

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

CASE NO. 08-CV-80893-CIV-MARRA/JOHNSON

JANE DOE,

Plaintiff,

vs.

JEFFREY EPSTEIN, et al.,

Defendants.

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Related Cases:

08-80119, 08-80232, 08-80380, 08-80381,  
08-80994, 08-80811, 08-80893, 09-80469,  
09-8-591, 09-80656, 09-80802, 09-81092

VIDEOTAPED DEPOSITION OF [REDACTED]  
TAKEN ON BEHALF OF THE PLAINTIFF

DATE: April 13, 2010

2

1 April 13, 2010

2 INDEX

3 WITNESS DIRECT CROSS REDIRECT RECROSS

4 [REDACTED] [REDACTED]

5 BY MR. EDWARDS 5 98

6 BY MR. HOROWITZ 65

7 BY MR. LANGINO 77

8 BY MS. EZELL 81

9

10 EXHIBITS

11 PLAINTIFFS

12 FOR IDENTIFICATION PAGE

13 1 Message dated August 21, 2005. 45

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1 APPEARANCES (CONTINUED)

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BY: JACK A. GOLDBERGER, ESQ.

ALSO PRESENT:  
JESSICA CADWELL  
JOE ROVNER, Videographer  
(U.S. Legal)

3

1 The videotaped deposition of [REDACTED]

2 [REDACTED] in the above-entitled and numbered

3 cause, was taken before me, TERRI BECKER, a

4 Registered Professional Reporter and Notary

5 Public for the State of Florida at Large, at 444

6 West Railroad Avenue, in the City of West Palm

7 Beach, Palm Beach County, in the State of

8 Florida, beginning at the hour of 10:00 o'clock

9 a.m., pursuant to the Notice in said cause for

10 the taking of said deposition which is annexed to

11 the court file herein, on behalf of the PLAINTIFF

12 in the above-entitled action pending in the

13 above-named court.

14 The appearances at said time and place

15 were as follows:

16 FARMER, JAFFE, WEISSING, EDWARDS,

17 FISTOS & LEHRMAN, PL

18 Attorneys for Plaintiffs Jane Does,

19 L.N. and E.W.

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24 BY: BRADLEY J. EDWARDS, ESQ.

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5

1 THEREUPON,

2 [REDACTED]

3 being by Terri Becker first duly sworn to tell

4 the whole truth, as hereinafter certified,

5 testified as follows:

6 DIRECT EXAMINATION

7 BY MR. EDWARDS:

8 Q Can you tell us your name.

9 A [REDACTED]

10 Q What is your date of birth?

11 A February 21, 1985.

12 Q What is your Social Security number?

13 A Under advice of my counsel, I invoke my

14 privileges under the Fifth and Sixth Amendments

15 to the United States Constitution and

16 respectfully decline to answer the question.

17 Q Where were you born?

18 A I'm sorry, though I would like to answer

19 your question, I must invoke my Fifth and Sixth

20 Amendment privileges and refuse to answer your

21 questions.

22 Q What is your current address?

23 MR. GOLDBERGER: There is going to be a

24 continued, obviously, you anticipate I'm

25 sure, continued invocation of Fifth

6

1 Amendment privileges. If it is okay with  
2 all counsel, to shorten things, I'll simply  
3 have the witness say "Fifth," if that  
4 satisfies everyone's interest.  
5 MR. EDWARDS: That is fine with me.  
6 MR. GOLDBERGER: Okay, with that Cathy?  
7 MS. EZELL: Yes.  
8 MR. HOROWITZ: Yes.  
9 Q I'll reask the question, what's your  
10 current address?  
11 A Fifth.  
12 Q Are you currently living at 358 El  
13 Brillo Way with a man named Jeffrey Epstein?  
14 A The Fifth.  
15 Q Are you also familiar with an address in  
16 New York, 301 East 66th Street?  
17 A The Fifth.  
18 Q When Mr. Epstein was incarcerated in  
19 jail, you went to visit him on numerous  
20 occasions; is that correct?  
21 MR. YAREMA: Objection.  
22 A The Fifth.  
23 Q When you went to visit him you indicated  
24 to jail personnel your address was 301 East 66th  
25 Street, apartment 8-D in New York City, New York;

7

1 is that correct?  
2 MR. YAREMA: Objection.  
3 A Fifth.  
4 Q Isn't it true when Mr. Epstein was in  
5 jail, you visited him on more than 50 occasions?  
6 MR. YAREMA: Form objection.  
7 Q True?  
8 A The Fifth.  
9 Q How long have you been in the United  
10 States, Ms. [REDACTED]?  
11 A The Fifth.  
12 Q Who brought you to the United States?  
13 MR. YAREMA: Form objection.  
14 A The Fifth.  
15 Q What is your current status in this  
16 country?  
17 A The Fifth.  
18 MR. YAREMA: Form objection.  
19 MR. GOLDBERGER: Let me take a half a  
20 second.  
21 (Witness and her counsel confer.)  
22 Q Are you a U.S. citizen?  
23 A The Fifth.  
24 Q What type of visa are you here on?  
25 MR. YAREMA: Form objection.

8

1 A The Fifth.  
2 Q Do you know a lady by the name of  
3 Maritsa Vazques?  
4 A The Fifth.  
5 Q Is this somebody who helped to falsify a  
6 visa for you?  
7 MR. YAREMA: Object to the form.  
8 A The Fifth.  
9 Q Do you know Evelyn Velasques?  
10 A The Fifth.  
11 Q Were you ever a working model in the  
12 United States?  
13 A The Fifth.  
14 Q Can you tell us your parents' names?  
15 A The Fifth.  
16 Q How is it that you have supported  
17 yourself financially, since you have been in this  
18 country?  
19 MR. YAREMA: Object to the form.  
20 A The Fifth.  
21 Q Have you supported yourself financially?  
22 A The Fifth.  
23 Q What is the last grade you completed in  
24 school?  
25 A The Fifth, I take the Fifth Amendment.

9

1 Q Are you in school now?  
2 A The Fifth.  
3 Q Have you ever attended any school in the  
4 United States?  
5 A The Fifth.  
6 Q Have you ever been employed since  
7 residing in the United States?  
8 A The Fifth.  
9 Q Is Jeffrey Epstein your sole means of  
10 financial support today?  
11 MR. YAREMA: Object to the form.  
12 A The Fifth.  
13 Q Since coming to this country, hasn't  
14 Jeffrey Epstein always been your sole means of  
15 financial support?  
16 MR. YAREMA: Object to the form.  
17 A The Fifth.  
18 Q How much does Jeffrey Epstein pay you  
19 today?  
20 MR. YAREMA: Object to the form.  
21 A The Fifth.  
22 Q What does every Epstein pay you for?  
23 MR. YAREMA: Object to the form.  
24 A The Fifth.  
25 Q Does he pay you specifically to be his

10

1 sex slave?  
2 MR. YAREMA: Object to the form.  
3 A The Fifth.  
4 Q Are you aware that the reports about you  
5 indicate that you were brought to the United  
6 States by Jeffrey Epstein when you were roughly  
7 13 or 14 years old to be his Yugoslavian lesbian  
8 sex slave?  
9 MR. YAREMA: Object to the form.  
10 A The Fifth.  
11 Q Is that true?  
12 MR. YAREMA: Object to the form.  
13 A The Fifth.  
14 Q Have you performed any services for  
15 Jeffrey Epstein aside from being his sex slave?  
16 MR. YAREMA: Object to the form.  
17 A The Fifth.  
18 Q What is your sexual orientation?  
19 MR. YAREMA: Object to the form.  
20 MR. GOLDBERGER: I'm going to instruct  
21 the witness not to answer that question. It  
22 serves no purpose other than to harass or  
23 intimidate her, so in addition to Fifth  
24 Amendment privileges, I'm objecting on  
25 privacy grounds.

11

1 A I take the Fifth.  
2 Q I represent a lady named, a young female  
3 named E.W.; you know who that is, right?  
4 MR. YAREMA: Object to the form.  
5 A The Fifth.  
6 Q Jeffrey Epstein made you have sex with  
7 E.W., didn't he?  
8 MR. YAREMA: Object to the form.  
9 A The Fifth.  
10 Q You did, in fact, engage in sexual  
11 activity with E.W. when she was only 16 years  
12 old; isn't that true?  
13 MR. YAREMA: Object to the form.  
14 A The Fifth.  
15 Q Back to my original question: And I'll  
16 ask you this way: Do you consider yourself  
17 heterosexual, bi-sexual, or can you answer that  
18 question?  
19 MR. YAREMA: Object to the form.  
20 MR. GOLDBERGER: Same objection. Do not  
21 answer the question.  
22 A Fifth.  
23 Q How did you meet Jeffrey Epstein?  
24 A Fifth.  
25 Q When did you become one of Jeffrey

12

1 Epstein's sex slaves?  
2 MR. YAREMA: Object to the form.  
3 A Fifth.  
4 Q What does it mean to be Jeffrey  
5 Epstein's sex slave?  
6 MR. YAREMA: Object to the form.  
7 A Fifth.  
8 Q Are you aware that Jeffrey Epstein reads  
9 books on how to be a proper master to his sex  
10 slave?  
11 MR. YAREMA: Object to the form.  
12 A Fifth.  
13 Q What has Jeffrey Epstein done to train  
14 you to be his sex slave?  
15 MR. YAREMA: Object to the form.  
16 A Fifth.  
17 Q What do your parents think about you  
18 being Jeffrey Epstein's sex slave?  
19 MR. YAREMA: Object to the form.  
20 A Fifth.  
21 Q When did you first learn that Jeffrey  
22 Epstein had a sexual obsession for underage minor  
23 females?  
24 MR. YAREMA: Object to the form.  
25 A Fifth.

13

1 Q How many times has Jeffrey Epstein made  
2 you have sex with underage minor females?  
3 MR. YAREMA: Object to the form.  
4 A Fifth.  
5 Q Do you enjoy sex with underage minor  
6 females?  
7 MR. YAREMA: Object to the form.  
8 A Fifth.  
9 Q What is the youngest child that Jeffrey  
10 Epstein has forced you to have sex with?  
11 MR. YAREMA: Object to the form.  
12 A Fifth.  
13 Q Does Jeffrey Epstein today still make  
14 you have sex with underage minor females?  
15 MR. YAREMA: Object to the form.  
16 A Fifth.  
17 Q How many underage minor females has  
18 Jeffrey Epstein made you have sex with, since you  
19 were over the age of 18?  
20 MR. YAREMA: Object to the form.  
21 A The Fifth.  
22 Q Prior to turning 18, is it true that  
23 Jeffrey Epstein made you have sex with many other  
24 children in kid-type orgies?  
25 MR. YAREMA: Object to the form.

14

1 A Fifth.  
2 Q Has Jeffrey Epstein also made you  
3 perform sexually on his friends?  
4 MR. YAREMA: Object to the form.  
5 A Fifth.  
6 Q Do you know David Copperfield?  
7 MR. YAREMA: Object to the form.  
8 A Fifth.  
9 Q Have you ever been made to perform  
10 sexually on David Copperfield?  
11 MR. YAREMA: Object to the form.  
12 A Fifth.  
13 Q Do you know Prince Andrew?  
14 A Fifth.  
15 Q Have you ever been made to perform  
16 sexually on Prince Andrew?  
17 MR. YAREMA: Object to the form.  
18 A Fifth.  
19 Q When was the first time that you knew  
20 Jeffrey Epstein molested underage girls?  
21 MR. YAREMA: Object to the form.  
22 A Fifth.  
23 Q Did Jeffrey Epstein molest you when you  
24 were underage?  
25 MR. YAREMA: Object to the form.

15

1 A Fifth.  
2 Q I'm assuming you understand why you're  
3 here today, correct?  
4 MR. YAREMA: Object to the form.  
5 A The Fifth.  
6 Q For allegations related to Jeffrey  
7 Epstein interacting sexually with numerous  
8 underage minor females; that's something you  
9 know, right?  
10 MR. YAREMA: Object to the form.  
11 A The Fifth.  
12 Q That's something in addition to the  
13 civil lawsuits, there were criminal cases  
14 involving the same conduct, correct?  
15 MR. YAREMA: Object to the form.  
16 A Fifth.  
17 Q You were a part of that criminal  
18 investigation, in fact, you were a co-conspirator  
19 of Jeffrey Epstein's; is that right?  
20 MR. YAREMA: Object to the form.  
21 A Fifth.  
22 Q What crimes did you conspire to commit  
23 with Jeffrey Epstein against underage minor  
24 females?  
25 MR. YAREMA: Object to the form.

16

1 A Fifth.  
2 Q Have you read the nonprosecution  
3 agreement between the government and Jeffrey  
4 Epstein?  
5 A Fifth.  
6 Q Are you aware that inside that document  
7 you are labeled as a co-conspirator of his crimes  
8 against children?  
9 MR. YAREMA: Object to the form.  
10 A Fifth.  
11 Q Isn't it true that your role was to lure  
12 or procure underage minor females to Jeffrey  
13 Epstein for him to molest, correct?  
14 MR. YAREMA: Object to the form.  
15 A Fifth.  
16 Q You also scheduled appointments for  
17 Jeffrey Epstein, so there would be designated  
18 times for Jeffrey Epstein to molest underage  
19 minor females, correct?  
20 MR. YAREMA: Object to the form.  
21 A The Fifth.  
22 Q As well, you participated in various sex  
23 acts with underage minor females, thus molesting  
24 them yourself; is that correct?  
25 MR. YAREMA: Object to the form.

17

1 A Fifth.  
2 Q Do you understand that Jeffrey Epstein's  
3 interaction with underage minor females is  
4 illegal? Do you understand that?  
5 MR. YAREMA: Object to the form.  
6 A The Fifth.  
7 Q Do you understand that the Lewd and  
8 Lascivious Molestation Statute in Florida  
9 indicates a person who intentionally touches in a  
10 lewd or lascivious manner, the breasts, genital  
11 area or buttocks, or the clothing covering them,  
12 of a person less than 16 years of age, or forces  
13 or entices a person under 16 years of age, to so  
14 touch the perpetrator, commits lewd or lascivious  
15 molestation? Are you aware of that statute?  
16 A Fifth.  
17 Q That is a statute that you know Jeffrey  
18 Epstein to have violated; is that true?  
19 MR. YAREMA: Object to the form.  
20 A The Fifth.  
21 Q That's a statute that you yourself have  
22 violated; is that true?  
23 MR. YAREMA: Object to the form.  
24 A The Fifth.  
25 Q You've observed Jeffrey Epstein violate

1 that statute on many underage minor females,  
 2 true?  
 3 MR. YAREMA: Object to the form.  
 4 A The Fifth.  
 5 Q Have you ever discussed with Jeffrey  
 6 Epstein that the fact that he is a child  
 7 molester?  
 8 MR. YAREMA: Object to the form.  
 9 A Fifth.  
 10 Q Have you asked Jeffrey Epstein why he  
 11 has made you interact with underage minor females  
 12 in a sexual manner?  
 13 MR. YAREMA: Object to the form.  
 14 A Fifth.  
 15 Q During the litigation of these civil  
 16 cases, has Jeffrey Epstein indicated to you an  
 17 intent to continue to molest children?  
 18 MR. YAREMA: Object to the form.  
 19 A Fifth.  
 20 Q Is it your intent to continue to commit  
 21 sex crimes against minors?  
 22 MR. YAREMA: Object to the form.  
 23 A Fifth.  
 24 Q In addition to your being named as a  
 25 co-conspirator of Jeffrey Epstein regarding his

1 crimes against minors, there is also a person  
 2 name [REDACTED] listed as a co-conspirator.  
 3 Do you know [REDACTED]?  
 4 A Fifth.  
 5 Q This is somebody who lives with you and  
 6 Jeffrey Epstein; is that true?  
 7 MR. YAREMA: Object to the form.  
 8 A Fifth.  
 9 Q And [REDACTED] is somebody who you  
 10 know to be Story Cowles's girlfriend; is that  
 11 true?  
 12 MR. YAREMA: Object to the form.  
 13 A Fifth.  
 14 Q She's spoken with Story Cowles about  
 15 this case on numerous occasions; is that true?  
 16 MR. YAREMA: Object to the form.  
 17 A Fifth.  
 18 Q [REDACTED] conversations with Story  
 19 Cowles and your observations of them, you believe  
 20 would implicate you in a crime and that's why  
 21 you're able to take the Fifth as to that  
 22 question?  
 23 MR. YAREMA: Object to the form.  
 24 A Fifth.  
 25 Q Who is Lesley Groff, also listed as a

1 co-conspirator in the non-prosecution agreement  
 2 related to Jeffrey Epstein's crimes against  
 3 minors?  
 4 MR. YAREMA: Object to the form.  
 5 A Fifth.  
 6 Q Do you know [REDACTED]  
 7 [REDACTED]?  
 8 A Fifth.  
 9 Q These are all people who also  
 10 participated in Jeffrey Epstein's scheme to lure  
 11 underage females to him for sex; is that true?  
 12 MR. YAREMA: Object to the form.  
 13 A Fifth.  
 14 Q You and these other co-conspirators  
 15 played various roles to make sure Jeffrey Epstein  
 16 was able to engage in sexual contact or conduct,  
 17 with underage minor females on an everyday basis;  
 18 is that true?  
 19 MR. YAREMA: Object to the form.  
 20 A Fifth.  
 21 Q Since the time you first met Jeffrey  
 22 Epstein, has his appetite for underage minor  
 23 females always been the same?  
 24 MR. YAREMA: Object to the form.  
 25 A Fifth.

1 Q By that I mean, have you observed  
 2 Jeffrey Epstein to interact sexually with  
 3 underage minor females literally on a daily  
 4 basis?  
 5 MR. YAREMA: Object to the form.  
 6 A Fifth.  
 7 Q Wasn't it one of your specific job  
 8 duties to make sure that he had different  
 9 underage minor females to molest on a daily  
 10 basis?  
 11 MR. YAREMA: Object to the form.  
 12 A Fifth.  
 13 Q In addition to the improper sexual  
 14 contact between Jeffrey Epstein and underage  
 15 minor females at the West Palm Beach house, you  
 16 have observed similar improper and illegal  
 17 contact by Jeffrey Epstein in his New York  
 18 mansion, as well, correct?  
 19 MR. YAREMA: Object to the form.  
 20 A Fifth.  
 21 Q In fact, he operates a very similar  
 22 scheme up there, in that he schedules these  
 23 appointments with underage minor females, under  
 24 the guise that it is going to be a massage; is  
 25 that correct?

