

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

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

JANE DOE NO. 2,

Plaintiff,

-vs-

VOLUME II

JEFFREY EPSTEIN,

Defendant.

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Related cases:

08-80232, 08-08380, 08-80381, 08-80994,  
08-80993, 08-80811, 08-80893, 09-80469,  
09-80591, 09-80656, 09-80802, 09-801092

VIDEO-CONFERENCED AND VIDEOTAPED  
DEPOSITION OF JANE DOE

Wednesday, September 30, 2009  
9:37 [REDACTED] - 6:10 [REDACTED]

One Clearlake Centre  
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West Palm Beach, Florida 33401

Reported By:

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EFTA00723105

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ALSO PRESENT:

Jeffrey Epstein, via video conference  
 Stan Sanders, Videographer

PROCEEDINGS

(Continued from Volume I of the same day.)  
 VIDEOGRAPHER: Back on the record at 11:52.

BY MR. CRITTON:

Q. Ms. Jane Doe, I have in front of you, I think, Exhibit 4 -- what I know to be Exhibit 4, which is the declaration of Ms. Villafana. Do you see that?

A. Yes.

Q. And I will represent to you, and I think you told me you don't know who she is; correct?

A. Yes.

Q. And on Page 2, she says is, "I" -- in her declaration says -- the first sentence says: "I am the Assistant US -- United States Attorney, assigned to the investigation of Jeffrey Epstein," and then -- "and the case was investigated by the Federal Bureau of Investigation, FBI," et cetera, et cetera.

Do you see that up at the top?

A. Yes.

Q. Okay. That's who she says she is. And then she's -- on Page 7 of her declaration she says: "I declare, under penalty of perjury, pursuant to 28 USC, Section 1746, that the following is true and correct, to the best of my knowledge and belief." And then she

2 (Pages 131 to 134)

1 signs this on 9th day of July 2008, and then it purports  
2 to be what is her signature above her printed name.

3 Do you see that?

4 A. Yes.

5 Q. All right. If I go to paragraph three, down  
6 at the bottom it says here -- there's a reference to  
7 Jane Doe, Page 3 -- [REDACTED] sorry -- Page 2, paragraph  
8 three. Are you with me?

9 A. Yes.

10 Q. Go up -- not -- not the footnotes. You know  
11 what a footnote is; don't you?

12 A. Yes.

13 Q. All right. Go up from the footnotes, then  
14 one, two, three lines up it says: "Jane Doe was  
15 identified."

16 Do you see that?

17 A. Yes.

18 Q. You are that Jane Doe; correct, Jane Doe?

19 A. Those are my initials.

20 Q. And -- and if you read -- in fact, I should  
21 probably have you just -- why don't you read to yourself  
22 paragraph three, because there's a reference to  
23 Mr. Edwards and three of his clients, [REDACTED], C.W. and  
24 Jane Doe. Do you see that?

25 A. Yes, I do.

1 Q. Okay. [REDACTED] would be [REDACTED] --

2 A. Yes.

3 Q. -- you would assume. C.W. would be E.W., and  
4 you would have to be the Jane Doe; Jane Doe?

5 A. Yes.

6 Q. Are you aware of any individuals that Miss --  
7 Mr. Edwards represents, other than you, [REDACTED], and E.W.?

8 A. No.

9 Q. All right. Then it goes down -- again, I  
10 take you back where it says: "Jane Doe was identified  
11 via the FBI's investigation in 2007, but she initially  
12 refused to speak to investigators."

13 Do you see that?

14 MR. EDWARDS: Object to the form.

15 THE WITNESS: Yes, I do.

16 BY MR. CRITTON:

17 Q. And that's true; you did refuse to speak with  
18 them?

19 MR. EDWARDS: Object to the form.

20 THE WITNESS: Yes. Yes, I did.

21 BY MR. CRITTON:

22 Q. All right. And then it says: "Jane Doe's  
23 status as a victim of a Federal offense was confirmed  
24 when she was interviewed by Federal agents on May 28th,  
25 2008."

1 Do you see that?

2 A. Yes.

3 Q. And then it says: "The FBI's Victim Witness  
4 specialist sent a letter to Jane Doe," you, "on May 30,  
5 2008."

6 Do you see that?

7 A. Yes, I do.

8 Q. Okay. You indicated that you were -- when I  
9 asked you earlier today -- excuse me -- when you had  
10 given your statements and you said, emphatically, you  
11 were three and a half months pregnant; correct?

12 A. Yes.

13 Q. All right. You wouldn't dispute  
14 Ms. Villafana's and the FBI's agents' statement that  
15 they interviewed you on May 28th of '08; correct?

16 A. No.

17 Q. And I think you -- well, I don't think. Let  
18 me start again.

19 You've told us -- you've testified that you  
20 only talked with the FBI on one occasion, and that one  
21 occasion had to have been May 28th of '08; correct?

22 A. Yes.

23 Q. Okay. And that was the first time, at least,  
24 that you had told any governmental authority, state,  
25 Federal, local, that you had been to Mr. Epstein's home;

1 correct?

2 A. Yes.

3 Q. And if you go to Exhibit 5 --

4 MR. CRITTON: And, Mr. Edwards, if you could  
5 help your client.

6 MR. EDWARDS: I haven't seen an Exhibit 5  
7 yet, I don't think.

8 MR. CRITTON: It's -- [REDACTED] sorry. Exhibit 5  
9 to Exhibit 4. My fault.

10 MR. EDWARDS: Okay. Just to show her where  
11 it is. It's -- if you look up at the upper,  
12 right-hand corner, there's a May 30th letter.

13 MR. CRITTON: May 30, 2008, letter. It's:  
14 "Dear Jane Doe," and it's been redacted in part.

15 MR. EDWARDS: Let's see if I can get there,  
16 and then I'll get her there.

17 BY MR. CRITTON:

18 Q. If you look -- you're now looking at  
19 Exhibit 5 to our Exhibit 4; correct, to Ms. Villafana's  
20 declaration?

21 A. Okay.

22 Q. And you see it's a letter from the US  
23 Department of Justice. It's dated May 30th, 2008, and  
24 it says: "Dear Jane Doe," because your name has been  
25 redacted; correct?

1 A. Uh-huh. Yes.  
 2 Q. And is this the Victim's Assistance Program,  
 3 a letter that you said you received sometime after you  
 4 met with the FBI?  
 5 A. Yes.  
 6 Q. Okay. And I think you said -- your -- your  
 7 best recollection was within a week, which is consistent  
 8 with this letter, which also then reconfirms that the  
 9 FBI had to have met with you, as reflected in the  
 10 declaration on May 28th, 2008, for the very first time;  
 11 correct?  
 12 A. Yes.  
 13 Q. All right. At the time that you received  
 14 this letter, I think you also told us that you had not  
 15 been represented, or you -- Mr. Edwards was not  
 16 representing you at that time; correct?  
 17 MR. EDWARDS: Object to the form.  
 18 THE WITNESS: Yes, it was shortly after.  
 19 BY MR. CRITTON:  
 20 Q. All right. If you then go down to Exhibit 7,  
 21 and it's easier to read.  
 22 MR. EDWARDS: Flip a few pages.  
 23 THE WITNESS: Here?  
 24 MR. EDWARDS: Keep going (inaudible).  
 25 THE WITNESS: Okay.

