

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

CASE NO. 08-CIV-80893 MARR/JOHNSON

JANE DOE,
Plaintiff,

vs.

JEFFREY EPSTEIN,
Defendant.


Tuesday, June 15, 2010
4:06 p.m.

SWORN STATEMENT OF 

Taken before ELAINE CRANDALL, Registered
Professional Reporter and Notary Public in and for
the State of Florida at Large, pursuant to Notice
of Taking Unsworn Statement in the above cause.

U.S. Legal Support
(305) 373-8404

1 APPEARANCES

2
3 FARMER, JAFFE, WEISSING, EDWARDS, FISTOS &
LEHRMAN4 BY: BRADLEY EDWARDS, ESQ.
425 North Andrews Avenue, Suite 2
5 Fort Lauderdale, Florida 33301-3268

6 ALSO PRESENT:

7 MICHAEL FISTEN
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1 Thereupon--

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3 was called as a witness by the Plaintiff and,
4 after having been first duly sworn, was examined
5 and testified as follows:

6

DIRECT EXAMINATION

7

BY MR. EDWARDS:

8

Q. Tell us your name.

9

A. [REDACTED].

10

Q. And just to the get to the point, you

11

know who Jeffrey Epstein is?

12

A. Yes.

13

Q. And you've met him before?

14

A. Yes.

15

Q. And you know who Jean-Luc Brunel is?

16

A. Yes.

17

Q. And you have met him before?

18

A. Yes.

19

Q. Which one did you meet first?

20

A. Jean-Luc Brunel.

21

Q. And where did you meet him?

22

A. In Miami Beach.

23

Q. When?

24

A. In 1998.

25

Q. And how?

1 A. In his office.

2 **Q. Related to what; modeling?**

3 A. Working, yeah. Modeling.

4 **Q. What, at that point in time, did you**
5 **know about Jean-Luc Brunel?**

6 A. Nothing. At that time I didn't know
7 anything.

8 **Q. So how did you meet with Jean-Luc Brunel**
9 **in his office in 1998?**

10 A. Because there was a gentleman from
11 Switzerland who wanted to make business with them.
12 And I was hired by that gentleman to look through
13 all the accounts to make sure that -- you know,
14 they were kind of in bankruptcy. But he wanted to
15 know that his money, his investment, would be
16 good. So that's why I went. Like, an external
17 audit to do -- to see what was the income, the
18 expenses and something like that.

19 **Q. Who is the guy from Switzerland?**

20 A. I'm not going to tell you his name.

21 **Q. Is that somebody who is still in touch**
22 **with Jean-Luc Brunel?**

23 A. No. Not at all.

24 **Q. What's the reason for not wanting to**
25 **disclose his name? Does he have anything to do**

1 with this case?

2 A. No. But I don't have permission. I
3 have to ask him.

4 Q. Okay. And after your meeting with
5 Jean-Luc Brunel in 1998 -- well, what company was
6 Jean-Luc Brunel with then?

7 A. [REDACTED] Models, it was, at that time.

8 Q. K-A-R-I-N?

9 A. Yes.

10 Q. And is that the only other modeling
11 agency that you have known Jean-Luc Brunel to be
12 associated with, besides MC Squared?

13 A. Yes.

14 Q. And how long was Jean-Luc with [REDACTED],
15 from 1998 through --

16 A. No, Jean-Luc was the owner of [REDACTED].
17 Before that. I think since 1986, in Paris.

18 Q. All right. And why was he no longer
19 affiliated with [REDACTED] at some point in time?

20 A. He closed -- he -- how you say -- he
21 made a dissolution. He dissolved the company.

22 Q. Were you ever hired to work with [REDACTED]?

23 A. I was hired to work with [REDACTED], yeah.

24 Q. When was that?

25 A. In 1998.

1 Q. What was your position?

2 A. At that time, bookkeeper.

3 Q. In Miami?

4 A. Yes.

5 Q. And how long did you stay as the
6 bookkeeper in Miami for [REDACTED]?

7 A. Until 2003, when they changed the
8 company to MC Squared.

9 Q. So when did the official change come
10 from [REDACTED] to MC Squared?

11 A. In 2003.

12 Q. And when is the first time you met
13 Jeffrey Epstein?

14 A. I met Jeffrey Epstein only once in my
15 life. And I believe it was in 2003. Two
16 thousand -- yeah, by the end of 2003, 2004.

17 Q. Where?

18 A. In New York.

19 Q. What was the occasion?

20 A. It was the open party for MC Squared.

21 Q. Where was that held?

22 A. In a discotheque in Manhattan.

23 Q. What discotheque?

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

25 Q. And did you meet Elaine Maxwell?

1 A. I don't know her name. But he was
2 with -- with a woman. I don't know.

3 **Q. And what is your understanding or what**
4 **was your understanding that Jeffrey -- in terms of**
5 **Jeffrey Epstein's involvement with MC Squared?**

6 A. Jean-Luc always said that Jeffrey was
7 his friend, that he is a millionaire. And that
8 Jeffrey was giving him the money to -- you know,
9 loans or whatever -- and the apartments for the
10 girls and things like that.

11 **Q. All right. Let's break that down.**
12 **Giving money for what purpose? For furthering MC**
13 **Squared?**

14 A. For -- for -- yeah, the money came to MC
15 Squared, not to -- I don't know. Prior to 2003, I
16 don't know if Jeffrey Epstein ever gave him money.
17 I know that from the longest Jean-Luc was living
18 in an apartment that belongs to Jeffrey Epstein.

19 **Q. What apartment is that?**

20 A. It's in New York. I don't know the
21 address.

22 **Q. Is that at 301 East 66th Street?**

23 A. Yeah, something like that. I think it's
24 that one.

25 **Q. And it's my understanding that Jeffrey**

1 Epstein owns or controls numerous apartments in
2 that -- at that same address; is that right?

3 A. Yes. Yes.

4 Q. And have you ever been to that address?

5 A. No.

6 Q. And how do you know that he owns or
7 controls numerous apartments at that address?

8 A. Because at that time [REDACTED] Valenzeula
9 was the office manager of the new and she was
10 dealing personally with the assistant of Jeffrey
11 Epstein. And she had to do the payments for the
12 cable and, I believe, electricity.

13 Q. And [REDACTED] -- who was the assistant of
14 Jeffrey Epstein that [REDACTED] was dealing with?

15 A. I don't know.

16 Q. [REDACTED] [REDACTED]?

17 A. I believe so.

18 Q. Do you remember that name?

19 A. Yes.

20 Q. That's somebody who no longer lives
21 here, right?

22 A. I -- I believe I heard that, yeah.

23 Q. Who did you hear that from?

24 A. [REDACTED]
25 [REDACTED]

1 **Q. Okay. And at some point in time you**
2 **came to know that the models were also staying in**
3 **these apartments at 301 East 66th Street, right?**

4 A. I don't know specifically they stay at
5 Jean-Luc's apartment. But I know that the models
6 were staying in different apartments that belong
7 to Jeffrey Epstein.

8 **Q. And what are the names of the models**
9 **that were staying there, that you remember?**

10 A. Most of them. You know, at that time,
11 when I was there who -- all the little girls.

12

13 **Q. How do you spell that?**

14 A. ██████████ I -- you know, that was in
15 2000-something. I don't recall all the names.
16 But there is a list that you can get it from the
17 office in New York.

18 **Q. A list --**

19 A. They have a list of models that they
20 were staying in those apartments.

21 **Q. If I were to request it from the office**
22 **in New York, what would I ask for?**

23 A. For the models' apartment list.
24 Chargeback for models apartments.

25 **Q. Chargeback?**

1 A. Yeah, because Jeffrey Epstein never
2 charged Jean-Luc for rent but Jean-Luc was
3 charging rent to the girls. And in her statements
4 it shows 301, 66 Apartment A, or Apartment B. And
5 he was charging them, like, a thousand dollars a
6 month.

7 **Q. How do you know that?**

8 A. Because I was doing the statements.

9 **Q. You were actually the one doing the**
10 **statements?**

11 A. Not all the time. I was in New York
12 starting 2003.

13 **Q. Through what date? You were in New York**
14 **from 2003 to --**

15 A. 2006.

16 **Q. And while you were in New York you were**
17 **working for MC Squared?**

18 A. Yes.

19 **Q. And what is the proof that you have seen**
20 **that Jeffrey Epstein was a partner or financial**
21 **supporter of MC Squared?**

22 A. I was the one who took the papers to
23 Mellon Bank.

24 **Q. That's in Miami?**

25 A. Yes. And Swetpaul (phonetic) -- I was

1 talking at the time to Rich -- I believe his name
2 was Rich Gany. That was one of the other
3 assistants of Jeffrey Epstein.

4 **Q. Gany, G-A-N-Y?**

5 A. Yeah.

6 **Q. Do they call him Eric Gany?**

7 A. That is his name, yeah, Eric Gany.

8 That's his name. I recall some things, not all
9 the time. I recall that Mr. Epstein didn't want
10 to sign the papers, but Mellon Bank didn't want to
11 accept the Line of Credit if he didn't sign. So
12 we had to return the papers to New York so he
13 actually signed the documents.

