 A. I refuse to answer.
6 Q. And you're aware of this 87-page police report
7 that details numerous females that indicate that they
8 were involved sexually with Mr. Epstein when they were
9 minors?
10 A. I refuse to answer.
11 MR. PIKE: Form.
12 Q. Did anyone instruct you to use the code word
13 "massage"?
14 A. I refuse to answer.
15 Q. And when referring to these underage minor
16 females that would come over to Mr. Epstein's house did
17 anybody also tell you to use the term "work"?
18 A. I refuse to answer.
19 MR. PIKE: Form.
20 Q. Meaning when somebody would call to schedule
21 one of these underage females for a massage isn't it
22 true that they would say "It's time to come to work"
23 and schedule a specific appointment?
24 MR. PIKE: Form.
25 A. I refuse to answer.
0028
1 Q. Is there a book or manual or is it written
2 anywhere that the -- that sex with underage minors is
3 to be referred to as a "massage"?
4 A. I refuse to answer.
5 MR. PIKE: Form.
6 Q. Were there ever team meetings, for lack of a
7 better word, where Jeffrey Epstein and possibly
8 Ghislaine Maxwell, [REDACTED] yourself, would talk
9 about this organization of obtaining underage girls for
10 Jeffrey Epstein for sex?
11 MR. PIKE: Form.
12 A. I refuse to answer.
13 Q. What methods does Jeffrey Epstein use to gain
14 access to underage minor females for sex?
15 MR. PIKE: Form.
16 A. I refuse to answer.
17 Q. What is your understanding of Jeffrey
18 Epstein's involvement with the modeling industry?
19 MR. PIKE: Form.
20 A. I refuse to answer.
21 Q. Have you ever modeled for MC Squared?
22 MR. PIKE: Form.
23 A. I refuse to answer.
24 Q. Has Jeffrey Epstein ever promised you anything
25 related to a modeling career?

0029

1 MR. PIKE: Form.
2 A. I refuse to answer.
3 Q. Have you ever talked to Jean Luc Brunel about
4 modeling?
5 A. I refuse to answer.
6 Q. Have you ever talked to Jean Luc Brunel about
7 his desire to have sex with underage females?
8 A. I refuse to answer.
9 Q. Isn't it true that Jean Luc Brunel has been in
10 trouble for years for having sex with underage minors
11 in Europe?
12 A. I refuse to answer.
13 Q. Are you familiar with The McIntyre Reports?
14 A. I refuse to answer.
15 Q. Okay. Are you familiar with reports done on
16 modeling agencies back in the 80's and 90's related to
17 agency owners having sex with underage minors?
18 MR. ROSS: Answer the question.
19 A. No, I'm not.
20 Q. Okay. Did you ever hear of Jean Luc Brunel's
21 reputation for having sex with underage girls?
22 MR. ROSS: Invoke.
23 A. I refuse to answer.
24 Q. Do you know how Jean Luc Brunel knows Jeffrey
25 Epstein?

0030

1 A. I refuse to answer.
2 MR. PIKE: Form.
3 Q. Isn't their connection the obsession for
4 underage minor females?
5 MR. PIKE: Form.
6 A. I refuse to answer.
7 Q. Based on your observations of Jeffrey Epstein
8 would you categorize his obsession for underage minor
9 females as an addiction?
10 MR. PIKE: Form.
11 A. I refuse to answer.
12 Q. Isn't it true that Ghislaine Maxwell delivers
13 underage minor females to Jeffrey Epstein?
14 MR. PIKE: Form.
15 A. I refuse to answer.
16 Q. Have you ever had a sexual relationship with
17 Ghislaine Maxwell?
18 A. I refuse to answer.
19 Q. Do you know what Ghislaine Maxwell does in
20 general for Jeffrey Epstein?
21 MR. PIKE: Form.
22 A. I refuse to answer.
23 Q. Have you seen photographs of underage minor
24 females in Jeffrey Epstein's patrol -- control or
25 possession?

0031

1 MR. PIKE: Form.

2 A. I refuse to answer.
3 Q. Were there surveillance cameras, hidden
4 surveillance cameras inside Jeffrey Epstein's home?
5 MR. PIKE: Form.
6 A. I refuse to answer.
7 Q. Did those surveillance cameras capture
8 underage minor females naked?
9 MR. PIKE: Form.
10 A. I refuse to answer.
11 Q. And didn't Jeffrey Epstein and Ghislaine
12 Maxwell watch those surreptitiously obtained videos of
13 underage minor females?
14 MR. PIKE: Form.
15 A. I refuse to answer.
16 Q. And those videos and photographs of underage
17 minor females were saved on Jeffrey Epstein's computers
18 in his house, right?
19 MR. PIKE: Form.
20 A. I refuse to answer.
21 Q. Have you seen those photographs and videos on
22 Jeffrey Epstein's computers?
23 MR. PIKE: Form.
24 A. I refuse to answer.
25 Q. Who have you talked to related to the criminal
0032 investigation into Jeffrey Epstein?
1 A. I refuse to answer.
2 MR. PIKE: Form.
3 MR. ROSS: In addition, attorney-client
4 privilege.
5 Q. And I certainly would -- do not want to know
6 anything you talked to your attorney about, I
7 apologize.
8 A. (Nods.)
9 Q. Why was it that you were named as a
10 co-conspirator of Jeffrey Epstein's in the
11 non-prosecution agreement?
12 MR. PIKE: Form.
13 A. I refuse to answer.
14 Q. Do you feel like a victim of Jeffrey
15 Epstein's?
16 MR. PIKE: Form.
17 A. I refuse to answer.
18 Q. Do you feel like Jeffrey Epstein brainwashed
19 you to some extent?
20 MR. PIKE: Form.
21 A. I refuse to answer.
22 Q. Do you feel any remorse for any role that you
23 may have played in having underage minor females at
24 Jeffrey Epstein's house for him to molest them?
25
0033 MR. PIKE: Form.
1 A. I refuse to answer.
2 Q. Have you known Ghislaine Maxwell and Jeffrey

4 Epstein to keep sex slaves?
5 A. I refuse to answer.
6 Q. Do you know somebody named [REDACTED]?
7 A. I refuse to answer.
8 Q. Have you met [REDACTED]?
9 A. I refuse to answer.
10 MR. EDWARDS: All right. Let me go ahead and
11 mark as -- as Plaintiff's Exhibit 1 a lawsuit that
12 was filed by Bob Josefsberg on behalf of Jane Doe
13 102 v. Jeffrey Epstein just for the purposes of
14 asking the witness some questions.
15 MR. ROSS: I've seen it.
16 (Whereupon, Plaintiff's Exhibit 1 was marked
17 for identification.)
18 Q. Have you ever read the lawsuit Jane Doe 102 v.
19 Jeffrey Epstein?
20 A. I refuse to answer.
21 Q. In the lawsuit it indicates the plaintiff was
22 15 years old when Ghislaine Maxwell and Jeffrey Epstein
23 had a threesome with this underage minor female. Are
24 you aware of that?
25 MR. PIKE: Form.
0034
1 A. I refuse to answer.
2 Q. And Jeffrey Epstein and/or Ghislaine Maxwell
3 obtained and purchased passports for 15-year-old Jane
4 Doe 102 to transport her to Palm Beach, New York City,
5 Santa Fe, Los Angeles, San Francisco, St. Louis, as
6 well as Europe, the Caribbean, and Africa; are you
7 aware of that?
8 A. I refuse to answer.
9 MR. PIKE: Form.
10 Q. It's also alleged that Jeffrey Epstein in
11 addition to molesting Jane Doe 102 along with Ghislaine
12 Maxwell forced her to have sex with other models,
13 actresses, and celebrities?
14 A. I refuse to answer.
15 MR. PIKE: Form.
16 Q. It also indicates that Jeffrey Epstein
17 transported other minor girls from Turkey, the Czech
18 Republic, Asia, and other countries. Are you aware of
19 that?
20 MR. PIKE: Form.
21 A. I refuse to answer.
22 Q. Is Jeffrey Epstein involved in the
23 international child sex trade?
24 MR. PIKE: Form.
25 A. I refuse to answer.
0035
1 Q. Is Jean Luc Brunel his partner in that
2 international child sex trade?
3 MR. PIKE: Form.
4 A. I refuse to answer.
5 Q. Are you aware that after -- that Jeffrey

6 Epstein forced Jane Doe 102 to have sex with other
7 adult male peers including royalty, politicians,
8 academicians, businessmen and/or other professional and
9 personal acquaintances of Jeffrey Epstein's?
10 MR. PIKE: Form.
11 A. I refuse to answer.
12 Q. Is that something that he did with girls other
13 than Jane Doe 102?
14 MR. PIKE: Form.
15 A. I refuse to answer.
16 Q. Aren't you familiar with Jeffrey Epstein's
17 practice of pimping out underage minor females to other
18 people that have the same sexual obsession with
19 underage minors?
20 MR. PIKE: Form.
21 A. I refuse to answer.
22 Q. And doesn't he benefit financially from that
23 sex trade?
24 MR. PIKE: Form.
25 A. I refuse to answer.
0036
1 Q. Jane Doe 102 ultimately escaped from him and
2 left to Australia, is that your understanding?
3 A. I refuse to answer.
4 MR. PIKE: Form.
5 Q. Have you ever spoken with Jane Doe 102?
6 A. I refuse to answer.
7 Q. On one of Epstein's birthdays a friend of
8 Jeffrey Epstein sent to him 12 -- three 12-year-old
9 girls from France who spoke no English for Epstein to
10 sexually exploit and abuse and after doing so he sent
11 them back to France the next day. Are you familiar
12 with that?
13 MR. PIKE: Form.
14 A. I refuse to answer.
15 Q. Isn't that something that is fairly common for
16 Mr. Epstein?
17 A. I refuse to answer.
18 MR. PIKE: Form.
19 Q. Who are the friends that send to Jeffrey
20 Epstein underage minor females for his birthday so that
21 he can abuse?
22 A. I refuse to answer.
23 MR. PIKE: Form.
24 Q. Is one of those friends Jean Luc Brunel?
25 A. I refuse to answer.
0037
1 Q. Have you ever met Prince Andrew?
2 A. I refuse to answer.
3 Q. Has Prince Andrew been involved with underage
4 minor females to your knowledge?
5 A. I refuse to answer.
6 Q. Have you ever met Alan Dershowitz?
7 A. I refuse to answer.

8 Q. When Alan Dershowitz stays at Jeffrey
9 Epstein's house isn't it true that he has been at the
10 house when underage minor females have been in the
11 bedroom with Jeffrey Epstein?
12 A. I refuse to answer.
13 Q. Has -- are you familiar with the media
14 publication or online resource RadarOnline?
15 A. I refuse to answer.
16 Q. Is that something that you assisted
17 Mr. Epstein with when he purchased RadarOnline?
18 A. I refuse to answer.
19 Q. And do you know his business partner in that
20 endeavor?
21 A. I refuse to answer.
22 Q. Isn't it also true that he used RadarOnline as
23 another way to gain access to underage minor females
24 for sex?
25 MR. PIKE: Form.
0038
1 A. I refuse to answer.
2 Q. Have you been to all of Jeffrey Epstein's
3 properties?
4 MR. PIKE: Form.
5 A. I refuse to answer.
6 Q. Certainly you've been to the property at 358
7 El Brillo Way, correct?
8 MR. PIKE: Form.
9 A. I refuse to answer.
10 Q. Have you been to his property in Manhattan?
11 A. I refuse to answer.
12 MR. PIKE: Form.
13 Q. And have you been to his island in -- it was
14 Little St. James, I believe he calls it Little
15 St. Jeff's now?
16 MR. PIKE: Form.
17 A. I refuse to answer.
18 Q. And have you witnessed underage child sex
19 orgies on that island?
20 MR. PIKE: Form.
21 A. I refuse to answer.
22 Q. Do you know a female named [REDACTED]
23 A. I refuse to answer.
24 Q. Do you know where [REDACTED] lives these days?
25 A. I refuse to answer.
0039
1 Q. What is your understanding of [REDACTED]
2 role in Jeffrey Epstein's life?
3 A. I refuse to answer.
4 MR. PIKE: Form.
5 Q. Isn't it true that she gets paid just to bring
6 him underage minor females for sex?
7 MR. PIKE: Form.
8 A. I refuse to answer.
9 Q. And additionally, she schedules the

10 appointments for underage minor females for him to
11 molest?
12 A. I refuse to answer.
13 MR. PIKE: Form.
14 Q. You know [REDACTED]?
15 A. I refuse to answer.
16 Q. Does she still work for Ghislaine Maxwell?
17 A. I refuse to answer.
18 Q. Was she an underage minor child victim of
19 Jeffrey Epstein's?
20 A. I refuse to answer.
21 Q. Through discovery we've talked to numerous
22 witnesses about, you know, Jeffrey Epstein and people
23 that work for him. I don't know if you'll be able to
24 answer any of these questions but I'll ask them anyway
25 one at a time.