22

1 MR. YAREMA: Object to the form?  
 2 A Fifth.  
 3 Q When he is in New York, he has contact  
 4 with underage minor females for the purposes of  
 5 sexually molesting them as well; is that  
 6 correct?  
 7 MR. YAREMA: Object to the form.  
 8 A Fifth.  
 9 Q When he is in his ranch in New Mexico,  
 10 similarly, Jeffrey Epstein is engaging in sex  
 11 with underage minor females from that local area  
 12 as well, and that's something you've observed?  
 13 MR. YAREMA: Object to the form.  
 14 A Fifth.  
 15 Q On his island, particularly, he has  
 16 flown underage minor females to the island for  
 17 underage kid-type orgies; is that true?  
 18 MR. YAREMA: Object to the form.  
 19 A Fifth.  
 20 Q You're shaking your head indicating, at  
 21 least to me, indicating that you may not agree  
 22 with what I'm saying, and I would love to give  
 23 you the chance to explain it to us.  
 24 MR. GOLDBERGER: I appreciate that, but  
 25 don't --

23

1 MR. EDWARDS: Read too much into it?  
 2 MR. GOLDBERGER: Exactly. Don't go  
 3 there. Just ask the questions and we will  
 4 move right along.  
 5 MR. EDWARDS: I agree, Jack, I just know  
 6 if this is played for a jury, I don't want  
 7 the jury to interpret her shaking her head  
 8 as a "No," and then her pleading the Fifth.  
 9 MR. GOLDBERGER: I appreciate that.  
 10 Don't take anything as to any head movements  
 11 or any body movements at all. Just ask the  
 12 questions and we will let the video speak  
 13 for itself.  
 14 Q How many of these -- you know what an  
 15 orgy is, don't you?  
 16 A Fifth.  
 17 Q And how many of these orgies, as I'm  
 18 calling them, where there are numerous underage  
 19 minors having sex with each other and with  
 20 Jeffrey Epstein, have you observed on Jeffrey  
 21 Epstein's island?  
 22 MR. YAREMA: Object to the form.  
 23 A Fifth.  
 24 Q Is part of your role as Jeffrey  
 25 Epstein's sex slave, to not tell the authorities

24

1 when Jeffrey Epstein commits these crimes against  
 2 children?  
 3 MR. YAREMA: Object to the form.  
 4 A Fifth.  
 5 Q Is there any way for you to escape being  
 6 his sex slave?  
 7 MR. YAREMA: Object to the form.  
 8 A Fifth.  
 9 Q Have you ever wanted to cooperate with  
 10 the authorities, so that you could escape being  
 11 his sex slave?  
 12 MR. YAREMA: Object to the form.  
 13 A Fifth.  
 14 Q Do you represent to others that you are  
 15 his girlfriend or his sex slave, or some other  
 16 designation?  
 17 MR. YAREMA: Object to the form.  
 18 A Fifth.  
 19 Q Isn't it true that you recently  
 20 represented to the Probation Officer that you  
 21 were his live-in girlfriend?  
 22 MR. YAREMA: Object to the form.  
 23 A Fifth.  
 24 Q When Probation calls the house, are you  
 25 told to tell Probation that he is in the swimming

25

1 pool or doing some other activity that would not  
 2 allow him to come to the telephone?  
 3 MR. YAREMA: Object to the form.  
 4 A Fifth.  
 5 Q Isn't it true you're under strict orders  
 6 to tell Probation that?  
 7 MR. YAREMA: Object to the form.  
 8 A Fifth.  
 9 Q Isn't it true you've heard Jeffrey  
 10 Epstein tell you on numerous occasions, regarding  
 11 the age of the girls that he wants to his house,  
 12 for the purposes of sexually molesting, the  
 13 phrase he uses is "the younger the better,"  
 14 true?  
 15 MR. YAREMA: Object to the form.  
 16 A Fifth.  
 17 Q I asked you earlier about E.W. out of  
 18 turn as a result of an objection related to your  
 19 sexual orientation, but I'll talk specifically  
 20 about E.W. right now. You know who that is,  
 21 right?  
 22 MR. YAREMA: Object to the form.  
 23 A Fifth.  
 24 Q That is somebody you observed Jeffrey  
 25 Epstein to call for the purposes of getting her

26

1 to his house to sexually molest; is that right?

2 MR. YAREMA: Object to the form.

3 A Fifth.

4 Q The first time she went to Jeffrey

5 Epstein's house was in 2002 when she was only 14

6 years old; is that true?

7 MR. YAREMA: Object to the form.

8 A Fifth.

9 Q In fact in 2002 you were only 18 years

10 old or so yourself; is that right?

11 A Fifth.

12 Q And E.W. is somebody you observed at

13 Jeffrey Epstein's house on more than 100

14 occasions between 2002 and 2005, a time period

15 between 14 and 17 years of age for her; is that

16 right?

17 MR. YAREMA: Object to the form.

18 A Fifth.

19 Q And each time E.W. was summoned to

20 Jeffrey Epstein's house, it was for the purposes

21 of Jeffrey Epstein sexually molesting her,

22 correct?

23 MR. YAREMA: Object to the form.

24 A Fifth.

25 Q If it was not Jeffrey Epstein personally

27

1 calling E.W., you observed [REDACTED] to call

2 E.W. for the purposes of her coming over and

3 pleasing Jeffrey Epstein sexually, correct?

4 MR. YAREMA: Object to the form.

5 A Fifth.

6 Q And do you remember the instance where

7 Jeffrey Epstein instructed you to lay down naked

8 and engage in a threesome with E.W. and Jeffrey

9 Epstein?

10 MR. YAREMA: Object to the form.

11 A Fifth.

12 Q Do you remember that that during that

13 threesome, Jeffrey Epstein demanded E.W. to

14 straddle you and otherwise engage sexually with

15 you while Jeffrey Epstein was using vibrators

16 and/or dildos on you?

17 MR. YAREMA: Object to the form.

18 A Fifth.

19 Q In addition to your sexual interactions

20 with E.W., isn't it true that you have used

21 strap-on dildos and vibrators on other underage

22 minors at Jeffrey Epstein's direction?

23 MR. YAREMA: Object to the form.

24 A Fifth.

25 Q You have given oral sex to underage

28

1 minor females?

2 MR. YAREMA: Object to the form.

3 A Fifth.

4 Q You have received oral sex from underage

5 minor females?

6 MR. YAREMA: Object to the form.

7 A Fifth.

8 Q All of these sexual acts with minor

9 females involving you happened in the presence of

10 Jeffrey Epstein?

11 MR. YAREMA: Object to the form.

12 A Fifth.

13 Q During your interaction with underage

14 minor females in a sexual manner, isn't it true

15 that Jeffrey Epstein would participate in the

16 sexual acts and the act would be over upon

17 Jeffrey Epstein ejaculating, correct?

18 MR. YAREMA: Object to the form.

19 A Fifth.

20 Q Did Jeffrey Epstein tell you, that when

21 E.W. was an underage minor female, he forced her

22 to give him oral sex?

23 MR. YAREMA: Object to the form.

24 A Fifth.

25 Q Do you remember E.W. coming over, a

29

1 young girl, with braces on, and going up into

2 Jeffrey Epstein's bedroom on numerous occasions

3 to be sexually molested?

4 MR. YAREMA: Object to the form.

5 A Fifth.

6 Q Do you know when it was that Jeffrey

7 Epstein developed his plan or scheme to gain

8 access to hundreds of underage minor females for

9 the purposes of his sexual gratification?

10 MR. YAREMA: Object to the form.

11 A Fifth.

12 Q Were you a part of the planning of that

13 scheme of Jeffrey Epstein's to gain access to

14 underage minor females?

15 MR. YAREMA: Object to the form.

16 A Fifth.

17 Q Do you know Ghislaine Maxwell?

18 A Fifth.

19 Q Is that somebody who helped Jeffrey

20 Epstein to devise the scheme to allow him access

21 to various and a variety of underage minor

22 females?

23 MR. YAREMA: Object to the form.

24 A Fifth.

25 Q Is [REDACTED] somebody that was also

30

1 involved in the planning of this scheme to gain  
2 access to underage minor females?  
3 MR. YAREMA: Object to the form.  
4 A Fifth.  
5 Q When is the first time that you observed  
6 Jeffrey Epstein's method of enticing or inducing  
7 underage minor females into sexual acts with him  
8 inside his bedroom?  
9 MR. YAREMA: Object to the form.  
10 A Fifth.  
11 Q Isn't it true that after an underage  
12 minor female was brought to Jeffrey Epstein's  
13 house, typically [REDACTED], or Adriana or  
14 yourself would lead that underage minor female to  
15 Jeffrey Epstein's bedroom and leave them alone in  
16 the room; is that true?  
17 MR. YAREMA: Object to the form.  
18 A Fifth.  
19 Q Then Jeffrey Epstein would appear either  
20 naked or wearing a towel; is that true?  
21 MR. YAREMA: Object to the form.  
22 A Fifth.  
23 Q This is his habit or method of  
24 operation, every single time, and that's  
25 something that he has told you about his sexual

31

1 interaction with underage minors; is that true?  
2 MR. YAREMA: Object to the form.  
3 A Fifth.  
4 Q And he would direct or demand or  
5 instruct the underage minor female to remove her  
6 clothing; is that true?  
7 MR. YAREMA: Object to the form.  
8 A Fifth.  
9 Q Then he would perform one or more lewd  
10 or lascivious or sexual acts on the underage  
11 minor female. Is that true?  
12 MR. YAREMA: Object to the form.  
13 A Fifth.  
14 Q And you have observed Jeffrey Epstein  
15 engage in sexual interaction with underage minor  
16 females on hundreds and hundreds of occasions,  
17 correct?  
18 MR. YAREMA: Object to the form.  
19 A Fifth.  
20 Q And you have observed Jeffrey Epstein  
21 using vibrators and sexual toys on underage  
22 minors, true?  
23 MR. YAREMA: Object to the form.  
24 A Fifth.  
25 Q In fact, he has also used vibrators and

32

1 sex toys on you, correct?  
2 A Fifth.  
3 Q And he has instructed you to use sex  
4 toys and vibrators on other underage minor  
5 females, correct?  
6 MR. YAREMA: Object to the form.  
7 A Fifth.  
8 Q You have observed Jeffrey Epstein  
9 digitally penetrate the vagina of underage minor  
10 females, including E.W., correct?  
11 MR. YAREMA: Object to the form.  
12 A Fifth.  
13 Q As part of his plan to avoid detection  
14 by law enforcement, you have observed Jeffrey  
15 Epstein to pay these underage minor females to be  
16 quiet, correct?  
17 MR. YAREMA: Object to the form.  
18 A Fifth.  
19 Q And this is something that he has told  
20 you he does, for the purposes of grooming these  
21 underage minor females, and avoiding law  
22 enforcement detection, correct?  
23 MR. YAREMA: Object to the form.  
24 A Fifth.  
25 Q Jeffrey Epstein has talked to you about

33

1 the psychology of brainwashing or grooming  
2 underage minor females to perform for him  
3 sexually, hasn't he?  
4 MR. YAREMA: Object to the form.  
5 A Fifth.  
6 Q And Sarah Kellen has also spoken with  
7 you about the methodology behind gaining access  
8 to and grooming underage minor females for sex?  
9 MR. YAREMA: Object to form.  
10 A Fifth.  
11 Q Isn't it true that Ghislaine Maxwell and  
12 yourself and [REDACTED] had access to a master  
13 list of underage minor females names and phone  
14 numbers so that they could be called?  
15 MR. GOLDBERGER: Time out. Are you  
16 talking to me, counsel?  
17 MR. HOROWITZ: Nodding my head, back at  
18 you. You were nodding at me.  
19 MR. GOLDBERGER: I wasn't nodding at  
20 you. I'm not talking to you, I'm not  
21 communicating with you. I don't know what  
22 you think we are doing here. You said "It  
23 is true," and I have no idea what you are  
24 talking about. Don't interrupt the  
25 deposition, okay?

34

1 MR. HOROWITZ: I think you interrupted.  
2 MR. GOLDBERGER: I didn't do a thing --  
3 MR. EDWARDS: I don't know what's  
4 happened here. It has deteriorated here for  
5 no reason whatsoever and has nothing to do  
6 with me or the witness.  
7 MR. GOLDBERGER: You're 100 percent  
8 correct.  
9 MR. EDWARDS: Can we go back to it.  
10 MR. GOLDBERGER: Absolutely.  
11 MR. EDWARDS: Perfect.  
12 The silent fight disrupted me. I lost  
13 where I am now.  
14 MR. GOLDBERGER: Sorry.  
15 MR. EDWARDS: Can you read it back.  
16 THE COURT REPORTER: Certainly.  
17 (The record was read.)  
18 MR. EDWARDS: I'll rephrase the  
19 question.  
20 **Q Isn't it true that yourself, Ghislaine**  
21 **Maxwell and [REDACTED] had access to a master**  
22 **of list of underage minor females names and phone**  
23 **numbers so they could be called for the purpose**  
24 **of coming to Jeffrey Epstein's house to be**  
25 **sexually molested?**

35

1 MR. YAREMA: Object to the form.  
2 A Fifth.  
3 **Q How many underage minor females are on**  
4 **that master list?**  
5 MR. YAREMA: Object to the form.  
6 A Fifth.  
7 **Q Are there photographs of these underage**  
8 **minor females on that master list?**  
9 MR. YAREMA: Object to the form.  
10 A Fifth.  
11 **Q Is that master list saved on a computer**  
12 **system, as has been testified to in the past?**  
13 MR. YAREMA: Object to the form.  
14 A Fifth.  
15 **Q Has Jeffrey Epstein talked to you about**  
16 **the success of his scheme to procure underage**  
17 **minor females?**  
18 MR. YAREMA: Object to the form.  
19 A Fifth.  
20 **Q By that, I mean, the method where he**  
21 **molests an underage minor female, then offers**  
22 **them additional money if they will bring him**  
23 **other underage minor females to molest; are you**  
24 **familiar with that system?**  
25 MR. YAREMA: Object to the form.

36

1 A Fifth.  
2 **Q In addition to that system, isn't it**  
3 **true that Jeffrey Epstein traffics underage minor**  
4 **females through a modeling agency?**  
5 MR. YAREMA: Object to the form.  
6 A Fifth.  
7 **Q Is a modeling agency that he is involved**  
8 **in with Jean Luc Brunel; you know who that is**  
9 **right?**  
10 MR. YAREMA: Object to the form.  
11 A Fifth.  
12 **Q Are you familiar with MC-2 or MC-Squared**  
13 **Modeling Agency?**  
14 A Fifth.  
15 **Q You know Jean Luc Brunel, right?**  
16 MR. YAREMA: Object to the form.  
17 A Fifth.  
18 **Q Is Jean Luc Brunel somebody that you**  
19 **have been made to perform on sexually?**  
20 MR. YAREMA: Object to the form.  
21 A Fifth.  
22 **Q Jean Luc Brunel is somebody that you**  
23 **know to also be a child molester, true?**  
24 MR. YAREMA: Object to the form.  
25 A Fifth.

37

1 **Q This is somebody who for years the**  
2 **public has known of Jean Luc Brunel as a child**  
3 **molester, true?**  
4 MR. YAREMA: Object to the form.  
5 A Fifth.  
6 **Q In fact, that is the only thing Jeffrey**  
7 **Epstein and Jean Luc Brunel have in common, is**  
8 **their obsession for underage minor females,**  
9 **correct?**  
10 MR. YAREMA: Object to the form.  
11 A Fifth.  
12 **Q And the modeling agency is but one other**  
13 **mechanism used by Jeffrey Epstein to gain access**  
14 **to underage minor females for sex, true?**  
15 MR. YAREMA: Object to the form.  
16 A Fifth.  
17 **Q I read you the statute earlier on Lewd**  
18 **and Lascivious Molestation, Chapter 800.04, and**  
19 **that's something that you have witnessed Jeffrey**  
20 **Epstein violate on hundreds of occasions,**  
21 **correct?**  
22 MR. YAREMA: Object to the form.  
23 A Fifth.  
24 **Q And something that you have witnessed**  
25 **Jeffrey Epstein specifically violate, against**

38

1 E.W., true?  
2 MR. YAREMA: Object to the form.  
3 A Fifth.  
4 Q Also a statute you have witnessed  
5 Jeffrey Epstein violate against then minor,  
6 L.M.?  
7 MR. YAREMA: Object to the form.  
8 A Fifth.  
9 Q In fact L.M. was somebody that Jeffrey  
10 Epstein liked or likes; isn't that true?  
11 MR. YAREMA: Object to the form.  
12 A Fifth.  
13 Q L.M. was somebody Jeffrey Epstein met  
14 when she was only 13 years old and began sexually  
15 molesting her the first day that he met her,  
16 true?  
17 MR. YAREMA: Object to the form.  
18 A Fifth.  
19 Q L.M. was one of his main girls, as he  
20 would call them; is that true?  
21 MR. YAREMA: Object to the form.  
22 A Fifth.  
23 Q L.M. procured for him or brought for him  
24 to his house, over 50 girls between the ages of  
25 12 and 15 years old; is that true?

39

1 MR. YAREMA: Object to the form.  
2 A Fifth.  
3 Q Each of these girls, aged 12 to 15, you  
4 observed come into the house, go into Jeffrey  
5 Epstein's bedroom and leave the house after being  
6 sexually molested, true?  
7 MR. YAREMA: Object to the form.  
8 A Fifth.  
9 Q And in addition to L.M. being sexually  
10 molested herself, she was enticed or coerced into  
11 bringing her friends over, to also be sexually  
12 molested, true?  
13 MR. YAREMA: Object to the form.  
14 A Fifth.  
15 Q Has Jeffrey Epstein talked to you about  
16 an FBI statement that was given by L.M.?  
17 A Fifth.  
18 Q He has also told you that that FBI  
19 statement that was favorable for him is  
20 completely false; isn't that true?  
21 MR. YAREMA: Object to the form.  
22 A Fifth.  
23 Q Has he spoken to you about the fact that  
24 she is now telling the complete story and  
25 accurate account as to what happened at Jeffrey

40

1 Epstein's house, and he is using all resources to  
2 try to intimidate and harass her; is that true?  
3 MR. YAREMA: Object to the form.  
4 A Fifth.  
5 Q In fact, has he talked to you about his  
6 tactic of intimidating and harassing any victims  
7 that come forward against him, regarding the  
8 sexual abuse that they endured by him?  
9 MR. YAREMA: Object to the form.  
10 A Fifth.  
11 Q Would you agree that Jeffrey Epstein  
12 contributed to the delinquency of these various  
13 minors that he sexually abused?  
14 MR. YAREMA: Object to the form.  
15 A Fifth.  
16 Q In addition to abusing them, he also  
17 encouraged them to return to him to receive more  
18 sexual abuse and encouraged them into a life of  
19 prostitution, true?  
20 MR. YAREMA: Object to the form.  
21 A Fifth.  
22 Q How many underage minor females have you  
23 observed Jeffrey Epstein engage in sex acts with  
24 on any of his airplanes?  
25 MR. YAREMA: Object to the form.

41

1 A Fifth.  
2 Q Have you engaged in sexual acts with any  
3 underage minor females on Jeffrey Epstein's  
4 airplanes?  
5 MR. YAREMA: Object to the form.  
6 A Fifth.  
7 Q How many times has Jeffrey Epstein  
8 talked to you about the reasons why he sexually  
9 abuses minors?  
10 MR. YAREMA: Object to the form.  
11 A Fifth.  
12 Q Didn't he tell you that it is his intent  
13 to harm these minors in hopes of gaining  
14 psychological advantage over them?  
15 MR. YAREMA: Object to the form.  
16 A Fifth.  
17 Q Are you aware that Jeffrey Epstein pled  
18 guilty to two felonies related to his interaction  
19 with minors?  
20 MR. YAREMA: Object to the form.  
21 A Fifth.  
22 Q And as a result he was incarcerated, and  
23 as we spoke about earlier, you visited him in  
24 jail on more than 50 occasions, correct?  
25 MR. YAREMA: Object to the form.