14 **Q. And what was he actually signing, that**
15 **you remember? Signing over as a Line of Credit**
16 **or --**

17 A. As a line -- as the grantor of the Line
18 of Credit. Because the Line of Credit came from
19 J. P. Morgan directly, but he was the grantor. He
20 was the one who actually was responsible.

21 **Q. And how much was the Line of Credit?**

22 A. A million dollars, it was, at that time.

23 **Q. And did you ever keep track of whether**
24 **or not that line was extended or any additional**
25 **monies were given to MC Squared?**

1 A. No, I don't know.

2 **Q. So in addition to his financial**
3 **guarantor on the Line of Credit of a million**
4 **dollars, what other involvement are you aware of**
5 **that Jeffrey Epstein had with MC Squared and/or**
6 **the apartments at 301 East 66th Street where the**
7 **models lived?**

8 A. They were planning on buying or
9 associating with a girl in -- in France for a --
10 for a company. They were planning to do a
11 company. And, actually, I gave the paper to -- to
12 Mr. Shawn Connolly, which is an actual paper that
13 came from the office from Jeffrey Epstein, that he
14 was giving instructions to Jean-Luc saying that he
15 wanted to have the same contracts as -- uh, what's
16 his name, of Donald Trump, and that he wanted to
17 have the same kind of benefits for the scouters.

18 So he was giving instructions to
19 Jean-Luc on what to do, what to -- there is a
20 woman in Paris, I don't recall her name, [REDACTED]
21 (phonetic), I believe it was, and they were --
22 they were, the three of them, trying to do a new
23 company. But then everything was, like, on zero.
24 They never -- they never did it together.

25 **Q. And do you know why?**

1 A. No.

2 Q. Would you know the lady's name in Paris
3 if I --

4 A. If you give it to me, yeah. If you give
5 me the name, I can recall.

6 Q. Okay. While I'm looking for that, how
7 many girls that were models were living in the
8 apartments at any given time at 301 East 66th
9 Street?

10 A. That's -- that's not only one apartment.
11 There are a lot of apartments there. There is not
12 only one girl. There is not only one apartment.
13 I believe there were, like, two or three
14 apartments. And they were put in between four
15 girls per apartment, I believe.

16 Q. How many apartments?

17 A. I believe there were, like, two or
18 three.

19 Q. And there is four girls per apartment?

20 A. Yeah.

21 Q. And you know that because you saw the
22 documentation at MC Squared that showed where
23 these girls were living?

24 A. Yes.

25 Q. Did you also have something to do with

1 **the visas that were prepared for the girls that**
2 **were working?**

3 A. Yes. I was providing the names to the
4 attorney. His name is Luis Font. He was doing
5 the visas here in Miami. There was another --
6 Valenzuela was handling directly the visas in New
7 York. And only when she had problems, she hired
8 another attorney. I don't know the name of the
9 attorney in New York. But Luis Font is the --
10 was, at that time, the attorney handling the visas
11 for Miami.

12 Q. Do you remember doing the visa for [REDACTED]
13 [REDACTED]?

14 A. No, that was done in New York by [REDACTED]
15 Valenzuela.

16 Q. And [REDACTED] visa, that you specifically
17 remember being done, right?

18 A. Yeah, I remember that. Because at one
19 point, I believe, one of the renovations of her
20 visa, something happened. And Mr. Epstein called
21 the office while I was there and was really upset.
22 And he spoke with Jean-Luc and they -- they were
23 really nasty with [REDACTED] and, you know, it wasn't
24 if -- it wasn't [REDACTED] fault. It was their fault
25 because they gave the wrong information. But, you

1 know, she was only an employee and that's it.

2 Q. How did [REDACTED] come into the
3 country?

4 A. By a model's visa, I believe.

5 Q. And was she brought in specifically by
6 Jeffrey Epstein or Jean-Luc or do you remember?

7 A. Mr. Epstein was paying for the visas.
8 But, you know, all the visas were done through --
9 through [REDACTED] or MC Squared. I believe she came
10 with [REDACTED] visa first, then everything
11 transferred to MC Square. And I believe those
12 visas were paid directly by Mr. Epstein.

13 Q. How old was [REDACTED] when she
14 first came?

15 A. I don't know. I wasn't in New York at
16 that time. Because I know she came prior to me
17 getting involved in New York.

18 Q. And you were involved in New York in
19 2003?

20 A. Yes.

21 Q. So she came in some time before that?

22 A. I believe so.

23 Q. But even back in 2003, she still -- I
24 don't know how old she is now. She's probably 24
25 or 25, right; do you know?

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A. No.

Q. Have you ever met her?

A. No.

**Q. Have you ever met [REDACTED]
(phonetic)?**

A. No.

**Q. You have only met Jeffrey Epstein once
in person. How many times have you talked to him
on the phone?**

A. Maybe once.

**Q. At some point in time you drove several
girls or a number of girls over to Jeffrey
Epstein's house; correct?**

A. Not me. Jean-Luc directly took them. I
was making the arrangements to get a limousine or
a car. And Jean-Luc himself was driving the girls
to his house because he was having a party and
there were supposed to be girls.

Q. Which girls did he drive over there?

A. One time I know he went with [REDACTED],
with -- uh, what's her name? Four girls from
Brazil, from the same agency. [REDACTED] is one of
them because I remember her name. The other
ones -- maybe if you --

Q. [REDACTED] [REDACTED]?

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A. No.

Q. [REDACTED]?

A. No.

Q. Do you know those two girls?

A. Yes.

Q. And were those girls somehow involved with Jean-Luc or the modeling agency?

A. Yes.

Q. They were both MC Squared models?

A. Yes.

Q. And at the time, when they began, how old were they; do you remember?

A. I believe [REDACTED] was, like, 14, 15. And [REDACTED] was 13, 14, when she came.

Q. Okay. And do you know where they are now, either one of them?

A. I know [REDACTED] is in New York.

Q. When is the last time you talked to her?

A. In 2006.

Q. How do you know she is in New York?

A. Because I saw her pictures whenever. I believe she's in New York. I don't know if she really is in New York but I believe.

Q. [REDACTED] [REDACTED]?

A. [REDACTED], the last time I saw her was in

1 2006, too. And, specifically, I don't know where
2 she is. But if she's in the United States, I
3 believe she's in New York. If not, she is in
4 Brazil or in Paris.

5 Q. All right. Do you know this person in
6 Brazil, [REDACTED]

7 A. No.

8 Q. Here is a document that we obtained
9 related to information from Jeffrey Epstein's
10 computer system. It says Massage Paris. It's in
11 a square there and it continues to the next page.
12 Tell me if you recognize any of those names.

13 A. No. [REDACTED] is one of the girls
14 that went with [REDACTED], now that I'm seeing kind of
15 names. Lila is one of the other ones. If this is
16 Lelita or [REDACTED], something like that, it's a
17 black girl that I believe she was -- she was not
18 underage but she was going out with one of
19 Jeffrey's best friends.

20 Q. Who is that?

21 A. I believe --

22 Q. Who is Jeffrey's best friend that she
23 was going out with?

24 A. I don't know. I don't know. [REDACTED],
25 something like that, is her name.

1 **Q. All right. What information do you have**
2 **about Jean-Luc being involved with underage girls**
3 **at any point in time? And by that I mean being**
4 **involved sexually with underage girls.**

5 A. One day he told me that he wishes he can
6 sleep with one of those girls that was underage.
7 And I told him that's a minor, whatever. And
8 then -- hold on, that's my son.

9 (Telephone interruption.)

10 A. He had a problem, you know. I cannot
11 say I saw them, look, because I would be lying.
12 And I'm not going to say any lie. But the only
13 thing that I can tell you that what I saw about
14 Jean-Luc is that Jean-Luc is a drug addict, a
15 cocaine addict.

16 **Q. At some point in time you actually saw**
17 **evidence of that, right?**

18 A. Yes.

19 **Q. I mean, him using cocaine that somebody**
20 **does every day?**

21 A. Yeah. He's an addict. He's used to
22 drugs, as well as, you know -- I know Mr. Epstein
23 doesn't take any alcohol, drugs. I know that. I
24 heard that.

25 **Q. How do you know?**

1 A. I heard that. I heard that. I don't
2 know, because I never met -- I never -- I was
3 never, like, around him or nothing like that. I'm
4 just telling you what I heard. But regarding
5 Jean-Luc, I know -- I know he has that kind of
6 problem, no?

7 **Q. And as long as you knew Jean-Luc, he**
8 **always had a cocaine problem?**

9 A. Yes.

10 **Q. What about Jeff Fuller?**

11 A. I know he had a cocaine problem, too.
12 He was one time on the Internet, you know, like, a
13 report on that.

14 **Q. And is Jeff Fuller somebody else who you**
15 **also knew to have been associated sexually with**
16 **underage girls?**

17 A. Jeff, I -- you know, I don't think Jeff.
18 I always thought Jeff was gay. For me, he's gay.
19 You know, that's the impression that I have. But
20 I don't think so.