0040

1 Is [REDACTED] somebody who travels with
2 Jeffrey Epstein?
3 MR. PIKE: Form.
4 A. I refuse to answer.
5 Q. And when Jeffrey Epstein is coming to town
6 doesn't he call [REDACTED] his number one assistant?
7 MR. PIKE: Form.
8 A. I refuse to answer.
9 Q. And at some point in time, it looks like in
10 early 2005 or late 2004, you were also an assistant of
11 Jeffrey Epstein's, correct?
12 MR. PIKE: Form.
13 A. I refuse to answer.
14 Q. And how was it that you transitioned from
15 being involved in modeling to being an employee of
16 Jeffrey Epstein?
17 MR. PIKE: Form.
18 A. I refuse to answer.
19 Q. Other than arranging for underage minor
20 females to come to Jeffrey Epstein's house did you do
21 anything else for Jeffrey Epstein?
22 MR. PIKE: Form.
23 A. I refuse to answer.
24 Q. Did you ever fly on Jeffrey Epstein's
25 airplane?

0041

1 A. I refuse to answer.
2 Q. Did you witness Jeffrey Epstein abuse --
3 sexually abusing underage minor females on his
4 airplane?
5 MR. PIKE: Form.
6 A. I refuse to answer.
7 Q. Did you know that it was illegal for Jeffrey
8 Epstein to interact sexually with underage minor
9 females?
10 MR. PIKE: Form.
11 A. I refuse to answer.

12 Q. Did you ever object to Jeffrey Epstein
13 interacting sexually with underage minor females?
14 MR. PIKE: Form.
15 A. I refuse to answer.
16 Q. Would Jeffrey Epstein get angry at you if you
17 did not have an appointment set for him with an
18 underage minor female?
19 MR. PIKE: Form.
20 A. I refuse to answer.
21 Q. Has Jeffrey Epstein contacted you in the last
22 year?
23 A. I refuse to answer.
24 MR. PIKE: Form.
25 Q. Has [REDACTED] contacted you within the last
0042 year?
1 A. I refuse to answer.
2 Q. Has anybody that is associated with Jeffrey
3 Epstein's party contacted you in the last year?
4 MR. PIKE: Form.
5 A. I refuse to answer.
6 Q. By that I mean to include Ghislaine Maxwell,
7 Lesley Groff, any of these people, have they contacted
8 you within the last year?
9 MR. PIKE: Form.
10 A. I refuse to answer.
11 Q. Are you familiar with the names of some of the
12 underage minor females?
13 A. I refuse to answer.
14 Q. Are you familiar with LM?
15 A. I refuse to answer.
16 Q. Do you remember what LM looked like?
17 A. I refuse to answer.
18 Q. Are you familiar with EW?
19 A. I refuse to answer.
20 Q. Do you remember what EW looked like?
21 A. I refuse to answer.
22 Q. Are you familiar with Jane Doe?
23 A. I refuse to answer.
24 Q. These are all females that were underage minor
0043 females that Jeffrey Epstein interacted with sexually
1 during a time when you were working for him; isn't that
2 true?
3 A. I refuse to answer.
4 MR. PIKE: Form.
5 Q. And LM was somebody that went over to Jeffrey
6 Epstein's house and was molested at a young age by him
7 more than 100 times; is that true?
8 MR. PIKE: Form.
9 A. I refuse to answer.
10 Q. And EW was also somebody who went over to
11 Jeffrey Epstein's house when she was between 14 and
12 16 years old more than a hundred times; isn't that
13

SUBJECT TO PROTECTIVE ORDER PARAGRAPHS 7, 8, 9, 10, 15, and 17

14 true?
15 MR. PIKE: Form.
16 A. I refuse to answer.
17 Q. And Jane Doe was somebody that went to Jeffrey
18 Epstein's house more than 15 times to be molested by
19 Jeffrey Epstein when she was 14 and 15 years old; is
20 that true?
21 MR. PIKE: Form.
22 A. I refuse to answer.
23 Q. Is it also true that LM brought to Jeffrey
24 Epstein's house between 50 and 75 other underage minor
25 females for Jeffrey Epstein to molest?
0044
1 A. I refuse to answer.
2 MR. ROSS: Form.
3 Q. Are you aware of Jeffrey Epstein's for lack of
4 a better word "ritual" with these underage minor
5 females in his bedroom?
6 MR. PIKE: Form.
7 A. I refuse to answer.
8 Q. Wouldn't it generally begin with Jeffrey
9 Epstein placing a call to [REDACTED] or yourself and
10 telling you that he's going to be in town at the Palm
11 Beach mansion?
12 MR. PIKE: Form.
13 A. I refuse to answer.
14 Q. And then isn't there a list of underage minor
15 females stored in the computer system?
16 MR. PIKE: Form.
17 A. I refuse to answer.
18 Q. And that computer system is interconnected
19 from his New York home, his New Mexico home, his
20 island, his home in France, and West Palm Beach; is
21 that correct?
22 MR. PIKE: Form.
23 A. I refuse to answer.
24 Q. And have you seen that list of underage minor
25 females stored in the computer system?
0045
1 MR. PIKE: Form.
2 A. I refuse to answer.
3 Q. And isn't it true there are over a thousand
4 girls at any given time between the age range of 12 and
5 17 all of which have been molested by Jeffrey Epstein?
6 MR. PIKE: Form.
7 A. I refuse to answer.
8 Q. And when Mr. Epstein would call and tell you
9 the time that he was going to be in town it would then
10 be your job to get an underage minor female to his
11 house and set a specific appointment for that person;
12 is that correct?
13 MR. PIKE: Form.
14 A. I refuse to answer.
15 Q. And he would tell you the exact time of day

16 that he wanted his two or three appointments to molest
17 underage minor females?
18 MR. PIKE: Form.
19 A. I refuse to answer.
20 Q. And you would go into the computer system and
21 call the person that he told you he wanted to see for
22 that day; is that correct?
23 MR. PIKE: Form.
24 A. I refuse to answer.
25 Q. And that may be [REDACTED]

0046

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

0047

1 my three clients, LM, EW, and Jane Doe you met
2 personally, right?
3 A. I refuse to answer.
4 MR. PIKE: Form.
5 Q. And then you would lead them upstairs to his
6 bedroom and leave him alone in the bedroom, leave my
7 client alone in the bedroom?
8 MR. PIKE: Form.
9 A. I refuse to answer.
10 Q. And let's take LM, and she went there many
11 times between the ages of 13 and 16. If she was taken
12 up to his bedroom she would be left alone in the
13 bedroom until Jeffrey Epstein arrived, correct?
14 MR. PIKE: Form.
15 A. I refuse to answer.
16 Q. And Jeffrey Epstein would appear usually naked
17 and order for her to take her clothes off?

18 A. I refuse to answer.
19 MR. PIKE: Form.
20 Q. And then Mr. Epstein would lay face down on
21 the massage table would usually be the next step,
22 correct?
23 MR. PIKE: Form.
24 A. I refuse to answer.
25 Q. And you know this ritual because at some point
0048
1 in time Jeffrey Epstein showed you exactly what he does
2 with each of these girls in the bedroom, correct?
3 MR. PIKE: Form.
4 A. I refuse to answer.
5 Q. So after about -- he would order the underage
6 minor female to begin massaging him, correct?
7 MR. PIKE: Form.
8 A. I refuse to answer.
9 Q. And then he would roll over and begin to
10 masturbate with his right hand, correct?
11 A. I refuse to answer.
12 Q. And then he would begin also grabbing the
13 breasts, buttocks, and vagina area of these underage
14 minor females, correct?
15 A. I refuse to answer.
16 MR. PIKE: Form.
17 Q. And his ritual was so specific that with each
18 of them he would demand that they pinch his nipples
19 very hard, right?
20 MR. PIKE: Form.
21 A. I refuse to answer.
22 Q. That's a fetish that you know that Jeffrey
23 Epstein has, right, he likes his nipples pinched very
24 hard?
25 MR. PIKE: Form.
0049
1 A. I refuse to answer.
2 Q. And as he's masturbating with one hand and has
3 his other hand groping or inserting his fingers into
4 the underage minor's vagina he's also telling them to
5 pinch his nipples, correct?
6 MR. PIKE: Form.
7 A. I refuse to answer.
8 Q. And this continues -- and sometimes this
9 escalates to him using vibrators, correct?
10 MR. PIKE: Form.
11 A. I refuse to answer.
12 Q. And have you seen vibrators in the Palm Beach
13 mansion house?
14 MR. PIKE: Form.
15 A. I refuse to answer.
16 Q. And other times he orders [REDACTED] to
17 participate in these encounters with underage minor
18 females; is that correct?
19 A. I refuse to answer.

20 Q. Are you familiar with [REDACTED]
21 strapping on dildos to have sex with these underage
22 minor females?
23 MR. PIKE: Form.
24 A. I refuse to answer.
25 Q. And when [REDACTED] would have sex with
0050
1 the underage minor females Jeffrey Epstein would watch
2 and continue to ejac -- continue to masturbate,
3 correct?
4 MR. PIKE: Form.
5 A. I refuse to answer.
6 Q. Has he ever asked you to participate in these
7 threesomes with underage minor females?
8 A. I refuse to answer.
9 MR. PIKE: Form.
10 Q. Have you ever participated in sex with
11 underage minor females at the direction of Jeffrey
12 Epstein?
13 MR. PIKE: Form.
14 A. I refuse to answer.
15 Q. The -- this whole experience that I am
16 explaining right now is identical every single time
17 with these underage minor females; isn't that your
18 understanding?
19 MR. PIKE: Form.
20 A. I refuse to answer.
21 Q. And this whole experience is what he has
22 taught you and the other employees to call a "massage",
23 correct?
24 MR. PIKE: Form.
25 A. I refuse to answer.
0051
1 Q. And it always ends with him ejaculating?
2 A. I refuse to answer.
3 MR. PIKE: Form.
4 Q. And then he offers 200 to \$300 cash to the
5 underage minor female, correct?
6 MR. PIKE: Form.
7 A. I refuse to answer.
8 Q. And then he also gives them another -- another
9 option to make money which is each time you come to my
10 house and we engage in this sexual interaction I will
11 give you \$200, but each female you bring me like you,
12 between the age range of 12 and 16, I will pay you \$200
13 per person.
14 MR. PIKE: Form.
15 Q. Is that something you're familiar with?
16 A. I refuse to answer.
17 Q. And LM at that offer was one of the girls who
18 brought him 75 plus underage minor females, correct?
19 MR. PIKE: Form.
20 A. I refuse to answer.
21 Q. And so he's basically created a pyramid of

22 underage minor females where the computer system has a
23 thousand of these females ready to come over to work
24 for him?

25 MR. PIKE: Form.

0052

1 A. I refuse to answer.

2 Q. Do you know what Jeffrey Epstein does for a
3 living?

4 A. I refuse to answer.

5 Q. Does he do anything aside from interacting
6 sexually with underage minor females?

7 MR. PIKE: Form.

8 A. I refuse to answer.

9 Q. Do you know how it is that he made his money
10 where he is purported to be a billionaire?

11 A. I refuse to answer.

12 MR. PIKE: Form.

13 Q. Do you know David Copperfield?

14 A. I refuse to answer.

15 Q. Is David Copperfield somebody that would come
16 into town and interact sexually with underage minor
17 females?

18 A. I refuse to answer.

19 Q. Do you know Martin Nowak?

20 A. I refuse to answer.

21 Q. Is that also somebody that would interact
22 sexually with underage minor females?

23 A. I refuse to answer.

24 Q. Do you know Leslie Wexner?

25 A. I refuse to answer.

0053

1 Q. Is that somebody you've met before?

2 A. I refuse to answer.

3 Q. Has Mr. Epstein himself interacted sexually
4 with Leslie Wexner?

5 MR. PIKE: Form.

6 A. I refuse to answer.

7 Q. When Mr. Epstein was being investigated
8 criminally how did you first learn about that?

9 A. I refuse to answer.

10 Q. At some point in time he was tipped off that
11 his home -- that a search warrant was going to be
12 executed on his home, correct?

13 MR. PIKE: Form.

14 A. I refuse to answer.

15 Q. And just a month before the execution of that
16 search warrant -- less than a month before the
17 execution of that search warrant he ordered you to do
18 something with certain evidence, didn't he?