42

1 A Fifth.

2 Q Aren't your observations with Jeffrey

3 Epstein's interactions with E.W., wouldn't you

4 agree he coerced her into a life of prostitution?

5 MR. YAREMA: Object to the form.

6 A Fifth.

7 Q And based on your observations of

8 Jeffrey Epstein's interactions with L.M.,

9 wouldn't you agree that Jeffrey Epstein coerced

10 her into a life of prostitution?

11 MR. YAREMA: Object to the form.

12 A Fifth.

13 Q And with respect to Jane Doe and E.W.

14 and L.M., wouldn't you agree that Jeffrey Epstein

15 forced these girls to be a prostitute for him?

16 MR. YAREMA: Object to the form.

17 A Fifth.

18 Q Would you agree that Jeffrey Epstein's

19 actions against E.W., L.M. and Jane Doe, were

20 intentional, deliberate and reckless?

21 MR. YAREMA: Object to the form.

22 A Fifth.

23 Q Would you agree that that intentional,

24 deliberate and reckless conduct by Jeffrey

25 Epstein against L.M., E.W. and Jane Doe was

43

1 likely to cause severe emotional distress?

2 MR. YAREMA: Object to the form.

3 A Fifth.

4 Q And isn't it a fact that Jeffrey Epstein

5 has specifically told you that it is his intent

6 to cause severe emotional distress, as it

7 weakened his victims?

8 MR. YAREMA: Object to the form.

9 A Fifth.

10 Q Has Jeffrey Epstein talked to you about

11 your role in what he calls a criminal enterprise?

12 MR. YAREMA: Object to the form.

13 A Fifth.

14 Q Has he talked to you about his

15 organization being a criminal enterprise, that

16 you need to help protect?

17 MR. YAREMA: Object to the form.

18 A Fifth.

19 Q What does Jeffrey Epstein do for a

20 living?

21 A Fifth.

22 Q Does he profit from international sex

23 trafficking of children?

24 MR. YAREMA: Object to the form.

25 A Fifth.

44

1 Q Do you profit from sex trafficking of

2 children?

3 MR. YAREMA: Object to the form.

4 A Fifth.

5 Q Do you know Sergio Cordero?

6 A Fifth.

7 Q Do you know Mike Sanka?

8 A Fifth.

9 Q Would you consider Jeffrey Epstein's

10 criminal enterprise that is designed to molest

11 underage minor females, to be organized?

12 MR. YAREMA: Object to the form.

13 A Fifth.

14 Q Is your role in that criminal

15 arrangement to molest underage minor females, to

16 help organize?

17 MR. YAREMA: Object to the form.

18 A Fifth.

19 Q As part of that organization, isn't it

20 true that you, as well as various staff members,

21 took meticulous messages regarding appointments

22 and scheduling underage minor females to come

23 over to be sexually molested?

24 MR. YAREMA: Object to the form.

25 A Fifth.

45

1 Q These were message pads that had a

2 carbon copy that were positioned or stationed in

3 several places around Jeffrey Epstein's home near

4 the telephone; you're familiar with those,

5 right?

6 MR. YAREMA: Object to the form.

7 A Fifth.

8 Q Since I'm assuming that you are going to

9 take the Fifth on each and every question related

10 to any messages, I will show you only one, which

11 will be marked, this one page, as Plaintiff's

12 Exhibit 1. The date on the message that I will

13 be showing you is 8/21, August 21, 2005.

14 (Message dated August 21, 2005 was

15 marked as Plaintiff's Exhibit number 1 for

16 identification, as of this date.)

17 MR. EDWARDS: Do you want to see it

18 first?

19 MR. GOLDBERGER: (Counsel examines

20 document and hands it to the witness.)

21 Q Would you look at the exhibit, please,

22 if you can see it? I don't know if you can see

23 it over your coffee.

24 A I can see it.

25 Q Okay. Do you recognize it?

46

1 A Fifth.

2 Q That particular message indicates it is

3 from [REDACTED]. You're the only "[REDACTED]" in the

4 house; is that correct?

5 MR. YAREMA: Object to the form.

6 A Fifth.

7 Q This is a call from you indicating that

8 "[REDACTED] cannot work today and [REDACTED] will be

9 here at 4:00 p.m.;" is that right?

10 MR. YAREMA: Object to the form?

11 A Fifth.

12 Q Who is [REDACTED]?

13 A Fifth.

14 MR. YAREMA: Object to the form.

15 Q That's an underage minor female that was

16 scheduled to be molested at Jeffrey Epstein's

17 house?

18 MR. YAREMA: Object to the form.

19 A Fifth.

20 Q You scheduled that act of molestation;

21 is that right?

22 MR. YAREMA: Object to the form.

23 A Fifth.

24 Q And Britney will be at the house at 4:00

25 p.m. Britney is another underage minor female;

47

1 is that correct?

2 MR. YAREMA: Object to the form.

3 A Fifth.

4 Q That's somebody else that you were

5 scheduling to come to his house at 4:00 p.m. for

6 Jeffrey Epstein to engage in sexual acts with

7 her, while she was an underage minor, true?

8 MR. YAREMA: Object to the form.

9 A Fifth.

10 Q Do you know Les Wexner?

11 A Fifth.

12 Q That's somebody that you know owns and

13 operates the Victoria's Secret, the Limited?

14 MR. YAREMA: Object to the form.

15 A Is that a question?

16 Q Is that somebody that you know to own

17 Victoria's Secret or operate Victoria's Secret?

18 A Fifth.

19 Q Do you know if Jeffrey Epstein still

20 talks with Leslie Wexner?

21 MR. YAREMA: Object to the form.

22 A Fifth.

23 Q Do you know Jane Doe-102?

24 A Fifth.

25 Q Are you aware of Jeffrey Epstein and

48

1 Ghislaine Maxwell's sexual interaction with Jane

2 Doe-102 when she was a minor?

3 MR. YAREMA: Object to the form.

4 Q This is one of many underage minor

5 females that was trafficked basically around the

6 globe to be sexually exploited and abused; is

7 that correct?

8 MR. YAREMA: Object to the form.

9 A Fifth.

10 Q Was that typical of Jeffrey Epstein and

11 Ghislaine Maxwell to sexually abuse minors on

12 Jeffrey Epstein's airplane?

13 MR. YAREMA: Object to the form.

14 A Fifth.

15 Q And also typical of Ghislaine Maxwell

16 and Jeffrey Epstein to prostitute or pimp out

17 underage minors to friends?

18 MR. YAREMA: Object to the form.

19 A Fifth.

20 Q By "friends," I am talking specifically

21 about people of royalty, politicians,

22 academicians, businessmen and other professional

23 or personal acquaintances?

24 MR. YAREMA: Object to the form.

25 A Fifth.

49

1 Q Were you with Jeffrey Epstein on his

2 birthday when one of his friends sent to him

3 12 -- sorry, three 12-year olds for the purposes

4 of Jeffrey Epstein sexually abusing them?

5 MR. YAREMA: Object to the form.

6 A Fifth.

7 Q How many occasions have you observed

8 Jeffrey Epstein to receive as gifts from friends,

9 underage minor females for the purposes of him

10 sexually abusing them?

11 MR. YAREMA: Object to the form.

12 A Fifth.

13 Q These three 12-year olds were from

14 France. Were they sent to him on his birthday by

15 Jean Luc Brunel or by somebody else?

16 MR. YAREMA: Object to form.

17 A Fifth.

18 Q Have you ever been made to engage in sex

19 with 12-year olds?

20 MR. YAREMA: Object to the form.

21 A Fifth.

22 Q Is it true that Jeffrey Epstein makes

23 you dress up as a 12-year old?

24 MR. YAREMA: Object to the form.

25 A Fifth.

50

1 Q As part of being Jeffrey Epstein's sex  
2 slave, isn't it true that he asks you or requests  
3 of you to dress younger than 12 at times?  
4 MR. YAREMA: Object to the form.  
5 A Fifth.  
6 Q Have you seen naked photographs of the  
7 underage minor females with whom Jeffrey Epstein  
8 has engaged in sex acts?  
9 MR. YAREMA: Object to the form.  
10 A Fifth.  
11 Q Are there hidden cameras in any of  
12 Jeffrey Epstein's homes, that you know to have  
13 taken surreptitious videos or photographs of  
14 underage minors?  
15 MR. YAREMA: Object to the form.  
16 A Fifth.  
17 Q Does Jeffrey Epstein still watch  
18 pornography to this day?  
19 MR. YAREMA: Object to the form.  
20 A Fifth.  
21 Q Does Jeffrey Epstein watch homemade  
22 pornographic videos of underage minors engaging  
23 in sex orgies on his island?  
24 MR. YAREMA: Object to the form.  
25 A Fifth.

51

1 Q Prior to the search warrant being  
2 executed, you are aware that at least three  
3 computers were taken at Jeffrey Epstein's  
4 direction, from Jeffrey Epstein's house, to avoid  
5 detection by law enforcement, correct?  
6 MR. YAREMA: Object to the form.  
7 A Correct.  
8 Q Adriana [REDACTED] and some other person  
9 took those computers to avoid Jeffrey Epstein --  
10 to avoid the authorities obtaining the evidence  
11 contained on those computers, correct?  
12 MR. YAREMA: Object to the form.  
13 A Fifth.  
14 Q Who are the persons along with Adriana  
15 [REDACTED] took the computers from Jeffrey  
16 Epstein's house prior to the execution of the  
17 search warrant?  
18 MR. YAREMA: Object to the form.  
19 A Fifth.  
20 Q Where are those computers today?  
21 MR. YAREMA: Object to the form.  
22 A Fifth.  
23 Q Were they taken by his investigator,  
24 Bill Riley?  
25 MR. YAREMA: Object to the form.

52

1 A Fifth.  
2 Q Do you know Bill Riley?  
3 A Fifth.  
4 Q Have you seen the flight logs from  
5 Jeffrey Epstein's private airplane flights?  
6 MR. YAREMA: Object to the form.  
7 A Fifth.  
8 Q Are you aware that you're listed as a  
9 passenger on many flights, along with Jeffrey  
10 Epstein on his private airplane?  
11 MR. YAREMA: Object to the form.  
12 A Fifth.  
13 Q Certainly comes as no surprise to you,  
14 since you were on his airplane on numerous  
15 occasions, correct?  
16 MR. YAREMA: Object to the form.  
17 A Fifth.  
18 Q On September 22, 2003, you were listed  
19 as being on a flight with [REDACTED], Jeffrey  
20 Epstein, [REDACTED], S.H. and B.T. My question  
21 is who is S.H. and who is B.T.?  
22 MR. YAREMA: Object to the form.  
23 A Fifth.  
24 Q Do you know [REDACTED]?  
25 A Fifth.

53

1 Q That's somebody that you're familiar  
2 with, because you have been to Jeffrey Epstein's  
3 house on many occasions with [REDACTED],  
4 correct?  
5 MR. YAREMA: Object to the form.  
6 A Fifth.  
7 Q In fact, do you remember there being a  
8 burglary of Jeffrey Epstein's house where he  
9 actually called the police to investigate the  
10 burglary?  
11 MR. YAREMA: Object to the form.  
12 A Fifth.  
13 Q And during the police investigation  
14 inside Jeffrey Epstein's house, you were speaking  
15 with [REDACTED], both in person, at Jeffrey  
16 Epstein's house, correct?  
17 MR. YAREMA: Object to the form.  
18 A Correct.  
19 Q Is this another person that Jeffrey  
20 Epstein, when she was a minor, violated  
21 sexually?  
22 MR. YAREMA: Object to the form.  
23 A Fifth.  
24 Q Do you still speak with [REDACTED]?  
25 MR. YAREMA: Object to the form.

54

1 A Fifth.  
2 Q Do you know Bill Clinton?  
3 A Fifth.  
4 Q You have been on Jeffrey Epstein's  
5 airplane with Bill Clinton?  
6 MR. YAREMA: Object to the form.  
7 A Fifth.  
8 Q Isn't take true you have been on Jeffrey  
9 Epstein's airplane with Doug Band, Bill Clinton's  
10 righthand man?  
11 MR. YAREMA: Object to the form.  
12 A Fifth.  
13 Q Have you witnessed improper sexual  
14 activity between Jeffrey Epstein and minors,  
15 while he was in the presence of Bill Clinton?  
16 MR. YAREMA: Object to the form.  
17 A Fifth.  
18 Q How many times have you ridden on the  
19 airplane with Jean Luc Brunel?  
20 MR. YAREMA: Object to the form.  
21 A Fifth.  
22 Q Each time that Jean Luc Brunel visits  
23 Jeffrey Epstein's house, does he bring underage  
24 minors to Jeffrey Epstein's house to engage in  
25 sex with?

55

1 MR. YAREMA: Object to the form.  
2 A Fifth.  
3 Q Do you know Glenn Dubin?  
4 A Fifth.  
5 Q Do you know Aline Weber?  
6 A Fifth.  
7 Q Is that somebody that was a sexual abuse  
8 victim at one point in time of Jeffrey Epstein  
9 and Jean Luc Brunel?  
10 MR. YAREMA: Object to the form.  
11 A Fifth.  
12 Q Between 2002 and 2005 when E.W. was  
13 abused by Jeffrey Epstein sexually, isn't it true  
14 that Jeffrey Epstein took flights to Palm Beach  
15 for the purposes of sexually abusing E.W.?  
16 MR. YAREMA: Object to the form.  
17 A Fifth.  
18 Q And between those same years of 2002 and  
19 2005, isn't it true that Jeffrey Epstein took  
20 airplane flights to Palm Beach from places  
21 outside of the State, to engage in sexual acts  
22 with L.M.?  
23 MR. YAREMA: Object to the form.  
24 A Fifth.  
25 Q From 2003 through 2005, isn't it true

56

1 Jeffrey Epstein specifically flew to Palm Beach  
2 for the purposes of engaging in sex acts with  
3 Jane Doe?  
4 MR. YAREMA: Object to the form.  
5 A Fifth.  
6 Q Generally, isn't it true Jeffrey Epstein  
7 would fly from place to place for the purpose of  
8 engaging in sexual activity with minors at his  
9 destination?  
10 MR. YAREMA: Object to the form.  
11 A Fifth.  
12 Q Isn't it true that he employed numerous  
13 people for the sole purpose of scheduling  
14 appointments with underage minor females at each  
15 destination he landed?  
16 MR. YAREMA: Object to the form.  
17 A Fifth.  
18 Q What is Jeffrey Epstein's relationship  
19 with Sandy Berger?  
20 MR. YAREMA: Object to the form.  
21 A Fifth.  
22 Q Do you know what Jeffrey Epstein's  
23 relationship is with Alan Dershowitz?  
24 MR. YAREMA: Object to the form.  
25 A Fifth.

57

1 Q That's somebody who you know to have  
2 stayed at Jeffrey Epstein's house on many  
3 occasions, correct?  
4 MR. YAREMA: Object to the form.  
5 A Fifth.  
6 Q And also somebody who you know to have  
7 been at the house when E.W. was in Jeffrey  
8 Epstein's bedroom getting sexually abused,  
9 correct?  
10 MR. YAREMA: Object to the form.  
11 A Fifth.  
12 Q Alan Dershowitz is also somebody that  
13 you also know to have been at the house when L.M.  
14 was being sexually abused in Jeffrey Epstein's  
15 bedroom, correct?  
16 MR. YAREMA: Object to the form.  
17 A Fifth.  
18 Q Generally, Alan Dershowitz is familiar  
19 with Jeffrey Epstein's habit of engaging in  
20 sexual acts with minors on a daily basis,  
21 correct?  
22 MR. YAREMA: Object to the form.  
23 A Fifth.  
24 Q When Alan Dershowitz was in town,  
25 Jeffrey Epstein did not break his schedule for

58

1 Alan Dershowitz, meaning he continued to sexually  
2 abuse minors despite Alan Dershowitz being a  
3 guest in the house?  
4 MR. YAREMA: Object to the form.  
5 A Fifth.  
6 Q Alan Dershowitz never engaged in any  
7 sexual activity with these underage minors; isn't  
8 that true?  
9 MR. YAREMA: Object to the form.  
10 A Fifth.  
11 Q Have you been made to have sex with  
12 Ghislaine Maxwell?  
13 MR. YAREMA: Object to the form.  
14 A Fifth.  
15 Q Do you know Emmy Taylor?  
16 A Fifth.  
17 Q Similar to you being Jeffrey Epstein's  
18 sex slave, is Emmy Taylor, or was Emmy Taylor  
19 Ghislaine Maxwell's sex slave?  
20 MR. YAREMA: Object to the form.  
21 A Fifth.  
22 Q Ghislaine Maxwell is somebody who you  
23 know to be bi-sexual, true?  
24 MR. YAREMA: Object to the form.  
25 A Fifth.

59

1 Q You know that Ghislaine Maxwell engaged  
2 in sexual acts with underage minor females, true?  
3 MR. YAREMA: Object to the form.  
4 A Fifth.  
5 Q This is yet another friend of Jeffrey  
6 Epstein's that is into the act of molesting  
7 underage minor females, right?  
8 MR. YAREMA: Object to the form.  
9 A Fifth.  
10 Q Now, you are the next participant in  
11 that activity, meaning you have been groomed to  
12 enjoy and appreciate the acts of sex with  
13 underage minors, true?  
14 MR. YAREMA: Object to the form.  
15 A Fifth.  
16 Q Has Jeffrey Epstein instructed you to  
17 lie to his Probation Officer in any way?  
18 MR. YAREMA: Object to the form.  
19 A Fifth.  
20 Q Mr. Visoski testified that you took a  
21 helicopter flight within the last year with  
22 Jeffrey Epstein to Miami. Do you remember that  
23 flight?  
24 MR. YAREMA: Object to the form.  
25 A Fifth.

60

1 Q What was the purpose of that flight?  
2 MR. YAREMA: Object to the form.  
3 A Fifth.  
4 Q Did you sign a confidentiality agreement  
5 with Jeffrey Epstein?  
6 MR. YAREMA: Object to the form.  
7 A Fifth.  
8 Q When is the last time that you observed  
9 Jeffrey Epstein have sex with a minor?  
10 MR. YAREMA: Object to the form.  
11 A Fifth.  
12 Q Since being on probation, has Jeffrey  
13 Epstein been able to, or has he flown to his  
14 island?  
15 MR. YAREMA: Object to the form.  
16 A Fifth.  
17 Q To your knowledge, has Jeffrey Epstein  
18 flown to New York while on probation or community  
19 control?  
20 MR. YAREMA: Object to the form.  
21 A Fifth.  
22 Q Isn't it true that he has flown both to  
23 New York and to his island, and you have  
24 accompanied him on those trips, since he was on  
25 community control?