21 **Q. Did you find out that Jeffrey Epstein**
22 **and/or Jean-Luc Brunel were involved in these**
23 **underage girls that were staying in these**
24 **apartments at 301 East 66th Street?**

25 A. I really don't know that. You know, I

1 cannot tell you. I know there were girls staying
2 there. I never knew if they were going there or
3 not.

4 **Q. You mean, you knew that the girls were**
5 **staying there; 13, 14, 15?**

6 A. Some of the girls were underage, yeah.

7 **Q. As well as 13, 14 or so?**

8 A. Thirteen or 14, yeah.

9 **Q. Did you ever ask any of the girls if**
10 **they were sexually involved with Jean-Luc and/or**
11 **Jeffrey Epstein?**

12 A. No. One time there was a problem with
13 [REDACTED]. And she was -- I believe she was
14 14 years old. And she tried to go -- or they took
15 her to a discotheque in Miami Beach. And when I
16 went to work the day after, they told me that the
17 police was asking. So since she was doing
18 whatever she wanted, you know, I brought her to my
19 house and I said, you're not going out at night;
20 you're only 13, 14, and that's my responsibility.

21 **Q. Do you know Sergio Cordero?**

22 A. Yes.

23 **Q. And do you know what Sergio's role was**
24 **in getting girls or something for Jeffrey Epstein?**

25 A. Yeah. That -- that is something that

1 Sergio, you know, comment with me. And he said
2 that when Jeffrey Epstein went to Ecuador,
3 Jean-Luc told me that he has to bring girls and
4 this and that, because Jeffrey was coming to
5 Ecuador. So they did such a big thing.

6 **Q. Right. But in terms of bringing girls,**
7 **specifically girls, that were very young?**

8 A. Yeah, but there was girls from Ecuador.
9 There is nothing you can do there. It's South
10 America.

11 **Q. I understand that. I'm not saying**
12 **whether it was legal or illegal. I'm just asking**
13 **you, the direction was that Jean-Luc told**
14 **Sergio --**

15 A. Not to bring girls. Never said --
16 never -- Sergio knew that they like young girls.

17 **Q. By young, what are we talking about?**

18 A. Eighteen, 19. Sergio -- you know, I
19 know Sergio. And more than anything, like, Sergio
20 is a father. And I don't think he will put his
21 hands on a ten, 11, 12, 13-year-old girl. You
22 know what I mean?

23 **Q. I'm not asking about him. Do you know**
24 **of Jeffrey Epstein being involved with underage**
25 **girls?**

1 A. I heard that, yeah.

2 Q. You heard that through whom? I don't
3 mean just the newspapers and things like that. I
4 mean --

5 A. No. Through -- through the office.
6 Through Jean-Luc. Through -- there were
7 conversations of Jean-Luc saying that, you know.

8 Q. Saying what?

9 A. That Jeffrey likes underage girls. And
10 never directly but, you know, his conversations
11 were like that.

12 Q. Okay. But, specifically, I just want to
13 know what evidence that we have, what real
14 conversations that you heard, about Jeffrey
15 Epstein liking underage girls.

16 A. I'm telling you Jean-Luc saying it from
17 his mouth.

18 Q. Okay. And, specifically, he says
19 Jeffrey Epstein likes underage girls or he likes
20 12-year-olds or likes what?

21 A. No, he likes young girls. When they
22 were talking in the office, there were a lot of
23 people. So they were not stupid. They were
24 knowing how to talk. Because they were making,
25 like, a big thing of, oh, look, he's going out

1 with Fulanita (phonetic), and we knew Fulanita was
2 only 18 years old. She is a young girl. So
3 that's the kind of girl he likes. You know what I
4 mean?

5 **Q. But there is nothing illegal going out**
6 **with an 18-year-old girl. And that's what I'm**
7 **asking.**

8 A. No.

9 **Q. What information do we have that Jeffrey**
10 **Epstein was involved with underage girls? I mean,**
11 **I have a lot of information of my own. But I'm**
12 **asking what information do you know.**

13 A. The only thing I heard in the office,
14 that Jean-Luc say it, that they like -- when they
15 say, oh, I wish I could sleep with this girl or
16 the fact that he was taking 15, 16-year-old girls
17 to his house.

18 **Q. Who?**

19 A. I know that because I saw him.

20 **Q. Jean-Luc was taking 15-year-old girls to**
21 **his own place?**

22 A. No, to Jeffrey's house.

23 **Q. To Jeffrey's house?**

24 A. Yes.

25 **Q. And what 15-year-old girls was he taking**

1 **to Jeffrey's house?**

2 A. At the time I'm telling you it was Lila,
3 [REDACTED]. I don't know remember the other two
4 girls. There is two Brazilian girls. I gave it
5 to you before, the names. I don't remember right
6 now.

7 **Q. Do you know [REDACTED]**

8 A. No.

9 **Q. Do you know Khalid Mohammed?**

10 A. Yes.

11 **Q. What did he do?**

12 A. He was a scouter and a booker.

13 **Q. Scouter; what does that mean?**

14 A. Person looking for models.

15 **Q. And how legitimate was --**

16 A. Khalid Salaam.

17 **Q. Salaam?**

18 A. Yeah.

19 **Q. Right. Where was he bringing models in**
20 **from or looking for models? Outside the country**
21 **or --**

22 A. Inside the country. Very -- not often
23 from outside the country, no, no. From inside.

24 **Q. Did you ever hear of any of the parties**
25 **that took place on Jeffrey Epstein's island?**

1 A. In --

2 **Q. Little St. James?**

3 A. One New Year's, I believe -- that was,
4 like, 2004, 2005, that New Year's -- they were
5 having a party there.

6 **Q. Who was having a party there?**

7 A. Mr. Epstein.

8 **Q. And who was at the party that you know?**

9 A. I know Jean-Luc was there. But then --
10 specifically, I don't know if Jean-Luc stay there,
11 because what I do recall is that, during those
12 days, there was, like, December 30 or 29,
13 something like that, Jean-Luc call me from Puerto
14 Rico that he was doing the scouting and he --
15 actually, he was the one who told me that he had
16 to go to Jeffrey's island because they were having
17 the party there for New Year's.

18 **Q. What other girls do you know of that**
19 **were at that party?**

20 A. I don't know.

21 **Q. Do you know of any of the other people**
22 **that were at that party?**

23 A. No.

24 **Q. Just Jean-Luc and Epstein?**

25 A. Yes.

1 Q. The last time that we talked, I have
2 just the investigative report, which basically was
3 just typed up from the things that you said. It
4 was written that Ms. Vasquez advised that she,
5 herself, submitted the documents to renew [REDACTED]
6 foreign visa on at least two occasions.

7 A. No, not me. It was [REDACTED] Valenzeula.
8 I never did her visa. That visa was done by
9 [REDACTED] in New York.

10 Q. When is the first time that you learned
11 that [REDACTED] was involved with Jeffrey
12 Epstein?

13 A. I believe in 2007. After I was out of
14 the company.

15 Q. You didn't know, when you were in the
16 company, that they were involved?

17 A. No.

18 Q. All right. At some point in time, did
19 you get in trouble, criminal trouble, related to
20 MC Squared?

21 A. They accuse me in 2006.

22 Q. Who accused you?

23 A. Jeff.

24 Q. Jeff Fuller?

25 A. Yes.

1 **Q. What did he accuse you of?**

2 A. Of stealing money. And I had a letter
3 from Jean-Luc authorizing me to get the money that
4 I had, you know.

5 **Q. And did you ultimately have to plead to**
6 **criminal charges because of that?**

7 A. That was my -- what my attorney told me.

8 **Q. Yeah?**

9 A. Yeah.

10 **Q. So now you're on probation or something?**

11 A. Yes.

12 **Q. How long does the probation last?**

13 A. They did it for 20 years. So I'm just
14 trying to reduce that.

15 **Q. Twenty-year probation?**

16 A. Yeah.

17 **Q. And other than Jeff Fuller, who else**
18 **was -- who else was making these accusations?**

19 A. Only Jeff.

20 **Q. How about Jean-Luc?**

21 A. I never -- my attorney told me that
22 Jean-Luc was never interviewed, nothing.

23 **Q. Jeffrey Epstein?**

24 A. No.

25 **Q. Have you talked to Jean-Luc about the**

1 **whole situation?**

2 A. I spoke with Jean-Luc on two or three
3 times. I spoke with Jean-Luc, like, two or three
4 times during -- prior to the middle of the
5 process, I did -- and I still have an e-mail that
6 he send me because he wanted to talk to me, I
7 wanted to talk to him. And I never made the time
8 because Jeff Fuller didn't allow him to talk to
9 me. So we never got to get together to talk.