1 BY MR. CRITTON:  
 2 Q. This is a letter also from the US Department  
 3 of Justice. It's from Ms. Villafana. It's directed to  
 4 Mr. Edwards. It's dated July 9th, 2008.  
 5 A. Uh-huh.  
 6 Q. And it says, Re: Jeffrey Epstein/S, and then  
 7 there's a redaction, R/Notification of Identified  
 8 Victim.  
 9 Do you see that?  
 10 A. Yes, I do.  
 11 Q. Okay. Have you ever seen this letter before?  
 12 A. I don't remember seeing this.  
 13 Q. Now, having seen the affidavit, Exhibit 4,  
 14 that is the declaration of Ms. Villafana that reflects  
 15 that you met with the FBI on May 28th, and consistent  
 16 with your earlier testimony, that you got the victim's  
 17 assistance letter shortly thereafter, which we now know,  
 18 from looking at one of the exhibits to the declaration,  
 19 was May 30th of '08.  
 20 Does that in any way refresh your  
 21 recollection how you got -- or from whom or how you got  
 22 the card to go find Mr. Edwards?  
 23 A. Well, no.  
 24 Q. Okay. And now, having seen the declaration  
 25 in exhibits -- and the exhibits that we've identified,

1 does that refresh your recollection that the FBI told  
 2 you that you could file some sort of civil suit against  
 3 Mr. Epstein?  
 4 MR. EDWARDS: Object to the form.  
 5 THE WITNESS: Yeah, they -- they may have  
 6 mentioned something of it.  
 7 BY MR. CRITTON:  
 8 Q. Okay. So that -- that refreshes your  
 9 recollection that the FBI said, you know, you may want  
 10 to go get your own lawyer and bring a money -- a civil  
 11 suit against Mr. Epstein; we're only criminal people?  
 12 MR. EDWARDS: Object to the form.  
 13 BY MR. CRITTON:  
 14 Q. Does that refresh your recollection?  
 15 A. Which document refreshes her recollection?  
 16 Any of this?  
 17 MR. CRITTON: No, I just quoted back to her  
 18 what she said to me.  
 19 MR. EDWARDS: Okay. Well, if you know the  
 20 answer to what he's talking about, then answer it.  
 21 THE WITNESS: They didn't -- I know -- I  
 22 mean, I don't remember what exactly they said to  
 23 me, but they did mention that I should get a  
 24 lawyer.  
 25

1 BY MR. CRITTON:  
 2 Q. All right. And that you might be able to get  
 3 money?  
 4 MR. EDWARDS: Object to the form.  
 5 THE WITNESS: I don't -- I can't remember  
 6 them saying anything to me about money.  
 7 BY MR. CRITTON:  
 8 Q. Then why would you need a lawyer under these  
 9 circumstances for any reason? You weren't -- or did  
 10 they indicate to you that you were a target of any  
 11 investigation?  
 12 MR. EDWARDS: Object to the form.  
 13 THE WITNESS: Basically, they just told me  
 14 that what happened to me was wrong, and that I  
 15 should do something about it.  
 16 BY MR. CRITTON:  
 17 Q. Okay. And you understood that doing  
 18 something about it was filing a lawsuit against  
 19 Mr. Epstein and ask for money?  
 20 MR. EDWARDS: Object to the form.  
 21 BY MR. CRITTON:  
 22 Q. Is that a fair statement?  
 23 A. Well, I wanted to have him prosecuted for  
 24 what he did, but I obviously can't do that.  
 25 Q. Because -- because you know from your own

1 criminal experiences that it's either the State of  
2 Florida or the United States Government that prosecutes  
3 people, not individuals; true?

4 MR. EDWARDS: Object to the form.

5 THE WITNESS: I don't understand.

6 BY MR. CRITTON:

7 Q. Well, you know that you can't prosecute -- a  
8 citizen doesn't have the right to prosecute. It's --  
9 it's an arm of the Government, and you know from your  
10 own experience. That is, when you got in trouble with  
11 the law, you know it was the State of Florida versus  
12 you; correct?

13 MR. EDWARDS: Object to the form.

14 THE WITNESS: That's not something that I  
15 specifically knew from my own experience, no.

16 BY MR. CRITTON:

17 Q. Okay. Well, we'll get to that a little  
18 later. Let -- let me go back to the discussions that  
19 you had with the FBI. I think you told me -- well, I  
20 know what I wanted to ask you. If you go back to  
21 Exhibit 4, Page 2 --

22 A. (Witness complies.)

23 Q. -- same paragraph, paragraph three. It says:  
24 Attached hereto are copies of letters provided to  
25 Mister -- or to Bradley Edwards, three clients, [REDACTED],

1 Third sentence says: "All three of those  
2 clients were victims of Jeffrey Epstein's while they  
3 were minors, beginning when they were 15 years old.

4 Do you see that?

5 A. Yes, I do.

6 Q. Okay. So Ms. Villafana, based upon her  
7 knowledge and the interview or the conversation that she  
8 had with the FBI and the information they had, have you,  
9 [REDACTED] and E.W. all being at least 15 when you first saw  
10 Mr. Epstein -- do you see that, at least what's  
11 represented in her sworn statement --

12 MR. EDWARDS: Object to the form.

13 THE WITNESS: Yes, I can see what it says.

14 BY MR. CRITTON:

15 Q. All right. Did the FBI at any time -- well,  
16 let me -- let me ask this question: If the FBI -- if  
17 you told the FBI that you were 15 when you first saw  
18 Mr. Epstein, based upon this declaration, does that now  
19 refresh your recollection that you never went to  
20 Mr. Epstein's home for the first time until after you  
21 turned 15, which would have been sometime after June  
22 17th of 2003?

23 MR. EDWARDS: Object to the form.

24 THE WITNESS: I remember specifically telling  
25 them and Jeffrey that I was 14 when I first met

1 C.W. and Jane Doe. And then there's a 1 for the  
2 footnote.

3 Do you see that?

4 A. Yes.

5 Q. All right. And, again, recognizing that  
6 Ms. Villafana is a United States Attorney, and that  
7 she's signing this declaration of oath under oath, based  
8 on her conversations that she had with the FBI -- at  
9 least that's what it purports to say -- but go down to  
10 Footnote 1. It says: "Attorney Edwards filed this  
11 motion on behalf of Jane Doe, without identifying which  
12 of his clients is the purported victim."

13 Did I read that correctly?

14 MR. EDWARDS: Object to the form.

15 THE WITNESS: I don't know.

16 BY MR. CRITTON:

17 Q. I want you to follow along. Did I just --  
18 let me read it again.

19 A. Oh, I read it ahead of you.

20 Q. [REDACTED] sorry? You're ahead of me?

21 A. Yeah.

22 Q. Okay. Well, then, we'll just -- let me go to  
23 the second sentence. It says: Accordingly, I will  
24 take -- I will address facts related to C.W., [REDACTED], and  
25 Jane Doe.

1 Jeffrey, and I told him that I was 15.

2 BY MR. CRITTON:

3 Q. Okay. Well, but you would agree with me that  
4 at least Miss -- the FBI and the US Attorney's Office  
5 believed you were 15, based on something that you told  
6 them; correct?

7 MR. EDWARDS: Object to the form.

8 THE WITNESS: It looks like that's what they  
9 believed. But they obviously misinterpreted what I  
10 told them, because I know what I told them.

11 BY MR. CRITTON:

12 Q. Would you agree with me that your  
13 recollection back in 2000 -- May of 2008 was probably  
14 better than it is today --

15 MR. EDWARDS: Object to the form.

16 BY MR. CRITTON:

17 Q. -- in September of 2009?

18 A. What do you mean?

19 Q. Well, would you agree that with another --  
20 let's see -- with another 16 months having passed since  
21 May of 2008, that your recollection as to the events  
22 involving Mr. Epstein were better back in 2008 than they  
23 are now?