61

1 MR. YAREMA: Object to the form.  
2 A Fifth.  
3 Q Isn't it also true that Jeffrey Epstein  
4 has indicated to you that he will always engage  
5 in sex acts with underage minor females?  
6 MR. YAREMA: Object to the form.  
7 A Fifth.  
8 Q In fact, that's something that he has  
9 told you, that he believes he is entitled to do;  
10 isn't that right?  
11 MR. YAREMA: Object to the form.  
12 A Fifth.  
13 Q Isn't it true that Jeffrey Epstein  
14 believes and has told you that if he doesn't  
15 physically force the underage minor female into  
16 any act, then he is entitled to engage in sex  
17 with any underage minor female despite the age?  
18 MR. YAREMA: Object to the form.  
19 A Fifth.  
20 Q What is the youngest female you have  
21 witnessed or observed Jeffrey Epstein to engage  
22 in sex with?  
23 MR. YAREMA: Object to the form.  
24 A Fifth.  
25 Q Do you have a bank account at Chase Bank

62

1 in New York?  
2 A Fifth.  
3 Q And the money in that bank account under  
4 your name is money that was given to you by  
5 Jeffrey Epstein, correct?  
6 MR. YAREMA: Object to the form.  
7 A Fifth.  
8 Q For the passed ten or so years, you have  
9 lived with Jeffrey Epstein under his control,  
10 right?  
11 MR. YAREMA: Object to the form.  
12 A Fifth.  
13 Q You get to lead the life of a  
14 millionaire, and to lead that life, you were only  
15 required to be Jeffrey Epstein's sex slave and to  
16 bring Jeffrey Epstein other slaves?  
17 MR. YAREMA: Object to the form.  
18 A Fifth.  
19 Q Is this 301 East 66th Street apartment  
20 still an apartment that you frequent today?  
21 MR. YAREMA: Object to the form.  
22 A Fifth.  
23 Q And you're familiar with the nine or ten  
24 apartments that Jeffrey Epstein owns or controls  
25 up there at 301 East 66th Street, aren't you?

63

1 MR. YAREMA: Object to the form.  
2 A Fifth.  
3 Q At any given time, there are between 8  
4 and 16 underage minors living in or staying at  
5 those apartments?  
6 MR. YAREMA: Object to the form.  
7 A Fifth.  
8 Q On the various passenger lists on  
9 Jeffrey Epstein's airplane, where it will list,  
10 for instance, Jeffrey Epstein, [REDACTED],  
11 [REDACTED] going from Florida to St.  
12 Thomas, then generically, female, female; would  
13 you know who those female, females are?  
14 MR. YAREMA: Object to the form.  
15 A Fifth.  
16 Q Are those females listed generically  
17 rather than specifically because they are  
18 underage minor females engaging in sex with you  
19 or Jeffrey Epstein?  
20 MR. YAREMA: Object to the form.  
21 A Fifth.  
22 Q Is Story Cowles someone that you see on  
23 a regular basis at Jeffrey Epstein's house?  
24 MR. YAREMA: Object to the form.  
25 A Fifth.

64

1 Q That's somebody who these days refers to  
2 himself as Jeffrey Epstein's personal assistant,  
3 right?  
4 MR. YAREMA: Object to the form.  
5 A Fifth.  
6 Q That's somebody who you know to work for  
7 or at the Florida Science Foundation, which is  
8 owned by Jeffrey Epstein, correct?  
9 MR. YAREMA: Object to the form.  
10 A Fifth.  
11 Q It is also somebody that you know to  
12 have stayed at Jeffrey Epstein's house with [REDACTED]  
13 [REDACTED], correct?  
14 MR. YAREMA: Object to the form.  
15 A Fifth.  
16 Q This is somebody that has been  
17 involved -- Story Cowles is somebody who's been  
18 involved sexually with [REDACTED] for at least  
19 a year, right?  
20 MR. YAREMA: Object to the form.  
21 A Fifth.  
22 Q In fact, you know that they took a trip  
23 around the world together and during that trip  
24 they discussed Jeffrey Epstein and his  
25 interaction with underage minor females,

65

1 correct?  
2 MR. YAREMA: Object to the form.  
3 A Fifth.  
4 MR. EDWARDS: Done. I don't have  
5 anything else.  
6 MR. GOLDBERGER: Okay.  
7 MR. HOROWITZ: I do, why don't we take a  
8 short break.  
9 MR. GOLDBERGER: We are stopping at  
10 11:50.  
11 MR. HOROWITZ: What?  
12 MR. GOLDBERGER: 11:50.  
13 MR. HOROWITZ: I kind of remember that  
14 e-mail.  
15 THE VIDEOGRAPHER: Off the video record.  
16 (Pause in the proceedings.)  
17 THE VIDEOGRAPHER: We are back on the  
18 video record at 11:18 a.m.)  
19 (At this time Robert Critton joined the  
20 proceedings.)  
21 CROSS EXAMINATION  
22 BY MR. HOROWITZ:  
23 Q Ms. [REDACTED], between 2001 and 2006,  
24 did Jeffrey Epstein instruct you to place  
25 telephone calls to arrange for girls under the

1 age of 18 to come to his home for his sexual  
2 gratification?  
3 MR. YAREMA: Object to the form.  
4 A Fifth.  
5 Q Between 2001 and 2006 did you, in fact,  
6 place telephone calls to arrange for girls under  
7 the age of 18 to come to Jeffrey Epstein's home  
8 for his sexual gratification?  
9 MR. YAREMA: Object to the form.  
10 A Fifth.  
11 Q Are you personally aware that a girl  
12 named M.L. came to Jeffrey Epstein's Palm Beach  
13 home in late 2004?  
14 MR. YAREMA: Object to the form.  
15 A Fifth.  
16 Q Did Jeffrey Epstein admit to you he  
17 sexually abused M.L.?  
18 MR. YAREMA: Object to the form.  
19 A Fifth.  
20 Q Isn't it true in late 2004 you made  
21 arrangements by telephone to bring M.L. to  
22 Jeffrey Epstein's home?  
23 MR. YAREMA: Object to the form.  
24 A Fifth.  
25 Q Did Jeffrey Epstein instruct you to

1 communicate by telephone to arrange for M.L. to  
2 come to his home for his sexual gratification?  
3 MR. YAREMA: Object to the form.  
4 A Fifth.  
5 Q Did Jeffrey Epstein inform you that M.L.  
6 would be giving him a massage that was sexual in  
7 nature?  
8 MR. YAREMA: Object to the form.  
9 A Fifth.  
10 Q Did Jeffrey Epstein tell you it was his  
11 intent during the course of M.L.'s visit to his  
12 home to persuade, induce or entice her to engage  
13 in sexual activity?  
14 MR. YAREMA: Object to the form.  
15 A Fifth.  
16 Q Did Jeffrey Epstein tell you that, in  
17 fact, he succeeded in persuading, inducing or  
18 enticing M.L. to engage in sexual activity with  
19 him?  
20 MR. YAREMA: Object to the form.  
21 A Fifth.  
22 Q Are you personally aware that a girl  
23 named Y.L. came to Jeffrey Epstein's Palm Beach  
24 home on multiple occasions in 2004?  
25 MR. YAREMA: Object to the form.

1 A Fifth.  
2 Q Did Jeffrey Epstein admit to you that he  
3 sexually abused Y.L. in his Palm Beach home in  
4 2004?  
5 MR. YAREMA: Object to the form.  
6 A Fifth.  
7 Q Did you ever instruct a girl named [REDACTED]  
8 [REDACTED] to bring other underage girls to Jeffrey  
9 Epstein's home for Jeffrey Epstein's sexual  
10 pleasure?  
11 MR. YAREMA: Object to the form.  
12 A Fifth.  
13 Q In 2004 did you communicate by telephone  
14 with [REDACTED] for the purpose of bringing  
15 Y.L. to Jeffrey Epstein's home for sexual  
16 activity MR. YAREMA: Object to the form.  
17 A Fifth.  
18 Q Did Jeffrey Epstein instruct you to  
19 communicate with [REDACTED] for the purpose of  
20 making arrangements for Y.L. to come to his home?  
21 MR. YAREMA: Object to the form.  
22 A Fifth.  
23 Q Did Jeffrey Epstein tell you it was his  
24 intent during the course of Y.L.'s visit to his  
25 home to persuade, induce or entice her to engage

1 in sexual activity with him?  
2 MR. YAREMA: Object to the form.  
3 A Fifth.  
4 Q Did Jeffrey Epstein admit to you that he  
5 had succeeded in, in fact, persuading, inducing  
6 or enticing Y.L. to engage in sexual activity  
7 with him?  
8 MR. YAREMA: Object to the form.  
9 A Fifth.  
10 Q Are you personally aware that a teenage  
11 girl named [REDACTED], came to Jeffrey Epstein's Palm  
12 Beach home on multiple occasions between 2003 and  
13 2005?  
14 MR. YAREMA: Object to the form.  
15 A Fifth.  
16 Q Did Jeffrey Epstein admit to you that he  
17 sexually abused [REDACTED]?  
18 MR. YAREMA: Object to the form.  
19 A Fifth.  
20 Q At any time prior to May of 2005, did  
21 Jeffrey Epstein instruct you to place telephone  
22 calls to [REDACTED] for the purpose of arranging for  
23 her to come to his home and engage in sexual  
24 activity?  
25 MR. YAREMA: Object to the form.

1 A Fifth.

2 Q Did you, in fact, communicate by

3 telephone with [REDACTED] for the purpose of arranging

4 for her to come to his home for sexual activity?

5 MR. YAREMA: Object to the form.

6 A Fifth.

7 Q At any time prior to May of 2005, did

8 you place a telephone call to [REDACTED] [REDACTED]

9 wherein you arranged for [REDACTED] to come to Jeffrey

10 Epstein's home for sexual activity?

11 MR. YAREMA: Object to the form.

12 A Fifth.

13 Q Prior to May of 2005, did you ever

14 observe [REDACTED] speaking with [REDACTED] by

15 telephone to arrange for [REDACTED] to come to Jeffrey

16 Epstein's home?

17 MR. YAREMA: Object to the form.

18 A Fifth.

19 Q Did Jeffrey Epstein tell you that it was

20 his intention to sexually abuse [REDACTED] during the

21 course of her visits to his home?

22 MR. YAREMA: Object to the form.

23 A Fifth.

24 Q Did Jeffrey Epstein tell you that he

25 succeeded in engaging [REDACTED] in sexual activity

1 while she was still a minor, at his home?

2 MR. YAREMA: Object to the form.

3 A Fifth.

4 Q Are you personally aware that a teenage

5 girl named an A.G., came to Jeffrey Epstein's

6 Palm Beach home in approximately 2001 or 2002?

7 MR. YAREMA: Object to the form.

8 A Fifth.

9 Q Did Jeffrey Epstein admit to you that he

10 sexually abused A.G. at his home while she was

11 still a child?

12 MR. YAREMA: Object to the form.

13 A Fifth.

14 Q In 2001 or 2002, did [REDACTED] inform

15 you that she received a telephone call in which

16 she was referred to A.G., who would be willing to

17 come to Jeffrey Epstein's home for sexual

18 activity?

19 MR. YAREMA: Object to the form.

20 A Fifth.

21 (Whereupon, at this point in the

22 proceedings, Robert Critton left the

23 deposition room.)

24 Q Did Jeffrey Epstein instruct you to call

25 A.G. to come to his home and give him a massage

1 in either 2001 or 2002?

2 MR. YAREMA: Object to the form.

3 A Fifth.

4 Q Did you, in fact, call A.G. to come to

5 Jeffrey Epstein's home and give him a massage in

6 a sexual nature in 2001 or 2002?

7 MR. YAREMA: Object to the form.

8 A Fifth.

9 Q Did you either observe or overhear [REDACTED]

10 [REDACTED] speaking with A.G. on the telephone to

11 arrange for A.G. to come to Jeffrey Epstein's

12 home for a massage of a sexual nature?

13 MR. YAREMA: Object to the form.

14 A Fifth.

15 Q Did Jeffrey Epstein tell you it was his

16 intent during the course of A.G.'s visit to his

17 home to persuade, induce or entice her to engage

18 in sexual activity?

19 MR. YAREMA: Object to the form.

20 A Fifth.

21 Q Didn't Jeffrey Epstein admit to you that

22 he succeeded in persuading, inducing or enticing

23 A.G. to engage in sexual activity with him at his

24 home while she was still a minor?

25 MR. YAREMA: Object to the form.

1 A Fifth.

2 Q Are you personally aware that a girl

3 named [REDACTED] came to Jeffrey Epstein's home in

4 approximately August 2004?

5 MR. YAREMA: Object to the form.

6 A Fifth.

7 Q Did Jeffrey Epstein admit to you that he

8 had sexually abused [REDACTED] when she was only 13

9 years old?

10 MR. YAREMA: Object to the form.

11 A Fifth.

12 Q In 2004 did you participate in a

13 telephone call wherein you arranged for [REDACTED] to

14 come to Jeffrey Epstein's home for the purpose of

15 giving him a massage that was to be sexual in

16 nature?

17 MR. YAREMA: Object to the form.

18 A Fifth.

19 Q Did Jeffrey Epstein instruct you to

20 communicate by telephone and make arrangements

21 for [REDACTED] to come to his home for sexual activity

22 while she was still a child?

23 MR. YAREMA: Object to the form.

24 A Fifth.

25 Q Did Jeffrey Epstein tell you it was his

1 intention during the course of [REDACTED]'s visit to  
2 his home to persuade, induce or entice her to  
3 engage in sexual activity with him?

4 MR. YAREMA: Object to the form.

5 A Fifth.

6 Q Did Jeffrey Epstein tell you that, in  
7 fact, he succeeded in persuading, inducing and  
8 enticing [REDACTED] to engage in sexual activity with  
9 him while she was still a child at his home?

10 MR. YAREMA: Object to the form.

11 A Fifth.

12 Q Are you personally aware that a girl  
13 named F.P. came to Jeffrey Epstein's home in Palm  
14 Beach on multiple occasions between 2003 and May  
15 of 2005?

16 MR. YAREMA: Object to the form.

17 A Fifth.

18 Q Did Jeffrey Epstein admit to you that he  
19 sexually abused F.P. at his home between 2003 and  
20 May of 2005?

21 MR. YAREMA: Object to the form.

22 A Fifth.

23 Q Prior to May of 2005, did you receive a  
24 phone call from a girl named [REDACTED] [REDACTED] wherein  
25 she told you she was bringing F.P. to Jeffrey

1 Epstein's home to give him a massage?

2 MR. YAREMA: Object to the form.

3 A Fifth.

4 Q At any time prior to 2005, did Jeffrey  
5 Epstein instruct you to communicate with [REDACTED]  
6 [REDACTED] by telephone to make arrangements for F.P.  
7 to come to his home?

8 MR. YAREMA: Object to the form.

9 A Fifth.

10 Q Prior to F.P.'s visits to Jeffrey  
11 Epstein's home, did Jeffrey Epstein tell you it  
12 was his intention to induce, entice and engage  
13 F.P., to engage in sexual activity with him?

14 MR. YAREMA: Object to the form.

15 A Fifth.

16 Q After F.P.'s visits to Jeffrey Epstein's  
17 home, did Jeffrey Epstein tell you that he  
18 succeeded in enticing, engaging and persuading  
19 F.P. to engage in sexual activity with him while  
20 she was still a child?

21 MR. YAREMA: Object to the form.

22 A Fifth.

23 Q Are you personally aware that a teenage  
24 girl named J.M. came to Jeffrey Epstein's Palm  
25 Beach home in approximately 2001 or 2002?

1 MR. YAREMA: Object to the form.

2 A Fifth.

3 Q Did you participate in a telephone call  
4 wherein you arranged for J.M. to come to Jeffrey  
5 Epstein's home for a massage?

6 MR. YAREMA: Object to the form.

7 A Fifth.

8 Q Did Jeffrey Epstein instruct you to  
9 participate in a telephone call wherein you were  
10 to arrange for J.M. to come to his home for  
11 sexual activity?

12 MR. YAREMA: Object to the form.

13 A Fifth.

14 Q Did Jeffrey Epstein admit to you it was  
15 his intention during the course of J.M.'s visit  
16 to his home, to engage her in sexual activity  
17 while she was still a child?

18 MR. YAREMA: Object to the form.

19 A Fifth.

20 Q Did Jeffrey Epstein admit to you he had,  
21 in fact, persuaded, enticed and engaged J.M. in  
22 sexual activity at his home while she was still a  
23 child?

24 MR. YAREMA: Object to the form.

25 A Fifth.

1 MR. HOROWITZ: No other questions at  
2 this point.

3 MR. LANGINO: I have less than ten  
4 minutes of questioning.

5 MR. GOLDBERGER: Fine, that will bring  
6 us right to the break.

7 CROSS EXAMINATION

8 BY MR. LANGINO:

9 Q I'm Adam Langino and I represent B.B.  
10 and C.L.

11 Do you know an individual named B.B.?

12 A Fifth.

13 Q Do you know an individual named C.L.?

14 A Fifth.

15 Q Have you seen B.B. at the defendant's  
16 Palm Beach property?

17 MR. YAREMA: Object to the form.

18 A Fifth.

19 Q Have you seen C.L. at the defendant's  
20 Palm Beach property?

21 MR. YAREMA: Object to the form.

22 A Fifth.

23 Q Have you ever engaged in a sexual act  
24 with B.B.... B.B.?

25 MR. YAREMA: Object to the form.

78

1 A Fifth.  
2 Q Have you ever engaged in a sexual act  
3 with C.L.... C.L.?  
4 MR. YAREMA: Object to the form.  
5 A Fifth.  
6 Q Did you ever observe the defendant,  
7 Jeffrey Epstein, with B.B.?  
8 MR. YAREMA: Object to the form.  
9 A Fifth.  
10 Q Did you ever observe the defendant,  
11 Jeffrey Epstein, with C.L.?  
12 MR. YAREMA: Object to the form?  
13 A Fifth.  
14 Q Have you ever physically touched B.B.?  
15 MR. YAREMA: Object to the form.  
16 A Fifth.  
17 Q Have you ever physically touched C.L.?  
18 MR. YAREMA: Object to the form.  
19 A Fifth.  
20 Q Has the defendant ever made a statement  
21 to you about B.B.?  
22 MR. YAREMA: Object to the form.  
23 A Fifth.  
24 Q Has the defendant ever made a statement  
25 to you about C.L.?

79

1 MR. YAREMA: Object to the form.  
2 A Fifth.  
3 Q Has [REDACTED] ever made a statement  
4 to you about B.B.?  
5 MR. YAREMA: Object to the form.  
6 A Fifth.  
7 Q Has [REDACTED] ever made a statement  
8 to you about C.L.?  
9 MR. YAREMA: Object to the form.  
10 A Fifth.  
11 Q Have you ever communicated with B.B.?  
12 MR. YAREMA: Object to the form.  
13 A Fifth.  
14 Q Have you ever communicated with C.L.?  
15 MR. YAREMA: Object to the form.  
16 A Fifth.  
17 Q Did you know that B.B., B.B. was a minor  
18 at the time of sexual abuse?  
19 MR. YAREMA: Object to the form.  
20 A Fifth.  
21 Q Did you know C.L.... C.L. was a minor at  
22 the time of the sexual abuse?  
23 MR. YAREMA: Object to the form.  
24 A Fifth.  
25 Q Do you know if B.B.'s sexual activity

80

1 with the defendant was consensual?  
2 MR. YAREMA: Object to the form.  
3 A Fifth.  
4 Q Do you know if C.L.'s sexual activity  
5 with the defendant was consensual?  
6 MR. YAREMA: Object to the form.  
7 A Fifth.  
8 Q When you participated in sexual acts  
9 with each minor, how did you feel?  
10 MR. YAREMA: Object to the form.  
11 A Fifth.  
12 Q In your heart, did you know it was  
13 wrong?  
14 MR. YAREMA: Object to the form, and in  
15 addition this is irrelevant and has already  
16 been addressed by Judge Hafele as an  
17 inappropriate question. That's my  
18 objection.  
19 A Fifth.  
20 Q During this time period did you feel  
21 confused?  
22 MR. YAREMA: Object to the form.  
23 MR. GOLDBERGER: Same --  
24 MR. YAREMA: Same objection.  
25 A Fifth.