10 **Q. And they prosecuted the case in Federal**
11 **Court here in Miami?**

12 A. Yes.

13 **Q. And your entire sentence was probation;**
14 **there was no prison or house arrest?**

15 A. House arrest one year. That, it was
16 done already. And then probation.

17 **Q. The last time, I have a lot of other**
18 **notes about some of the models that were being**
19 **brought in and signing visas, as if they were**
20 **going to work here, but really they were living in**
21 **the apartment and didn't really do any modeling**
22 **work.**

23 A. Yeah, that is true. That is true. I
24 told you that. Many, many girls were coming here.
25 Many girls were coming here first without a visa,

1 without a working visa. Most of the girls, they
2 were coming in to the States as tourists. They
3 were working -- whenever they work, they were
4 collecting 30 percent from their income when they
5 were not even legal. They didn't even have a
6 Social Security or nothing but they never pay it.
7 Neither to the government, neither to the girls,
8 you know. And within the time, I believe Jean-Luc
9 start getting pressure from Mr. Epstein that he
10 didn't want to get in trouble and he put some
11 pressure on Jean-Luc. So he wanted all the girls
12 to have a visa. So they start working on the
13 visas of the girls.

14 **Q. Okay.**

15 A. And they were making, like, contracts or
16 things like that. Because, prior to that, they
17 didn't have it. Prior to that, when Jean-Luc --
18 prior to Jean-Luc getting the money from
19 Mr. Epstein, Jean-Luc was doing whatever he
20 wanted.

21 **Q. Okay.**

22 A. And later, you know, Mr. Epstein put the
23 money that he had to start taking, you know, all
24 the invoices from Mr. Epstein.

25 **Q. Does Jeffrey Epstein know that Jean-Luc**

1 **is a coke addict?**

2 A. I don't know. I don't even know that
3 Mr. Epstein knows that Jean-Luc lied to him all
4 the time. Because when he -- when I gave the Line
5 of Credit to Jean-Luc, Jean-Luc presented false
6 statements to him. You know, Mr. Epstein wanted
7 to see that the company was a profitable company
8 and we had to hide all those numbers. And we had
9 to give him, like, positive numbers so he can see
10 that the company was making money but in belief
11 always was in red.

12 **Q. What do you mean by that? Jeffrey**
13 **Epstein said, hey, I'm going to give you money as**
14 **long as the company is positive?**

15 A. Yeah. Mr. Epstein wanted to see -- I
16 believe -- I believe, since he's a very successful
17 person moneywise, he was not stupid to put his
18 money, even though he knew he was able to get
19 girls or whatever, you know, if that was the case.
20 But deep inside he wanted to see if these people
21 really -- if this company was profitable for him
22 to put a million dollars.

23 So maybe Eric Gany, at the time, was one
24 of his advisors. And they wanted to see the
25 profit and loss statements and, you know, the

1 balance book or whatever.

2 I told you the name of the accountant
3 that you could go and took all those papers, you
4 know, make a subpoena or whatever, of Richard
5 Fernandez, that he could give you all the
6 information, 1998, '99, 2000, after 2005, that he
7 did everything and you could see the company was
8 always in red, always.

9 **Q. So the company wasn't profitable but**
10 **Jean-Luc falsified documents to show to Jeffrey**
11 **Epstein?**

12 A. Yes.

13 **Q. And have you seen the real documents and**
14 **the falsified documents?**

15 A. Yes.

16 **Q. So you know that they were falsified?**

17 A. Yes.

18 **Q. Is it your understanding that Jeffrey**
19 **Epstein is still involved, from a financial**
20 **aspect, in MC Squared?**

21 A. I believe so. Because, as far as I
22 know, the Line of Credit wasn't paid. The million
23 dollars wasn't paid.

24 **Q. And Jean-Luc and Jeffrey Epstein are**
25 **still friends?**

1 A. Yes. Jean-Luc is still living in
2 Jeffrey Epstein's apartment in New York.

3 **Q. How do you know that?**

4 A. Well, because -- because I know.

5 **Q. From [REDACTED]?**

6 A. Yes.

7 **Q. Is [REDACTED] still working for MC Squared?**

8 A. No.

9 **Q. Do you know who is working for MC
10 Squared?**

11 A. It was working until not too long ago a
12 very -- [REDACTED] goddaughter, [REDACTED], she was
13 working there.

14 **Q. How do you spell it?**

15 A. [REDACTED]

16 **Q. Okay. Anybody else?**

17 A. In Europe?

18 **Q. Yes, or here.**

19 A. No, that was related to [REDACTED]? No,

20 [REDACTED] -- [REDACTED].

21 **Q. Who works in the MC Squared office here?**

22 A. Here, I knew other things, because
23 Amanda Grant and -- I gave you her name more than
24 one time. Amanda was working with them until
25 2008. And she got a lot of information. And she

1 wanted -- you know, she call -- I arrange she call
2 Immigration, because they screw her. And,
3 actually, they made her leave the company because
4 she has -- she is a single mother, four kids. And
5 they were giving her a lot of bad -- bad time.

6 (Telephone interruption.)

7 **Q. How do you spell her name, Amanda Grand,**
8 **G-R-A-N-D?**

9 A. N-T. Amanda Grant.

10 **Q. And do you know her address, phone**
11 **number; something like that?**

12 A. I have -- you can get it in Facebook.
13 She's in Facebook. Amanda Grant.

14 **Q. Do you have it?**

15 A. Not in this phone. My other phone broke
16 so I don't. I can get it for you, if you want.

17 **Q. Yeah, I would appreciate it.**

18 A. Yeah.

19 Amanda had also the information of
20 monies, as I told you before, that took monies
21 that they were transferred to the British Virgin
22 Islands.

23 **Q. Monies transferred to the British Virgin**
24 **Islands?**

25 A. Yes.

1 **Q. From what account to what?**

2 A. Jean-Luc opened an account there because
3 Jeffrey told him that it was better to open an
4 account there. So there was money -- like, for
5 example, if the monies were going to Manuel Cruz
6 to do a shoot or something, Jean-Luc was
7 negotiating with the girls and say, okay, if you
8 go to do the sunny photos, I give you \$2,000 cash,
9 no reports, whatever.

10 So Jean-Luc had -- as billing that
11 company from another company, or from the British
12 Virgin Islands. So he was neither paying taxes
13 here and maybe he was making \$20,000 on that
14 shooting and he was giving the girl only \$2,000
15 and that money never came to be reported here.

16 **Q. Okay. Other than you saying that you**
17 **know that a 15-year-old or so went to Jean-Luc's**
18 **house with him, how else do we know that Jean-Luc**
19 **and/or Jeffrey Epstein, I'm more concerned with**
20 **Jeffrey Epstein, were involved sexually with**
21 **underage girls?**

22 A. How do I know? I -- I -- I cannot tell
23 you that I saw -- that I was there because that's
24 not true. I never saw anything.

25 **Q. Right. But sometimes you just know?**

1 A. Yeah, sometimes -- and that's -- that's
2 what I can tell you. I know because -- I can tell
3 you about Jean-Luc, that I know because I met him
4 for ten years. Okay? I can put my hands on fire
5 and I can tell you that he did it. About Jean-Luc
6 I can say it. I don't know about Mr. Epstein
7 because I was never -- I met him once in my life.
8 I saw him once in my life. And after that, when I
9 saw him, was in the newspapers; that's it.

10 **Q. And, otherwise, you just heard that**
11 **Jeffrey Epstein likes underage girls?**

12 A. Underage girls, yeah.

13 **Q. And there was a time where Sergio --**
14 **well, I've talked to Sergio, so I'll talk to him**
15 **about whatever the Ecuador trip was.**

16 A. Yes.

17 **Q. All right. Do you know of this company,**
18 **COUQ --**

19 A. No.

20 **Q. -- Foundation. All right. Do you know**
21 **of somebody by the name of [REDACTED]**

22 A. No.

23 **Q. Somebody who provided Jeffrey Epstein**
24 **girls?**

25 A. No.

1 Q. How about [REDACTED]

2 A. No.

3 Q. Never heard that name?

4 A. No.

5 Q. [REDACTED]?

6 A. I believe I heard that name. But I --

7 Q. She works up in New York and I believe

8 she works for Jeffrey Epstein in some capacity.

9 Do you know what that is?

10 A. I believe so. No.

11 Q. Okay.

12 A. The person who can tell you that is [REDACTED].

13 Because [REDACTED] was very involved with Jeffrey

14 Epstein's office.

15 Q. What is [REDACTED] number again?

16 A. [REDACTED]

17 Q. Do you know Jojo Fontanella?

18 A. No.

19 Q. No? Other than Jean-Luc, what other

20 people that are friends with Jean-Luc share this

21 interest in underage girls, that you know of?

22 A. No.

23 Q. I mean, who are his friends? Who are

24 the guys he hangs out with?

25 A. Jeff. When he was in Miami, Jeff,

1 Corrado.

2 **Q. Who is Corrado?**

3 A. A friend of Jean-Luc. An Italian guy.
4 They were always like that, Corrado and Luc. I
5 met Jean-Luc's friends in Ecuador, like people
6 that had to be -- people that they were involved
7 with modeling agencies in Europe, in South
8 America, but very different people, very different
9 people. I met some people from France. Pero,
10 really, even if they were guys or whatever,
11 gentlemen. You know, like, very proper people.
12 Like, from Brazil, too. And the womans, you know.