24 MR. EDWARDS: Object to the form.

25 THE WITNESS: No.

1 BY MR. CRITTON:

2 Q. Okay. You think your recollection is better  
3 now?

4 A. No, I think it's pretty much the same.

5 Q. All right. You told me the FBI -- well, let  
6 me strike that.

7 You said you told the FBI how you came to be  
8 at Mr. Epstein's the first time; correct?

9 A. Yes.

10 Q. And in response to their question, you told  
11 them that [REDACTED] took you; correct?

12 A. Yes. Yes.

13 Q. How many times did -- did you go or did [REDACTED]  
14 take you to Jeffrey Epstein's home?

15 A. One.

16 Q. Just the first time?

17 A. Yes.

18 Q. And what did [REDACTED] tell you about -- well, let  
19 me strike that.

20 You were friends with [REDACTED].?

21 A. Yes.

22 Q. And you say it was, at least your  
23 recollection today, is it was sometime in February, plus  
24 or minus a month, of '03?

25 A. Yes.

1 Q. All right. When you went the first time --  
2 or before you went the first time, how long had you  
3 known [REDACTED].?

4 A. About three years.

5 Q. And did you meet -- how did you meet [REDACTED].?

6 A. I met her in the sixth grade at school.

7 Q. Was she in your class?

8 A. No.

9 Q. Is she older or younger, same age?

10 A. I think she's a little bit younger, but she's  
11 about the same age.

12 Q. You mean within a couple of months of one  
13 another?

14 A. Yes.

15 Q. How about E.W., by the sixth grade did you  
16 already know E.W.?

17 A. No.

18 Q. So [REDACTED] was the first person you knew?

19 A. Yes.

20 Q. What school was that?

21 A. Watson B. Duncan Middle School.

22 Q. You were in the same sixth grade, just  
23 different classes?

24 A. Yes.

25 Q. Did you know -- and you became friends?

1 Initially acquaintances, but eventually friends?

2 A. Yes.

3 Q. Let's see. Duncan Middle School, where you  
4 would have been there sixth, seventh and eighth?

5 A. No. I went there for sixth grade, and I  
6 moved in seventh grade.

7 Q. Did [REDACTED] stay there?

8 A. I don't know.

9 Q. Where did you go for seventh grade?

10 A. Okeeheelee Middle School.

11 Q. Is that because you moved locations where you  
12 were living?

13 A. Yes.

14 Q. Okay. And in sixth grade you would have  
15 been -- let's see -- sixth grade you would have been how  
16 old?

17 A. Eleven.

18 Q. Who were you living with -- who were you  
19 living with when you went to Duncan Middle?

20 A. My grandmother.

21 Q. Ms. Brewer?

22 A. Yes.

23 Q. Okay. Who were you living with when you went  
24 to Okeeheelee?

25 A. I was in between my grandmother and my

1 mother.

2 Q. Is this during the time that is -- between  
3 the sixth and the seventh grade, is this the time that  
4 your -- that the incident occurred where your father had  
5 been charged with, in essence, murdering Joey?

6 MR. EDWARDS: Object to the form.

7 THE WITNESS: It was summer before seventh  
8 grade.

9 BY MR. CRITTON:

10 Q. Is that the reason that you were no longer  
11 with your grandmother at that point in time, and why you  
12 went to Okeeheelee?

13 A. I was with my grandmother. My grandmother  
14 moved because my mother wanted me to go to that school  
15 because she wanted the school to believe that I was  
16 living with her.

17 Q. She wanted you to go to Okeeheelee?

18 A. Yes. She wanted -- I don't know who really,  
19 but she wanted somebody to believe that I was living  
20 with her, and not with my grandmother.

21 Q. So mom said, come, you're staying with me,  
22 and -- and, ultimately, you went to Okeeheelee?

23 A. Yes.

24 Q. Did you stay in touch with [REDACTED].?

25 A. No.

1 Q. When you were in sixth grade, did you and  
 2 [REDACTED] used to play together?  
 3 A. No.  
 4 Q. Did you -- you just knew each other from  
 5 school?  
 6 A. Yes.  
 7 Q. Did you ever meet [REDACTED]'s mom?  
 8 A. No.  
 9 Q. Have you ever met [REDACTED]'s mom?  
 10 A. No.  
 11 Q. Has [REDACTED] ever talked to you about her mom?  
 12 A. No.  
 13 Q. Has anyone ever told you that [REDACTED]'s mom is a  
 14 prostitute?  
 15 A. No.  
 16 MR. EDWARDS: Object to the form.  
 17 BY MR. CRITTON:  
 18 Q. Have you heard that before today, that [REDACTED]'s  
 19 mother was a prostitute?  
 20 A. No.  
 21 Q. Did you see [REDACTED] during your seventh grade at  
 22 all?  
 23 A. No.  
 24 Q. How about eighth grade?  
 25 A. We were living close to each other, so I met

1 her again, yes.  
 2 Q. In eighth grade, were you still at  
 3 Okeeheelee?  
 4 A. Yes.  
 5 Q. But you were living closer now to [REDACTED], so  
 6 you started hanging out together or were friendly,  
 7 became friends again?  
 8 A. We hung out once in a while, not a whole lot.  
 9 Q. And I think you said you never have been to  
 10 [REDACTED]'s house?  
 11 A. No, I had never --  
 12 Q. Back at that point in time.  
 13 A. No.  
 14 Q. Okay. Had she ever been -- had you ever  
 15 brought her over to your house or your grandmother's  
 16 house or wherever you were living at the time?  
 17 A. Yes.  
 18 Q. And this would have been in what, in eighth  
 19 grade now we're talking about?  
 20 A. Yes.  
 21 Q. Okay. When you were in sixth grade and  
 22 around [REDACTED], did you and [REDACTED] ever drink alcohol  
 23 together?  
 24 A. No.  
 25 Q. Did you ever do any kind of drugs together --

1 A. No.  
 2 Q. -- legal or illegal?  
 3 A. No.  
 4 Q. Prescription drugs that -- although they  
 5 weren't your prescription?  
 6 A. No.  
 7 Q. Were you aware that [REDACTED] was doing drugs --  
 8 A. No.  
 9 Q. -- or alcohol back at that point in time in  
 10 sixth, seventh and eighth -- sixth and seventh grade?  
 11 A. No.  
 12 Q. How about eighth grade, were you -- had you  
 13 started drinking by the time you had hit eighth grade?  
 14 MR. EDWARDS: Object to the form.  
 15 BY MR. CRITTON:  
 16 Q. By drinking, I mean alcohol.  
 17 A. I -- I had probably had a drink at some  
 18 point.  
 19 Q. And had you started doing drugs by the time  
 20 you were in the eighth grade, illegal drugs?  
 21 MR. EDWARDS: Object to the form.  
 22 THE WITNESS: Yes.  
 23 BY MR. CRITTON:  
 24 Q. All right. And what had you started?  
 25 Smoking pot?

1 A. Yes.  
 2 Q. All right. How about the Ecstasy, the one  
 3 Ecstasy that you say you took, was that back in the  
 4 eighth grade?  
 5 MR. EDWARDS: Object to the form.  
 6 THE WITNESS: I was either 13 or 14.  
 7 BY MR. CRITTON:  
 8 Q. So at least before you met Mr. Epstein, you  
 9 had at least done -- you were drinking alcohol, you were  
 10 using pot, and you had had Ecstasy; true?  
 11 MR. EDWARDS: Object to the form.  
 12 THE WITNESS: Yes.  
 13 BY MR. CRITTON:  
 14 Q. And had you also had Xanax by age 12, 13, 14?  
 15 A. No.  
 16 Q. Did you ever smoke pot with [REDACTED]? And [REDACTED]  
 17 talking eighth grade.  
 18 A. Probably.  
 19 Q. And how about Ecstasy, were you or [REDACTED] --  
 20 well, let me strike that.  
 21 Had you ever taken Ecstasy when [REDACTED] was  
 22 around?  
 23 A. No.  
 24 Q. Okay. Who were you with when you had the  
 25 Ecstasy?