19 MR. PIKE: Form.

20 A. I refuse to answer.

21 Q. In fact, there were at least three very key
22 computers that contained a lot of the information that
23 I've been asking you about. You're familiar with those

24 computers that were in his house, correct?
25 MR. PIKE: Form.
0054
1 A. I refuse to answer.
2 Q. And he ordered you to come over and take those
3 computers out of his house, correct?
4 A. I refuse to answer.
5 MR. PIKE: Form.
6 Q. And you could basically take the local
7 database that exposed this criminal enterprise that
8 I've been talking about dealing with sex with underage
9 minor vehicles -- underage minor females and you could
10 take the evidence from his home, correct?
11 MR. PIKE: Form.
12 A. I refuse to answer.
13 Q. And you've seen the material that's on those
14 computers, correct?
15 MR. PIKE: Form.
16 A. I refuse to answer.
17 Q. And if I were to look at those computers it
18 would display exactly what I've been describing to you
19 today, right?
20 MR. PIKE: Form.
21 A. I refuse to answer.
22 Q. And you went to his house with a male,
23 correct?
24 A. I refuse to answer.
25 MR. PIKE: Form.
0055
1 Q. There was one other guy with you that helped
2 that assisted you to take these computers from his
3 home; is that right?
4 MR. PIKE: Form.
5 A. I refuse to answer.
6 Q. Where did you take those?
7 A. I refuse to answer.
8 Q. Did you take those -- was it Bill Reilly that
9 went to the home?
10 A. I refuse to answer.
11 Q. Do you know who Bill Reilly is?
12 A. I refuse to answer.
13 Q. He's one of the investigators hired by Roy
14 Black to represent Jeffrey Epstein?
15 A. I refuse to answer.
16 Q. Did you take those computers ever to your
17 house?
18 A. I refuse to answer.
19 Q. And I guess the house that I would be talking
20 about is the [REDACTED], have those
21 computers ever been to that house?
22 MR. PIKE: Form.
23 A. I refuse to answer.
24 Q. Were you nervous about the fact that you were
25 taking these computers out of the home at a time when a

0056

1 search warrant was imminent?
2 A. I refuse to answer.
3 Q. Did you ever question when you were directed
4 to take these computers from his home?
5 A. I refuse to answer.
6 Q. How much additional money or bonus were you
7 paid to take the computers that we're talking about out
8 of Jeffrey Epstein's house?
9 MR. PIKE: Form.
10 A. I refuse to answer.
11 Q. Would those computers reveal criminal activity
12 of only Jeffrey Epstein or of others?
13 MR. PIKE: Form.
14 A. I refuse to answer.
15 Q. Did you talk with [REDACTED] about the
16 criminal investigation into Jeffrey Epstein and others?
17 A. I refuse to answer.
18 Q. Well, at some point in time what's been marked
19 as Defense Exhibit 1, you received a Grand Jury
20 investigation target letter, correct?
21 A. I refuse to answer.
22 Q. Well, we have it right here. I'm familiar
23 with it. I know you got the letter and I know that,
24 you know, the substance of it you're not going to tell
25 me about. But this letter is dated August 31st, 2007,

0057

1 the search warrant was executed on his home back in
2 October of 2005. So during those two years leading up
3 to this target letter who did you talk to?
4 A. I refuse to answer.
5 Q. Did you --
6 MR. ROSS: And privilege. Attorney-client
7 privilege.
8 Q. Okay. In addition to your attorney did you
9 talk to anybody else about the criminal investigation?
10 A. I refuse to answer.
11 Q. And [REDACTED] was your initial computer --
12 computer -- was your initial attorney in this case,
13 correct?
14 MR. ROSS: You can answer yes or no.
15 A. Yes.
16 Q. Okay. And that was an attorney that was hired
17 for you by Jeffrey Epstein?
18 MR. ROSS: Invoke.
19 A. I refuse to answer.
20 Q. Someone that was paid for by Jeffrey Epstein
21 to represent you?
22 MR. PIKE: Form.
23 A. I refuse to answer.
24 Q. So once he hired you a criminal attorney then
25 it seemed like you did something wrong?

0058

1 MR. PIKE: Form.

2 A. I refuse to answer.
3 Q. You hadn't actually gone into any relationship
4 with Jeffrey Epstein with the intent to commit crimes,
5 did you?
6 A. I refuse to answer.
7 Q. You didn't know that he was a child molester
8 when you first met him, did you?
9 MR. PIKE: Form.
10 A. I refuse to answer.
11 Q. Were you impressed by his money and his
12 lifestyle?
13 A. I refuse to answer.
14 Q. Did you think that he could get you further in
15 life if you would just listen to what he said?
16 MR. PIKE: Form.
17 A. I refuse to answer.
18 Q. At this point in time you have no contact with
19 him as a child molester, do you?
20 MR. PIKE: Form.
21 A. I refuse to answer.
22 Q. Did Jeffrey Epstein assist in getting you a
23 visa?
24 A. I refuse to answer.
25 MR. PIKE: Form.
0059
1 Q. Has he done any favors for your family?
2 A. I refuse to answer.
3 MR. PIKE: Form.
4 Q. Is he paying for your college?
5 A. I refuse to answer.
6 MR. PIKE: Form.
7 Q. Right now is he paying for your college?
8 MR. ROSS: Invoke.
9 A. I refuse to answer.
10 MR. PIKE: Form.
11 Q. Did Jeffrey Epstein ever talk to you about the
12 chances of him going to prison?
13 A. I refuse to answer.
14 MR. PIKE: Form.
15 Q. Did Jeffrey Epstein ever talk to you about
16 what he intended his defenses to be to the criminal
17 actions he committed against these underage minors?
18 A. I refuse to answer.
19 MR. PIKE: Form.
20 Q. Did he tell you that he would spend as much
21 money as possible to intimidate and harass these
22 underage minor victims?
23 A. I refuse to answer.
24 MR. PIKE: Form.
25 Q. Did he tell you that he would destroy their
0060
1 credibility?
2 A. I refuse to answer.
3 Q. Did he tell you that he could scare them to go

SUBJECT TO PROTECTIVE ORDER PARAGRAPHS 7, 8, 9, 10, 15, and 17

4 away?
5 A. I refuse to answer.
6 MR. PIKE: Form and form to the last question.
7 MR. EDWARDS: All right. Let's see, what did
8 I say, I said this was --
9 MR. ROSS: I.
10 MR. EDWARDS: -- Plaintiff's I and we're going
11 to write on the back of it and then -- okay.
12 Q. Jeffrey Epstein kept message pads near all of
13 his phones in his home, right?
14 MR. PIKE: Form.
15 A. I refuse to answer.
16 Q. And those are message pads that have a carbon
17 copy back side to them, you're familiar with them?
18 MR. PIKE: Form.
19 A. I refuse to answer.
20 Q. And this is for anybody who takes a message
21 they write it down that somebody called, the reason for
22 calling, the time that they called?
23 MR. PIKE: Form.
24 A. I refuse to answer.
25 Q. And many a times anytime that Jeffrey Epstein

0061

1 was in town there were at least two scheduled
2 "massages" for lack of a better word, with Jeffrey
3 Epstein and these underage minor females, correct?
4 A. I refuse to answer.
5 MR. PIKE: Form.
6 Q. And do you have the -- and there was a
7 particular scheduling book that contained these
8 appointments with -- between Jeffrey Epstein and
9 underage minor females, correct?
10 MR. PIKE: Form.
11 A. I refuse to answer.
12 Q. And it was your primary responsibility to
13 assist [REDACTED] in setting these appointments up,
14 right?
15 A. I refuse to answer.
16 MR. PIKE: Form.
17 Q. It took at least two or three full-time
18 employees to keep up with Jeffrey Epstein's addiction
19 to underage minors, correct?
20 A. I refuse to answer.
21 MR. PIKE: Form.
22 Q. Lesley Groff did pretty much the same thing up
23 in New York, right?
24 MR. PIKE: Form.
25 A. I refuse to answer.

0062

1 Q. And you're familiar that there is this group
2 of girls in New York that were summoned to his home for
3 generally the exact same thing as the Palm Beach girls?
4 A. I refuse to answer.
5 Q. All right.

6 MR. PIKE: Form.
7 Q. I'm going to show you an exhibit here, we'll
8 mark it as -- you know what, it's a bunch of message
9 pads, I'm going to mark it as 2A, -B, -C, -D, whatever.
10 So we'll say 2A.
11 (Whereupon, Plaintiff's Exhibit 2A through 2H
12 were marked for identification.)
13 Q. Do you recognize it?
14 A. I refuse to answer.
15 Q. Okay.
16 MR. PIKE: May I see that?
17 MR. EDWARDS: Sure.
18 Q. Do you recognize the handwriting on it?
19 A. I refuse to answer.
20 Q. It indicates "[REDACTED] hasn't confirmed [REDACTED]
21 for 11 yet, so she is keeping [REDACTED] on hold in case
22 [REDACTED] doesn't call back."
23 What does that message mean?
24 A. I refuse to answer.
25 MR. PIKE: Form.

0063

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

0064

1 that he would promise these girls something in order to
2 get them to allow him to sexually abuse them?
3 MR. PIKE: Form.
4 A. I refuse to answer.
5 Q. Because he certainly did not want them to tell
6 the police, correct?
7 A. I refuse to answer.

8 Q. And did you have many meetings about what to
9 do if any of these girls told the police?
10 A. I refuse to answer.
11 MR. PIKE: Form.
12 Q. Was it always known that Jeffrey Epstein would
13 hire everyone attorneys and tell everyone just not to
14 talk?
15 MR. PIKE: Form.
16 A. I refuse to answer.
17 Q. And at the same time then he could employ a
18 bunch of investigators, dig up a bunch of dirt on these
19 girls, and intimidate them and scare them to go away,
20 correct?
21 MR. PIKE: Form.
22 A. I refuse to answer.
23 Q. And Jeffrey Epstein doesn't like -- he didn't
24 like any of these underage minor females, right?
25 MR. PIKE: Form.
0065
1 A. I refuse to answer.
2 Q. In fact, it was the opposite, he liked to hurt
3 them; isn't that true?
4 MR. PIKE: Form.
5 A. I refuse to answer.
6 Q. And after they came forward if they told the
7 truth he was dead set on hurting them even more,
8 correct?
9 MR. PIKE: Form.
10 A. I refuse to answer.
11 Q. And that's also a feeling that Ghislaine
12 Maxwell shared as well, correct?
13 A. I refuse to answer.
14 Q. And that's something that she also told you,
15 "Don't worry. If we get caught we have it covered and
16 we'll just attack these little girls."
17 MR. PIKE: Form.
18 A. I refuse to answer.
19 Q. All right. There's another message from
20 9/10/05. [REDACTED] says [REDACTED] confirmed for 4 p.m."
21 Can you tell us what that message means?
22 MR. PIKE: Form.
23 A. I refuse to answer.
24 Q. It's another underage minor female that
25 Jeffrey Epstein's going to molest at 4 p.m., correct?
0066
1 A. I refuse to answer.
2 Q. And when I say "molest", you know, he may say
3 "massage", I mean, that's -- that's something
4 interchangeable, right?
5 MR. PIKE: Form.
6 A. I refuse to answer.
7 Q. It's the routine that I described in detail
8 that is identical with every single girl every single
9 time, correct?

10 A. I refuse to answer.
11 Q. And it's basically as far as he can get with
12 this underage minor female without her crying or
13 screaming or running out of the house?
14 MR. PIKE: Form.
15 A. I refuse to answer.
16 Q. Did you ever see any of the girls cry or
17 scream or run out of the house?
18 MR. PIKE: Form.
19 A. I refuse to answer.
20 Q. Did you have a personal relationship with any
21 of these underage minor females?
22 A. I refuse to answer.
23 Q. There's another message here from 9/10/05,
24 same day later in the day, 10 p.m. saying "[REDACTED] will
25 be at 11. Do you want me to cancel [REDACTED]"
0067
1 Do you know what that message means?
2 MR. PIKE: Form.
3 A. I refuse to answer.
4 Q. What is this?
5 There's another message from 9/11/05 saying "I
6 got a car for," and then the name is blotted out. The
7 State Attorney's Office blotted the names of minors out
8 sometimes in their file. So do you -- do you know --
9 can you fill in that blank?
10 A. I refuse to answer.
11 Q. Do you know if this was the car that he rented
12 for Jane Doe 4?
13 A. I refuse to answer.
14 Q. All right. Or the car that he rented for AH?
15 A. I refuse to answer.
16 MR. PIKE: Form.
17 Q. You're familiar with both of those people,
18 right?
19 A. I refuse to answer.
20 Q. In fact, AH was somebody that was over at
21 Jeffrey Epstein's house many times, correct?
22 A. I refuse to answer.
23 MR. PIKE: Form.
24 Q. 9/3/2005. Message from [REDACTED] saying "I left
25 message for [REDACTED] to confirm for 11 a.m. and [REDACTED]
0068
1 for 4:30 p.m."
2 Do you remember leaving that message?
3 A. I refuse to answer.
4 Q. And this is --
5 MR. PIKE: Form.
6 Q. It's his typical schedule where he schedules
7 one underage minor female to molest in the morning and
8 one in the afternoon, correct?
9 MR. PIKE: Form.
10 A. I refuse to answer.
11 Q. I mean, considering this is -- have you ever

12 worked anywhere else where there is somebody sexually
13 molesting underage minor females on a daily basis like
14 this?

15 MR. PIKE: Form.

16 A. I refuse to answer.

17 Q. At some point in time did you tell your
18 parents that this was happening?

19 MR. PIKE: Form.

20 A. I refuse to answer.

21 Q. Did you ever talk to anybody else in the house
22 and say "Hey, look, this is not right"?

23 A. I refuse to answer.

24 Q. Do you feel sorry for these girls?

25 A. I refuse to answer.

0069

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

2 A. I refuse to answer.

3 Q. Okay. And do you know what happened up in the
4 bedroom between AH as a minor and Jeffrey Epstein?

5 MR. PIKE: Form.

6 A. I refuse to answer.

7 Q. Well, this is what she tells police: "She
8 arrived at the house, went upstairs to the bedroom.
9 She advised she immediately removed her clothing and
10 [REDACTED] and Epstein were already naked in the
11 bedroom. AH explained that [REDACTED] and she
12 had a sexual encounter that included kissing, touching,
13 and oral sex. AH remembered that she climaxed and was
14 removing herself from the massage table. Epstein then
15 turned AH onto her stomach on the massage table and
16 inserted his penis into her vagina. AH stated Epstein
17 began to pump his penis in her vagina. AH became upset
18 over this. She said her head was being held forcibly
19 against the bed as he continued to pump inside her.
20 She screamed 'No,' and Epstein stopped. He would
21 normally pay her \$200, but for this he apologized and
22 paid her a thousand dollars for that visit."