13 **Q. How about Simon Parra; you know who that**
14 **is?**

15 A. Simon Parra, yeah.

16 **Q. How do you know him?**

17 A. I met him through Jean-Luc.

18 **Q. And what's his story?**

19 A. Mr. Parra was a very good friend of the
20 office. I cannot say of Jean-Luc because he was
21 only a friend of him. He was a very good friend
22 of the office, because Mr. Parra is a gentleman.
23 He was lending money to the office. Whenever I
24 requested, he always gave it to me for the office.
25 You know, that I signed -- I had to sign papers

1 for him or whatever, to -- to do the payrolls or
2 whatever. But Mr. Parra is a guy that he likes to
3 be surrounded by girls. But not underage girls.

4 **Q. Okay. What was Jeffrey Epstein getting**
5 **out of MC Squared?**

6 A. The only thing that I can think he was
7 getting was the girls. Nothing else. Because he
8 has all the money.

9 **Q. And the company wasn't making money**
10 **anyway?**

11 A. No.

12 **Q. And you know the company wasn't making**
13 **money?**

14 A. It wasn't at all. At all. So the only
15 thing that he was -- I believe that he wanted to
16 get involved was because of the girls, that's it.
17 Pero, he wanted to do it legally, like, girls
18 coming here, even if they were underage or
19 whatever, with visas.

20 **Q. Because the modeling industry is one of**
21 **those industries where there is a lot of girls**
22 **underage coming in the country, right?**

23 A. Yes.

24 **Q. That's pretty easy access to underage**
25 **girls?**

1 A. Yes.

2 Q. And they come in the country and they
3 don't have their parents?

4 A. Yes.

5 Q. So they don't really have any parental
6 supervision while they're here?

7 A. Not at all.

8 Q. So the modeling industry is one that
9 some guys use that to get underage girls and
10 that's happened for a long time, really, right?

11 A. Yes.

12 Q. So is that what Jean-Luc Brunel still
13 does?

14 A. Yes.

15 Q. Still uses it to get underage girls to
16 sleep with, really, right?

17 A. Yes.

18 Q. And Jeffrey Epstein, too?

19 A. I cannot tell you that because I don't
20 know. I know if there is -- there is kind of a
21 relationship, I believe they will or he will. You
22 know, he still does it. But I don't know. I
23 cannot tell you because I was never -- I was
24 never -- what I can say that I know, because I was
25 with that person for the longest, was with

1 Jean-Luc. The same thing that I can tell you,
2 that even if he has a daughter, whatever, I put my
3 hands on fire that Jeff Fuller is gay.

4 **Q. Okay. And Jean-Luc, you saw him use**
5 **cocaine at work?**

6 A. Not in the office. But sometimes he was
7 coming to the office, like, with blood coming from
8 the nose and white things here, that he had to go,
9 oh, you go and clean yourself or whatever, you
10 know.

11 **Q. Would he talk about his cocaine**
12 **addiction?**

13 A. Not directly, but it was a box properly,
14 everyone knew about that. And he was the one --
15 the kind of person who didn't feel ashamed to
16 tell. For example, Sergio was there and I was
17 here and he was there and he was, like, Sergio, go
18 and get me the best one, you know. And Sergio was
19 going and getting it for him.

20 **Q. So he didn't really hide the fact that**
21 **he used cocaine?**

22 A. No. No. But not in the office, not in
23 front of the bookers.

24 **Q. Where is the office in New York?**

25 A. Six West 14th Street.

1 Q. And do you know what Khalid is doing
2 now?
3 A. No.
4 Q. Is he in Miami?
5 A. Yes, he's in Miami.
6 Q. Do you know his number?
7 A. No, I don't know his number.
8 Q. How about Mike Sanka?
9 A. Michael Sanka, he's in California.
10 Q. What did he do?
11 A. He represents -- he represents artists,
12 players. He is, like, a manager.
13 Q. Did he have any role in procuring
14 underage girls for anybody?
15 A. Never. No. Not at all.
16 Q. How about Arnaud Brunel?
17 A. He's Jean-Luc's brother.
18 Q. Is he here in Miami?
19 A. No.
20 Q. Where is he?
21 A. France.
22 Q. Has he ever been here in Miami?
23 A. Yes.
24 Q. When is the last time you talked to him?
25 Been a while?

1 A. 2006. No, 2003.

2 **Q. Okay. Is he close with Jean-Luc?**

3 A. No. Well, he's his brother, you know.

4 **Q. Yeah.**

5 A. There is a blood relation there. But I
6 can tell you it's, like, oil and water, two
7 different persons. Two different heads. Two
8 different mentalities.

9 **Q. Who are the people --**

10 A. A gentleman and a beast. Mr. Arnaud
11 Brunel is a gentleman, a very correct person, very
12 transparent. The other is the opposite.

13 **Q. Do you know this guy, Etienne?**

14 A. Etienne Rau. He was another partner of
15 Jean-Luc, in [REDACTED]. Another gentleman, another
16 real good person. Actually, Jean-Luc screw him
17 and he took him out from [REDACTED]. He closed
18 [REDACTED] here in Miami, without Mr. Etienne's
19 knowledge.

20 **Q. And if we talk to Etienne, he would not**
21 **have nice things to say about Jean-Luc?**

22 A. No. Not at all.

23 **Q. What about --**

24 A. Ruth.

25 **Q. Who is that?**

1 A. Ruth, the other lady in Paris. It's the
2 same thing. She will tell you everything.

3 Jean-Luc came from Paris --

4 **Q. How do you spell her name?**

5 A. I don't know her name. Her last name I
6 don't know. Her name is Ruth. R-U-T-H. Like, he
7 came from Paris. Because if he stay in Paris, he
8 had to pay taxes and this and that. Everything
9 that he was avoiding.

10 **Q. Who, Jean-Luc?**

11 A. Jean-Luc.

12 **Q. Do you know how he and Jeffrey Epstein**
13 **became friends?**

14 A. No.

15 **Q. Or why they became friends?**

16 A. No.

17 **Q. I mean, other than underage girls, what**
18 **else do those two have in common?**

19 A. That's the only thing, I believe. And
20 it's very -- you know, like, I saw Mr. Epstein
21 once in a gym, in a church, very simple. And you
22 see Jean-Luc on the same place and you see
23 Jean-Luc with a -- Prada pants and with a Gucci
24 T-shirt and with Dolce Cabana sunglasses. It's
25 like two different characters.

1 Q. And how many girls, at any one time,
2 would MC Squared have under them?

3 A. A lot. Like, over 200, 300.

4 Q. Other than the one time where four girls
5 were taken to Jeffrey Epstein's house -- and all
6 four of those girls were underage at the time,
7 right?

8 A. Yes.

9 Q. They were 14 or 15 at the time?

10 A. Yeah, 15, 16, 14; something like that.

11 Q. Other than that time, what other
12 occasion -- jog your memory, think this through --
13 have you known of Jeffrey Epstein to be in the
14 same vicinity as any of the models? Was there
15 ever a time that Jean-Luc says, hey, Jeffrey
16 Epstein is coming up to New York this weekend,
17 we're going to hang out at the apartment or
18 Jeffrey Epstein is this?

19 A. No. Never. Jean-Luc never mentioned
20 his name until 2003, when, actually, Mr. Epstein
21 got involved. To me, you know, to me. Prior to
22 that, one more time, you can talk to [REDACTED]. She
23 knew Jeffrey Epstein prior -- prior to me.

24 Q. Before you did?

25 A. Yes.

1 **Q. And she has seen him more often than you**
2 **have?**

3 A. Of course, because she was in New York
4 all the time. She live in New York and I never
5 live there. I was, like, commuting one week in
6 New York, two weeks in Miami. One week in New
7 York, two weeks in Miami.

8 **Q. Are you leaving to go to Colombia soon?**

9 A. To Peru.

10 **Q. To Peru?**

11 A. Yeah.

12 **Q. When?**

13 A. The 24th.

14 **Q. And do you know when you're going to be**
15 **back?**

16 A. The 28th.

17 **Q. All right. Like I said, I would hope**
18 **and think that this whole thing -- that your**
19 **involvement is completely done. However, there is**
20 **one case that Jeffrey Epstein has not settled**
21 **right now that could go to trial. If it went to**
22 **trial, then we could be called at trial. But it's**
23 **highly unlikely that is going to happen. I'm just**
24 **letting you know there is a possibility.**

25 ██████████, do you know who that is?