1 A. I was with an old friend.  
 2 Q. Who?  
 3 A. Melissa.  
 4 Q. What's Melissa's last name?  
 5 A. Kapusta.  
 6 Q. [REDACTED] sorry?  
 7 A. K-a-p-u-s-t-a.  
 8 Q. Is she a friend of yours?  
 9 A. I haven't seen her or spoken to her in a few  
 10 years.  
 11 Q. Did she used to live out -- or in the area  
 12 that you did?  
 13 A. Yes.  
 14 Q. Is she older, younger, or same age?  
 15 A. Well, she went to the same school. We were  
 16 the same age. She was -- she's a little bit younger, a  
 17 few months.  
 18 Q. Okay. And when you would smoke pot, who did  
 19 you get that from?  
 20 MR. EDWARDS: Object to the form.  
 21 THE WITNESS: I don't know.  
 22 BY MR. CRITTON:  
 23 Q. Okay. Did you ever get it from your  
 24 grandmother?  
 25 A. No.

1 A. She was friends with my friend.  
 2 Q. She being who? E.W.?  
 3 A. E.W. was friends with my friend, Melissa, and  
 4 that's how I met her.  
 5 Q. So you met E.W. through Melissa?  
 6 A. Yes.  
 7 Q. What age?  
 8 A. Thirteen or 14, maybe. [REDACTED] not positive.  
 9 Q. And did you and E.W. hit it off right away,  
 10 once you met through Melissa?  
 11 A. No, we did not.  
 12 Q. Did you ever smoke pot with E.W. back at that  
 13 time? Because she was using drugs, too; wasn't she?  
 14 MR. EDWARDS: Object to the form.  
 15 THE WITNESS: I don't know what she was  
 16 doing.  
 17 BY MR. CRITTON:  
 18 Q. Okay. Are you saying she wasn't using drugs,  
 19 or you just don't know, one way or the other?  
 20 A. I just don't know.  
 21 Q. But you've used illegal drugs with E.W. ;  
 22 haven't you --  
 23 MR. EDWARDS: Object to the form.  
 24 BY MR. CRITTON:  
 25 Q. -- from the time you met her?

1 Q. Okay. Did you ever smoke pot in your  
 2 grandmother's house?  
 3 A. Probably.  
 4 Q. Okay. Was she aware that you were smoking  
 5 pot?  
 6 A. No.  
 7 Q. [REDACTED], after -- during eighth grade continued  
 8 to be friends?  
 9 A. Yes.  
 10 Q. Okay. When you say you went to Epstein's  
 11 house for the first time, what grade were you in?  
 12 A. I was in eighth grade for the second time.  
 13 Q. You repeated eighth grade?  
 14 A. Yes.  
 15 Q. So you would have still been at -- at that  
 16 time at Okeeheelee?  
 17 A. In the middle of that year I believe I left  
 18 that school and went to an all girls school.  
 19 Q. Was that Pace?  
 20 A. Yes.  
 21 Q. But you were still -- you would still see  
 22 [REDACTED] from time to time?  
 23 A. Yes.  
 24 Q. Okay. Was -- was E.W. around this time, as  
 25 well? Were you friends now with E.W.?

1 A. Yes.  
 2 Q. Now, when you first met E.W., where was she  
 3 living?  
 4 A. She was living with her mom in --  
 5 Q. Do you know what her mom's name is?  
 6 A. Eva.  
 7 Q. Did you ever go over to E.W.'s house, back at  
 8 that time period --  
 9 A. I --  
 10 Q. -- seventh, eighth, ninth grade?  
 11 A. I went outside her house once. I -- I had  
 12 never been inside of her house.  
 13 Q. But you met her mom?  
 14 A. No.  
 15 Q. You never met her mom?  
 16 A. I have met her mom, but at that point, no.  
 17 Q. Okay. Did you meet her mom after this  
 18 lawsuit has been filed?  
 19 A. No.  
 20 Q. Did you meet her at what point in time?  
 21 A. I met her when I worked at IHOP.  
 22 Q. Did she come in as a -- was she a waitress  
 23 there, or did she --  
 24 A. She worked there.  
 25 Q. Did she help you get your job?

1 A. Yes.  
 2 Q. And was that when you were living with E.W.?  
 3 A. Yes.  
 4 Q. Okay. That was when you were living with  
 5 E.W. at the apartment with Jessie?  
 6 A. Yes.  
 7 Q. And when -- was there anybody else living  
 8 there at that apartment with you, Jessie and E.W. during  
 9 that few months that you were there in 2006?  
 10 A. No.  
 11 Q. And that's when you met mom -- mum -- E.W.'s  
 12 mother? [REDACTED] sorry.  
 13 MR. EDWARDS: Form.  
 14 THE WITNESS: Yes.  
 15 BY MR. CRITTON:  
 16 Q. And did E.W. say, you need to get a job, you  
 17 know, why not -- maybe my mom can help you get a job at  
 18 IHOP?  
 19 A. No. I expressed to her that I wanted a job.  
 20 Q. Had you had a job before that point in time?  
 21 A. Not really a real job. I had -- I had a job,  
 22 but I -- I like went there for a week, and stopped.  
 23 Q. And that was where?  
 24 A. I worked for a man named Stan Crooks.  
 25 Q. Who is Stan Crooks?

1 A. He is an auctioneer. He is my uncle's  
 2 friend.  
 3 Q. The uncle who drove you to Mr. Epstein's  
 4 home?  
 5 A. No.  
 6 Q. Another uncle?  
 7 A. Yes.  
 8 Q. Another brother of Mr. Dial?  
 9 A. Yes.  
 10 Q. What's his name?  
 11 A. Oakley.  
 12 Q. Is his first name?  
 13 A. Yes.  
 14 Q. What's his last name?  
 15 A. Brown.  
 16 Q. They -- looks like there's a -- was it a  
 17 Jeff Brown?  
 18 A. Yes.  
 19 Q. A Jeff Brown and Oakley Brown, but they're --  
 20 are they like stepbrothers with your dad?  
 21 A. My dad was a first born. He has a different  
 22 father.  
 23 Q. All right. So I think you told me you would  
 24 have been at Mr. Epstein's house -- you would have been  
 25 in the eighth grade for the first time, eighth grade,

1 and you were hanging out with [REDACTED].?  
 2 MR. EDWARDS: Object to the form.  
 3 BY MR. CRITTON:  
 4 Q. You were friends -- were friends with [REDACTED].?  
 5 MR. EDWARDS: Object to the form.  
 6 THE WITNESS: Yes.  
 7 BY MR. CRITTON:  
 8 Q. And at that time that [REDACTED] first approached  
 9 you, were you aware that E.W. -- whether or not E.W. had  
 10 been to Mr. Epstein's home?  
 11 A. I didn't know for a fact, no.  
 12 Q. [REDACTED] sorry?  
 13 A. I did not know for a fact.  
 14 Q. And what did -- what did [REDACTED] tell you?  
 15 A. About going to Jeffrey Epstein's house.  
 16 Q. What did -- what did [REDACTED] raise with you?  
 17 That is how did the -- before [REDACTED] ever told you or  
 18 asked you whether [REDACTED] be interested in going to  
 19 Mr. Epstein's home, did she -- that is [REDACTED] -- were you  
 20 aware that she had been to Mr. Epstein's home? That is  
 21 had she talked about it amongst you all?  
 22 MR. EDWARDS: Object to the form.  
 23 THE WITNESS: I had heard about it, not from  
 24 [REDACTED].  
 25

1 BY MR. CRITTON:  
 2 Q. What had you heard and from whom?  
 3 A. I don't remember who exactly it was. It may  
 4 have been [REDACTED]'s boyfriend at the time.  
 5 Q. Which boyfriend would that have been?  
 6 A. I don't know. I think probably her baby's  
 7 father.  
 8 Q. Justin Sprague?  
 9 A. Yes.  
 10 Q. Did you know Cory Sprague?  
 11 A. Yes.  
 12 Q. Okay. Did you ever have sexual relationship  
 13 with Justin Sprague?  
 14 A. No.  
 15 Q. Did you ever have one with Cory Sprague?  
 16 MR. EDWARDS: Object to the form. [REDACTED]  
 17 instructing the witness not to answer, invoking her  
 18 privacy rights, privacy rights of third parties.  
 19 MR. CRITTON: Well, let me just do something  
 20 so we can get this on the record.  
 21 Is -- let me have marked as Exhibit -- where  
 22 are we -- 5.  
 23 (Discussion held off the record.)  
 24 MR. CRITTON: Four was the declaration of  
 25 Marie Villafana.