23 Are you familiar with that encounter?

24 A. I refuse to answer.

25 MR. PIKE: Form.

0070

1 Q. Do you remember a time when AH as a
2 16-year-old I believe at this time left her house --
3 left the house visibly upset?

4 MR. PIKE: Form.

5 A. I refuse to answer.

6

7

8

9

10 MR. PIKE: Form.

11 A. I refuse to answer.

12 Q. These message pads were message pads that were
13 taken from trash pulls outside of Jeffrey Epstein's
home and for the most -- well, there's so many messages

14 here, but most of them are by somebody other than
15 yourself. So my question is who are the other people
16 that would take messages for Jeffrey Epstein for
17 underage minor females to come to the house?
18 MR. PIKE: Form.
19 A. I refuse to answer.
20 Q. And the messages include CL, "Can I come work
21 today?"
22 What does "work" mean?
23 A. I refuse to answer.
24 MR. PIKE: Form.
25 Q. That means come to your house and get paid for

0071

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

0072

1 A. I refuse to answer.
2 Q. And at that point in time -- well, are you
3 aware of him molesting underage minors while he was a
4 teacher there?
5 A. I refuse to answer.
6 Q. There's another note that's not a message pad
7 which I guess I will -- since it has your name on it I
8 will mark it as what are we on -- 3 -- wait, C --
9 MR. ROSS: 3.
10 MR. EDWARDS: I messed up.
11 MR. ROSS: 3.
12 (Whereupon, Plaintiff's Exhibit 3 was marked
13 for identification.)
14 Q. Look at that while I fix what I've messed up
15 over here.

16 MR. ROSS: I'm going to show this to the
17 witness.
18 MR. EDWARDS: Yes. Yes.
19 Q. Do you recognize that document?
20 A. I refuse to answer.
21 Q. There are a lot of different things on here
22 that don't necessarily relate to you. At least I can't
23 tell that they do. But it does indicate "[REDACTED]
24 parents are going to the embassy on the 23rd."
25 Do you remember when that happened?
0073
1 A. I refuse to answer.
2 Q. Why did your parents go to the embassy?
3 A. I refuse to answer.
4 Q. More importantly why was Mr. Epstein concerned
5 that your parents were going to the Embassy?
6 MR. PIKE: Form.
7 A. I refuse to answer.
8 Q. Was -- at that point in time was Mr. Epstein
9 assisting your parents with anything?
10 A. I refuse to answer.
11 Q. Are your parents citizens of the United
12 States?
13 MR. ROSS: Form.
14 A. I refuse to answer.
15 Q. Are you?
16 A. No.
17 Q. Has Mr. Epstein ever offered to get you a visa
18 for the United States?
19 A. I refuse to answer.
20 MR. PIKE: Form.
21 Q. Do you know Raer Roshan?
22 A. I refuse to answer.
23 Q. That was Jeffrey Epstein's partner in
24 RadarOnline, correct?
25 A. I refuse to answer.
0074
1 Q. And if I showed you every single message pad
2 here would you be able to answer any of the questions
3 about any of the messages that were left at Jeffrey
4 Epstein's house?
5 A. I refuse to answer.
6 MR. EDWARDS: Okay. That saves us a lot of
7 time.
8 MR. ROSS: It did.
9 Q. Have you ever met Bill Clinton?
10 A. I refuse to answer.
11 Q. Is Bill Clinton -- was Bill Clinton a friend
12 of Jeffrey Epstein's?
13 A. I refuse to answer.
14 Q. Is Bill Clinton somebody who Jeffrey Epstein
15 has ever procured underage minor females for?
16 A. I refuse to answer.
17 MR. PIKE: Form.

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18 Q. And just -- and just for, you know, the sake
19 of what the evidence shows, there's no evidence that I
20 have that indicates that that happened, but if you were
21 going to answer that question I'm willing to ask it.
22 Have you met him at Jeffrey Epstein's house in
23 Palm Beach County?
24 MR. PIKE: Form.
25 A. I refuse to answer.

0075
1 Q. You have flown on Jeffrey Epstein's airplanes
2 numerous times, correct?
3 A. I refuse to answer.
4 Q. As well as Bill Clinton and you're aware of
5 that, right?
6 MR. PIKE: Form.
7 A. I refuse to answer.
8 Q. Have you ever seen the flight logs from
9 Jeffrey Epstein's airplanes?
10 MR. PIKE: Form.
11 A. I refuse to answer.
12 Q. And on many times it is Bill Clinton, Secret
13 Service agents, Jeffrey Epstein, Ghislaine Maxwell,
14 [REDACTED] and others. Have you -- do you know
15 about those flights?
16 A. I refuse to answer.
17 MR. PIKE: Form.
18 Q. And have you ever witnessed sex on any of
19 Jeffrey Epstein's flights?
20 A. I refuse to answer.
21 MR. PIKE: Form.
22 Q. Do you know [REDACTED]
23 A. I refuse to answer.
24 Q. Is that somebody that is Ghislaine Maxwell's
25 sex slave?

0076
1 A. I refuse to answer.
2 Q. And isn't it typical for Jeffrey Epstein to
3 have a sex slave that flies with him on the airplane?
4 A. I refuse to answer.
5 MR. PIKE: Form.
6 Q. And one of the qualifications is that the
7 section slave be underage, correct?
8 MR. PIKE: Form.
9 A. I refuse to answer.
10 Q. And if the sex slave is 15 years old isn't it
11 your understanding and based on your observations that
12 he will even make them dress as if they're 11 or 12?
13 MR. PIKE: Form.
14 A. I refuse to answer.
15 MR. PIKE: Form.
16 Q. Do you know President Andres Pastrana?
17 A. I refuse to answer.
18 Q. Do you know him as somebody who has had sex
19 with underage minor females brought to him by Jeffrey

20 Epstein?
21 MR. PIKE: Form.
22 A. I refuse to answer.
23 Q. Have you ever heard of Ehud Burak?
24 A. I refuse to answer.
25 MR. PIKE: Form.
0077
1 Q. Is that another person that Epstein -- Jeffrey
2 Epstein procures underage minor females for?
3 MR. PIKE: Form.
4 A. I refuse to answer.
5 Q. You've met Naomi Campbell I'm assuming?
6 A. I refuse to answer.
7 Q. Anytime separate and apart from any dealings
8 with Jeffrey Epstein have you met her in the modeling
9 industry? That's a model, right?
10 MR. PIKE: Form.
11 MR. ROSS: You can answer the question.
12 A. No, I have not.
13 Q. Okay. Do you know Todd Meister?
14 A. I refuse to answer.
15 Q. Joel Pashcow?
16 A. I refuse to answer.
17 Q. You've been to their houses?
18 A. I refuse to answer.
19 Q. Do you know Aline Weber?
20 A. I refuse to answer.
21 Q. Have you ever stayed at the 301 East 66th
22 Street places with Aline Weber?
23 MR. PIKE: Form.
24 A. I refuse to answer.
25 Q. And typically aren't there at least 16
0078
1 underage minor females staying at those various
2 condominiums located at 301 East 66th Street?
3 A. I refuse to answer.
4 Q. And those females get work visas to say that
5 they're models, but actually they are prostituted out
6 by Jeffrey Epstein and John Luc Brunel, correct?
7 A. I refuse to answer.
8 MR. PIKE: Form.
9 Q. And various businessmen and politicians around
10 New York and Washington, D.C. go to those apartments
11 frequently to have sex with underage minors; is that
12 true?
13 A. I refuse to answer.
14 Q. Do you remember a flight on December 3rd, 2004
15 that you took with Jeffrey Epstein, [REDACTED]
16 [REDACTED] and somebody with initials SH --
17 A. I refuse to answer.
18 Q. -- from JFK to PBI?
19 MR. PIKE: Form.
20 Q. Do you remember that?
21 A. I refuse to answer.

22 Q. Who is SH?
23 A. I refuse to answer.
24 Q. Is that an underage minor?
25 A. I refuse to answer.
0079
1 Q. Do you remember a flight that you took
2 December 27th with [REDACTED] and Jeffrey
3 Epstein?
4 A. I refuse to answer.
5 Q. What airport is this, TIST?
6 A. I refuse to answer.
7 Q. Do you know Doug Band?
8 A. I refuse to answer.
9 Q. Isn't that Bill Clinton's assistant?
10 A. I refuse to answer.
11 Q. You've been on the airplane with him before?
12 A. I refuse to answer.
13 Q. Have you been on the airplane with Bill
14 Clinton before?
15 A. I refuse to answer.
16 Q. Who is [REDACTED]?
17 A. I refuse to answer.
18 Q. That's somebody you've flown with on Jeffrey
19 Epstein's plane on numerous occasions, correct?
20 MR. PIKE: Form.
21 A. I refuse to answer.
22 Q. In fact, during the year 2005 you flew on
23 Jeffrey Epstein's plane would you say more than 50
24 times?
25 A. I refuse to answer.
0080
1 MR. PIKE: Form.
2 Q. And you flew to his island, right?
3 A. I refuse to answer.
4 MR. PIKE: Form.
5 Q. You flew to New Mexico?
6 A. I refuse to answer.
7 MR. PIKE: Form.
8 Q. You flew to New Jersey?
9 MR. PIKE: Form.
10 A. I refuse to answer.
11 Q. Several of the flights are just yourself,
12 Jeffrey Epstein, and [REDACTED] What did you do on
13 those flights?
14 MR. PIKE: Form.
15 A. I refuse to answer.
16 Q. Who's Adam Perrylang?
17 A. I refuse to answer.
18 Q. Is that somebody that you were made to have
19 sex with?
20 A. I refuse to answer.
21 Q. Did Jeffrey Epstein ever make you have sex
22 with any females?
23 MR. PIKE: Form.

24 A. I refuse to answer.
25 Q. Did he ever make you have sex with any of his
0081 friends?
1 MR. PIKE: Form.
2 A. I refuse to answer.
3 Q. Who is Sandy Berger?
4 A. I refuse to answer.
5 Q. That's somebody else that was affiliated with
6 Bill Clinton at one point in time, correct?
7 A. I refuse to answer.
8 Q. A close friend of Jeffrey Epstein's?
9 MR. PIKE: Form.
10 A. I refuse to answer.
11 Q. He called the house within three weeks of the
12 search warrant being executed. Did he tip off Jeffrey
13 Epstein?
14 MR. PIKE: Form.
15 A. I refuse to answer.
16 Q. Is he somebody that's involved with underage
17 minors?
18 A. I refuse to answer.
19 Q. Do you know Igor Zinoviev?
20 A. I refuse to answer.
21 Q. Andrea Metrovich?
22 A. I refuse to answer.
23 Q. Have you flown on the airplane with Alan
24 Dershowitz before?
25 0082 MR. PIKE: Form.
1 A. I refuse to answer.
2 Q. And Jean Luc Brunel is somebody who you have
3 been on the airplane with several times, correct?
4 A. I refuse to answer.
5 MR. PIKE: Form.
6 Q. And when Jean Luc Brunel is on this airplane
7 there are underage minor -- minor females on the
8 airplane with you, correct?
9 MR. PIKE: Form.
10 A. I refuse to answer.
11 Q. Is there a back room to this airplane? Is
12 there any sort of separation or is it all one big room?
13 MR. PIKE: Form.
14 A. I refuse to answer.
15 Q. So if Jeffrey Epstein and Jean Luc Brunel are
16 engaged in sex acts with underage minors did you --
17 A. I refuse --
18 Q. Sorry -- did you observe any of those acts?
19 A. I refuse to answer.
20 MR. PIKE: Form.
21 Q. And on numerous of the flights the flight logs
22 indicate someone's name then oftentimes initials, but
23 sometimes it would just say "three females". Do you
24 know why?
25

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0083

1 A. I refuse to answer.
2 MR. PIKE: Form.
3 Q. Who's [REDACTED]?
4 A. I refuse to answer.
5 Q. Do you know [REDACTED]?
6 A. I refuse to answer.
7 Q. They're the house managers up at the mansion
8 up in Manhattan, correct?
9 MR. PIKE: Form.
10 A. I refuse to answer.
11 Q. And they assist Mr. Epstein in engaging in
12 underage sex with minors in New York, correct?
13 MR. PIKE: Form.
14 A. I refuse to answer.
15 Q. They also maintain a pretty close relationship
16 with the police?
17 A. I refuse to answer.
18 Q. And that's a big component also, right, that
19 Jeffrey Epstein has -- is friendly with the law
20 enforcement, correct?
21 MR. PIKE: Form.
22 A. I refuse to answer.
23 Q. Like law enforcement would do favors for not
24 only Jeffrey Epstein but his various assistants. If
25 you were speeding around the neighborhood they wouldn't

0084

1 give you a ticket, correct?
2 MR. PIKE: Form.
3 A. I refuse to answer.
4 Q. Was it ever your job to call the police
5 department and ask if any police reports were on file
6 or anybody complained about the activities at Jeffrey
7 Epstein's house?
8 MR. PIKE: Form.
9 A. I refuse to answer.
10 Q. Have you ever gone physically to the police
11 department?
12 A. I refuse to answer.
13 Q. Was there a flight where you flew alone with
14 Jean Luc Brunel?
15 A. I refuse to answer.
16 Q. Have you ever flown on the plane with Prince
17 Andrew?
18 MR. PIKE: Form.
19 A. I refuse to answer.
20 Q. Do you know [REDACTED]?
21 A. I refuse to answer.
22 Q. That's another model that Jeffrey Epstein
23 knows, correct?
24 A. I refuse to answer.
25 MR. PIKE: Form.