- 1 A. No.
- 2 Q. [REDACTED]?
- 3 A. No.
- 4 Q. [REDACTED]
- 5 A. No.
- 6 Q. [REDACTED]
- 7 A. No.
- 8 Q. [REDACTED]?
- 9 A. No.
- 10 Q. [REDACTED] [REDACTED]?
- 11 A. [REDACTED] [REDACTED], I know -- I didn't mention
- 12 her because I didn't remember her name. Now you
- 13 say it, [REDACTED] [REDACTED] was a girl who was working for
- 14 [REDACTED]. She was not underage but she was a young
- 15 girl. She was working for [REDACTED]. She was
- 16 studying and she was living at Jeffrey Epstein's
- 17 apartment. She was living at his place.
- 18 Q. And what was her involvement with
- 19 Jean-Luc and/or Jeffrey Epstein?
- 20 A. She was working at [REDACTED].
- 21 Q. Okay. As a model?
- 22 A. No. She was a -- an employee.
- 23 Q. She traveled on his airplane with him a
- 24 lot?
- 25 A. Yeah, because she's a personal friend of

1 Jeffrey. She was living in his place.

2 Q. Anything else about him that --

3 A. No.

4 Q. Or about her?

5 A. No.

6 Q. [REDACTED]

7 A. No.

8 Q. Any other people that you know that were
9 living in that apartment at any time?

10 A. No.

11 Q. Other than the people that you named
12 already, which are now [REDACTED], [REDACTED], [REDACTED]
13 [REDACTED], [REDACTED], [REDACTED]?

14 A. I don't think [REDACTED] lived there. [REDACTED]
15 was living in one of the models' apartment that we
16 rent. Because besides those two apartments, we
17 rent apartments in New York for the girls.

18 Q. Who decides whether the girls live in --

19 A. Jean-Luc.

20 Q. Jean-Luc decides whether the girls live
21 at 301 that's owned by Jeffrey Epstein or the
22 other apartments that are rented by MC Squared?

23 A. Yeah.

24 Q. And how does he make that determination?

25 A. He's the owner.

1 Q. Oh, but, I mean, what are the
2 qualifications? I mean, if he likes the girl or
3 they're underage or they're --

4 A. No, if there were, like, good girls,
5 girls that they could make money, they were living
6 in an expensive place. If they were, like,
7 regular girls, they were living in shitty places.

8 Q. Okay. But which one is Jeffrey
9 Epstein's place?

10 A. An expensive place.

11 Q. Okay. So the better models were living
12 there?

13 A. Yes.

14 Q. [REDACTED], do you know who that
15 is?

16 A. No.

17 Q. Did you ever meet with [REDACTED]

18 A. No.

19 Q. Did you know that she was friends with
20 Jeffrey Epstein?

21 A. No.

22 Q. Did you ever meet [REDACTED] [REDACTED]?

23 A. That's the woman that was involved with
24 Mr. Epstein, no?

25 Q. No. [REDACTED] [REDACTED] is the owner of

1 **Victoria's Secret?**

2 A. No. No. He was a writer.

3 **Q. No. He's the owner of Victoria's**
4 **Secret, The Limited, Abercrombie.**

5 A. No. No.

6 **Q. Did you ever hear anything about Jeffrey**
7 **Epstein's relationships, who he was with: Male,**
8 **female, a person's name?**

9 A. I knew, because [REDACTED] told me that he had
10 a relationship with a woman that her father was
11 very wealthy and that's how he started his own
12 money. And if you tell me the name, maybe I can
13 remember. But I don't --

14 **Q. Ghislaine Maxwell?**

15 A. Yes.

16 **Q. And her father was Robert Maxwell?**

17 A. Yes.

18 **Q. Other than that relationship, are you**
19 **aware of any other relationships of Jeffrey**
20 **Epstein?**

21 A. No.

22 **Q. How many times are you aware of Jean-Luc**
23 **bringing underage girls to Jeffrey Epstein's home**
24 **in Palm Beach?**

25 A. While I was there, when I was working

1 with them, maybe -- maybe two, three times a year.
2 The last year; you know, 2003, 2004, 2005.

3 **Q. And how would you know --**

4 A. Not prior to that.

5 **Q. How would you know that Jean-Luc was**
6 **taking underage girls to Jeffrey Epstein's house**
7 **during those years?**

8 A. Because he was saying in the office:
9 There is a party at Jeffrey's house; I'm taking
10 the girls. And the girls, that they were in town,
11 they were, like, underage girls.

12 **Q. We are still talking about 14, 15?**

13 A. Sixteen, yeah.

14 **Q. Sixteen, at the oldest?**

15 A. Yes. And they were going, the other
16 girls, too, but he -- he personally was taking the
17 little ones. Because the other ones, they could
18 go in their own cars or whatever, you know, with
19 their boyfriends.

20 **Q. Did you ever say anything to him about**
21 **taking underage girls to Jeffrey Epstein's house?**

22 A. You know, as a mother I always told him
23 that they were underage girls. And he was saying,
24 oh, that I'm the father.

25 **Q. But you knew what was going on?**

1 A. Not really. Not really. Not really
2 that -- because I would never think that they were
3 going to a party. And I didn't know Mr. Epstein
4 in that scenario, you know. I know Jean-Luc was
5 crazy or is crazy, but not stupid to be with those
6 particular girls, because these girls were coming
7 from a very good friend of him in Brazil.

8 **Q. Who is that?**

9 A. And he didn't -- I don't remember her
10 name. The mother agent of these four girls. I
11 gave it to you before. I don't remember her name.
12 It's a black woman.

13 **Q. It's not** ██████████

14 A. No. What's her name?

15 **Q. Because I have that part of the report**
16 **right here, stating that Brunel had a connection**
17 **with a young Brazilian woman but I don't have a**
18 **name for that person.**

19 A. No. He was having a connection with a
20 woman in Brazil that she was giving him
21 prostitutes when he needed it.

22 **Q. The connection woman in Brazil was**
23 **giving Jean-Luc prostitutes?**

24 A. Real prostitutes when he needed it.

25 **Q. How old were these prostitutes?**

1 A. I don't know. I don't know because I
2 was never in Brazil with him or nothing like that.

3 **Q. In Brazil?**

4 A. In Brazil. That was in Brazil.

5 **Q. Was Jeffrey Epstein involved in these --**

6 A. Jeffrey Epstein was going to Brazil
7 because he has one or two clients that they're
8 from there. So they were going, they were meeting
9 there and everything like that.

10 **Q. So you know of at least occasions where**
11 **Jeffrey Epstein and Jean-Luc were in Brazil --**

12 A. Yes.

13 **Q. -- and there was a particular person**
14 **that would provide prostitutes for them?**

15 A. Yeah, because one time I know because
16 Jean-Luc say it to me openly.

17 **Q. What did he say?**

18 A. That that woman was giving him, not
19 models; they were prostitutes.

20 **Q. In my notes it says underage**
21 **prostitutes. Is that something that --**

22 A. Yeah, maybe. They were underage girls.
23 Like, 16, 17, 18.

24 **Q. Ms. Vasquez stated, tell me if you agree**
25 **with this, that Brunel would have her prepare a**

1 list on a weekly basis that covered changing out
2 or replacing the girls staying in Epstein's
3 apartment and providing them with living expenses,
4 as well. And then it goes on, saying that he
5 charged them rent?

6 A. Yeah, yeah. He was the one who said who
7 stays in what apartment and -- actually, what he
8 said is, like, A, B, C, stays in Jeffrey's
9 apartment. So that was the order. That's it. So
10 the rest, [REDACTED] was supposed to put in whatever she
11 wanted.

12 Q. The notes indicate that you -- you were
13 talking about [REDACTED] being a Russian,
14 14 years old, that lived in Epstein's apartment?

15 A. No. I never said that.

16 Q. You weren't there then?

17 A. No. I never said that. So whoever
18 wrote that, I was never --

19 Q. This is written off typing notes because
20 obviously we didn't have a reporter to get it
21 down. So that's why I wanted to get her here so
22 that we know exactly what your story is. It would
23 make it easier.

24 A. I heard of that girl. And I remember
25 clearly that it was a problem with her visa. And

1 that's why she -- I remember there was a -- end of
2 the year and I was with [REDACTED] in New York and she
3 was, like, really upset because they were, like,
4 mistreating her because of that; the fact that
5 they were blaming her for the papers, doing it
6 incorrectly. And then [REDACTED] told me, you know, that
7 girl never work, she was never a model. She was
8 living in his place but she disappear. So she
9 actually never even worked as a model.

10 Q. [REDACTED]?

11 A. Yeah.

12 Q. And that's just something [REDACTED] knows
13 because [REDACTED] was there?

14 A. Yes.

15 Q. All right. Do you know where [REDACTED] works
16 now?

17 A. At Hope Community.

18 Q. What's that?

19 A. It's a government organization in New
20 York.

21 Q. Has she spoken with the F.B.I.?

22 A. I don't know.

23 Q. Have you been contacted by the F.B.I. or
24 any government agency related to Jeffrey Epstein?

25 A. F.B.I.?

1 Q. The F.B.I.

2 A. Yes.

3 Q. When was that?

4 A. In 2008.

5 Q. 2008?

6 A. Yes.

7 Q. And where did you meet with them?

8 A. In my office at the Four Ambassadors.

9 Q. At the Four Ambassadors. That's where
10 Sergio is, too, right?

11 A. Yeah.

12 Q. So do you still see Sergio?

13 A. I spoke with him sometimes; once in a
14 while.

15 Q. Did Sergio have to speak with the
16 F.B.I., as well?

17 A. I don't know.

18 Q. Do you know of anybody else that spoke
19 with the F.B.I. about Jeffrey Epstein?

20 A. I don't know. I don't think Eva spoke
21 with him -- with them. I don't know.

22 Q. And what did you tell the F.B.I.?

23 A. I told them everything that I -- the
24 same thing that I knew. At that time I even had
25 maybe more information. I gave everything from

1 Amanda and everything like that. But the lady --

2 Q. [REDACTED]?

3 A. Yeah, [REDACTED]. That was her name. She
4 was, like -- I told her, you have to go -- go to
5 Immigration. I say, go visit over there. And
6 when I call her once she told me: You know what?
7 I need -- I need fact. I need proof, I need
8 girls.