1 This is going to be marked as Exhibit 5.  
2 (Discussion held off the record.)  
3 (Defendant's Exhibit No. 5 was marked for  
4 identification.)

5 BY MR. CRITTON:

6 Q. Exhibit 5 is the order that Judge Johnson  
7 entered on September 4, 2009, in the consolidated case  
8 that dealt specifically with Mr. Epstein's emergency  
9 motion for independent medical exam, and it was directed  
10 to Mr. Hill's client, [REDACTED].

11 Within -- within that order, on Page 2 she  
12 says -- or dealt with questions that could be asked, the  
13 scope of the exam. But Judge Johnson --

14 MR. CRITTON: And I just want to put this on  
15 the record, and then we can move on, if your  
16 instruction is the same, Brad.

17 But she talks about it in the first paragraph  
18 on the second page, first full paragraph. She,  
19 Judge Johnson, who's dealing with a discovery  
20 issue, says, the remaining issues involve  
21 Plaintiff's request for an order limiting the scope  
22 of the proposed examination by disallowing repeated  
23 questioning regarding, quote, highly sensitive  
24 areas of inquiry, including Plaintiff's medical  
25 history, psychiatric history, sexual history,

1 support her novel position that the Plaintiff who  
2 puts her mental, emotional and psychiatric state at  
3 issue can place a limitation on the number of times  
4 defense counsel, or agents retained by him, can  
5 inquire into areas relevant to these issues, where  
6 the subject matter involved is highly personal,  
7 embarrassing, sensitive or otherwise humiliating.

8 Plaintiff is seeking millions of dollars in  
9 personal injury damages for, among other things,  
10 physical injury, pain and suffering, emotional  
11 distress, psychological, mental anguish,  
12 humiliation, embarrassment, loss of self-esteem,  
13 loss of dignity and invasion of her privacy. And  
14 she goes on to describe at least specifically to  
15 [REDACTED].

16 And then the last two sections I want to just  
17 put on the record is on the first -- first full  
18 paragraph on Page 4. It says: Under these  
19 circumstances, where Plaintiff --

20 MR. EDWARDS: Circumstances of [REDACTED], that's  
21 what we're talking about; right?

22 MR. CRITTON: Right.

23 Under these circumstances --

24 MR. EDWARDS: Yes.

25 MR. CRITTON: -- where Plaintiff is seeking

1 social history, sexual abuse history, substance  
2 abuse history, et cetera, and imposing certain time  
3 restraints on the examination itself.

4 And the Court goes on to deny -- the  
5 Plaintiff's request to limit the scope of the  
6 examination is denied.

7 And if you go over on Page 3, Judge Johnson  
8 says: Presumably, Plaintiff -- and there was a --  
9 there was a questionnaire that was being referenced  
10 then -- she says: Presumably, Plaintiff, who in  
11 this instance to this order was [REDACTED], but it  
12 applies to every Federal court Plaintiff, will be  
13 asked these questions two or more times, first by  
14 defense counsel at Andreana's deposition scheduled  
15 to take place shortly, and again by Dr. Hall at the  
16 upcoming examination.

17 And then she goes on to say that Plaintiff's  
18 objection is that, by having to answer these same  
19 questions about the same subject matter three  
20 separate times would only serve to embarrass,  
21 humiliate, intimidate and further victimize the  
22 Plaintiff.

23 She -- she -- Judge Johnson goes on to say at  
24 the next full paragraph: Plaintiff's site no case  
25 law, and independent research has uncovered none to

1 to recover medical expenses associated with these  
2 complex medical issues, full knowledge of the  
3 Plaintiff's past and present medical,  
4 psychological, familial, social histories is  
5 essential. And while neither a duplication nor  
6 embarrassment is desired, under the circumstances  
7 presented, where the number and the scope of  
8 damages claimed are vast and the Plaintiff's past  
9 history eventful, it may nonetheless be  
10 unavoidable.

11 And then she goes: This is not to say that  
12 the restrictions on the scope of the questions may  
13 never be put into effect, and if the case  
14 progresses, and Plaintiff can show that Defendant's  
15 invasive questioning is being done in bad faith or  
16 for purposes of harassment, the Court may  
17 reconsider imposing limitations of the sort  
18 requested herein.

19 At this point, however, the Court agrees with  
20 Defendant that to restrict the number of times  
21 defense counsel may ask the Plaintiff personal and  
22 sensitive questions concerning some of the pivotal  
23 issues in this case would work an injustice by  
24 preventing Defendant from being able to defend  
25 himself.

1 So I don't know whether you have seen this  
2 order --

3 MR. EDWARDS: Yeah. Well, I -- I haven't  
4 seen it, but having read that, it certainly doesn't  
5 change my position. It's clearly talking about a  
6 different Plaintiff, different set of  
7 circumstances. And very seldom, if ever, does it  
8 talk about issues regarding the names of sexual  
9 partners, sexual positions or sexual activity. It  
10 talks about other things that I have let you  
11 conduct your examination on. So...

12 MR. HILL: And the other thing is, is I filed  
13 the motion so, to be included in this record, the  
14 scope of the relief that I was seeking, the motion  
15 for protective order. The motion to limit the CME  
16 was regarding repeated questioning in the same  
17 areas of inquiry. Nothing about that motion for  
18 protective order sought to prevent discussion about  
19 past sexual history at all. It was to the number  
20 of times it could be disclosed and discussed.

21 So to suggest that that is somehow a ruling  
22 that everything is open game is not entirely  
23 consistent with the relief that I was seeking in  
24 that motion.

25 MR. EDWARDS: So if you want to make this an

1 MR. EDWARDS: If it relates to sexual  
2 partners' names or sexual positions and things that  
3 are obviously intended only to humiliate, yes,  
4 that's going to be my objection.

5 MR. CRITTON: Now, Pam, if I could get you to  
6 go back to the question I asked.

7 So long, Adam.

8 (Whereupon, Mr. Horowitz left the  
9 proceedings.)

10 (Whereupon, the requested portion of the  
11 record was read aloud by the Court Reporter.)

12 MR. CRITTON: Let me be clear on the  
13 question. Let me see the question preceding.

14 COURT REPORTER: This is the preceding  
15 question...

16 (Whereupon, the requested portion of the  
17 record was read aloud by the Court Reporter.)

18 BY MR. CRITTON:

19 Q. All right. Let me just ask the question so  
20 it is clear: Did you ever have a sexual relationship  
21 with Cory Sprague?

22 MR. EDWARDS: And [REDACTED] instructing the witness  
23 not to answer, based on her own privacy rights, as  
24 well as the privacy rights of third-party, innocent  
25 persons.

1 exhibit, you can.