0085

1 Q. Somebody that he had engaged in sex with when

2 she was underage?
3 A. I refuse to answer.
4 Q. She actually got a modeling contract out of
5 it?
6 MR. PIKE: Form.
7 A. I refuse to answer.
8 Q. Why does Jean Luc Brunel and Jeffrey Epstein
9 fly together so often?
10 MR. PIKE: Form.
11 A. I refuse to answer.
12 Q. And why does Ghislaine Maxwell also fly so
13 often with Jeffrey Epstein and Jean Luc Brunel?
14 A. I refuse to answer.
15 MR. PIKE: Form.
16 Q. Isn't it true that all three of them are
17 obsessed and addicted to sex with underage minors?
18 MR. PIKE: Form.
19 A. I refuse to answer.
20 MR. PIKE: Brad, how much longer do you have?
21 MR. EDWARDS: How long? You want to take a
22 break?
23 MR. PIKE: Yeah.
24 MR. EDWARDS: Sure. It's going a lot faster
25 than I thought it would.

0086

1 VIDEOGRAPHER: Off the record, 11:33 a.m.
2 (Recess taken at 11:33 a.m.)
3 (Deposition resumed at 11:43 a.m.)
4 VIDEOGRAPHER: On the record, 11:43 a.m.
5 BY MR. EDWARDS:
6 Q. All right. There's one more message that I
7 wanted to ask you about. As I mentioned, I'm not going
8 to go through all of the messages that I have, but
9 there's one from 9/4/2005, 9:08 a.m. from [REDACTED] "Is
10 it okay for [REDACTED] to stop by and drop something?"
11 A. I refuse to answer.
12 MR. PIKE: Form.
13 Q. So what were your hours working for Jeffrey
14 Epstein?
15 A. I refuse to answer.
16 Q. I mean, some of these messages are 9:00 in the
17 morning and others are as late as 8:30 or 9 at night.
18 So what were your hours?
19 A. I refuse to answer.
20 Q. Another message from 9/4 also, same day,
21 [REDACTED] "I think, "confirmed an 11 a.m., [REDACTED] is at
22 4:30 p.m."
23 MR. MERMELSTEIN: I think that's one you did.
24 MR. EDWARDS: Oh, yeah? Okay.
25 Q. All right. Do you remember that message?
0087
1 A. I refuse to answer.
2 MR. EDWARDS: Do you care how I attach it
3 since it's --

4 MR. ROSS: No.
5 MR. EDWARDS: I'll attach it as whatever it
6 is.
7 MR. ROSS: 4.
8 MR. EDWARDS: 2 -- well, I'll just go 2H since
9 it's a message. You don't have a problem with
10 that? 2H?
11 MR. ROSS: Whatever.
12 (Whereupon, Plaintiff's Exhibit 2H was marked
13 for identification.)
14 Q. Do you still consider Jeffrey Epstein a
15 friend?
16 A. I refuse to answer.
17 MR. PIKE: Form.
18 Q. Did you ever think of Jeffrey Epstein as a
19 friend?
20 MR. PIKE: Form.
21 A. I refuse to answer.
22 Q. Other than the people that I've mentioned
23 of -- you know, President Pastrana and Ehud Burak and
24 Prince Andrew did you meet any other people of royalty
25 being friends with Jeffrey Epstein?
0088
1 MR. PIKE: Form.
2 A. I refuse to answer.
3 Q. Can you tell us any of the other folks that
4 Jeffrey Epstein would supply underage minor girls to?
5 MR. PIKE: Form.
6 A. I refuse to answer.
7 Q. Do you know a man by the name of Glenn Dubin?
8 A. I refuse to answer.
9 Q. Do you know his wife?
10 A. I refuse to answer.
11 Q. His wife at some point in time was associated
12 with Jeffrey Epstein; is that correct?
13 A. I refuse to answer.
14 Q. And her name's Eva Dubin; is that right?
15 A. I refuse to answer.
16 Q. Either way, isn't it true that Jeffrey Epstein
17 then started supplying underage females to Glenn Dubin?
18 MR. PIKE: Form.
19 A. I refuse to answer.
20 Q. Do you know [REDACTED]?
21 A. I refuse to answer.
22 Q. Is that somebody who also worked for Jeffrey
23 Epstein?
24 A. I refuse to answer.
25 MR. PIKE: Form.
0089
1 Q. Did Jeffrey Epstein ever get a legitimate
2 massage from somebody that's a masseuse?
3 MR. PIKE: Form.
4 A. I refuse to answer.
5 Q. The underage females that we've talked about

6 particularly, LM, EW, and Jane Doe, those girls were
7 not prostitutes, were they?
8 A. I refuse to answer.
9 Q. These were just girls who were in 8th, 9th,
10 10th grade in high school, right?
11 A. I refuse to answer.
12 Q. These were girls that you knew had never
13 committed prostitution in the past, right?
14 A. I refuse to answer.
15 Q. And that goes for all of these girls on the
16 phone list of underage minors to call, these were not
17 prostitutes, correct?
18 A. I refuse to answer.
19 Q. You never called a prostitution or escort
20 service for Jeffrey Epstein, did you?
21 MR. PIKE: Form.
22 A. I refuse to answer.
23 Q. And as well you never called a legitimate
24 massage parlor for Jeffrey Epstein, correct?
25 A. I refuse to answer.
0090
1 MR. PIKE: Form.
2 Q. He devised this scheme of having underage
3 minor girls bring him other underage minor girls so
4 that he could gain access to his target age group, 12
5 to 16 years old, correct?
6 A. I refuse to answer.
7 Q. Have you heard Jeffrey Epstein say "The
8 younger the better?"
9 A. I refuse to answer.
10 Q. And did Jeffrey Epstein tell you that it made
11 him happy the younger the girl was?
12 A. I refuse to answer.
13 MR. PIKE: Form.
14 Q. The less developed the girl is the more
15 excited Jeffrey Epstein gets; is that true?
16 MR. PIKE: Form.
17 A. I refuse to answer.
18 Q. Do you ever plan to talk to Jeffrey Epstein in
19 the future?
20 A. I refuse to answer.
21 MR. PIKE: Form.
22 Q. Would you ever work for him again?
23 A. I refuse to answer.
24 Q. Why didn't you stop working for him sooner?
25 A. I refuse to answer.
0091
1 MR. PIKE: Form.
2 Q. Did you -- well, you knew that it was illegal
3 what he was doing at the time you were doing it,
4 correct?
5 A. I refuse to answer.
6 Q. Did you know that you were part of a large
7 child molestation ring?

8 MR. PIKE: Form.
9 A. I refuse to answer.
10 Q. Did you ever tell anyone while you were
11 working for him that you wanted to stop?
12 A. I refuse to answer.
13 MR. PIKE: Form.
14 Q. Did you continue working there because you
15 were just scared to stop?
16 A. I refuse to answer.
17 MR. PIKE: Form.
18 Q. Were you in fear of what Ghislaine Maxwell or
19 Jeffrey Epstein might do to you if you quit performing
20 your services for his child molestation ring?
21 A. I refuse to answer.
22 MR. PIKE: Form.
23 Q. Did Jeffrey Epstein ever threaten you?
24 A. I refuse to answer.
25 MR. PIKE: Form.
0092
1 Q. Did Ghislaine Maxwell ever threaten you?
2 A. I refuse to answer.
3 Q. How was it decided who would call which girl?
4 A. I refuse to answer.
5 Q. And by that, just so it's clear, like I said,
6 there's going to be many, many, many message pads, I
7 have not counted them, but a lot created by either
8 yourself or someone named [REDACTED]
9 [REDACTED]
10 [REDACTED], various people that we know to have been
11 employed at Jeffrey Epstein's home. And it seems that
12 on one particular day [REDACTED] may call several girls, you
13 may call several girls, [REDACTED] may call several girls.
14 Who is directing which -- which of you, which of the
15 assistants is going to call the underage minor to give
16 them an appointment?
17 A. I refuse to answer.
18 MR. PIKE: Form.
19 Q. And what would happen on the occasions where
20 Jeffrey Epstein says he's going to be in town and then
21 he's ultimately not in town but a girl shows up anyway?
22 MR. PIKE: Form.
23 A. I refuse to answer.
24 Q. Weren't you just told just to pay her to keep
25 her happy?
0093
1 A. I refuse to answer.
2 Q. And isn't part of the whole scheme that these
3 girls were typically told "Don't tell anybody what goes
4 on inside this house," right?
5 MR. PIKE: Form.
6 A. I refuse to answer.
7 Q. And did Jeffrey Epstein tell you that because
8 these girls are young and they're poor and they're
9 underprivileged type girls they're likely not going to

10 say anything anyway? Isn't that what he told you?
11 MR. PIKE: Form.
12 A. I refuse to answer.
13 Q. Did Ghislaine Maxwell talk to you about that
14 as well?
15 A. I refuse to answer.
16 MR. PIKE: Form.
17 Q. Have you seen Jeffrey Epstein angry?
18 A. I refuse to answer.
19 Q. Isn't it true that he's very nice and engaging
20 as long as he gets his way and gets you to cooperate,
21 right?
22 A. I refuse to answer.
23 Q. But if he doesn't get his way he gets very,
24 very angry and mad and scary; isn't that true?
25 A. I refuse to answer.

0094

1 Q. And you've seen both sides of him, right?
2 A. I refuse to answer.
3 Q. In fact, you know of girls who were 13 years
4 old and cooperated with everything he said because they
5 felt they had no choice up in that bedroom, right?
6 A. I refuse to answer.
7 MR. PIKE: Form.
8 Q. And you also know girls who resisted and were
9 yelled at and told to grab their money and get out of
10 there, right?
11 A. I refuse to answer.
12 Q. Wouldn't you agree that that house upstairs
13 can be somewhat confusing in how it's -- how it's laid
14 out?
15 A. I refuse to answer.
16 Q. In fact, there's a stairwell that starts from
17 the kitchen, there's a door and it almost blends in in
18 the kitchen with the other closets, correct?
19 A. I refuse to answer.
20 MR. PIKE: Form.
21 Q. But you open that door and there's a stairway
22 that twists it seems to the left and there's another
23 door at the top of that stairway, right?
24 A. I refuse to answer.
25 Q. And then when you exit that stairway you take

0095

1 a right and you head towards a little hallway that
2 eventually leads into Mr. Epstein's bedroom, right?
3 A. I refuse to answer.
4 Q. And if it's your first time in that bedroom as
5 a 14-year-old girl and you don't like what's happened
6 up there would you agree that it's a tough way to find
7 your -- a place to find your way out of?
8 MR. PIKE: Form.
9 A. I refuse to answer.
10 Q. Did Jeffrey -- didn't Jeffrey Epstein tell you
11 that he would act as a father-type figure to these

12 girls?
13 A. I refuse to answer.
14 MR. PIKE: Form.
15 Q. And he would propose that what they are doing
16 for him or with him despite the law is okay?
17 A. I refuse to answer.
18 MR. PIKE: Form.
19 Q. And they could continue to make a lot of money
20 if they would come over and be his sex victims, right?
21 MR. PIKE: Form.
22 A. I refuse to answer.
23 Q. And you were aware when my client, LM, was
24 pregnant at 16 years old that Jeffrey Epstein bought
25 everything on her baby registry, right?
0096
1 A. I refuse to answer.
2 MR. PIKE: Form.
3 Q. Was it you or ██████████ that took all of
4 the gifts over to her home?
5 MR. PIKE: Form.
6 A. I refuse to answer.
7 Q. I believe it was ██████████ in a -- did
8 Jeffrey Epstein own a Mercedes?
9 MR. PIKE: Form.
10 A. I refuse to answer.
11 Q. And do you remember when ██████████ loaded
12 up the Mercedes with all the baby gifts and took it to
13 my client's trailer?
14 A. I refuse to answer.
15 Q. And that was so that while LM -- that was to
16 thank her while she was pregnant she continued to bring
17 him 13-, 14-, and 15-year-old girls to molest, correct?
18 MR. PIKE: Form.
19 A. I refuse to answer.
20 Q. Because LM would no longer qualify as somebody
21 he'd be sexually interacting with as she was pregnant,
22 correct?
23 MR. PIKE: Form.
24 A. I refuse to answer.
25 Q. Because the only real disqualifications for
0097
1 interacting sexually with Mr. Epstein are if you have
2 tattoos, right?
3 A. I refuse to answer.
4 Q. If you're African-American or black?
5 A. I refuse to answer.
6 Q. You've never known him to interact with an
7 African-American or black girl, have you?
8 A. I refuse to answer.
9 Q. If you've been pregnant?
10 A. I refuse to answer.
11 Q. Or if you are pregnant, correct?
12 A. I refuse to answer.
13 Q. But certainly he was not above having a