81

1 Q Are you currently in love with the  
2 defendant?  
3 MR. YAREMA: Object to the form, same  
4 objection. That question has no relevance  
5 to this... it is inappropriate per Judge  
6 Hafele's order.  
7 MR. GOLDBERGER: Also involves privacy  
8 rights of my client. I instruct her not to  
9 answer the question.  
10 A Fifth.  
11 Q Have you ever been in love with Jeffrey  
12 Epstein?  
13 MR. GOLDBERGER: Same objection.  
14 MR. YAREMA: Same objections.  
15 A Fifth.  
16 MR. LANGINO: Thank you.  
17 CROSS EXAMINATION  
18 BY MS. EZELL:  
19 (Discussion off the record.)  
20 Q Good morning, Ms. [REDACTED]. I'm  
21 Katherine Ezell and I represent Jane Doe 103,  
22 whose name is A.H., which shall appear as A.H. in  
23 the deposition.  
24 Are you aware that in 2004 and 5, there  
25 was a sort of hidden staircase that would take

82

1 one from the kitchen upstairs to the master  
2 bedroom and massage area?  
3 MR. YAREMA: Object to the form.  
4 A Fifth.  
5 Q Do you recall there being nude  
6 photographs on the staircase?  
7 MR. YAREMA: Object to the form.  
8 A Fifth.  
9 Q Did you know A.H.?  
10 A Fifth.  
11 Q Did A.H. come to the house at 358 El  
12 Brillo Way to provide a massage to Jeffrey  
13 Epstein?  
14 MR. YAREMA: Object to the form.  
15 A Fifth.  
16 Q Did that massage become sexual in  
17 nature?  
18 MR. YAREMA: Object to the form.  
19 A Fifth.  
20 Q Did A.H. become a regular visitor at  
21 Jeffrey Epstein's house?  
22 MR. YAREMA: Object to the form.  
23 A Fifth.  
24 Q Do you remember that she came maybe  
25 hundreds of times?

83

1 MR. YAREMA: Object to the form.  
2 A Fifth.  
3 Q Do you recall that she was under the age  
4 of 18 at the time she was coming to Jeffrey  
5 Epstein's home?  
6 MR. YAREMA: Object to the form.  
7 A Fifth.  
8 Q Were you younger than A.H. at the time?  
9 MR. YAREMA: Object to the form.  
10 A Fifth.  
11 Q Do you remember occasions when you and  
12 Jeffrey Epstein were already in bed when A.H.  
13 arrived?  
14 MR. YAREMA: Object to the form.  
15 A Fifth.  
16 Q Do you recall Jeffrey Epstein  
17 instructing A.H. to remove her clothes and join  
18 the two of you in bed?  
19 MR. YAREMA: Object to the form.  
20 A Fifth.  
21 Q Do you recall that you and Jeffrey  
22 Epstein bringing sex toys in bed for you and A.H.  
23 to use on each other?  
24 MR. YAREMA: Object to the form.  
25 A Fifth.

84

1 Q Do you recall that Jeffrey Epstein would  
2 join in by performing oral sex on one or the  
3 other of you -- you or A.H.?  
4 MR. YAREMA: Object to the form.  
5 A Fifth.  
6 Q Do you recall that also happening,  
7 meaning the oral sex, being performed on the  
8 massage table --  
9 MR. YAREMA: Objection.  
10 Q -- to A.H.?  
11 MR. YAREMA: Object to the form.  
12 A Fifth.  
13 Q Were you present one day when Jeffrey  
14 Epstein held A.H. down on the massage table and  
15 while holding her inserted his penis into A.H.'s  
16 vagina?  
17 MR. YAREMA: Object to the form.  
18 A Fifth.  
19 Q Do you recall he stated that he wanted  
20 you to observe this?  
21 MR. YAREMA: Object to the form.  
22 A Fifth.  
23 Q Do you recall that A.H. had rules,  
24 lines, that she had stated Jeffrey Epstein was  
25 not to cross, in their encounters?

85

1 MR. YAREMA: Object to the form.  
2 A Fifth.  
3 Q Do you recall that A.H. had forbidden  
4 any kind of vaginal penetration?  
5 MR. YAREMA: Object to the form.  
6 A Fifth.  
7 Q Do you recall that A.H. refused to touch  
8 Jeffrey Epstein's penis?  
9 MR. YAREMA: Object to the form.  
10 A Fifth.  
11 Q Do you recall that day when Jeffrey  
12 Epstein held A.H. on her stomach on the massage  
13 table and began pumping his penis into her  
14 vagina, that she screamed "No"?  
15 MR. YAREMA: Object to the form.  
16 A Fifth.  
17 Q Do you recall that upon her screaming,  
18 Epstein stopped and apologized?  
19 MR. YAREMA: Object to the form.  
20 A Fifth.  
21 Q Do you recall that Jeffrey Epstein paid  
22 her \$1,000 for that visit?  
23 MR. YAREMA: Object to the form.  
24 A Fifth.  
25 Q Did you engage in sex with A.H. when she

86

1 was under 18?  
2 MR. YAREMA: Object to the form.  
3 A Fifth.  
4 Q Did Jeffrey Epstein watch you and A.H.  
5 having sex while he masturbated?  
6 MR. YAREMA: Object to the form.  
7 A Fifth.  
8 Q Are you aware that A.H.'s activities  
9 with Jeffrey Epstein escalated further and  
10 further as time went on?  
11 MR. YAREMA: Object to the form.  
12 A Fifth.  
13 Q Did you see Jeffrey Epstein use  
14 vibrators and strap-on -- use vibrators on A.H.?  
15 MR. YAREMA: Object to the form.  
16 A Fifth.  
17 Q Did you and A.H. engage in sex with  
18 strap-on penises?  
19 MR. YAREMA: Object to the form.  
20 A Fifth.  
21 Q Did you see Jeffrey Epstein perform oral  
22 sex on A.H. numerous times?  
23 MR. YAREMA: Object to the form.  
24 A Fifth.  
25 Q Did Jeffrey Epstein pay A.H. an

87

1 additional \$200 to perform oral sex on you?  
2 MR. YAREMA: Object to the form.  
3 A Fifth.  
4 Q Do you recall that each time a new toy  
5 or activity was introduced when A.H. was there to  
6 give massages, Jeffrey Epstein paid A.H.  
7 additional money?  
8 MR. YAREMA: Object to the form.  
9 A Fifth.  
10 Q Would Jeffrey Epstein masturbate while  
11 watching you and A.H. perform sexual acts?  
12 MR. YAREMA: Object to the form.  
13 A Fifth.  
14 Q Do you recall that Jeffrey Epstein  
15 provided A.H. with gifts of purses and  
16 bathingsuits?  
17 MR. YAREMA: Object to the form.  
18 A Fifth.  
19 Q Do you recall that Jeffrey Epstein  
20 provided A.H. with a blue 2000 Dodge Neon which  
21 had been rented for her?  
22 MR. YAREMA: Object to the form.  
23 A Fifth.  
24 Q Do you recall that Jeffrey Epstein  
25 ordered that roses be delivered to A.H. at the

88

1 end of a play performance during her senior year?  
2 MR. YAREMA: Object to the form.  
3 A Fifth.  
4 THE VIDEOGRAPHER: Counsel, can we stop  
5 for one minute?  
6 MS. EZELL: Sure.  
7 THE VIDEOGRAPHER: Off the video record  
8 11:43 a.m.  
9 (Short pause.)  
10 (Whereupon at this point in time, Mr.  
11 Langino left the proceedings.)  
12 THE VIDEOGRAPHER: Back on the video  
13 record 1:43 a.m.  
14 CROSS EXAMINATION (CONTINUED)  
15 BY MS. EZELL:  
16 Q Were you present in October 2005 when  
17 the Palm Beach Police Department raided Jeffrey  
18 Epstein's home?  
19 MR. YAREMA: Object to the form.  
20 A Fifth.  
21 Q You and others were aware that there  
22 would be a raid at that time; were you not?  
23 MR. YAREMA: Object to the form.  
24 A Fifth.  
25 Q Who informed you that there would be a

89

1 raid on the house?  
2 MR. YAREMA: Object to the form.  
3 A Fifth.  
4 Q Did you participate in the removal of  
5 nude photographs, sex toys, computer records from  
6 358 El Brillo Way prior to the raid?  
7 MR. YAREMA: Object to the form.  
8 A Fifth.  
9 Q Do you know who removed those objects at  
10 that time?  
11 MR. YAREMA: Object to the form.  
12 A Fifth.  
13 Q Do you remember that at times Jeffrey  
14 Epstein paid A.H. to just sleep in his bed in the  
15 nude?  
16 MR. YAREMA: Object to the form.  
17 A Fifth.  
18 Q Do you recall at times he paid her to  
19 just cuddle with him?  
20 MR. YAREMA: Object to the form.  
21 A Fifth.  
22 Q Did you ever drive A.H. to or from 358  
23 El Brillo Way?  
24 MR. YAREMA: Object to the form.  
25 A Fifth.

90

1 Q Did you ever know [REDACTED] to drive  
2 A.H. to or from 358 El Brillo Way?  
3 MR. YAREMA: Object to the form.  
4 A Fifth.  
5 Q Do you remember the houseman at that  
6 time as being Alfredo Rodriguez?  
7 MR. YAREMA: Object to the form.  
8 A Fifth.  
9 Q Do you remember Alfredo Rodriguez being  
10 instructed to drive A.H. to or from 358 El Brillo  
11 Way?  
12 MR. YAREMA: Object to the form.  
13 A Fifth.  
14 Q Do you recall a time when Alfredo  
15 Rodriguez discovered A.H. asleep upstairs naked?  
16 MR. YAREMA: Object to the form.  
17 A Fifth.  
18 Q Were you aware Jeffrey Epstein  
19 repeatedly asked A.H. to allow him to photograph  
20 her in the nude?  
21 MR. YAREMA: Object to the form.  
22 A Fifth.  
23 Q Did you allow Jeffrey Epstein to take  
24 photographs, nude photographs of you?  
25 MR. YAREMA: Object to the form.

91

1 A Fifth.  
2 Q Do you recall a time when A.H. gave in  
3 and did allow Jeffrey Epstein to photograph her  
4 while nude?  
5 MR. YAREMA: Object to the form.  
6 A Fifth.  
7 Q Did you ever see any of those  
8 photographs taken by Jeffrey Epstein of A.H. in  
9 the nude?  
10 MR. YAREMA: Object to the form.  
11 A Fifth.  
12 Q Do you know whether those photographs  
13 were ever developed?  
14 MR. YAREMA: Object to the form.  
15 A Fifth.  
16 Q Do you know what kind of camera Jeffrey  
17 Epstein liked to use when taking photographs of  
18 women posing in the nude?  
19 MR. YAREMA: Object to the form.  
20 A Fifth.  
21 Q Did you ever hear here Jeffrey Epstein  
22 tell A.H. that she needed to lose ten pounds?  
23 MR. YAREMA: Object to the form.  
24 A Fifth.  
25 Q Did you ever hear here him tell her that

92

1 he would pay her 1,000 or \$1,500 if she would  
2 lose ten pounds?  
3 MR. YAREMA: Object to the form.  
4 A Fifth.  
5 Q Did you know A.H. to be a good student?  
6 MR. YAREMA: Object to the form.  
7 A Fifth.  
8 Q Did it appear that you that A.H. was  
9 smart?  
10 MR. YAREMA: Object to the form.  
11 A Fifth.  
12 Q Did you observe that A.H. was concerned  
13 about her grades?  
14 MR. YAREMA: Object to the form.  
15 A Fifth.  
16 Q Do you recall Jeffrey Epstein expressing  
17 interest in A.H.'s college ambitions?  
18 MR. YAREMA: Object to the form.  
19 A Fifth.  
20 Q Have you known Jeffrey Epstein to brag  
21 about donations he's made to colleges like NYU,  
22 Columbia, Harvard and Wharton?  
23 MR. YAREMA: Object to the form.  
24 A Fifth.  
25 Q Do you know that A.H. wanted very much

93

1 to go to school in New York at NYU or at  
2 Columbia?  
3 MR. YAREMA: Object to the form.  
4 A Fifth.  
5 Q Did you know that Jeffrey Epstein  
6 promised to help her get into one of those  
7 schools?  
8 MR. YAREMA: Object to the form.  
9 A Fifth.  
10 Q Do you know whether he did help?  
11 MR. YAREMA: Object to the form.  
12 A Fifth.  
13 Q Do you know whether he offered to pay  
14 some of her college expenses?  
15 MR. YAREMA: Object to the form.  
16 A Fifth.  
17 Q Did you ever observe Jeffrey Epstein  
18 working with A.H. on her college applications?  
19 MR. YAREMA: Object to the form.  
20 A Fifth.  
21 Q Did you ever see A.H. just hanging out  
22 at Jeffrey Epstein's house studying while nude?  
23 MR. YAREMA: Object to the form.  
24 A Fifth.  
25 Q Did you know that Jeffrey Epstein gave

94

1 A.H. airline tickets and theater tickets in New  
2 York?  
3 MR. YAREMA: Object to the form.  
4 A Fifth.  
5 Q Did you and A.H. ever go shopping  
6 together?  
7 MR. YAREMA: Object to the form.  
8 A Fifth.  
9 Q Did you call A.H. once and ask her to go  
10 shopping with you for Jeffrey Epstein on his  
11 birthday?  
12 MR. YAREMA: Object to the form.  
13 A Fifth.  
14 Q Did you and A.H. purchase adult sex toys  
15 to use for Jeffrey Epstein's birthday, as a show,  
16 for him?  
17 MR. YAREMA: Object to the form.  
18 A Fifth.  
19 Q Are you aware that Jeffrey Epstein told  
20 A.H. he would pay her to bring other young girls  
21 to give him massages?  
22 MR. YAREMA: Object to the form.  
23 A Fifth.  
24 Q Do you know that Jeffrey Epstein paid  
25 A.H. \$200 for each girl that she brought to him,

95

1 to give him a massage?  
2 MR. YAREMA: Object to the form.  
3 A Fifth.  
4 MR. GOLDBERGER: I guess we will have to  
5 take a break now, if that's all right with  
6 you.  
7 MS. EZELL: Okay.  
8 THE VIDEOGRAPHER: 11:50 a.m., going off  
9 the video record.  
10 MR. GOLDBERGER: I will be done at 1:15  
11 so we can go until 1:30.  
12 (Pause in the proceedings.)  
13 THE VIDEOGRAPHER: We are back on the  
14 video record at 1:36 p.m.  
15 CROSS EXAMINATION (CONTINUED)  
16 BY MS. EZELL:  
17 Q Ms. [REDACTED], did you ever have dinner  
18 at Jeffrey Epstein's house, with David  
19 Copperfield as a guest, when A.H. was present?  
20 MR. YAREMA: Object to the form.  
21 A The Fifth.  
22 Q Have you met David Copperfield?  
23 A Fifth.  
24 Q Have you ever been given tickets to go  
25 see one of his shows?

96

1 A The Fifth.  
2 Q Do you know if typically girls who  
3 Epstein knew, were given tickets to go to the  
4 show, then invited back stage?  
5 MR. YAREMA: Object to the form.  
6 A Fifth.  
7 THE VIDEOGRAPHER: Can you speak up?  
8 THE WITNESS: (Adjusts microphone.)  
9 Q Did A.H. ever tell you that David  
10 Copperfield tried to feel her butt during dinner?  
11 MR. YAREMA: Object to the form.  
12 A Fifth.  
13 Q Did you ever hear Jeffrey Epstein  
14 telling any of the young women who came to give  
15 him massages, that he was a brain scientist?  
16 MR. YAREMA: Object to the form.  
17 A Fifth.  
18 Q Did you know A.D.?  
19 A Fifth.  
20 Q And from now on I will use the initials  
21 A.D. Do you know that A.D. visited Jeffrey  
22 Epstein at 358 El Brillo Way some 15 to 20 times?  
23 MR. YAREMA: Object to the form?  
24 A Fifth.  
25 Q Did you ever interact with A.D. while

97

1 she was there to give a massage?  
2 MR. YAREMA: Object to the form.  
3 A Fifth.  
4 Q Did you know that at the time she was  
5 visiting Mr. Epstein and providing massages, she  
6 was under the age of 18?  
7 MR. YAREMA: Object to the form.  
8 A Fifth.  
9 Q Do you recall being introduced to A.D.  
10 by Mr. Epstein?  
11 MR. YAREMA: Object to the form.  
12 A Fifth.  
13 Q Do you recall that Jeffrey Epstein  
14 instructed you and A.D. to kiss and fondle each  
15 other around the breasts and buttocks while  
16 massaging him?  
17 MR. YAREMA: Object to the form.  
18 A Fifth.  
19 Q Did you ever see Mr. Epstein use a large  
20 vibrator/massager on A.D.?  
21 MR. YAREMA: Object to the form.  
22 A Fifth.  
23 Q Did Jeffrey Epstein ever ask you to  
24 purchase a digital camera for him to give A.D.?  
25 MR. YAREMA: Object to the form.