2 MR. CRITTON: [REDACTED] just saying --

3 MR. EDWARDS: It certainly doesn't change my  
4 position.

5 MR. CRITTON: All right. And [REDACTED] just saying  
6 this is -- we're going to come -- I will certainly  
7 ask the Court for relief --

8 MR. EDWARDS: Sure.

9 MR. CRITTON: -- for sanctions and the costs  
10 and fees related to that.

11 I just wanted to give you the opportunity to  
12 read the order and what she said about defense  
13 counsel asking repeated questions about these areas  
14 or the number of times that they'll be asked, not  
15 only by defense counsel --

16 MR. EDWARDS: It sounds like --

17 MR. CRITTON: -- but as well by the doctor.

18 So I think it's an appropriate area. You can  
19 still stay with your same instructions.

20 MR. EDWARDS: Yeah, it sounds like you can  
21 ask it as many times as you want.

22 MR. CRITTON: And you'll continue to object.

23 MR. EDWARDS: Well, it depends on the  
24 question.

25 MR. CRITTON: All right.

1 BY MR. CRITTON:

2 Q. Were you aware that [REDACTED] has -- as of today,  
3 are you aware that at some point in time she had a  
4 sexual relationship with Cory Sprague?

5 A. No.

6 Q. Are you aware that [REDACTED] had a sexual  
7 relationship, not only with Justin Sprague, but as well  
8 Cory Sprague?

9 MR. CRITTON: Did I say [REDACTED]? Did I say --

10 MR. EDWARDS: Well, you just asked the same  
11 question twice.

12 BY MR. CRITTON:

13 Q. Right. Are you aware that E.W. had a sexual  
14 relationship, as did [REDACTED], with both Justin Sprague and  
15 Cory Sprague?

16 A. I knew that E.W. had dated Justin before [REDACTED].  
17 did.

18 Q. Okay. Were you aware that she had a -- had  
19 sexual activity, both with -- or with Justin Sprague?

20 A. No.

21 Q. Did she tell you that?

22 A. Well, E.W.? Yes.

23 Q. She told you she had had sexual relationship  
24 with Justin Sprague?

25 A. Yes.

1 Q. Did she tell -- did she, E.W., as well tell  
2 you she had a sexual relationship or had sexual activity  
3 with Cory Sprague?

4 A. No.

5 Q. Did you ever tell E.W. whether you had sexual  
6 activity with Cory?

7 A. No.

8 Q. Did you ever tell [REDACTED] whether you had a  
9 sexual relationship with Cory?

10 A. No.

11 Q. Now back to how you learned about  
12 Mr. Epstein. I think you said that Justin Sprague, who  
13 was the father of [REDACTED]'s son?

14 A. Yes.

15 Q. And his name is [REDACTED]?

16 A. [REDACTED]'s son?

17 Q. Yes.

18 A. No.

19 Q. What's his name?

20 A. [REDACTED] [REDACTED]

21 Q. That's right. [REDACTED] [REDACTED] sorry.

22 COURT REPORTER: Spell?

23 BY MR. CRITTON:

24 Q. Spelled?

25 A. C-a-i-d-e-n.

1 Q. So if [REDACTED] has testified under oath that  
2 Justin didn't care and just said, bring home the bacon,  
3 that would be a surprise to you?

4 MR. EDWARDS: Object to the form.

5 THE WITNESS: I wouldn't really care whether  
6 Justin wanted her to go or not. That's none of my  
7 business.

8 BY MR. CRITTON:

9 Q. And that was not my question. So [REDACTED] going  
10 to ask Pamela to read it back to you, and if you could  
11 answer my question, please.

12 (Whereupon, the requested portion of the  
13 record was read aloud by the Court Reporter.)

14 BY MR. CRITTON:

15 Q. Let me rephrase it, then.

16 If [REDACTED] has testified under oath that Justin  
17 said, being aware that [REDACTED] was getting money from this  
18 old guy in Palm Beach, that his response -- Justin's  
19 response to [REDACTED] was, I don't care, just bring home the  
20 bacon, that --

21 A. Well, [REDACTED] sure --

22 Q. Let me finish the question.

23 -- that would be a surprise to you, based  
24 upon at least what you -- your impression is from  
25 Justin; is that correct?

1 COURT REPORTER: And Sprague?

2 THE WITNESS: I don't know his last name --

3 MR. CRITTON: S-p-r-a-g-u-e, I believe.

4 That's how I've seen it answered in  
5 interrogatories.

6 BY MR. CRITTON:

7 Q. What did you hear from Justin, or what did --  
8 what was Justin saying about Mr. Epstein?

9 A. That [REDACTED] was seeing some old guy, who was  
10 paying her money.

11 Q. And Justin, did he think that was a good idea  
12 because she was getting money?

13 MR. EDWARDS: Object to the form.

14 BY MR. CRITTON:

15 Q. What did he say?

16 A. I think Justin was probably upset about it.

17 Q. And what makes you believe that Justin may  
18 have been upset about [REDACTED] going -- or seeing some old  
19 guy, as you -- as he described it to you, who was paying  
20 her money? What did he say?

21 A. I don't remember exactly what he said. [REDACTED]  
22 sure that he wasn't happy about it, though.

23 Q. What -- what makes you believe that?

24 A. Because they were living together, and they  
25 were, I guess, in a relationship.

1 MR. EDWARDS: Object to the form.

2 THE WITNESS: I don't know.

3 BY MR. CRITTON:

4 Q. All right. You might not be surprised one  
5 way or the other; true?

6 MR. EDWARDS: Object to the form.

7 THE WITNESS: Yeah, that's true.

8 BY MR. CRITTON:

9 Q. Was Justin working at that time?

10 A. I don't know.

11 Q. How old was Justin at the time that she  
12 was -- he was having a relationship with [REDACTED]? And I  
13 guess you both -- if I understood, she probably was in  
14 the ninth grade, because you were doing the second year  
15 of eighth grade; correct?

16 A. I don't know.

17 Q. Is Justin older, younger?

18 A. I don't know how old --

19 Q. Were they --

20 A. -- he is.

21 Q. Were they living together?

22 A. Yes.

23 Q. Where were they living together?

24 A. I don't know. In a trailer.

25 Q. And how long had they been living together?

1 A. I don't know.  
 2 Q. Had you ever gone over and stayed -- or gone  
 3 to [REDACTED] and Justin's trailer and stayed -- stayed there,  
 4 partied with them?  
 5 A. No.  
 6 Q. Hung out?  
 7 A. I had gone there before, yes.  
 8 Q. Okay. When Justin was there?  
 9 A. Yes.  
 10 Q. How many months before that you -- before  
 11 that you first went to Epstein's? Had they been living  
 12 together a number of months?  
 13 A. I don't know.  
 14 Q. Okay. How long before had you been to  
 15 their -- before Justin said something to you about [REDACTED].  
 16 going over to -- that some old guy was paying her? Was  
 17 that at least a month or two?  
 18 A. I don't know.  
 19 Q. Okay. Did they continue to live together for  
 20 a number of months?  
 21 A. I don't know how long they lived together.  
 22 Q. How many times did you ever go to their  
 23 trailer?  
 24 A. Two.  
 25 Q. And did E.W. ever go with you?

1 A. No.  
 2 Q. When you went to their trailer on those two  
 3 occasions, would it be a correct statement that you had  
 4 both alcohol and smoked pot?  
 5 A. No.  
 6 Q. Okay. On either occasion did you smoke pot  
 7 when you were with Justin and [REDACTED].?  
 8 A. Probably on one.  
 9 Q. Okay. And did you ever have alcohol with  
 10 [REDACTED] and Justin, as well?  
 11 A. No.  
 12 Q. Okay. So Justin tells you [REDACTED] was getting  
 13 money from some older guy. Did she --  
 14 MR. EDWARDS: Object to the form.  
 15 BY MR. CRITTON:  
 16 Q. Is that correct? Before -- before [REDACTED] ever  
 17 referenced anything to you or said anything to you?  
 18 A. Yes.  
 19 Q. Okay. And when he said -- when Justin told  
 20 you that, was anybody else present?  
 21 A. I don't know.  
 22 Q. What was your reaction -- well, let me ask  
 23 you this: What did Justin -- did you say, well, what do  
 24 you mean she's getting money from an older guy?  
 25 MR. EDWARDS: Object to the form.