14 pregnant 16-year-old girl bringing him underage minor
15 females, correct?
16 A. I refuse to answer.
17 Q. In fact --
18 MR. PIKE: Form.
19 Q. -- it was his belief that he was doing her a
20 favor in that he was giving her money for providing a
21 service, correct?
22 MR. PIKE: Form.
23 A. I refuse to answer.
24 Q. Is it Jeffrey Epstein's belief that he did
25 these girls a favor?
0098
1 A. I refuse to answer.
2 Q. I mean, doesn't he think that these girls are
3 lucky that he ever -- that they ever -- that he ever
4 allowed them out of their trailer and into his mansion,
5 correct?
6 A. I refuse to answer.
7 MR. PIKE: Form.
8 Q. We've defined the molestation statute or at
9 least I read it to you earlier and now we've talked
10 about this scheme of Jeffrey Epstein gaining access to
11 this number of underage minor females. At the time
12 when you were working for him did you recognize him as
13 a serial child molester?
14 MR. PIKE: Form.
15 A. I refuse to answer.
16 Q. Do you know of anybody that ever worked for
17 him that quit working for him because of what he was
18 doing?
19 A. I refuse to answer.
20 MR. PIKE: Form.
21 Q. Do you know Michael Friedman?
22 A. I refuse to answer.
23 Q. Is that somebody you ever met there?
24 A. I refuse to answer.
25 Q. What countries does Jeffrey Epstein typically
0099
1 bring underage minor females from?
2 A. I refuse to answer.
3 Q. Do you know why he chooses the countries that
4 he chooses to import underage minor females from?
5 A. I refuse to answer.
6 MR. PIKE: Form.
7 Q. Was Nadia -- do you know how old [REDACTED]
8 [REDACTED] was when she came to this country?
9 A. I refuse to answer.
10 Q. Have you had conversations with [REDACTED]
11 [REDACTED] about Jeffrey Epstein bringing her to this
12 country?
13 A. I refuse to answer.
14 Q. She's been described by some as his
15 Yugoslavian lesbian sex slave. Is that something that

16 is an accurate description based on the observations
17 you have?
18 A. I refuse to answer.
19 MR. PIKE: Form.
20 Q. Did you ever engage in any lesbian sex with
21 [REDACTED]?
22 A. I refuse to answer.
23 Q. Has [REDACTED] ever had sex with Jeffrey
24 Epstein?
25 MR. PIKE: Form.
0100
1 A. I refuse to answer.
2 Q. Do you know how it is that [REDACTED] met
3 Jeffrey Epstein?
4 A. I refuse to answer.
5 Q. Do you know Story Cowles?
6 A. I refuse to answer.
7 Q. You know who Sergio Cordero is?
8 A. I refuse to answer.
9 Q. Well, that's somebody who also assists
10 Mr. Epstein in bringing him underage minor females for
11 sex, correct?
12 A. I refuse to answer.
13 MR. PIKE: Form.
14 Q. And Khalid Monroe, you know who that is?
15 A. I refuse to answer.
16 Q. Also somebody that through MC Squared or some
17 affiliation with that modeling agency would help for
18 Jeffrey Epstein to gain access to underage minor
19 females for sex, correct?
20 MR. PIKE: Form.
21 A. I refuse to answer.
22 Q. And do you know of trips that Mr. Cordero,
23 Mr. Brunel, and Mr. Epstein took to Brazil specifically
24 for the purposes of Mr. Epstein engaging in sex with
25 12-year-old girls?
0101
1 MR. PIKE: Form.
2 A. I refuse to answer.
3 Q. Are you -- you are aware that Jeffrey Epstein
4 pled guilty to two felonies related to his sexual
5 interactions, correct?
6 A. I refuse to answer.
7 Q. Okay.
8 VIDEOGRAPHER: Excuse me, counsel.
9 MR. ROSS: I object on privilege grounds --
10 attorney-client privilege grounds.
11 MR. EDWARDS: Okay, fine. I was trying to get
12 into an area we may get answers.
13 VIDEOGRAPHER: Could I just get you to put
14 your phone on the table? I'm starting to get
15 interference.
16 MR. ROSS: The phone?
17 VIDEOGRAPHER: Yes, sir.

18 MR. EDWARDS: You got a secret phone?
19 VIDEOGRAPHER: It's anytime it receives any
20 kind of information.
21 MR. ROSS: Oh, okay, yeah, it's --
22 VIDEOGRAPHER: It's not that it's ringing.
23 MR. ROSS: Right. It's not doing it now.
24 VIDEOGRAPHER: I apologize for the
25 interruption.

0102
1 Q. All right. I ask you that question because
2 there was also something called a non-prosecution
3 agreement. Are you familiar with that document?
4 A. I refuse to answer.
5 MR. ROSS: Attorney-client privilege.
6 Q. And that is also a document that included your
7 name as a co-conspirator; are you familiar with that?
8 A. I refuse to answer.
9 MR. ROSS: Attorney-client privilege.
10 Q. And that is because of your involvement with
11 calling on the telephone underage minors to bring them
12 to Jeffrey Epstein's house, correct?
13 A. I refuse to answer.
14 Q. Or for your involvement in scheduling
15 appointments in Jeffrey Epstein's appointment book for
16 underage minor -- underage minor females to be involved
17 with Jeffrey Epstein sexually, correct?
18 MR. PIKE: Form.
19 A. I refuse to answer.
20 Q. It is certainly not because you sought out
21 this child molestation ring in hopes of rising to the
22 top, correct?
23 MR. PIKE: Form.
24 A. I refuse to answer.
25 Q. Didn't you do everything that you did that
0103
1 anybody could ever say is illegal at the direction of
2 Jeffrey Epstein?
3 A. I refuse to answer.
4 Q. And if it wasn't at the direction of Jeffrey
5 Epstein it was at the direction of Ghislaine Maxwell or
6 Sarah Kellen, correct?
7 MR. PIKE: Form.
8 A. I refuse to answer.
9 Q. I mean, those things were not things that you
10 would have done but for being under the supervision of
11 Jeffrey Epstein; isn't that right?
12 MR. PIKE: Form.
13 A. I refuse to answer.
14 Q. And you continued to do these things either
15 out of fear or because you were just impressed with
16 Jeffrey Epstein's lifestyle?
17 A. I refuse to answer.
18 Q. Aren't you angry for him involving you in this
19 criminal activity?

20 A. I refuse to answer.
21 MR. PIKE: Form.
22 Q. Do you ever intend in the future to talk about
23 what he did and what he involved you in?
24 MR. PIKE: Form.
25 A. I refuse to answer.
0104
1 Q. Wouldn't you like to separate yourself being
2 the person that you are from this person who brought
3 you into this mess?
4 MR. PIKE: Form.
5 A. I refuse to answer.
6 Q. Is Jeffrey Epstein paying for your attorney
7 now?
8 MR. PIKE: Form.
9 A. I refuse to answer.
10 MR. ROSS: Well, actually you can answer.
11 A. No, my parents help me.
12 Q. Are you aware of Jeffrey Epstein's closest
13 friends now?
14 A. I refuse to answer.
15 MR. PIKE: Form.
16 Q. Who are the people that you believe are
17 Jeffrey Epstein's enemies?
18 MR. PIKE: Form.
19 A. I refuse to answer.
20 Q. Did you ever find out that Jeffrey Epstein and
21 Ghislaine Maxwell had been targeting and preying upon
22 underage females for sex for more than a decade?
23 MR. PIKE: Form.
24 A. I refuse to answer.
25 Q. Who is Jeffrey Epstein's girlfriend now, if
0105
1 you know?
2 A. I refuse to answer.
3 MR. PIKE: Form.
4 Q. Since being on house arrest has Jeffrey
5 Epstein continued to engage in sex with underage minor
6 females?
7 MR. PIKE: Form.
8 A. I refuse to answer.
9 Q. Knowing that his habit was more than -- was at
10 least two underage minor females for sex every single
11 day do you believe that he stopped?
12 MR. PIKE: Form.
13 A. I refuse to answer.
14 Q. Isn't it your belief that he will continue to
15 do that once all of these cases are over?
16 A. I refuse to answer.
17 MR. PIKE: Form.
18 Q. Isn't it true that Jeffrey Epstein believes
19 that he is entitled to have sex with whomever he wants
20 including 12-, 13-, 14-year-old girls?
21 MR. PIKE: Form.

SUBJECT TO PROTECTIVE ORDER PARAGRAPHS 7, 8, 9, 10, 15, and 17

22 A. I refuse to answer.
23 Q. Do you know whether he continues -- do you
24 know whether he intends to continue to molest underage
25 minors within the United States?

0106

1 MR. PIKE: Form.
2 A. I refuse to answer.
3 Q. Do you know Mike Sanka?
4 A. I refuse to answer.
5 Q. That's somebody else that assisted Jeffrey
6 Epstein in gaining access to underage minor females
7 that were foreigners, correct?

8 A. I refuse to answer.
9 MR. PIKE: Form.
10 Q. He's also involved in the modeling agency,
11 too, correct?

12 MR. PIKE: Form.
13 A. I refuse to answer.
14 Q. That's a friend of or former friend of Jean
15 Luc Brunel's?

16 A. I refuse to answer.
17 Q. How many times has Jean Luc Brunel shown up at
18 Jeffrey Epstein's house with underage minor females?

19 MR. PIKE: Form.
20 A. I refuse to answer.
21 Q. And when that would happen isn't it true that
22 they would have orgies with these underage minor
23 females?

24 MR. PIKE: Form.
25 A. I refuse to answer.

0107

1 Q. What was done -- or let me ask it a different
2 way. Strike that.
3 Where is the scheduling book for the massage
4 appointments for Jeffrey Epstein?

5 MR. PIKE: Form.
6 A. I refuse to answer.
7 Q. Is that something else that was removed from
8 the home prior to the search warrant being executed?

9 A. I refuse to answer.
10 MR. PIKE: Form.
11 Q. Do you know how it is that -- well, did
12 Jeffrey Epstein ever tell you that because of the
13 people he knew he would not be going to prison for the
14 crimes that he committed?

15 A. I refuse to answer.
16 MR. PIKE: Form.
17 Q. And is it your understanding that Ken Starr
18 had played a major role in devising the non-prosecution
19 agreement or having the government agree not to
20 prosecute Jeffrey Epstein for his crimes against
21 minors?

22 A. I refuse to answer.
23 MR. PIKE: Form.

24 Q. Is it also your understanding that Bill
25 Clinton played somewhat of a role in helping Jeffrey
0108 Epstein out of the trouble that he would have been in
1 related to his sexual interactions with minor females?
2
3 A. I refuse to answer.
4 MR. PIKE: Form.
5 Q. Did Jeffrey Epstein tell you that you need to
6 cooperate if you want the protection that me and my
7 connections can give you for this activity?
8 MR. PIKE: Form.
9 A. I refuse to answer.
10 Q. You admit that you called LM on the telephone
11 for her to come to Jeffrey Epstein's house to be
12 molested by Jeffrey Epstein when she was an underage
13 female?
14 A. I refuse to answer.
15 MR. PIKE: Form. Asked and answered twice.
16 Q. Do you agree that you called EW on the
17 telephone for the purposes of her coming to Jeffrey
18 Epstein's house for him to sexually molest her?
19 MR. PIKE: Same objection.
20 A. I refuse to answer.
21 Q. And do you agree that you called Jane Doe and
22 told her to come to your house to work, meaning for
23 Jeffrey Epstein to sexually molest her?
24 MR. PIKE: Asked and answered.
25 A. I refuse to answer.
0109
1 Q. The first trial that is set in these cases is
2 in July of this year. Do you intend to be in the local
3 area?
4 MR. ROSS: You can answer.
5 A. Yes.
6 Q. Okay. And what address will you be at?
7 MR. ROSS: You can answer.
8 A. [REDACTED]
9 Q. [REDACTED]
10 A. [REDACTED]
11 Q. And the ZIP is?
12 A. [REDACTED]
13 Q. And I presume that if I needed to find you or
14 locate you or anything else I could go through your
15 attorney?
16 A. Yes.
17 Q. Okay. Who do you live at that address with?
18 MR. ROSS: You can answer.
19 [REDACTED]
20 [REDACTED]
21 [REDACTED]
22 [REDACTED]
23 [REDACTED]
24 [REDACTED]
25 [REDACTED]

SUBJECT TO PROTECTIVE ORDER PARAGRAPHS 7, 8, 9, 10, 15, and 17

0110

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0112

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[REDACTED]

Q. And have you told [REDACTED] or [REDACTED] your involvement with Jeffrey Epstein?

A. I refuse to answer.

Q. Have you told your parents?

A. I refuse to answer.

Q. Are your parents in the country now?

MR. ROSS: You can answer.

A. No.

Q. Do they have plans to come back?

MR. ROSS: You can answer.

A. They may visit, I'm not sure.

Q. But on a permanent basis they're in [REDACTED]?

A. Yes.

Q. Okay. What's the address where they are in [REDACTED]?

A. [REDACTED]

Q. She's great. I'm sure she got that.

A. Would you like me to spell it out?

[REDACTED] second word,

[REDACTED] MR. EDWARDS: One way to never find a witness

is just move to [REDACTED] There's no way.

MR. ROSS: Couldn't get anyone to type the subpoena.

MR. EDWARDS: Right, exactly. All right. I don't have any other questions for you. Thank you.

THE WITNESS: Thank you.