1 A Fifth.  
 2 Q Did you know that Jeffrey Epstein gave  
 3 A.D. a digital camera?  
 4 MR. YAREMA: Object to the form.  
 5 A Fifth.  
 6 MS. EZELL: I don't have any other  
 7 questions. Thank you.  
 8 MR. GOLDBERGER: You still have your  
 9 microphone on. You must have something on  
 10 your mind, Brad.  
 11 REDIRECT EXAMINATION  
 12 BY MR. EDWARDS:  
 13 Q Ms. [REDACTED], through the whole day  
 14 you've taken the Fifth on just about every single  
 15 question. Is there any reason why we should not  
 16 presume that the answer to these questions would  
 17 incriminate you?  
 18 MR. YAREMA: Object to the form.  
 19 A The Fifth.  
 20 Q The reason that you have taken the Fifth  
 21 is because the questions you have been asked  
 22 would have been answered in the affirmative and  
 23 you're afraid of prosecution for your  
 24 involvement, true?  
 25 MR. GOLDBERGER: Don't answer that

1 question. It interferes with the  
 2 attorney/client relationship that I have  
 3 with Ms. [REDACTED] and any discussions she  
 4 and I may have had would come under that  
 5 privilege.  
 6 You can try and dance around that, but  
 7 I'm simply not going to allow her to answer  
 8 that question. If you want to bring it up  
 9 with the Judge, you can.  
 10 MR. EDWARDS: Thanks, Jack.  
 11 MR. GOLDBERGER: Okay.  
 12 THE VIDEOGRAPHER: Off the video record  
 13 at 1:41 p.m.  
 14 THE COURT REPORTER: You're ordering  
 15 this, Brad?  
 16 MR. EDWARDS: Yes. Copies?  
 17 MS. EZELL: Yes.  
 18 MR. YAREMA: Yes.  
 19 THE COURT REPORTER: And Adam wanted it;  
 20 is that right?  
 21 MR. EDWARDS: Yes.  
 22 (Time noted: 1:45 p.m.)  
 23  
 24  
 25

1 THE STATE OF FLORIDA)  
 2 COUNTY OF PALM BEACH)  
 3 I, TERRI BECKER, a Registered  
 4 Professional Reporter and Notary Public for the  
 5 State of Florida at Large, do hereby certify that  
 6 I reported the videotaped deposition of [REDACTED]  
 7 [REDACTED], the WITNESS, called by the PLAINTIFF  
 8 in the above-entitled action; that the witness  
 9 was duly sworn by me; that the foregoing pages,  
 10 numbered from 1 to 104, inclusive, constitute a  
 11 true record of the deposition by said witness.  
 12 I further certify that I am not attorney  
 13 or counsel of any of the parties, nor a relative  
 14 or employee of any attorney or counsel connected  
 15 with the action, nor financially interested in  
 16 the action.  
 17 WITNESS MY HAND and official seal in the  
 18 City of West Palm Beach, County of Palm Beach,  
 19 State of Florida, this 19th day of April 2010.  
 20  
 21   
 22 TERRI BECKER, Registered  
 23 Professional Reporter and  
 24 Notary Public, State of Florida  
 25 at Large. My Commission expires  
 March 13, 2011.

1 THE STATE OF FLORIDA)  
 2 COUNTY OF PALM BEACH)  
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 4  
 5 The foregoing certificate was  
 6 acknowledged before me this \_\_\_\_\_  
 7 day of \_\_\_\_\_ 2010.  
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 15 \_\_\_\_\_  
 Notary Public, State of Florida.  
 My commission No.  
 Expires March 13, 2011.  
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1 I, [REDACTED], do hereby  
2 certify that I have read the foregoing transcript  
3 of my deposition given on April 13, 2010; that  
4 together with the correction page attached hereto  
5 noting changes in form or substance, if any, it  
6 is true and correct.

7  
8 [REDACTED] MARCINKOVA

9  
10  
11  
12  
13  
14 I do hereby certify that the deposition  
15 of [REDACTED] was submitted to the witness  
16 for reading and signing; that after she had  
17 stated to the undersigned Notary Public that she  
18 had read and examined her deposition, she signed  
19 the same in the presence of the undersigned  
20 authority on the \_\_\_\_ day of \_\_\_\_ 2010.

21  
22  
23 \_\_\_\_\_  
24  
25

1 U.S. LEGAL SUPPORT  
2 Registered Professional Reporters  
3 444 West Railroad Avenue  
4 Suite 300  
5 West Palm Beach, Florida 33401  
6 (561)835-0220

7 April 19, 2010

8 ATTERBURY GOLDBERG, WEISS  
9 One Clearlake Centre, Suite 1400  
10 250 Australian Avenue South  
11 West Palm Beach, Florida 33401

12 ATTENTION: JACK GOLDBERGER, ESQ.

13 In Re: DOE [REDACTED] EPSTEIN

14 Deposition of: [REDACTED]

15 Dear Mr. Goldberger:

16 Since counsel have agreed that you may  
17 have the witness read and sign your copy of the  
18 deposition, for your convenience, enclosed  
19 herewith you will find an Errata Sheet for the  
20 witness' use in entering any changes to the  
21 deposition.

22 Thank you for your prompt attention.

23 Cordially yours,  
24 U.S. LEGAL SUPPORT

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1 ERRATA SHEET  
2 In Re: DOE [REDACTED] EPSTEIN  
3 DO NOT WRITE ON TRANSCRIPT  
4 ENTER CHANGES HERE:

5 PAGE	6 LINE	7 CHANGE	8 REASON
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16 [REDACTED]

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18  
19 THE STATE OF FLORIDA)  
20 COUNTY OF PALM BEACH)  
21 I DO HEREBY CERTIFY THAT [REDACTED]  
22 appeared before me and stated that she has read  
23 her deposition; further, that this Errata Sheet  
24 was signed in my presence on this \_\_\_\_ day  
25 of \_\_\_\_ 2010.

26 \_\_\_\_\_

<b>A</b>	addition 10:23 15:12 18:24 21:13 27:19 36:2 39:9 40:16 80:15	5:20 10:21 11:17,21 81:9 98:16,25 99:7 answered 98:22 anticipate 5:24 apartment 6:25 62:19,20 apartments 62:24 63:5 apologized 85:18 appear 30:19 81:22 92:8 appearances 3:14 4:1 appeared 103:20 appetite 20:22 applications 93:18 appointments 16:16 21:23 44:21 56:14 appreciate 22:24 23:9 59:12 approximately 71:6 73:4 75:25 April 1:20 2:1 100:19 102:3 104:4 area 17:11 22:11 82:2 arrange 65:25 66:6 67:1 70:15 72:11 76:10 arranged 70:9 73:13 76:4 arrangement 44:15 arrangements 66:21 68:20 73:20 75:6 arranging 69:22 70:3 arrived 83:13 Ashley 46:8,12 aside 10:15 asked 18:10 25:17 90:19 98:21 asks 50:2 asleep 90:15 assistant 64:2 assuming 15:2 45:8 attached 102:4 attended 9:3 attention 104:8 104:16 ATTERBURY 4:16 104:6 attorney 100:12 100:14 Attorneys 3:17 3:22 4:2,8,12 attorney/client 99:2	August 2:12 45:13,14 73:4 Australian 104:7 authorities 23:25 24:10 51:10 authority 102:20 Avenue 3:6,18 104:2,7 avoid 32:13 51:4 51:9,10 avoiding 32:21 aware 10:4 12:8 16:6 17:15 41:17 47:25 51:2 52:8 66:11 67:22 69:10 71:4 73:2 74:12 75:23 81:24 86:8 88:21 90:18 94:19 A.D 96:18,21,21 96:25 97:9,14 97:20,24 98:3 A.G 71:5,10,16 71:25 72:4,10 72:11,16,23 A.H 81:22,22 82:9,11,20 83:8,12,17,22 84:3,10,14,15 84:23 85:3,7 85:12,25 86:4 86:8,14,17,22 86:25 87:5,6 87:11,15,20 87:25 89:14 89:22 90:2,10 90:15,19 91:2 91:8,22 92:5 92:8,12,17,25 93:18,21 94:1 94:5,9,14,20 94:25 95:19 96:9 a.m 3:9 65:18 88:8,13 95:8	55:14,20 56:1 66:12 67:23 68:3 69:12 71:6 74:14 75:25 77:16 77:20 88:17 100:2,18,18 101:2 103:19 104:3,7 Becker 3:3 5:3 100:3,21 104:20 bed 83:12,18,22 89:14 bedroom 29:2 30:8,15 39:5 57:8,15 82:2 began 38:14 85:13 beginning 3:8 behalf 1:13 3:11 believe 19:19 believes 61:9,14 Berger 56:19 better 25:13 Bill 51:24 52:2 54:2,5,9,15 birth 5:10 birthday 49:2,14 94:11,15 Biscayne 3:23 bi-sexual 11:17 58:23 blue 87:20 body 23:11 books 12:9 born 5:17 Boulevard 3:23 4:3,13 braces 29:1 Brad 98:10 99:15 Bradley 3:20 104:23 brag 92:20 brain 96:15 brainwashing 33:1 break 57:25 65:8 77:6 95:5 breasts 17:10 97:15 Brillo 6:13 82:12 89:6,23 90:2,10 96:22 bring 35:22 54:23 62:16 66:21 68:8 77:5 94:20 99:8 bringing 39:11 68:14 74:25 83:22 Britney 46:8,24 46:25 brought 7:12 10:5 30:12 38:23 94:25
		<b>B</b>		
		back 11:15 33:17 34:9,15 65:17 88:12 95:13 96:4 Band 54:9 bank 4:8 61:25 61:25 62:3 Banyon 4:13 based 42:7 basically 48:5 basis 20:17 21:4 21:10 57:20 63:23 bathingsuits 87:16 Beach 3:7,7 4:4 4:13,18 21:15		

Brunel 36:8, 15 36:18, 22 37:2 37:7 49:15 54:19, 22 55:9 Building 4:8 burglary 53:8, 10 BURMAN 4:12 businessmen 48:22 butt 96:10 buttocks 17:11 97:15 B.B 4:3 77:9, 11 77:15, 24, 24 78:7, 14, 21 79:4, 11, 17, 17 79:25 B.T 52:20, 21	76:17, 23 children 13:24 16:8 18:17 24:2 43:23 44:2 citizen 7:22 City 3:6 4:8 6:25 100:18 civil 15:13 18:15 Clearlake 4:17 104:6 client 81:8 Clinton 54:2, 5 54:15 Clinton's 54:9 clothes 83:17 clothing 17:11 31:6 coerced 39:10 42:4, 9 coffee 45:23 COLEMAN 4:12 college 92:17 93:14, 18 colleges 92:21 Columbia 92:22 93:2 come 25:2 39:4 40:7 44:22 47:5 66:1, 7 67:2 68:20 69:23 70:4, 9 70:15 71:17 71:25 72:4, 11 73:14, 21 75:7 76:4, 10 82:11 99:4 comes 52:13 coming 9:13 27:2 28:25 34:24 83:4 commission 100:22 101:15 104:21 commit 15:22 18:20 commits 17:14 24:1 common 37:7 communicate 67:1 68:13, 19 70:2 73:20 75:5 communicated 79:11, 14 communicating 33:21 community 60:18 60:25 complete 39:24 completed 8:23 completely 39:20 computer 35:11 89:5 computers 51:3, 9 51:11, 15, 20 concerned 92:12	conduct 15:14 20:16 42:24 confer 7:21 confidentiality 60:4 confused 80:21 connected 100:14 consensual 80:1 80:5 consider 11:16 44:9 conspire 15:22 constitute 100:10 Constitution 5:15 contact 20:16 21:14, 17 22:3 contained 51:11 continue 18:17 18:20 continued 4:1 5:24, 25 58:1 88:14 95:15 contributed 40:12 control 60:19, 25 62:9 controls 62:24 convenience 104:14 conversations 19:18 cooperate 24:9 Copies 99:16 Copperfield 14:6 14:10 95:19 95:22 96:10 copy 45:2 104:13 Cordero 44:5 Cordially 104:17 correct 6:20 7:1 15:3, 14 16:13 16:19, 24 21:18, 25 22:6 26:22 27:3 28:17 31:17 32:1, 5, 10, 16 32:22 34:8 37:9, 21 41:24 46:4 47:1 48:7 51:5, 7 51:11 52:15 53:4, 16, 18 57:3, 9, 15, 21 62:5 64:8, 13 65:1 102:6 correction 102:4 counsel 5:13 6:2 7:21 33:16 45:19 88:4 100:13, 14 104:13 country 7:16 8:18 9:13 County 3:7 100:2 100:18 101:2	103:19 course 67:11 68:24 70:21 72:16 74:1 76:15 court 1:1 3:11 3:13 34:16 99:14, 19 covering 17:11 Cowles 19:14, 19 63:22 64:17 Cowles's 19:10 co-conspirator 15:18 16:7 18:25 19:2 20:1 co-conspirators 20:14 Co-Counsel 4:17 crime 19:20 crimes 15:22 16:7 18:21 19:1 20:2 24:1 criminal 15:13 15:17 43:11 43:15 44:10 44:14 Critton 4:12, 15 65:19 71:22 cross 2:3 65:21 77:7 81:17 84:25 88:14 95:15 cuddle 89:19 current 5:22 6:10 7:15 currently 6:12 81:1 C.F 4:3 C.L 77:10, 13, 19 78:3, 3, 11, 17 78:25 79:8, 14 79:21, 21 80:4	defendant 4:12 78:6, 10, 20, 24 80:1, 5 81:2 Defendants 1:8 4:17 defendant's 77:15, 19 deliberate 42:20 42:24 delinquency 40:12 delivered 87:25 demand 31:4 demanded 27:13 Department 88:17 deposition 1:13 3:1, 10 33:25 71:23 81:23 100:6, 11 102:3, 14, 18 103:21 104:10 104:14, 15 Dershowitz 56:23 57:12, 18, 24 58:1, 2, 6 designated 16:17 designation 24:16 designed 44:10 despite 58:2 61:17 destination 56:9 56:15 detection 32:13 32:22 51:5 deteriorated 34:4 developed 29:7 91:13 devise 29:20 different 21:8 digital 97:24 98:3 digitally 32:9 dildos 27:16, 21 dinner 95:17 96:10 direct 2:3 5:6 31:4 direction 27:22 51:4 discovered 90:15 discussed 18:5 64:24 Discussion 81:19 discussions 99:3 disrupted 34:12 distress 43:1, 6 DISTRICT 1:1, 1 document 16:6 45:20 Dodge 87:20 Doe 1:4 42:13, 19 42:25 56:3 81:21 103:2 104:9 Doe-102 47:23
<b>C</b>				
C 5:2 CADWELL 4:22 call 25:25 27:1 38:20 46:7 70:8 71:15, 24 72:4 73:13 74:24 76:3, 9 94:9 called 33:14 34:23 53:9 100:7 calling 23:18 27:1 calls 24:24 43:11 65:25 66:6 69:22 camera 91:16 97:24 98:3 cameras 50:11 carbon 45:2 case 1:2 19:15 cases 1:10 15:13 18:16 Cathy 6:6 cause 3:3, 9 43:1 43:6 CC 104:23 Centre 4:17 104:6 Certainly 34:16 52:13 certificate 101:5 certified 5:4 certify 100:5, 12 102:2, 14 103:20 chance 22:23 CHANGE 103:5 changes 102:5 103:3 104:15 Chapter 37:18 Chase 61:25 child 13:9 18:6 36:23 37:2 71:11 73:22 74:9 75:20				
<b>D</b>				
				D 3:25 5:2 daily 21:3, 9 57:20 dance 99:6 date 1:20 5:10 45:12, 16 dated 2:12 45:14 David 4:14 14:6 14:10 95:18 95:22 96:9 104:24 Davies 52:20, 24 53:3, 15, 24 day 38:15 50:18 84:13 85:11 98:13 100:19 101:7 102:20 103:21 days 64:1 Dear 104:12 decline 5:16

48:2	43:15 44:10	82:13 83:12	examined 102:18	21:9, 15, 23
doing 25:1 33:22	entice 67:12	83:16, 22 84:1	examines 45:19	22:4, 11, 16
donations 92:21	68:25 72:17	84:14, 24	executed 51:2	28:1, 5, 9, 14
Doug 54:9	74:2 75:12	85:12, 18, 21	execution 51:16	29:8, 14, 22
dress 49:23 50:3	enticed 39:10	86:4, 9, 13, 21	exhibit 45:12, 15	30:2, 7 31:16
drive 89:22 90:1	76:21	86:25 87:6, 10	45:21	32:5, 10, 15, 21
90:10	entices 17:13	87:14, 19, 24	EXHIBITS 2:10	33:2, 8, 13
Dubin 55:3	enticing 30:6	89:14 90:18	expenses 93:14	34:22 35:3, 8
duly 5:3 100:9	67:18 69:6	90:23 91:3, 8	expires 100:22	35:17, 23 36:4
duties 21:8	72:22 74:8	91:17, 21	101:15 104:21	37:8, 14 40:22
	75:18	92:16, 20 93:5	explain 22:23	41:3 44:11, 15
<b>E</b>	entitled 61:9, 16	93:17, 25	exploited 48:6	44:22 48:5
earlier 25:17	Epstein 1:7 4:12	94:10, 19, 24	expressing 92:16	49:9 50:7
37:17 41:23	6:13, 18 7:4	96:3, 13, 22	Ezell 2:8 4:10	56:14 59:2, 7
East 6:16, 24	9:9, 14, 18, 22	97:5, 10, 13, 19	6:7 81:18, 21	61:5 63:13, 16
62:19, 25	10:6, 15 11:6	97:23 98:2	88:6, 15 95:7	63:18 64:25
Edwards 2:5 3:16	11:23 12:8, 13	103:2 104:9	95:16 98:6	<b>Fifth</b> 5:14, 19, 25
3:20 5:7 6:5	12:22 13:1, 10	Epstein's 12:1, 5	99:17 104:24	6:3, 11, 14, 17
23:1, 5 34:3, 9	13:13, 18, 23	12:18 15:19	e-mail 65:14	6:22 7:3, 8, 11
34:11, 15, 18	14:2, 20, 23	17:2 20:2, 10	E.W.3:17 11:3, 7	7:14, 17, 23
45:17 65:4	15:7, 23 16:4	23:21, 25 26:5	11:11 25:17	8:1, 4, 8, 10, 13
98:12 99:10	16:13, 17, 18	26:13, 20	25:20 26:12	8:15, 20, 22, 25
99:16, 21	17:18, 25 18:6	27:22 29:2, 13	26:19 27:1, 2	8:25 9:2, 5, 8
104:23	18:10, 16, 25	30:6, 12, 15	27:8, 13, 20	9:12, 17, 21, 24
either 30:19	19:6 20:15, 22	34:24 39:5	28:21, 25	10:3, 10, 13, 17
72:1, 9	21:2, 14, 17	40:1 41:3	32:10 38:1	10:23 11:1, 5
ejaculating	22:10 23:20	42:3, 8, 18	42:3, 13, 19, 25	11:9, 14, 22, 24
28:17	24:1 25:10, 25	44:9 45:3	55:12, 15 57:7	12:3, 7, 12, 16
El 6:12 82:11	26:21, 25 27:3	46:16 48:12		12:20, 25 13:4
89:6, 23 90:2	27:7, 9, 13, 15	50:1, 12 51:3	<b>F</b>	13:8, 12, 16, 21
90:10 96:22	28:10, 15, 17	51:4, 16 52:5	fact 11:10 15:18	14:1, 5, 8, 12
Emmy 58:15, 18, 18	28:20 29:7, 20	53:2, 8, 14, 16	18:6 21:21	14:14, 18, 22
emotional 43:1, 6	30:19 31:14	54:4, 9, 23, 24	26:9 31:25	15:1, 5, 11, 16
employed 9:6	31:20 32:8, 15	56:18, 22 57:2	37:6 38:9	15:21 16:1, 5
56:12	32:25 35:15	57:8, 14, 19	39:23 40:5	16:10, 15, 21
employee 100:14	36:3 37:7, 13	58:17 59:6	43:4 53:7	17:1, 6, 16, 20
enclosed 104:14	37:20, 25 38:5	62:15 63:9, 23	61:8 64:22	17:24 18:4, 9
encounters 84:25	38:10, 13	64:2, 12 66:7	66:5 67:17	18:14, 19, 23
encouraged 40:17	39:15 40:11	66:12, 22	69:5 70:2	19:4, 8, 13, 17
40:18	40:23 41:7, 17	67:23 68:9, 9	72:4 74:7	19:21, 24 20:5
endured 40:8	42:9, 14, 25	68:15 69:11	76:21	20:8, 13, 20, 25
enforcement	43:4, 10, 19	70:10, 16 71:5	false 39:20	21:6, 12, 20
32:14, 22 51:5	47:6, 19, 25	71:17 72:5, 11	falsify 8:5	22:2, 8, 14, 19
engage 11:10	48:10, 16 49:1	73:3, 14 74:13	familiar 6:15	23:8, 16, 23
20:16 27:8, 14	49:4, 8, 22	75:1, 11, 16, 24	35:24 36:12	24:4, 8, 13, 18
31:15 40:23	50:7, 17, 21	76:5 82:21	45:4 53:1	24:23 25:4, 8
47:6 49:18	51:9 52:10, 20	83:5 85:8	57:18 62:23	25:16, 23 26:3
54:24 55:21	53:20 54:14	88:18 93:22	FARMER 3:16	26:8, 11, 18, 24
61:4, 16, 21	55:8, 13, 14, 19	94:15 95:18	favorable 39:19	27:5, 11, 18, 24
67:12, 18	56:1, 6 57:25	Errata 103:1, 21	FBI 39:16, 18	28:3, 7, 12, 19
68:25 69:6, 23	59:16, 22 60:5	104:14	February 5:11	28:24 29:5, 11
72:17, 23 74:3	60:9, 13, 17	escalated 86:9	feel 80:9, 20	29:16, 18, 24
74:8 75:12, 13	61:3, 13, 21	escape 24:5, 10	96:10	30:4, 10, 18, 22
75:19 76:16	62:5, 9, 16, 24	Esq 3:20, 25 4:5	felonies 41:18	31:3, 8, 13, 19
85:25 86:17	63:10, 19 64:8	4:10, 14, 15, 19	female 11:2	31:24 32:2, 7
engaged 41:2	64:24 65:24	104:8, 23, 23	28:21 30:12	32:12, 18, 24
50:8 58:6	66:16, 25 67:5	104:24, 24	30:14 31:5, 11	33:5, 10 35:2
59:1 76:21	67:10, 16 68:2	et 1:7	35:21 46:15	35:6, 10, 14, 19
77:23 78:2	68:18, 23 69:4	Evelyn 8:9	46:25 61:15	36:1, 6, 11, 14
engaging 22:10	69:16, 21	everyday 20:17	61:17, 20	36:17, 21, 25
50:22 56:2, 8	70:19, 24 71:9	everyone's 6:4	63:12, 12, 13	37:5, 11, 16, 23
57:19 63:18	71:24 72:15	evidence 51:10	females 12:23	38:3, 8, 12, 18
70:25 75:18	72:21 73:7, 19	Exactly 23:2	13:2, 6, 14, 17	38:22 39:2, 8
enjoy 13:5 59:12	73:25 74:6, 18	EXAMINATION 5:6	15:8, 24 16:12	39:14, 17, 22
ENTER 103:3	75:5, 11, 17	65:21 77:7	16:19, 23 17:3	40:4, 10, 15, 21
entering 104:15	76:8, 14, 20	81:17 88:14	18:1, 11 20:11	41:1, 6, 11, 16
enterprise 43:11	78:7, 11 81:12	95:15 98:11	20:17, 23 21:3	41:21 42:1, 6