1 THE WITNESS: I didn't look into it.  
 2 BY MR. CRITTON:  
 3 Q. [REDACTED] sorry?  
 4 A. I didn't look into it.  
 5 Q. Well, why did Justin even mention it to you?  
 6 MR. EDWARDS: Object to the form.  
 7 THE WITNESS: I don't know.  
 8 BY MR. CRITTON:  
 9 Q. Did he tell you how much money she was  
 10 getting?  
 11 A. No.  
 12 Q. Did he tell you what she was doing with  
 13 him --  
 14 A. No.  
 15 Q. -- for the money?  
 16 A. No.  
 17 Q. Okay. Did she -- did he tell you who the guy  
 18 was?  
 19 A. No.  
 20 Q. Did he tell you where the guy was --  
 21 A. No.  
 22 Q. -- or where he lived?  
 23 A. No.  
 24 Q. He just said, [REDACTED] is getting money from some  
 25 older guy?

1 A. Yes.  
 2 Q. Okay. And what did you interpret that in  
 3 your own mind to mean?  
 4 MR. EDWARDS: Object to the form.  
 5 THE WITNESS: I don't know.  
 6 BY MR. CRITTON:  
 7 Q. Okay. Did you -- did you wonder why [REDACTED] was  
 8 being paid money by some person just to go to his house?  
 9 MR. EDWARDS: Object to the form.  
 10 THE WITNESS: Sure I wondered, but I didn't  
 11 ask.  
 12 BY MR. CRITTON:  
 13 Q. Had -- to your knowledge, had [REDACTED] ever  
 14 received money from men for doing things, whatever those  
 15 things might be?  
 16 MR. EDWARDS: Object to the form.  
 17 THE WITNESS: I don't know.  
 18 BY MR. CRITTON:  
 19 Q. Okay. She may have; she may not. You just  
 20 don't know, at least at that point in time; right?  
 21 MR. EDWARDS: Object to the form.  
 22 THE WITNESS: I don't know.  
 23 BY MR. CRITTON:  
 24 Q. That's what [REDACTED] saying. Listen to my  
 25 question. As of the time that Justin raised the issue

1 with you, before you went to Mr. Epstein's the first  
2 time, that [REDACTED] was getting some money from some old  
3 guy, do you -- do you have any knowledge whether she had  
4 ever received money from a young person or an old person  
5 for doing anything?

6 A. No.

7 Q. Was anybody else present when Justin said  
8 that to you?

9 A. I don't know.

10 Q. Well, when's the next time -- how much -- how  
11 much time passed before again the issue of [REDACTED] getting  
12 money for -- from some older man --

13 MR. EDWARDS: Object to the form.

14 BY MR. CRITTON:

15 Q. -- came up again?

16 A. I don't know if it did.

17 Q. Okay. Did you tell the FBI that  
18 Justin Sprague had mentioned that [REDACTED] was getting money  
19 from an older guy?

20 A. No.

21 Q. Okay. You're tell -- just telling us that  
22 now?

23 MR. EDWARDS: Object to the form.

24 THE WITNESS: Yes.  
25

1 Q. Do you remember when that was?

2 A. No.

3 Q. Did they give you cards?

4 A. Yes.

5 Q. Do you still have those cards?

6 A. No.

7 Q. What did you do with those cards?

8 A. I don't know.

9 Q. Did you ever turn them over to Mr. Edwards?

10 A. I don't think so.

11 Q. Okay. You said there were two lawyers, but  
12 whatever the card said was who they were?

13 MR. EDWARDS: Object to the form.

14 THE WITNESS: Yes.

15 BY MR. CRITTON:

16 Q. How much time did they spend with you?

17 A. I don't know.

18 Q. More than five minutes?

19 A. I don't know.

20 Q. More than an hour?

21 A. I don't know.

22 Q. Okay. So you can't -- you said two  
23 individuals who -- who were there on behalf of  
24 Mr. Epstein met with you, talked with you. You don't  
25 know -- you can't tell me the date or even the year;

1 BY MR. CRITTON:

2 Q. By the way, have you ever given any  
3 statements to anyone else? Anybody else ask you about  
4 Epstein at any time?

5 MR. EDWARDS: Objection. Don't answer.

6 Attorney-client privilege.

7 BY MR. CRITTON:

8 Q. Well, except -- and I -- when I ask questions  
9 like that -- and Brad will still make his objections,  
10 which will remind me -- [REDACTED] not interested whether  
11 some -- Mr. Edwards or someone from his office asked  
12 you. You know, [REDACTED] -- [REDACTED] confident that he interviewed  
13 you or someone from his office interviewed you. So  
14 separate that.

15 Have you ever given any other statements,  
16 either in writing, orally, by tape, by stenographer, to  
17 any other person, other than the FBI, and talked about  
18 Epstein?

19 A. Yes.

20 Q. To whom?

21 A. I spoke to two lawyers who came to my house,  
22 which apparently represented Jeffrey Epstein at the  
23 time.

24 Q. On just one occasion?

25 A. Yes.

1 correct?

2 A. Yes.

3 Q. Okay. That's -- and you can't tell me how  
4 long you spoke with them, whether it was five minutes or  
5 three hours; correct?

6 A. It wasn't very long.

7 Q. Five to ten minutes?

8 A. Maybe.

9 Q. Did they take any notes?

10 A. I don't know.

11 Q. Did they record a statement from you at all?

12 A. No.

13 Q. Did you tell them the truth?

14 A. I don't know.

15 Q. Okay. Are you in the habit of lying to  
16 people?

17 MR. EDWARDS: Object to the form.

18 THE WITNESS: No.

19 BY MR. CRITTON:

20 Q. You have lied before, though, in a court  
21 proceeding; have you not?

22 A. Yes, I have.

23 Q. All right. And, in fact, in your father's  
24 proceedings that involved the charges that were brought  
25 against your father for killing Joey is you gave a

1 number of conflicting statements --

2 A. Yes.

3 Q. -- not only in deposition, but as well in  
4 court; true?

5 A. Yes.

6 Q. Okay. And you admitted that in those court  
7 proceedings you lied on a number of those statements;  
8 true?

9 MR. EDWARDS: Object to the form.

10 THE WITNESS: Yes.

11 BY MR. CRITTON:

12 Q. And you lied to either help your father or to  
13 help your mother, depending on which side you were  
14 taking on a particular occasion; correct?

15 A. Yes.

16 Q. Other than the statement that you gave to  
17 these two individuals on behalf of Mr. Epstein and the  
18 FBI, separate and apart from your lawyers, are those the  
19 only two statements that you've ever given about any  
20 facts or circumstances relating to your visits to  
21 Mr. Epstein's home?

22 A. No.

23 Q. Who else have you given a statement to?

24 A. A therapist.

25 Q. Did she take a recorded state -- is that

1 MR. EDWARDS: Object to the form.

2 THE WITNESS: Yes.

3 BY MR. CRITTON:

4 Q. Something like that?

5 A. Yes.

6 Q. Did you inquire and say, well, what's she  
7 doing to get money?

8 A. No.

9 Q. Okay. Did you have a job at the time?

10 A. No.

11 Q. Well, who supported you back at this time in  
12 seventh, eighth, ninth grade? Who supported you?

13 A. My grandmother.

14 Q. Okay. And that's Ms. Brewer?

15 A. Yes.

16 Q. Does your -- and did your grandmother work  
17 during that time period?

18 A. Yes.

19 Q. What kind of work did she do?

20 A. She works at Home Depot.

21 Q. Does she still work there?

22 A. Yes.

23 Q. And does she own the house on Edge Hill Road?

24 A. Yes.

25 Q. Okay. And where you lived on -- and she had

1 Randee Speciale?

2 A. Yes.

3 Q. Did -- and I assume that's a she?

4 A. Yes.

5 Q. Did she take a recorded statement, or you've  
6 just talked about it with her?

7 A. I just talked to her about it.

8 Q. Let's go back to Justin Sprague. So Justin  
9 told you, at some point before you first went, is that  
10 [REDACTED] was doing something with an older man, and she was  
11 getting money; right?