CROSS-EXAMINATION

BY MR. MERMELSTEIN:

Q. Okay. Mrs. Ross, I have some questions for you. Your husband, [REDACTED] what does he do for a living?

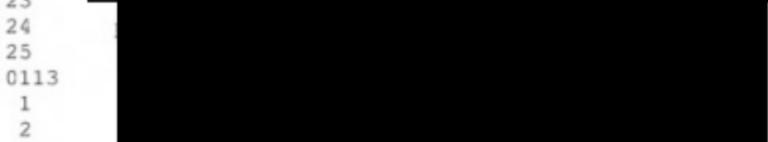
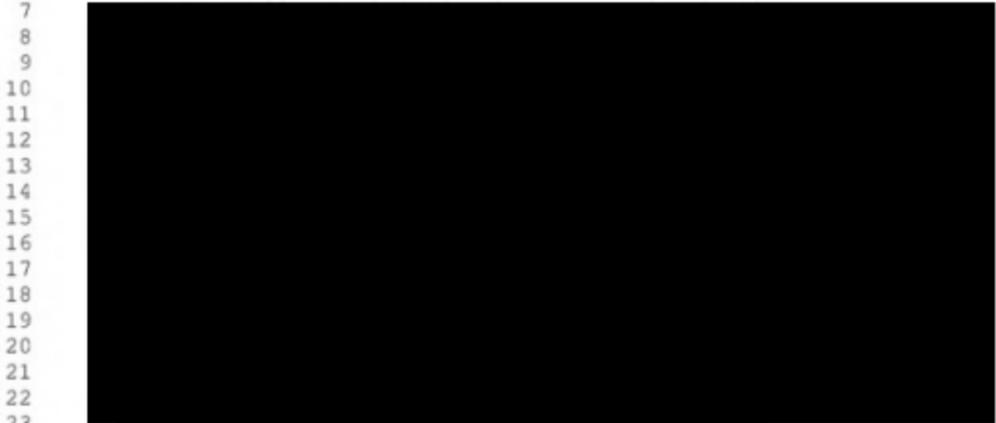
[REDACTED]

Q. And I believe you testified that you met him

in Europe, correct?

SUBJECT TO PROTECTIVE ORDER PARAGRAPHS 7, 8, 9, 10, 15, and 17

2 A. Correct.
3 Q. And did he have a different employment or
4 profession then?
5 A. Yes.
6 Q. What was he doing then?
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0113



25 Q. Did he work for MC Squared?
0114
1 A. I refuse to answer.
2 Q. In 2004 and 2005 you were employed by Jeffrey
3 Epstein, correct?

SUBJECT TO PROTECTIVE ORDER PARAGRAPHS 7, 8, 9, 10, 15, and 17

4 MR. PIKE: Form.
5 A. I refuse to answer.
6 Q. And as an employee of Jeffrey Epstein you were
7 under his instruction and supervision, correct?
8 MR. PIKE: Form.
9 A. I refuse to answer.
10 MR. PIKE: Let's go off the record for a
11 second.
12 MR. MERMELSTEIN: Sure.
13 VIDEOGRAPHER: Off the record at 12:12 p.m.
14 (Discussion off the record.)
15 MR. MERMELSTEIN: I'll be brief on the general
16 questions.
17 VIDEOGRAPHER: On the record, 12:14 p.m.
18 BY MR. MERMELSTEIN:
19 Q. And as an employee of Jeffrey Epstein were you
20 also subject to the -- to the instructions and
21 supervision of Ghislaine Maxwell?
22 MR. PIKE: Form.
23 A. I refuse to answer.
24 Q. And as an employee of Jeffrey Epstein did you
25 work under the supervision and instruction of his
0115
1 primary assistant [REDACTED]
2 MR. PIKE: Form.
3 A. I refuse to answer.
4 Q. Okay. Did Jeffrey Epstein tell you that --
5 that he recruited from western Palm Beach County
6 underage girls to come to his Palm Beach mansion for
7 sexual activity?
8 MR. PIKE: Form.
9 A. I refuse to answer.
10 Q. And did Jeffrey Epstein have a computer
11 database at his Palm Beach mansion where he listed
12 underage high school girls in Palm Beach County and
13 their contact information so that he could have these
14 underage minors come to his house for sexual activity?
15 MR. PIKE: Form.
16 A. I refuse to answer.
17 Q. And did Jeffrey Epstein tell you that the
18 reason he brought in underage minors from western Palm
19 Beach County is because he anticipated they would be
20 impressed, in awe, and intimidated by his wealth?
21 MR. PIKE: Form.
22 A. I refuse to answer.
23 Q. And as young girls who were impressed and in
24 awe and intimidated of his wealth they would do what he
25 asked them to do?
0116
1 MR. PIKE: Form.
2 A. I refuse to answer.
3 Q. And as young underage girls who were
4 impressed, intimidated, and in awe of his wealth they
5 would be unlikely to -- to complain to authorities that

6 he was engaging in sexual activity with them?
7 A. I refuse to answer.
8 MR. PIKE: Form.
9 Q. Okay. Did Jeffrey Epstein instruct you to
10 call girls on the telephone to schedule appointments
11 for them to come to his Palm Beach house for massages
12 which were, in fact, to be sexual activity?
13 MR. PIKE: Form.
14 A. I refuse to answer.
15 Q. Prior to May 2005 did you call Jane Doe 4 to
16 schedule appointments for her to come to the Epstein
17 house to engage in -- to give Jeffrey Epstein a massage
18 which would, in fact, be sexual activity with Jeffrey
19 Epstein?
20 MR. PIKE: Form.
21 A. I refuse to answer.
22 Q. Okay. Prior to May 2005 while you were at the
23 Epstein house in Palm Beach did you receive calls from
24 Jane Doe 4 regarding the scheduling of an appointment
25 for her to come to the Epstein house to give Jeffrey
0117 Epstein a massage?
1 MR. PIKE: Form.
2 A. I refuse to answer.
3 Q. When Jane Doe 7 -- let me strike that.
4 Do you know Jane Doe 7?
5 A. I refuse to answer.
6 Q. When Jane Doe 7 was a minor female did you
7 call Jane Doe 7 to schedule appointments for her to
8 come to the Epstein house in Palm Beach to give Epstein
9 a massage?
10 MR. PIKE: Form.
11 A. I refuse to answer.
12 Q. When Jane Doe 7 was a minor female did you
13 receive calls from Jane Doe 7 while you were at the
14 Epstein house for her to come to the house by
15 appointment and give Jeffrey Epstein a massage?
16 MR. PIKE: Form.
17 A. I refuse to answer.
18 Q. The computer database that Jeffrey Epstein
19 maintained girls from western Palm Beach County who
20 would come to the house in Palm Beach to give Epstein a
21 massage, did that computer database include the name
22 and contact information for Jane Doe 2?
23 MR. PIKE: Form.
24 A. I refuse to answer.
0118
1 Q. Do you know who Jane Doe 2 is?
2 A. I refuse to answer.
3 Q. Do you know who Jane Doe 5 is?
4 A. I refuse to answer.
5 Q. Did the computer database that Epstein
6 maintained on his computers in his home have the name
7 and contact information for Jane Doe 5 so that Epstein

SUBJECT TO PROTECTIVE ORDER PARAGRAPHS 7, 8, 9, 10, 15, and 17

8 could contact her for -- for massages in his Palm Beach
9 home?
10 MR. PIKE: Form.
11 A. I refuse to answer.
12 Q. Do you know the name Jane Doe 6?
13 A. I refuse to answer.
14 Q. Did the computer database that Epstein
15 maintained in his home of underage girls who he would
16 have come over for massages and sexual activity did
17 that computer database include the name and contact
18 information for Jane Doe 6?
19 A. I refuse to answer.
20 Q. Do you know the name Jane Doe 3?
21 A. I refuse to answer.
22 Q. Did the computer database that Jeffrey Epstein
23 maintained in his home include the name and contact
24 information of Jane Doe 3 so that he could contact Jane
25 Doe 3 to come to his Palm Beach home and give him a
0119 message which would become sexual activity?
1 A. I refuse to answer.
2 Q. Did the computer database that Jeffrey Epstein
3 maintained in his home include the name Jane Doe 4?
4 MR. PIKE: Form.
5 A. I refuse to answer.
6 Q. Do you know Jane Doe 4?
7 A. I refuse to answer.
8 Q. Did the -- did Jeffrey Epstein tell you that
9 he maintained the contact information for Jane Doe 4 in
10 his computer database in his home so that he could
11 contact her to come to his Palm Beach mansion for
12 massages?
13 MR. PIKE: Form.
14 A. I refuse to answer.
15 Q. Did you know for a fact that the computer
16 database included the name Jane Doe 4 so that Jeffrey
17 Epstein could contact her and she would come to the
18 Palm Beach mansion to give Jeffrey Epstein a massage?
19 MR. PIKE: Form.
20 A. I refuse to answer.
21 Q. Did you know that the computer database that
22 Jeffrey Epstein maintained his home contained the name
23 and contact information of Jane Doe 7 --
24 A. I refuse -- sorry.
25
0120 Q. I'm sorry -- so he would contact Jane Doe 7
1 and have her come to his house to give him a massage?
2 A. I refuse to answer.
3 Q. Are you aware that the computer database that
4 Jeffrey Epstein maintained in his home contained the
5 name Jane Doe 8 so that he could contact Jane Doe 8 and
6 have him come to the house in Palm Beach for purposes
7 of giving him a massage?
8 MR. PIKE: Form.
9

10 A. I refuse to answer.
11 Q. You removed three computers from the Palm
12 Beach house with another gentleman prior to the search
13 warrant being issued by the Palm Beach police; isn't
14 that correct?
15 A. I refuse to answer.
16 MR. PIKE: Form. Asked and answered.
17 Q. And Jeffrey Epstein instructed you to remove
18 those computers; is that correct?
19 MR. PIKE: Form, asked and answered.
20 A. I refuse to answer.
21 Q. And Jeffrey Epstein told you that the reason
22 he was instructing you to remove the computers was to
23 hide his sexual activities with underage minors from
24 the authorities?
25 MR. PIKE: Form.

0121
1 A. I refuse to answer.
2 Q. As an employee of Jeffrey Epstein did you know
3 Janusz Banaziak?
4 A. I refuse to answer.
5 MR. PIKE: Form.
6 Q. Was Janusz Banaziak also an employee of
7 Jeffrey Epstein?
8 MR. PIKE: Form.
9 A. I refuse to answer.
10 Q. When Janusz Banaziak testified that you and
11 another gentleman removed the three computers from
12 Jeffrey Epstein's home he was telling the truth,
13 correct?
14 A. I refuse to answer.
15 MR. PIKE: Form.
16 Q. Did you observe Jeffrey Epstein persuading,
17 inducing, or enticing underage girls to engage in
18 sexual activities with him?
19 A. I refuse to answer.
20 Q. Did you -- strike that.
21 Did you observe Jeffrey Epstein persuading,
22 inducing, or enticing girls who came to his house for
23 the purpose of giving him a massage to engage in sexual
24 activity with him?
25 MR. PIKE: Form.

0122
1 A. I refuse to answer.
2 Q. Did Jeffrey Epstein tell you that he induced,
3 persuaded, or enticed underage girls to engage in
4 sexual activities with him when they came to his Palm
5 Beach mansion to give him a massage?
6 MR. PIKE: Form.
7 A. I refuse to answer.
8 Q. Would you instruct -- when you spoke to
9 underage girls to schedule appointments for massage in
10 Epstein's home would you instruct these girls to lie
11 about their ages and say they were 18 years old when

12 you knew that they were younger than 18?
13 A. I refuse to answer.
14 Q. Did Jeffrey Epstein instruct you as to what to
15 say to the girls who you contacted by telephone to make
16 appointments to schedule massages in Epstein's home?
17 A. I refuse to answer.
18 MR. PIKE: Form.
19 Q. And would Jeffrey Epstein tell you to have the
20 girls who you contacted by the telephone to make
21 appointments to come to the mansion to give Jeffrey
22 Epstein massages, that they should -- that these girls
23 should lie about their ages to Jeffrey Epstein?
24 MR. PIKE: Form.
25 A. I refuse to answer.

0123
1 Q. Prior to May 2005 are you aware that Jeffrey
2 Epstein had numerous appointments with Jane Doe 4 for
3 her to come to the mansion to come to give him a
4 massage?
5 A. I refuse to answer.
6 MR. PIKE: Form.
7 Q. Prior to May 2005 are you aware that Jane Doe
8 4 would come to the mansion to give Jeffrey Epstein a
9 massage on a frequent and regular basis?
10 A. I refuse to answer.
11 MR. PIKE: Form.
12 Q. Are you aware that prior to May 2005 Jeffrey
13 Epstein engaged with -- engaged in sexual activities
14 with Jane Doe 4 at the Palm Beach mansion 50 to a
15 hundred times?
16 A. I refuse to answer.
17 MR. PIKE: Form.
18 Q. Did Jeffrey Epstein admit to you that on
19 numerous occasions he -- when Jane Doe 4 was an
20 underage minor he touched her breasts?
21 MR. PIKE: Form.
22 A. I refuse to answer.
23 Q. Did Jeffrey Epstein admit to you that on
24 numerous occasions when Jane Doe 4 was an underage
25 minor he touched and groped her buttocks?