9 I say, well, I'm giving you the tools
10 that I have. There is nothing else that I can --
11 I cannot create something because I don't create a
12 story. I tell you what it is. This is the fact.
13 You go and you can use this to also do something
14 else. But if your point is, you know, minor
15 accusations, like underage girls being with him in
16 the bed, I'm not going to say anything because I
17 don't know. I wasn't there. I don't know. What
18 I heard, my ears heard, you heard, she heard,
19 whatever.

20 Q. From Jean-Luc is the only person you
21 heard it?

22 A. Yeah.

23 Q. Or [REDACTED]?

24 A. Yes. That's it.

25 Q. Who probably heard it from Jean-Luc?

1 A. And who probably heard it from Jeffrey's
2 office. I don't know.

3 **Q. Okay. But in terms of things that**
4 **happened at Jeffrey Epstein's house or homes**
5 **around the country, you don't know?**

6 A. Nothing. We have never been involved
7 with that gentleman or his own things. Never.

8 **Q. It was only a relationship with**
9 **Jean-Luc?**

10 A. For the office. That started 2003.
11 That's when he -- that's when he actually gets
12 involved.

13 MR. EDWARDS: All right. I believe
14 I'm done. Hold on a second.

15 BY MR. EDWARDS:

16 **Q. When Jeffrey Epstein was in jail, did**
17 **you know of Jean-Luc going to see him regularly?**

18 A. No.

19 **Q. Did you even know that he went to jail?**

20 A. Yeah.

21 **Q. I mean, at some point in time, but while**
22 **he was in jail, did you know for any other reason**
23 **other than newspapers that he was there?**

24 A. No.

25 **Q. Have you ever heard of this guy, Joe**

1 **Pagano (phonetic)?**

2 A. No.

3 **Q. Larry Vasasky (phonetic), do you know**
4 **the pilot?**

5 A. No. With his personal things, we
6 never -- as far as I know, me personally, never.

7 **Q. Yeah, no, I'm only asking you about**
8 **people who were on flights with Jeffrey Epstein**
9 **and Jean-Luc. So that's why I was thinking that**
10 **maybe Jean-Luc would say who was on that flight.**

11 A. No, because I know one time I know he
12 came in his plane and he forgot Gucci pants in his
13 airplane. So we had to go to the airport to pick
14 up the pants. But I had to wait outside and
15 somebody went inside to pick up the pants.

16 **Q. [REDACTED] (phonetic); do you**
17 **know who that is?**

18 A. No.

19 **Q. Was there a Colombian girl, 13 years**
20 **old, approximately, being protected by Jean-Luc?**

21 A. Colombian girl?

22 **Q. That's all the information that I have.**
23 **No?**

24 A. No.

25 **Q. Who else would process the visas for the**

1 **underage girls?**

2 A. At that time, it was Evelyn Valenzuela
3 in New York. And whenever she was not able to do
4 it, she hired an attorney. I don't know the name
5 of the attorney in New York. And in Miami the
6 person who was doing everything for visas was Luis
7 Font.

8 **Q. Who are the people that -- that are --**
9 **you know most of Jean-Luc's friends. Who are the**
10 **people who dislike Jean-Luc? Who are the people**
11 **we should talk to about they know him, they're**
12 **familiar with him, but they're going to tell us --**

13 A. Talk to Khalid.

14 **Q. Khalid?**

15 A. Yeah, talk to Khalid. Talk to Amanda.

16 **Q. You don't know how to track Khalid down**
17 **right now?**

18 A. Amanda can give you the information of
19 Khalid.

20 **Q. Amanda Grant?**

21 A. Yes. And I'm going to give you a
22 letter -- I'll send you an e-mail of Amanda's
23 telephone number. I go into my Facebook and I ask
24 her.

25 **Q. Okay.**

1 A. And who else? Who else? Talk to Elit.
2 There is -- there is a lot of people in New York.
3 But you ask [REDACTED]. Ask [REDACTED]. She can give you the
4 names. I don't know the names exactly. I gave
5 Conchita a name. And I thought that this woman
6 was really upset with him. But when she call her,
7 it was, like, the girl was talking too much
8 flowers about him. So it's, you know --

9 **Q. So you never know?**

10 A. Yeah. You never know. That is true.
11 You never know. Five thousand dollars in Brazil
12 is a lot of money. You know, you can buy a house.

13 **Q. So you can also buy somebody to be**
14 **quiet?**

15 A. Money talks. That's what they doing all
16 the time.

17 **Q. Do you know of Epstein paying anybody**
18 **off during this whole litigation?**

19 A. If I know, I don't know. But I can say
20 that, yes, because if it wasn't Jeffrey Epstein,
21 if it would be Juan Perez, believe me, Juan Perez
22 would be put in jail forever and ever.

23 **Q. Who?**

24 A. I'm giving you a name.

25 **Q. Oh, right. Right.**

1 A. Because he's Jeffrey Epstein and he has
2 all the money he has, he could shut up everybody.
3 But if it would have been Juan Perez in the same
4 situation, Juan Perez would be right now all his
5 life in jail.

6 **Q. But do you know of any people that**
7 **Jeffrey Epstein had paid during the civil**
8 **litigation --**

9 A. I don't know.

10 **Q. -- to not talk or to go away?**

11 A. I don't know.

12 **Q. Or -- I mean, I'm sort of surprised that**
13 **we haven't heard more from the models who were in**
14 **New York, didn't make it as models and were only**
15 **up there in the apartments for Jeffrey Epstein or**
16 **Jean-Luc.**

17 A. Because not all the models, even if they
18 are underage, they agree to do whatever they want.
19 You know, like, in my case, I was -- when I was
20 with the girls and I was talking to the girls, I
21 always said, you know, like, you are going to do a
22 job. You're not being hired to do nothing else.
23 You work for nine to five. Even if you go to do a
24 three-day in San Francisco and the owner of this
25 company wants to ask you something, it's up to

1 you. You're hired to do your job. After that, we
2 have no control.

3 You know, they were -- there were girls
4 that they were going to do jobs of 100,000,
5 \$200,000. And they were coming, they're real
6 upset, that they never wanted to work again with
7 those people, even though they were paying.
8 Because they were, like, molesting. No way; I'm
9 here to work. That's it.

10 **Q. Who were those people?**

11 A. For example, there is a girl, a
12 Brazilian girl, what's her name? [REDACTED]
13 [REDACTED] She did a job in San Francisco. And
14 the guy wanted to --

15 **Q. Do you know her last name?**

16 A. No. No. I don't remember. And the guy
17 wanted to take her out in his yacht. And she
18 said, no, I'm going back to my hotel. I'm here to
19 do my shooting from nine to five and that's it.
20 And the guy didn't want to shoot her that next day
21 and he return her in a private plane. But we had
22 to find for her money because she had a three-day
23 shooting for \$15,000 for each day or \$20,000 each
24 day. And because she didn't want to go with him
25 in the boat, he didn't want to have her anymore.

1 But my contract was for three days. That's not my
2 problem.

3 **Q. Who were some of the other people that**
4 **you found out later were trying to molest the**
5 **girls?**

6 A. No; I found out because I had a very
7 good relation with [REDACTED]. [REDACTED] called to
8 complain and she want all her money. If not, we
9 are suing them. So I had to call them: You know,
10 either you pay or we sue you for this. So they
11 pay.

12 But with the other girls, I would always
13 say, you are going to do this job, we're
14 responsible to pay you for the job. Whatever you
15 want to do after is not our concern. That is up
16 to you. You're already old enough to do what
17 you're going to do. So that's why I believe most
18 of the models are not saying anything because what
19 they going to do? You know, like, they were not
20 stupid.

21 **Q. I'm more concerned with the girls who**
22 **were staying at the 301 East 66th Street**
23 **apartments.**

24 A. You can get all that information from
25 [REDACTED]. [REDACTED] has all of that. Because [REDACTED] was

1 actually the one who was buying everything for
2 that place and things like that. She -- you know,
3 if she has all that information, she will give it
4 to you.

5 **Q. She would have the first and last names?**

6 A. Everything.

7 **Q. And lists and everything?**

8 A. Everything.

9 **Q. Okay. So she seems like the right**
10 **person to talk to?**

11 A. Yes. You know, [REDACTED] will give you
12 details on everything that has to be with New
13 York. Everything related to New York, [REDACTED] will
14 give it to you.