42:12,17,22	89:3,8,12,17	14:25 15:4,10	69:8,14,18,25	genital 17:10
43:3,9,13,18	89:21,25 90:4	15:15,20,25	70:5,11,17,22	getting 25:25
43:21,25 44:4	90:8,13,17,22	16:9,14,20,25	71:2,7,12,19	57:8
44:6,8,13,18	91:1,6,11,15	17:5,19,23	72:2,7,13,19	Ghislaine 29:17
44:25 45:7,9	91:20,24 92:4	18:3,8,13,18	72:25 73:5,10	33:11 34:20
46:1,6,11,13	92:7,11,15,19	18:22 19:7,12	73:17,23 74:4	48:1,11,15
46:19,23 47:3	92:24 93:4,9	19:16,23 20:4	74:10,16,21	58:12,19,22
47:9,11,18,22	93:12,16,20	20:12,19,24	75:2,8,14,21	59:1
47:24 48:9,14	93:24 94:4,8	21:5,11,19	76:1,6,12,18	gifts 49:8 87:15
48:19,25 49:6	94:13,18,23	22:1,7,13,18	76:24 77:17	girl 29:1 66:11
49:12,17,21	95:3,21,23	23:22 24:3,7	77:21,25 78:4	67:22 68:7
49:25 50:5,10	96:1,6,12,17	24:12,17,22	78:8,12,15,18	69:11 71:5
50:16,20,25	96:19,24 97:3	25:3,7,15,22	78:22 79:1,5	73:2 74:12,24
51:13,19,22	97:8,12,18,22	26:2,7,17,23	79:9,12,15,19	75:24 94:25
52:1,3,7,12	98:1,5,14,19	27:4,10,17,23	79:23 80:2,6	girlfriend 19:10
52:17,23,25	98:20	28:2,6,11,18	80:10,14,22	24:15,21
53:6,12,23	fight 34:12	28:23 29:4,10	81:3 82:3,7	girls 14:20
54:1,3,7,12	file 3:11	29:15,23 30:3	82:14,18,22	25:11 38:19
54:17,21 55:2	financial 9:10	30:9,17,21	83:1,6,9,14	38:24 39:3
55:4,6,11,17	9:15	31:2,7,12,18	83:19,24 84:4	42:15 65:25
55:24 56:5,11	financially 8:17	31:23 32:6,11	84:11,17,21	66:6 68:8
56:17,21,25	8:21 100:15	32:17,23 33:4	85:1,5,9,15	94:20 96:2
57:5,11,17,23	find 104:14	33:9 35:1,5,9	85:19,23 86:2	give 22:22 28:22
58:5,10,14,16	fine 6:5 77:5	35:13,18,25	86:6,11,15,19	71:25 72:5
58:21,25 59:4	first 5:3 12:21	36:5,10,16,20	86:23 87:2,8	75:1 87:6
59:9,15,19,25	14:19 20:21	36:24 37:4,10	87:12,17,22	94:21 95:1
60:3,7,11,16	26:4 30:5	37:15,22 38:2	88:2,19,23	96:14 97:1,24
60:21 61:2,7	38:15 45:18	38:7,11,17,21	89:2,7,11,16	given 27:25
61:12,19,24	FISTOS 3:16	39:1,7,13,21	89:20,24 90:3	39:16 62:4
62:2,7,12,18	Flagler 4:9	40:3,9,14,20	90:7,12,16,21	63:3 95:24
62:22 63:2,7	flew 56:1	40:25 41:5,10	90:25 91:5,10	96:3 102:3
63:15,21,25	flight 52:4,19	41:15,20,25	91:14,19,23	giving 67:6
64:5,10,15,21	59:21,23 60:1	42:5,11,16,21	92:3,6,10,14	73:15
65:3 66:4,10	flights 52:5,9	43:2,8,12,17	92:18,23 93:3	Glenn 55:3
66:15,19,24	55:14,20	43:24 44:3,12	93:8,11,15,19	globe 48:6
67:4,9,15,21	Florida 1:1 3:5	44:17,24 45:6	93:23 94:3,7	go 23:2 34:9
68:1,6,12,17	3:8,19,24 4:4	46:5,10,14,18	94:12,17,22	39:4 93:1
68:22 69:3,9	4:9,13,18	46:22 47:2,8	95:2,20 96:5	94:5,9 95:11
69:15,19 70:1	17:8 63:11	47:14,21 48:3	96:11,16,23	95:24 96:3
70:6,12,18,23	64:7 100:1,5	48:8,13,18,24	97:2,7,11,17	going 5:23 10:20
71:3,8,13,20	100:19,22	49:5,11,16,20	97:21,25 98:4	21:24 29:1
72:3,8,14,20	101:1,14	49:24 50:4,9	98:18 102:5	45:8 63:11
73:1,6,11,18	103:18 104:3	50:15,19,24	Fort 3:19	95:8 99:7
73:24 74:5,11	104:7,21	51:6,12,18,21	forward 40:7	GOLDBERG 104:6
74:17,22 75:3	flown 22:16	51:25 52:6,11	Foundation 64:7	Goldberger 4:16
75:9,15,22	60:13,18,22	52:16,22 53:5	France 49:14	4:19 5:23 6:6
76:2,7,13,19	fly 56:7	53:11,17,22	frequent 62:20	7:19 10:20
76:25 77:12	follows 3:15 5:5	53:25 54:6,11	friend 59:5	11:20 22:24
77:14,18,22	fondle 97:14	54:16,20 55:1	friends 14:3	23:2,9 33:15
78:1,5,9,13	forbidden 85:3	55:10,16,23	39:11 48:17	33:19 34:2,7
78:16,19,23	force 61:15	56:4,10,16,20	48:20 49:2,8	34:10,14
79:2,6,10,13	forced 13:10	56:24 57:4,10	further 86:9,10	45:19 65:6,9
79:16,20,24	28:21 42:15	57:16,22 58:4	100:12 103:21	65:12 77:5
80:3,7,11,19	forces 17:12	58:9,13,20,24	F.P 74:13,19,25	80:23 81:7,13
80:25 81:10	foregoing 100:9	59:3,8,14,18	75:6,10,13,16	95:4,10 98:8
81:15 82:4,8	101:5 102:2	59:24 60:2,6	75:19	98:25 99:11
82:10,15,19	form 7:6,13,18	60:10,15,20		104:8,12
82:23 83:2,7	7:25 8:7,19	61:1,6,11,18	<b>G</b>	good 81:20 92:5
83:10,15,20	9:11,16,20,23	61:23 62:6,11	gain 29:7,13	government 16:3
83:25 84:5,12	10:2,9,12,16	62:17,21 63:1	30:1 37:13	grade 8:23
84:18,22 85:2	10:19 11:4,8	63:6,14,20,24	gaining 33:7	grades 92:13
85:6,10,16,20	11:13,19 12:2	64:4,9,14,20	41:13	gratification
85:24 86:3,7	12:6,11,15,19	65:2 66:3,9	Gardens 4:4	29:9 66:2,8
86:12,16,20	12:24 13:3,7	66:14,18,23	Generally 56:6	67:2
86:24 87:3,9	13:11,15,20	67:3,8,14,20	57:18	Groff 19:25
87:13,18,23	13:25 14:4,7	67:25 68:5,11	generically	groomed 59:11
88:3,20,24	14:11,17,21	68:16,21 69:2	63:12,16	grooming 32:20

33:1,8	65:7,11,13,22	69:21 71:24	99:10 104:8	61:3,13,21
grounds 10:25	77:1 104:23	73:19 75:5	JAFFE 3:16	62:5,9,15,16
guess 95:4	hour 3:8	76:8 81:8	jail 6:19,24 7:5	62:24 63:9,10
guest 58:3 95:19	house 21:15	instructed 27:7	41:24	63:19,23 64:2
guilty 41:18	24:24 25:11	32:3 59:16	Jane 1:4 3:17,22	64:8,12,24
guise 21:24	26:1,5,13,20	90:10 97:14	4:8 42:13,19	65:24 66:7,12
	30:13 34:24	instructing	42:25 47:23	66:16,22,25
	38:24 39:4,5	83:17	48:1 56:3	67:5,10,16,23
<b>H</b>	40:1 46:4,17	intent 18:17,20	81:21	68:2,8,9,15
habit 30:23	46:24 47:5	41:12 43:5	Jean 36:8,15,18	68:18,23 69:4
57:19	51:4,16 53:3	67:11 68:24	36:22 37:2,7	69:11,16,21
Hafele 80:16	53:8,14,16	72:16	49:15 54:19	70:9,15,19,24
Hafele's 81:6	54:23,24 57:2	intention 70:20	54:22 55:9	71:5,9,17,24
68:7,14,19	57:7,13 58:3	74:1 75:12	Jeffrey 1:7 4:12	72:5,11,15,21
70:8 74:24	63:23 64:12	76:15	6:13 9:9,14	73:3,7,14,19
75:5	82:11,21 89:1	intentional	9:18 10:6,15	73:25 74:6,13
half 7:19	93:22 95:18	42:20,23	11:6,23,25	74:18,25 75:4
HAND 100:17	houseman 90:5	intentionally	12:4,8,13,18	75:10,11,16
hands 45:20	hundreds 29:8	17:9	12:21 13:1,9	75:17,24 76:4
hanging 93:21	31:16,16	interact 18:11	13:13,18,23	76:8,14,20
happened 28:9	37:20 82:25	21:2 96:25	14:2,20,23	78:7,11 81:11
34:4 39:25		interacting 15:7	15:6,19,23	82:12,21 83:4
happening 84:6		interaction 17:3	16:3,12,17,18	83:12,16,21
harass 10:22	<b>I</b>	28:13 31:1,15	17:2,17,25	84:1,13,24
40:2	idea 33:23	41:18 48:1	18:5,10,16,25	85:8,11,21
harassing 40:6	identification	64:25	19:6 20:2,10	86:4,9,13,21
harm 41:13	2:11 45:16	interactions	20:15,21 21:2	86:25 87:6,10
Harvard 92:22	illegal 17:4	27:19 42:3,8	21:14,17	87:14,19,24
head 22:20 23:7	21:16	interest 6:4	22:10 23:20	88:17 89:13
23:10 33:17	implicate 19:20	92:17	23:20,24 24:1	90:18,23 91:3
hear 91:21,25	improper 21:13	interested	25:9,24 26:4	91:8,16,21
96:13	21:16 54:13	100:15	26:13,20,21	92:16,20 93:5
heard 25:9	inappropriate	interferes 99:1	26:25 27:3,7	93:17,22,25
heart 80:12	80:17 81:5	international	27:8,13,15,22	94:10,15,19
held 84:14 85:12	incarcerated	43:22	28:10,15,17	94:24 95:18
helicopter 59:21	6:18 41:22	interpret 23:7	28:20 29:2,6	96:13,21
help 43:16 44:16	including 32:10	interrupt 33:24	29:13,19 30:6	97:13,23 98:2
93:6,10	inclusive 100:10	interrupted 34:1	30:12,15,19	JESSICA 4:22
helped 8:5 29:19	incriminate	intimidate 10:23	31:14,20 32:8	job 21:7
hereinafter 5:4	98:17	40:2	32:14,25	JOE 4:22
hereto 102:4	INDEX 2:2	intimidating	34:24 35:15	join 83:17 84:2
herewith 104:14	indicate 10:5	40:6	36:3 37:6,13	joined 65:19
heterosexual	indicated 6:23	introduced 87:5	37:19,25 38:5	Judge 80:16 81:5
11:17	18:16 61:4	97:9	38:9,13 39:4	99:9
hidden 50:11	indicates 17:9	investigate 53:9	39:15,25	jury 23:6,7
81:25	46:2	investigation	40:11,23 41:3	J.M 75:24 76:4
holding 84:15	indicating 22:20	15:18 53:13	41:7,17 42:2	76:10,15,21
home 45:3 66:1,7	22:21 46:7	investigator	42:8,9,14,18	
66:13,22 67:2	individual 77:11	51:23	42:24 43:4,10	<b>K</b>
67:12,24 68:3	77:13	invited 96:4	43:19 44:9	K 5:2
68:9,15,20,25	induce 67:12	invocation 5:25	45:3 46:16	Katherine 4:10
69:12,23 70:4	68:25 72:17	invoke 5:13,19	47:6,19,25	81:21 104:24
70:10,16,21	74:2 75:12	involved 30:1	48:10,12,16	Kellen 19:2,3,9
71:1,6,10,17	inducing 30:6	36:7 64:17,18	49:1,4,8,22	27:1 29:25
71:25 72:5,12	67:17 69:5	involvement	50:1,7,12,17	30:13 33:6,12
72:17,24 73:3	72:22 74:7	98:24	50:21 51:3,4	34:21 52:19
73:14,21 74:2	inform 67:5	involves 81:7	51:9,15 52:5	63:10 64:13
74:9,13,19	71:14	involving 15:14	52:9,19 53:2	64:18 70:14
75:1,7,11,17	informed 88:25	28:9	53:8,14,15,19	71:14 72:10
75:25 76:5,10	initials 96:20	irrelevant 80:15	54:4,8,14,23	79:3,7 90:1
76:16,22 83:5	inserted 84:15	island 22:15,16	54:24 55:8,13	Kellen's 19:18
88:18	inside 16:6 30:8	23:21 50:23	55:14,19 56:1	kid-type 13:24
homemade 50:21	53:14	60:14,23	56:6,18,22	22:17
homes 50:12	instance 27:6		57:2,7,14,19	kind 65:13 85:4
hopes 41:13	63:10	<b>J</b>	57:25 58:17	91:16
Horowitz 2:6	instruct 10:20	J 3:20 4:5	59:5,16,22	kiss 97:14
3:21,25 6:8	31:5 65:24	Jack 4:19 23:5	60:5,9,12,17	kitchen 82:1
33:17 34:1	66:25 68:7,18			