0124
1 A. I refuse to answer.
2 Q. Did Jeffrey Epstein admit to you on numerous
3 occasions when Jane Doe 4 was an underage minor that he
4 rubbed Jane Doe 4's vagina?
5 A. I refuse to answer.
6 MR. PIKE: Form.
7 Q. Did Jeffrey Epstein admit to you that on
8 occasions prior to Jane Doe 4 turning the age of 18
9 that he performed oral sex on Jane Doe 4?
10 MR. PIKE: Form.
11 A. I refuse to answer.
12 Q. Did Jeffrey Epstein admit to you that on
13 numerous occasions prior to Jane Doe 4 reaching the age

14 of 18 he would place a vibrator on Jane Doe 4's
15 genitals?
16 MR. PIKE: Form.
17 A. I refuse to answer.
18 Q. Did Jeffrey Epstein admit to you that prior to
19 Jane Doe 4 becoming 18 years of age he would masturbate
20 in her presence?
21 A. I refuse to answer.
22 MR. PIKE: Form to the last question.
23 MR. MERMELSTEIN: Hum?
24 MR. PIKE: Form to the last question.
25 Q. Did Jeffrey Epstein admit to you that prior to
0125
1 Jane Doe 7 reaching the age of 18 years old he would
2 touch her breasts?
3 MR. PIKE: Form.
4 A. I refuse to answer.
5 Q. Did Jeffrey Epstein admit to you that prior to
6 Jane Doe 7 reaching the age of 18 he would grope her --
7 grope Jane Doe 7's buttocks?
8 MR. PIKE: Form.
9 A. I refuse to answer.
10 Q. And did Jeffrey Epstein admit to you that
11 prior to Jane Doe 7 reaching the age of 18 he would rub
12 Jane Doe 7's vagina?
13 A. I refuse to answer.
14 MR. PIKE: Form.
15 Q. Do you know who [REDACTED] is?
16 A. I refuse to answer.
17 Q. Did Jeffrey Epstein instruct you to call [REDACTED]
18 [REDACTED] on numerous occasions to recruit underage girls
19 to come to the Palm Beach Mansion to give Jeffrey
20 Epstein a massage?
21 MR. PIKE: Form.
22 A. I refuse to answer.
23 Q. Did Jeffrey Epstein instruct you on numerous
24 occasions to contact [REDACTED] for the purpose of
25 scheduling underage girls for appointments to come to
0126
1 the Palm Beach mansion and give Jeffrey Epstein a
2 massage?
3 A. I refuse to answer.
4 MR. PIKE: Form.
5 Q. Did Jeffrey Epstein advise you that [REDACTED]
6 [REDACTED] was his contact in western Palm Beach County
7 high schools for the purpose of recruiting underage
8 girls to come to the Palm Beach mansion where he would
9 then engage in sexual activity with them?
10 A. I refuse to answer.
11 MR. PIKE: Form.
12 Q. Did [REDACTED] instruct you on how to
13 contact underage girls for the purpose of bringing them
14 to the Palm Beach mansion for massages and what to say
15 to these young girls?

16 MR. PIKE: Form.
17 A. I refuse to answer.
18 Q. Did [REDACTED] train you in how to contact
19 girls and recruit them to come to the Palm Beach
20 mansion and -- and provide Jeffrey Epstein with
21 massages?
22 A. I refuse to answer.
23 MR. PIKE: Form.
24 Q. Was one of your primary duties scheduling
25 regular appointments, at least two per day, for Jeffrey
0127 Epstein to have underage girls come to the mansion to
1 give him a massage?
2 MR. PIKE: Asked and answered, form.
3 A. I refuse to answer.
4 MR. MERMELSTEIN: Okay. That's all I have.
5 MR. PIKE: I have no questions.
6 MR. EDWARDS: I only have a couple.
7 I'll go ahead and mark this as Number 4.
8 (Whereupon, Plaintiff's Exhibit 4 was marked
9 for identification.)
10 REDIRECT EXAMINATION
11 BY MR. EDWARDS:
12 Q. This photograph appears to be Jeffrey Epstein,
13 yourself, and Maer Roshan in this photograph taken from
14 an internet newspaper. Can you tell me where that
15 picture was taken?
16 A. I refuse to answer.
17 MR. PIKE: May I see that, counsel?
18 Q. Was this related -- this event, was it related
19 to MC Squared?
20 A. I refuse to answer.
21 Q. All right. What is -- I know that you told us
22 that you're not employed now because you're in school.
23 What was your last employment?
24 A. [REDACTED]
0128
1 Q. [REDACTED]
2 A. [REDACTED]
3 Q. [REDACTED]
4 A. [REDACTED]
5 Q. [REDACTED]
6 A. Correct.
7 Q. Where did you work prior to that?
8 A. I worked for maybe less than a month at a
9 clothing store.
10 Q. What clothing store?
11 A. [REDACTED]
12 Q. Where's that?
13 A. South Beach.
14 Q. Where in South Beach?
15 A. It's on Collins Avenue and I believe maybe 6th
16 and 8th, I'm not sure.
17 Q. Okay. Why'd you leave there?

18 A. The clothing store?
19 Q. Correct.
20 A. Because I got the [REDACTED]
21 Q. And that's what you want to be you said?
22 A. Yes, um-hum.
23 Q. Okay. And I suppose that you left the
24 [REDACTED] because you went to school to finish
25 your degree?
0129
1 A. Well, I was working part-time and going to
2 school part-time and it just became too challenging.
3 The [REDACTED] program is very demanding, so I wanted
4 to dedicate myself to study.
5 Q. How long were you at this [REDACTED]
6 [REDACTED]
7 A. Maybe two and a half years about maybe.
8 Something like that.
9 Q. All right. So we're in -- when was it that
10 you left there?
11 A. May of 2009.
12 Q. Okay. May '09, so that brings us back to late
13 2006 or something when you started there?
14 A. Yes. That would be about right, yes.
15 Q. And then it was sometime earlier than that in
16 2006 when you were at the clothing store?
17 A. Yes.
18 Q. And you were there for about a month?
19 A. About, yes.
20 Q. Give or take --
21 A. Yes.
22 Q. -- a week or so?
23 Where -- where did you work prior to the
24 clothing store [REDACTED]
25 A. I was modeling.
0130
1 Q. And where were you modeling?
2 A. In Miami. New York.
3 Q. For what agency?
4 A. In Miami I was with [REDACTED] I was with
5 [REDACTED]
6 Q. Who's that?
7 A. [REDACTED]
8 Q. [REDACTED]
9 A. [REDACTED]
10 Q. Okay. That was in Miami?
11 A. Yes.
12 Q. And then what agency did you work through in
13 New York?
14 A. [REDACTED]
15 Q. [REDACTED]
16 A. [REDACTED]
17 Q. [REDACTED]
18 A. Yes.
19 Q. [REDACTED]

20 A. Yes.
21 Q. [REDACTED]
22 who was the person that got you hooked up
23 at [REDACTED]?
24 A. My husband had that contact.
25 Q. Okay. How long did you work with [REDACTED]?
0131
1 A. I'm trying to think. I do not recall exact
2 timeframe.
3 Q. All right. Well, if the clothing store was
4 sometime late 2006 are we talking about earlier in the
5 year 2006 when you were working with [REDACTED] in Miami and
6 [REDACTED] in New York?
7 MR. ROSS: I'm going to ask you to invoke.
8 THE WITNESS: I'm sorry?
9 MR. ROSS: You should invoke with regard to
10 this timeframe you're talking about now.
11 MR. EDWARDS: Okay.
12 A. I refuse to answer.
13 Q. Okay. Can you tell me about any job that you
14 had modeling or otherwise prior to working at [REDACTED]
15 or with [REDACTED]?
16 A. Recall -- just name any --
17 Q. Any -- what was your -- what employment did
18 you have just prior to working with [REDACTED]
19 [REDACTED]?
20 A. I was working as a model in Europe. I
21 graduated from high school in 2002 and I dedicated that
22 year to modeling and so I was modeling. I did not have
23 employment.
24 Q. All right. So just so I understand you were
25 modeling in Europe, you came over here in 2002.
0132
1 A. Um-hum.
2 Q. There's a period of time from 2002 through
3 2006 where -- you know, 2006 you start with [REDACTED]
4 and again with [REDACTED]. I know when you came over here
5 in 2002 you were with [REDACTED] also, right?
6 A. I'm sorry, you're confusing me with the
7 timeframe.
8 Q. I'm confusing myself, how about that. Let's
9 start over.
10 2002 you come over to the United States,
11 you're working at [REDACTED]?
12 A. Yes, I've been invited by [REDACTED].
13 Q. Okay. And then if I understand you correctly
14 over time you continue to work with or through [REDACTED].
15 A. Well, I've been, you know, changing agencies
16 throughout the period.
17 Q. Okay. What are some of the other modeling
18 agencies you have worked for or with?
19 A. I refuse to answer.
20 Q. Okay. The only other names of modeling
21 agencies that you can answer are [REDACTED].

22 is that correct?
23 THE WITNESS: Should I?
24 MR. ROSS: Well, she's already answered also
25 [REDACTED]
0133
1 MR. EDWARDS: But I thought that was somebody
2 through Elite, like they're --
3 MR. ROSS: No, no, no, [REDACTED] is a --
4 MR. EDWARDS: Different, okay.
5 Q. All right. Is there anybody else that you're
6 able to -- to tell me where you worked?
7 MR. ROSS: Invoke as to any further
8 information.
9 THE WITNESS: I'm sorry?
10 MR. ROSS: Invoke your privilege.
11 A. I refuse to answer any questions.
12 MR. EDWARDS: All right. That's all I got.
13 MR. MERMELSTEIN: Can I just follow up a
14 couple?
15 RE-CROSS-EXAMINATION
16 BY MR. MERMELSTEIN:
17 Q. In what has been marked as Exhibit 2C is a
18 phone message from you to [REDACTED] -- from you to Jeffrey
19 Epstein dated September 10th, 2005 at 1:15 p.m.
20 And the message that you left was "[REDACTED]
21 confirmed 4 p.m.", is that correct?
22 A. I refuse to answer.
23 Q. Is the [REDACTED] referred to in this message
24 [REDACTED] ?
25 MR. PIKE: Form.
0134
1 A. I refuse to answer.
2 Q. And did you schedule [REDACTED] --
3 MR. PIKE: Form.
4 Q. -- [REDACTED] to come to the Palm Beach
5 mansion as an underage female to give Jeffrey Epstein
6 massages?
7 MR. PIKE: Form.
8 A. I refuse to answer.
9 Q. Also what has been marked as Exhibit 2F is a
10 phone message from you to Jeffrey Epstein dated
11 September 11th, 2005 at 9:15 a.m. And the message was
12 that you got a car for a particular person. Do you
13 recall that?
14 MR. PIKE: Form.
15 A. I refuse to answer.
16 Q. Is the car that you obtained on
17 September 11th, 2005 for Jane Doe 4?
18 MR. PIKE: Form.
19 A. I refuse to answer.
20 Q. And Jane Doe 4 is a girl who had been coming
21 to the Palm Beach mansion to give Jeffrey Epstein a
22 massage and engage in sexual activities with him for a
23 substantial period of time; is that correct?

24 A. I refuse to answer.
25 Q. And also what has been marked as Exhibit 2H --
0135
1 actually --
2 MR. EDWARDS: Is that G?
3 MR. MERMELSTEIN: Are they similar?
4 MR. EDWARDS: Yeah, I guess they blocked out
5 names on one of them and they didn't on the other.
6 MR. MERMELSTEIN: Right. Okay.
7 Q. And what has been marked as Exhibit 2G is a
8 message from you to Jeffrey Epstein dated
9 September 3rd, 2005 at 8:50 p.m. And the message you
10 left is, quote, "I left message for [REDACTED] to confirm
11 for 11:00 a.m. and [REDACTED] for 4:30 p.m."
12 Did you, in fact, leave that message?
13 MR. PIKE: Form.
14 A. I refuse to answer.
15 Q. And this message that you left confirmed an
16 appointment for Jane Doe 4 for 4:30 p.m., correct?
17 A. I refuse to answer.
18 MR. MERMELSTEIN: All right. That's all I
19 have.
20 MR. ROSS: Waive.
21 MR. MERMELSTEIN: All right.
22 VIDEOGRAPHER: Off the record, 12:42 p.m.
23 THE REPORTER: Are you ordering?
24 MR. EDWARDS: Yes.
25 MR. PIKE: I want a copy, a mini, no ASCII,
0136
1 and no word index.
2 MR. MERMELSTEIN: I'll take a copy with a
3 mini.
4 (The deposition was concluded at 12:42 p.m.)
5 (Reading and signing of the deposition was
6 waived by the witness and all parties.)
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CERTIFICATE OF OATH

STATE OF FLORIDA
COUNTY OF BROWARD

I, Janet L. McKinney, Registered Professional Reporter, Florida Professional Reporter, Certified LiveNote Reporter, Notary Public, State of Florida, certify that [REDACTED] ROSS personally appeared before me on March 15, 2010 and was duly sworn.

Signed this 21st day of March, 2010.

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Janet L. McKinney
Registered Professional Reporter
Florida Professional Reporter
Certified LiveNote Reporter
Notary Public, State of Florida
Commission No.: DD552183
Expires: June 2, 2010

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CERTIFICATE OF REPORTER

STATE OF FLORIDA
COUNTY OF BROWARD

I, Janet McKinney, Registered Professional Reporter, Florida Professional Reporter, Certified LiveNote Reporter, certify that I was authorized to and did stenographically report the deposition of [REDACTED] [REDACTED] pages 1 through 138; that a review of the transcript was not requested; and that the transcript is a true record of my stenographic notes.

I further certify that I not a relative, employee, attorney, or counsel of any of the parties, nor am I a relative or employee of any of the parties' attorneys or counsel connected with the action, nor am I financially interested in the action.

Dated this 21st day of March, 2010.

Janet L. McKinney, RPR, FPR, CLR
Registered Professional Reporter
Florida Professional Reporter
Certified LiveNote Reporter

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