15 **Q. Other than that, your recommendation is**
16 **to talk to Khalid?**

17 A. Talk to Khalid. Talk to Amanda.

18 **Q. Amanda Grant?**

19 A. Amanda will tell you a lot of things.

20 **Q. And she is here?**

21 A. She's in Miami. Yeah, she's in Miami.

22 **Q. If I find [REDACTED], will she**
23 **talk?**

24 A. You can try.

25 **Q. I mean, she is obviously someone who**

1 **knows, right?**

2 A. Yeah, you can try.

3 **Q. I mean, you know her as a person.**

4 A. Yes.

5 **Q. So is she somebody who seems like**
6 **would --**

7 A. If you start saying that she can make a
8 lot of money, she will talk. That's it. That's
9 the only way you're going to get what you want.

10 **Q. That's the only reason why anybody is**
11 **going to talk?**

12 A. Yeah. You have to start -- if you don't
13 start with that, nobody is going to open their
14 mouth. Why? For what? They have to know that if
15 they're going to open their mouth, they're going
16 to get something for their words. If everybody
17 start knowing that they will be able to make
18 money, you're not going to have one; you're going
19 to have hundreds. You know, if -- if -- talk to
20 **█**. Ask **█**. And, you know, give me a call
21 later. And if you want, give you the name of
22 people in Brazil that you're going to call and
23 start -- if you start saying, look, if you
24 cooperate and you tell me everything you know
25 because, you know, you will be able to make

1 \$50 million, \$20 million, how much you want, let's
2 find it. If they don't get anything like that,
3 they're not going to do anything. They're not
4 going to move a pencil. Because he goes with
5 \$5,000 and they're happy.

6 **Q. Right.**

7 A. They're happy.

8 **Q. Do you know of that happening already?**

9 A. Yeah. I can say with -- with this
10 woman, that is probably with [REDACTED] That woman
11 hate him.

12 **Q. Hates Jeff Epstein?**

13 A. No, Jean-Luc. And now she's, like, the
14 best friend. Jean-Luc never pay her \$50,000 he
15 owe her. And maybe, finally, he pay it and
16 whatever, and now he has her in his pocket.

17 **Q. Who else does Jean-Luc stay with when**
18 **he's here?**

19 A. I don't know -- he doesn't stay anymore
20 in his apartment. He has a house now. He rents a
21 house. So I know --

22 **Q. In New York?**

23 A. No, in Miami. In New York, he's still
24 in the place of Jeffrey Epstein.

25 **Q. Oh, okay. And down here he stays --**

1 A. He used to live in 1100 West Avenue in
2 the penthouse. Not anymore.

3 **Q. Other than Jeff Fuller, that's the only**
4 **real friend here?**

5 A. Other than Jeff Fuller. Jeff Fuller is
6 his partner. You know, Corrado is another friend
7 of him but I don't know his last name. He lives
8 here in Miami.

9 **Q. How do you spell the first name?**

10 A. C-O-R-R-A-D-O. He's an Italian guy.
11 That's another person he is very close, very
12 close, friend of Jean-Luc since Europe. But if
13 you don't go to him saying about the money,
14 Corrado is not going to talk. And if you talk to
15 Corrado about money, believe me, you're not going
16 to have one; you're going to have 20 names and
17 you're going to have 20 cases.

18 Pero, if you don't go with your tool,
19 which is going to be, okay, we can make money, we
20 can do this, we can do that, they're not going
21 to -- they're not go to sell his friend because
22 they go out with him. Because when they go out
23 with Jean-Luc, Jean-Luc pays for the bills,
24 Jean-Luc pays for the gas, Jean-Luc pays for the
25 vacation, Jean-Luc pays for this and that; even if

1 he doesn't have any money to pay his payroll.

2 **Q. How much time does Jean-Luc spend in**
3 **France?**

4 A. Very little. Very little. He's
5 traveling all over the world. He's traveling all
6 over the world.

7 **Q. And does he have money problems?**

8 A. Yeah. He doesn't have any money.

9 **Q. He doesn't?**

10 A. Jean-Luc doesn't have any money.

11 **Q. Where does he get the money from, then?**

12 A. From the company. First you have to pay
13 Jean-Luc's credit cards and expenses before you
14 pay anybody else.

15 **Q. That's the rules?**

16 A. Yeah. He's -- his American Express
17 comes for \$50,000. Of course, maybe 20 are
18 tickets for the models, that they going to be
19 reimbursed by the client, but 30,000 are his
20 expenses. And he says, no, that's scouting. So
21 we have to pay for that.

22 **Q. Okay. Who are the other scouts for MC**
23 **Squared?**

24 A. Khalid was one. Jeff Fuller is another
25 one. There is another woman, [REDACTED] What's

1 her name? Something like that, is her name. I
2 don't recall her name. She does the scouting,
3 too.

4 **Q. Okay.**

5 A. In New York he had another scouter. A
6 Jewish guy. But now he has the office of MC
7 Squared in Tel Aviv. You can talk to him, too. I
8 don't recall his name. But it's in the Web page
9 of MC Squared.

10 **Q. Okay. Yeah, but he's Jean-Luc's friend,**
11 **right?**

12 A. Yeah, but money talks.

13 **Q. Are there any of the other modeling**
14 **agencies that are not friendly with MC Squared?**
15 **Such as Ford Modeling Agency; is that someone?**

16 A. There is a guy in New York that you have
17 to talk to.

18 **Q. Who is that?**

19 A. Uh, what his name? What his name?
20 Jean-Luc sue him and then he sue him and he won,
21 because Jean-Luc never paid two girls. And he was
22 the -- the general manager of New York. And he
23 opened his own agency and he did much better than
24 Jean-Luc.

25 **Q. Do you remember the name of the agency?**

1 A. It's one -- can be One Model.

2 **Q. One?**

3 A. Yeah. It's Scott. That's his name,
4 Scott and One Management. If there is a person
5 that is going to talk everything for Jean-Luc,
6 it's going to be him.

7 **Q. And have you seen pictures of Jean-Luc**
8 **and underage girls in any other context other than**
9 **at model shoots, parties or whatever?**

10 A. Parties, yeah. There were pictures. He
11 has pictures in his Facebook with the girls,
12 hugging the girls or whatever.

13 **Q. Right. Any with Jeffrey Epstein?**

14 A. No. I don't think so.

15 **Q. Have you ever seen any pictures with**
16 **Jeffrey Epstein and the models?**

17 A. The ones that he took at the party.

18 **Q. Do you know where those are?**

19 A. No. In Jean-Luc's computer.

20 **Q. Okay. Has Jean-Luc ever talked about**
21 **any of the cases involving Jeffrey Epstein?**

22 A. Never.

23 **Q. To you or anybody else that you know?**

24 A. No, not that I know.

25 MR. EDWARDS: All right. I'm going

1 to be in touch, maybe with the trial
2 subpoena. Hopefully we can just tell
3 you that it's off, if things are off.
4 If it's on, then I'll let you know. But
5 you can just call my office and I'll
6 tell you.

7 THE WITNESS: Okay. But I'm going
8 to call you --

9 MR. EDWARDS: All of the Federal
10 trial subpoenas tell you that you have
11 to be there on that day. But you can
12 just call me and I'll tell you whether
13 you really have to be there or you
14 don't.

15 THE WITNESS: This is July 19.

16 MR. EDWARDS: Right.

17 THE WITNESS: This is for which
18 one?

19 MR. EDWARDS: It's just one of the
20 very many Jane Does.

21 THE WITNESS: And this is another
22 subpoena?

23 MR. EDWARDS: It's for trial.

24 MR. FISTEN: It's just for trial.

25 (Thereupon, the Sworn Statement was

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concluded at 5:23 p.m.)

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CERTIFICATE OF OATH

STATE OF FLORIDA)
COUNTY OF MIAMI-DADE)

I, the undersigned authority, certify that
[REDACTED] personally appeared before me and
was duly sworn.

WITNESS my hand and official seal this 24th
day of June, 2010.

ELAINE CRANDALL
Notary Public - State of Florida
My Commission No. DD710458
Expires: December 28, 2011

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4 CERTIFICATE OF REPORTER5 STATE OF FLORIDA :
6 : SS.
7 COUNTY OF MIAMI-DADE :8 I, ELAINE CRANDALL, Registered Professional
9 Reporter and Notary Public in and for the State of
10 Florida at Large, do hereby certify that I
11 reported the Sworn Statement of [REDACTED], a
12 witness called in the above-styled cause; and that
13 the foregoing pages, numbered from 1 to 74,
14 inclusive, constitute a true and correct
15 transcription of my shorthand report of the
16 deposition by said witness.17 I further certify that I am not an attorney
18 or counsel of any of the parties, nor a relative
19 or employee of any attorney or counsel connected
20 with the action, nor financially interested in the
21 action.22 WITNESS my hand and official seal in the City
23 of Miami, County of Miami-Dade, State of Florida,
24 this 24th day of June, 2010.
25_____
21 ELAINE CRANDALL, R.P.R.

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