103:21	26:20 27:2	100:11	64:3,19 77:6	see 45:17,22,22
present 4:21	29:9 32:20	records 89:5	95:5 99:20	45:24 63:22
84:13 88:16	49:3,9 55:15	RECROSS 2:3	righthand 54:10	86:13,21 91:7
95:19	56:2	REDIRECT 2:3	rights 81:8	93:21 95:25
presume 98:16	purses 87:15	98:11	Riley 51:24 52:2	97:19
Prince 14:13,16	pursuant 3:9	referred 71:16	Robert 4:15	seen 50:6 52:4
prior 13:22 51:1	P.A 3:21	refers 64:1	65:19 71:22	77:15,19
51:16 69:20	p.m 46:9,25 47:5	refuse 5:20	68:8,14	senior 88:1
70:7,13 74:23	95:14 99:13	refused 85:7	68:19 70:8	sent 49:2,14
75:4,10 89:6	99:22	regarding 18:25	74:24 75:6	September 52:18
privacy 10:25		25:10 40:7	Rodriguez 90:6,9	Sergio 44:5
81:7	Q	44:21	90:15	serves 10:22
private 52:5,10	question 5:16,19	Registered 3:4	role 16:11 23:24	services 10:14
privilege 99:5	6:9 10:21	100:3,21	43:11 44:14	severe 43:1,6
privileges 5:14	11:15,18,21	104:1,20	roles 20:15	sex 10:1,8,15
5:20 6:1	19:22 34:19	regular 63:23	room 30:16 71:23	11:6 12:1,5,9
10:24	45:9 47:15	82:20	roses 87:25	12:14,18 13:2
probation 24:20	52:20 80:17	related 1:10	Ross 20:6	13:5,10,14,18
24:24,25 25:6	81:4,9 98:15	15:6 20:2	roughly 10:6	13:23 16:22
59:17 60:12	99:1,8	25:18 41:18	ROVNER 4:22	18:21 20:11
60:18	questioning 77:4	45:9	royalty 48:21	22:10 23:19
proceedings	questions 5:21	relationship	rules 84:23	23:25 24:6,11
65:16,20	23:3,12 77:1	56:18,23 99:2		24:15 27:25
71:22 88:11	98:7,16,21	relative 100:13	S	28:4,22 32:1
95:12	quiet 32:16	relevance 81:4	s 67:11 68:24	32:3 33:8
procure 16:12		remember 27:6,12	72:16 74:1	37:14 40:23
35:16	R	28:25 53:7	75:10,16	43:22 44:1
procured 38:23	R 5:2	59:22 65:13	76:15 79:25	49:18 50:1,8
professional 3:4	raid 88:22 89:1	82:24 83:11	80:4 84:15	50:23 54:25
48:22 100:4	89:6	89:13 90:5,9	86:8 92:17	56:2 58:11,18
100:21 104:1	raided 88:17	removal 89:4	Sandy 56:19	58:19 59:12
104:20	Railroad 3:6	remove 31:5	Sanka 44:7	60:9 61:5,16
profit 43:22	104:2	83:17	Sarah 19:2,3,9	61:22 62:15
44:1	ranch 22:9	removed 89:9	19:18 27:1	63:18 83:22
promised 93:6	read 16:2 23:1	rented 87:21	29:25 30:13	84:2,7 85:25
prompt 104:16	34:15,17	repeatedly 90:19	33:6,12 34:21	86:5,17,22
proper 12:9	37:17 102:2	rephrase 34:18	52:19 63:10	87:1 89:5
property 77:16	102:18 103:20	reported 100:6	64:12,18	94:14
77:20	104:13	Reporter 3:4	70:14 71:14	sexual 10:18
prosecution	reading 102:16	34:16 99:14	72:9 79:3,7	11:10 12:22
98:23	reads 12:8	99:19 100:4	90:1	18:12 20:16
prostitute 42:15	reask 6:9	100:21 104:20	satisfies 6:4	21:13 25:19
48:16	reason 34:5	Reporters 104:1	saved 35:11	27:19 28:8,14
prostitution	98:15,20	reports 10:4	saying 22:22	28:16 29:9
40:19 42:4,10	103:5	represent 11:2	schedule 57:25	30:7,25 31:10
protect 43:16	reasons 41:8	24:14 77:9	scheduled 16:16	31:15,21 40:8
provide 82:12	recall 82:5 83:3	81:21	46:16,20	40:18 41:2
provided 87:15	83:16,21 84:1	represented	schedules 21:22	47:6 48:1
87:20	84:6,19,23	24:20	scheduling 44:22	54:13-55:7,21
providing 97:5	85:3,7,11,17	requests 50:2	47:5 56:13	56:8 57:20
psychological	85:21 87:4,14	required 62:15	scheme 20:10	58:7 59:2
41:14	87:19,24	residing 9:7	21:22 29:7,13	66:1,8 67:2,6
psychology 33:1	89:18 90:14	resources 40:1	29:20 30:1	67:13,18 68:9
public 3:5 37:2	91:2 92:16	respect 42:13	35:16	68:15 69:1,6
100:4,22	97:9,13	respectfully	school 8:24 9:1	69:23 70:4,10
101:14 102:17	receive 40:17	5:16	9:3 93:1	70:25 71:17
104:21	49:8 74:23	result 25:18	schools 93:7	72:6,12,18,23
pumping 85:13	received 28:4	41:22	Science 64:7	73:15,21 74:3
purchase 94:14	71:15	return 40:17	scientist 96:15	74:8 75:13,19
97:24	reckless 42:20	ridden 54:18	screamed 85:14	76:11,16,22
purpose 10:22	42:24	right 11:3 15:9	screaming 85:17	77:23 78:2
34:23 56:7,13	recognize 45:25	15:19 23:4	seal 100:17	79:18,22,25
60:1 68:14,19	record 34:17	25:20,21 26:1	search 51:1,17	80:4,8 82:16
69:22 70:3	65:15,18	26:10,16 36:9	second 7:20	87:11
73:14	81:19 88:7,13	36:15 45:5	Secret 47:13,17	sexually 14:3,10
purposes 22:4	95:9,14 99:12	46:9,21 59:7	47:17	14:16 15:7
25:12,25		61:10 62:10	Security 5:12	21:2 22:5

25:12 26:1,21 27:3,14 29:3 33:3 34:25 36:19 38:14 39:6,9,11 40:13 41:8 44:23 48:6,11 49:4,10 53:21 55:13,15 57:8 57:14 58:1 64:18 66:17 68:3 69:17 70:20 71:10 73:8 74:19 shaking 22:20 23:7 Sheet 103:1,21 104:14 shopping 94:5,10 short 65:8 88:9 shorten 6:2 show 45:10 94:15 96:4 showing 45:13 shows 95:25 sign 60:4 104:13 signed 102:18 103:21 signing 102:16 silent 34:12 similar 21:16,21 58:17 similarly 22:10 simple 6:2 99:7 single 30:24 98:14 Sixth 5:14,19 slave 10:1,8,15 12:5,10,14,18 23:25 24:6,11 24:15 50:2 58:18,19 62:15 slaves 12:1 62:16 sleep 89:14 smart 92:9 Social 5:12 sole 9:9,14 56:13 somebody 8:5 19:5,9 25:24 26:12 29:19 29:25 36:18 36:22 37:1 38:9,13 47:4 47:12,16 49:15 53:1 55:7 57:1,6 57:12 58:22 64:1,6,11,16 64:17 sorry 5:18 34:14 49:3 sort 81:25 South 104:7 SOUTHERN 1:1	speak 23:12 53:24 96:7 speaking 53:14 70:14 72:10 specific 21:7 specifically 9:25 25:19 37:25 43:5 48:20 56:1 63:17 spoke 41:23 spoken 19:14 33:6 39:23 St 63:11 staff 44:20 stage 96:4 staircase 81:25 82:6 State 3:5,7 55:21 100:1,5 100:19,22 101:1,14 103:18 104:21 stated 84:19,24 102:17 103:20 statement 39:16 39:19 78:20 78:24 79:3,7 States 1:1 5:15 7:10,12 8:12 9:4,7 10:6 stationed 45:2 status 7:15 statute 17:8,15 17:17,21 18:1 37:17 38:4 stayed 57:2 64:12 staying 63:4 stomach 85:12 stop 88:4 stopped 85:18 stopping 65:9 story 19:10,14 19:18 39:24 63:22 64:17 straddle 27:14 strap-on 27:21 86:14,18 Street 4:9 6:16 6:25 62:19,25 strict 25:5 student 92:5 studying 93:22 submitted 102:15 substance 102:5 succeeded 67:17 69:5 70:25 72:22 74:7 75:18 success 35:16 Suite 3:18,23 4:3,8,13,18 104:2,6 summoned 26:19 support 9:10,15 104:1,18	supported 8:16 8:21 sure 5:25 20:15 21:8 88:6 surprise 52:13 surreptitious 50:13 swimming 24:25 sworn 5:3 100:9 system 35:12,24 36:2 S.H 52:20,21	<hr/> T <hr/> table 84:8,14 85:13 tactic 40:6 take 7:19 8:25 11:1 19:21 23:10 45:9 54:8 65:7 81:25 90:23 95:5 taken 1:13 3:3 50:13 51:3,23 91:8 98:14,20 talk 25:19 talked 32:25 35:15 39:15 40:5 41:8 43:10,14 talking 33:16,20 33:24 48:20 talks 47:20 Taylor 58:15,18 58:18 Teala 52:20,24 53:3,15,24 teenage 69:10 71:4 75:23 Tel 3:19,24 4:4 4:10,14,19 telephone 25:2 45:4 65:25 66:6,21 67:1 68:13 69:21 70:3,8,15 71:15 72:10 73:13,20 75:6 76:3,9 tell 5:3,8 8:14 23:25 24:25 25:6,10 28:20 41:12 67:10 67:16 68:23 70:19,24 72:15 73:25 74:6 75:11,17 91:22,25 96:9 telling 39:24 96:14 ten 62:8,23 77:3 91:22 92:2 Terri 3:3 5:3 100:3,21 104:20 testified 5:5	35:12 59:20 Thank 81:16 98:7 104:16 Thanks 99:10 theater 94:1 thing 34:2 37:6 things 6:2 think 12:17 33:22 34:1 Thomas 63:12 three 49:3,13 51:2 threesome 27:8 27:13 tickets 94:1,1 95:24 96:3 time 3:14 14:19 20:21 26:4,14 26:19 30:5,24 33:15 54:22 55:8 60:8 63:3 65:19 69:20 70:7 75:4 79:18,22 80:20 83:4,8 86:10 87:4 88:10,22 89:10 90:6,14 91:2 97:4 99:22 times 13:1 16:18 41:7 50:3 54:18 82:25 86:22 89:13 89:18 96:22 today 9:10,19 13:13 15:3 46:8 51:20 62:20 told 24:25 30:25 32:19 39:18 43:5 61:9,14 74:25 94:19 touch 17:14 85:7 touched 78:14,17 touches 17:9 towel 30:20 town 57:24 toy 87:4 toys 31:21 32:1 32:4 83:22 89:5 94:14 trafficked 48:5 trafficking 43:23 44:1 traffics 36:3 train 12:13 transcript 102:2 103:3 tried 96:10 trip 64:22,23 trips 60:24 true 7:4,7 10:11 11:12 13:22 16:11 17:18 17:22 18:2 19:6,11,15	20:11,18 22:17 24:19 25:5,9,14 26:6 27:20 28:14 30:11 30:16,20 31:1 31:6,11,22 33:11,23 34:20 36:3,23 37:3,14 38:1 38:10,16,20 38:25 39:6,12 39:20 40:2,19 44:20 47:7 49:22 50:2 54:8 55:13,19 55:25 56:6,12 58:8,23 59:2 59:13 60:22 61:3,13 66:20 98:24 100:11 102:6 truth 5:4 try 40:2 99:6 turn 25:18 turning 13:22 two 41:18 83:18 type 7:24 typical 48:10,15 typically 30:13 96:2
				<hr/> U <hr/> underage 12:22 13:2,5,14,17 14:20,24 15:8 15:23 16:12 16:18,23 17:3 18:1,11 20:11 20:17,22 21:3 21:9,14,23 22:4,11,16,17 23:18 27:21 27:25 28:4,13 28:21 29:8,14 29:21 30:2,7 30:11,14 31:1 31:5,10,15,21 32:4,9,15,21 33:2,8,13 34:22 35:3,7 35:16,21,23 36:3 37:8,14 40:22 41:3 44:11,15,22 46:15,25 47:7 48:4,17 49:9 50:7,14,22 54:23 56:14 58:7 59:2,7 59:13 61:5,15 61:17 63:4,18 64:25 68:8 undersigned 102:17,19 understand 15:2 17:2,4,7	

United 1:1 5:15 7:9,12 8:12 9:4,7 10:5 upstairs 82:1 90:15 use 32:3 83:23 86:13,14 91:17 94:15 96:20 97:19 104:15 uses 25:13 U.S 4:23 7:22 104:1,18	vs 1:6 ██████:3,8,13,21 74:1,8 ██████:11,17,22 70:3,9,14,15 70:20,25	10:2,9,12,16 10:19 11:4,8 11:13,19 12:2 12:6,11,15,19 12:24 13:3,7 13:11,15,20 13:25 14:4,7 14:11,17,21 14:25 15:4,10 15:15,20,25 16:9,14,20,25 17:5,19,23 18:3,8,13,18 18:22 19:7,12 19:16,23 20:4 20:12,19,24 21:5,11,19 22:1,7,13,18 23:22 24:3,7 24:12,17,22 25:3,7,15,22 26:2,7,17,23 27:4,10,17,23 28:2,6,11,18 28:23 29:4,10 29:15,23 30:3 30:9,17,21 31:2,7,12,18 31:23 32:6,11 32:17,23 33:4 33:9 35:1,5,9 35:13,18,25 36:5,10,16,20 36:24 37:4,10 37:15,22 38:2 38:7,11,17,21 39:1,7,13,21 40:3,9,14,20 40:25 41:5,10 41:15,20,25 42:5,11,16,21 43:2,8,12,17 43:24 44:3,12 44:17,24 45:6 46:5,10,14,18 46:22 47:2,8 47:14,21 48:3 48:8,13,18,24 49:5,11,16,20 49:24 50:4,9 50:15,19,24 51:6,12,18,21 51:25 52:6,11 52:16,22 53:5 53:11,17,22 53:25 54:6,11 54:16,20 55:1 55:10,16,23 56:4,10,16,20 56:24 57:4,10 57:16,22 58:4 58:9,13,20,24 59:3,8,14,18 59:24 60:2,6 60:10,15,20 61:1,6,11,18 61:23 62:6,11	62:17,21 63:1 63:6,14,20,24 64:4,9,14,20 65:2 66:3,9 66:14,18,23 67:3,8,14,20 67:25 68:5,11 68:16,21 69:2 69:8,14,18,25 70:5,11,17,22 71:2,7,12,19 72:2,7,13,19 72:25 73:5,10 73:17,23 74:4 74:10,16,21 75:2,8,14,21 76:1,6,12,18 76:24 77:17 77:21,25 78:4 78:8,12,15,18 78:22 79:1,5 79:9,12,15,19 79:23 80:2,6 80:10,14,22 80:24 81:3,14 82:3,7,14,18 82:22 83:1,6 83:9,14,19,24 84:4,9,11,17 84:21 85:1,5 85:9,15,19,23 86:2,6,11,15 86:19,23 87:2 87:8,12,17,22 88:2,19,23 89:2,7,11,16 89:20,24 90:3 90:7,12,16,21 90:25 91:5,10 91:14,19,23 92:3,6,10,14 92:18,23 93:3 93:8,11,15,19 93:23 94:3,7 94:12,17,22 95:2,20 96:5 96:11,16,23 97:2,7,11,17 97:21,25 98:4 98:18 99:18 104:24 year 59:21 64:19 88:1 years 10:7 11:11 17:12,13 26:6 26:9,15 37:1 38:14,25 55:18 62:8 73:9 York 6:16,25,25 21:17 22:3 60:18,23 62:1 93:1 94:2 young 11:2 29:1 94:20 96:14 younger 25:13 50:3 83:8	youngest 13:9 61:20 Yugoslavian 10:7 Y.L 67:23 68:3 68:15,20,24 69:6
V 5:2 103:2 104:9 vagina 32:9 84:16 85:14 vaginal 85:4 variety 29:21 various 16:22 20:15 29:21 40:12 44:20 63:8 Vazques 8:3 Velasaques 8:9 vibrators 27:15 27:21 31:21 31:25 32:4 86:14,14 vibrator/mas... 97:20 victim 55:8 victims 40:6 43:7 Victoria's 47:13 47:17,17 video 23:12 65:15,18 88:7 88:12 95:9,14 99:12 Videographer 4:22 65:15,17 88:4,7,12 95:8,13 96:7 99:12 videos 50:13,22 videotaped 1:13 3:1 100:6 violate 17:25 37:20,25 38:5 violated 17:18 17:22 53:20 visa 7:24 8:6 visit 6:19,23 67:11 68:24 72:16 74:1 76:15 85:22 visited 7:5 41:23 96:21 visiting 97:5 visitor 82:20 visits 54:22 70:21 75:10 75:16 Visoski 59:20	W 4:10 want 23:6 45:17 99:8 wanted 24:9 84:19 92:25 99:19 wants 25:11 warrant 51:1,17 wasn't 21:7 33:19 watch 50:17,21 86:4 watching 87:11 way 6:13 11:16 24:5 59:17 82:12 89:6,23 90:2,11 96:22 weakened 43:7 wearing 30:20 Weber 55:5 WEISS 4:16 104:6 WEISSING 3:16 went 6:19,23 26:4 86:10 West 3:6,6 4:9 4:13,18 21:15 100:18 104:2 104:3,7 Wexner 47:10,20 Wharton 92:22 whatsoever 34:5 willing 71:16 witness 2:3 6:3 7:21 10:21 34:6 45:20 96:8 100:7,8 100:11,17 102:15 104:13 104:15 witnessed 37:19 37:24 38:4 54:13 61:21 women 91:18 96:14 work 46:8 64:6 working 8:11 93:18 world 64:23 wouldn't 42:3,9 42:14 WRITE 103:3 wrong 80:13	Y Yarema 4:14 6:21 7:2,6,13,18 7:25 8:7,19 9:11,16,20,23	\$ \$1,000 85:22 \$1,500 92:1 \$200 87:1 94:25	
			0 08-CV-80893-... 1:2 08-80119 1:10 08-80232 1:10 08-80380 1:10 08-80381 1:10 08-80811 1:11 08-80893 1:11 08-80994 1:11 09-8-591 1:11 09-80469 1:11 09-80656 1:11 09-80802 1:11 09-81092 1:11	
			1 12:12 4:8 45:12 45:15 100:10 1,000 92:1 1:15 95:10 1:30 95:11 1:36 95:14 1:41 99:13 1:43 88:13 1:45 99:22 10:00 3:8 100 26:13 34:7 103 81:21 104 100:10 11:18 65:18 11:43 88:8 11:50 65:10,12 95:8 12 38:25 39:3 49:3 50:3 12-year 49:3,13 49:19,23 13 1:20 2:1 10:7 38:14 73:8 100:23 101:15 102:3 104:22 14 10:7 26:5,15 1400 4:18 104:6 15 38:25 39:3 96:22 16 11:11 17:12 17:13 63:4 17 26:15 18 13:19,22 26:9 66:1,7 83:4 86:1 97:6 18205 3:23 19 104:4	

19th 100:19 1985 5:11	45 2:12 463-4346 4:10		
<u>2</u>	<u>5</u>		
2 3:18, 22 20 96:22 200 4:3 2000 87:20 2001 65:23 66:5 71:6, 14 72:1 72:6 75:25 2002 26:5, 9, 14 55:12, 18 71:6 71:14 72:1, 6 75:25 2003 52:18 55:25 69:12 74:14 74:19 2004 66:13, 20 67:24 68:4, 13 73:4, 12 81:24 2005 2:12 26:14 45:13, 14 55:12, 19, 25 69:13, 20 70:7 70:13 74:15 74:20, 23 75:4 88:16 2006 65:23 66:5 2010 1:20 2:1 100:19 101:7 102:3, 20 103:22 104:4 2011 100:23 101:15 104:22 █:12 5:11 45:13, 14 22 52:18 2218 3:23 25 4:9 250 104:7 2925 4:3	5 2:5 81:24 50 7:5 38:24 41:24 515-1400 4:4 524-2820 3:19 561 4:4, 14, 19 561) 835-0220 104:3		
	<u>6</u>		
	65 2:6 659-8300 4:19 66th 6:16, 24 62:19, 25		
	<u>7</u>		
	77 2:7		
	<u>8</u>		
	8 3:22 63:3 8-D 6:25 8/21 45:13 800.04 37:18 81 2:8 842-2820 4:14 88 4:8		
	<u>9</u>		
	931-2200 3:24 954 3:19 4:10 98 2:5		
<u>3</u>			
3 4:8 300 104:2 301 6:16, 24 62:19, 25 303 4:13 305 3:24 33130 4:9 33160 3:24 33301 3:19 33401 4:13, 18 104:3, 7 33410 4:4 358 6:12 82:11 89:6, 22 90:2 90:10 96:22			
<u>4</u>			
4:00 46:9, 24 47:5 400 4:13 425 3:18 444 3:5 104:2			

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