12 MR. EDWARDS: Form.

13 THE WITNESS: Yes.

14 BY MR. CRITTON:

15 Q. Okay. Did he tell you how much money she was  
16 getting?

17 A. No.

18 Q. And as to why he told you, do you know why he  
19 told you? That is, it just came out of the air, hey,  
20 [REDACTED]'s making money from some old man, and he's paying  
21 her money?

22 A. I think I went to his house at one point when  
23 she wasn't there and asked him where she was.

24 Q. Oh, and he said, she's over at some older  
25 guy's house, and he's paying her money?

1 a car?

2 A. Yes.

3 Q. And what does she do for Home Depot?

4 A. She's a manager.

5 Q. Is she the G -- the general manager of the  
6 store, or manager of a department?

7 A. [REDACTED] not positive.

8 Q. How long has she worked for Home Depot?

9 A. I think 11 years. [REDACTED] not sure exactly,  
10 though.

11 Q. And the house that you lived in -- or that  
12 you were living at the time on Edge Hill Road, how many  
13 bedrooms is it?

14 A. Three.

15 Q. Okay. And did you have your own room?

16 A. Yes.

17 Q. Did you share a bathroom, or did you have  
18 your own bathroom?

19 A. I have my own bathroom.

20 Q. And did -- and Ms. Brewer, that is your  
21 grandmother, did she, if you wanted, if you needed a new  
22 pair of shoes, if you needed clothes, would she help you  
23 get those?

24 A. When I was living her -- with her, yes, she  
25 did.

1 Q. So she had a home, so you had shelter, you  
 2 had -- you had clothing, and -- and I assume she fed  
 3 you. I mean, she bought the groceries so that you all  
 4 could eat?  
 5 A. When I was living with her, yes.  
 6 Q. And she -- she, as well, would you help her  
 7 do grocery shopping from time to time?  
 8 A. Yes.  
 9 Q. And would you help her with the cooking and  
 10 whatever other, you know, kind of like a typical person,  
 11 typical daughter or granddaughter, you helped with  
 12 chores around the house, or did you not?  
 13 MR. EDWARDS: Form.  
 14 THE WITNESS: Yes.  
 15 BY MR. CRITTON:  
 16 Q. Okay. You did help?  
 17 A. Yes.  
 18 Q. And did she give you an allowance, as well?  
 19 A. No.  
 20 Q. Pardon?  
 21 A. No.  
 22 Q. Did she give you some spending money? If you  
 23 needed to go -- if you wanted to go to a movie with your  
 24 friends or you were going out to dinner with your  
 25 friends, would she say, you know, here's five or ten or

1 And did you ever try to get back to your  
 2 grandma's house?  
 3 A. No.  
 4 Q. When -- and when you were staying with  
 5 Ms. Kaputsa and her family, did they give you food,  
 6 shelter, clothing, help you out?  
 7 A. Yeah.  
 8 Q. Okay. And did your grandmother help you at  
 9 all during that time period?  
 10 A. No.  
 11 Q. Did your mother help you at that time period?  
 12 A. No.  
 13 Q. But it was your choice to run away from your  
 14 mother; correct? That is, you made a voluntary choice,  
 15 I don't want to be with mother anymore?  
 16 A. Well, yes. But...  
 17 Q. You -- you made -- you made a voluntary,  
 18 knowledgeable decision, I don't want to stay with my mom  
 19 anymore, for whatever the circumstances, I want to go to  
 20 Melissa's, and Melissa's family took you in?  
 21 A. Yes.  
 22 Q. Okay. Did you ever -- and when you left your  
 23 grandmother's house -- did you leave your grandmother's  
 24 house, what, in eighth, ninth grade? What grade?  
 25 A. When we first moved I was living with my mom,

1 15 bucks so you can go do something?  
 2 MR. EDWARDS: Form.  
 3 THE WITNESS: Yes, when I was living with  
 4 her, she did.  
 5 BY MR. CRITTON:  
 6 Q. And did you live with her during that time  
 7 period, that is eighth -- eighth grade -- both eighth  
 8 grades, ninth and tenth?  
 9 A. I was living with my mom, and I ran away.  
 10 Q. Okay. And where did you run when you ran?  
 11 A. I ran to my friend, Melissa's.  
 12 Q. Kaputska, or whatever? I probably missed  
 13 that, probably.  
 14 A. Kapusta.  
 15 Q. Kapusta.  
 16 A. Kapusta.  
 17 Q. Kapusta. Did you -- is that where you went,  
 18 to Melissa's -- we'll call her Melissa, and we won't  
 19 butcher her name -- you went to Melissa's house?  
 20 A. Yes.  
 21 Q. And would the family let you stay there?  
 22 A. Yes.  
 23 Q. Her family?  
 24 A. Her mother.  
 25 Q. Her mother.

1 and I was going back and forth.  
 2 Q. Between grandmother's and mom?  
 3 A. My mom's, yes.  
 4 Q. All right. And when you were living with  
 5 your mom, she would provide food, shelter, clothing;  
 6 correct?  
 7 A. No.  
 8 Q. Okay. Well, what did you do? Did she  
 9 provide food?  
 10 A. Not for me.  
 11 Q. When you were living with her?  
 12 A. Yes.  
 13 Q. Where did you get your food?  
 14 A. My friends.  
 15 Q. You mean you would go over to other people's  
 16 houses to eat?  
 17 A. Yes.  
 18 Q. Did your mother -- I've read somewhere she  
 19 has drug problems.  
 20 A. Yes.  
 21 Q. Okay. And has she been on -- had significant  
 22 drug problems ever since you can -- your earliest  
 23 memories of her?  
 24 A. Yes.  
 25 Q. All right. And I assume that's been a

1 substantial burden on you mentally, emotionally?

2 MR. EDWARDS: Object to the form.

3 THE WITNESS: I've always had my grandmother,  
4 so no.

5 BY MR. CRITTON:

6 Q. So you don't care -- I mean, it -- it had no  
7 impact on you that your mother -- well, let me strike  
8 that.

9 I've seen some places that she's a crack  
10 addict, is that true?

11 A. Yes.

12 Q. All right. And would you agree with me that  
13 has had an emotional impact on your life?

14 MR. EDWARDS: Object to the form.

15 THE WITNESS: Not really.

16 BY MR. CRITTON:

17 Q. Okay. So the fact that your mother has been  
18 a crack addict since you can remember or had significant  
19 drug problems since your earliest recollection, it's  
20 your testimony to this jury that has had no emotional  
21 impact on you or psychological impact on you at all?

22 MR. EDWARDS: Object to the form.

23 BY MR. CRITTON:

24 Q. Is that your testimony?

25 A. I've always had my grandmother, so no, not

1 nonprescription drugs?

2 A. No.

3 Q. Have you ever seen him physically or verbally  
4 abuse your mother?

5 A. No.

6 Q. It's your testimony you're unaware of any  
7 domestic violence issues associated between Mr. Veet and  
8 your mother, is that --

9 A. Yes.

10 Q. Are you closer to your father than you are  
11 your mother?

12 A. Yes.

13 Q. Why?

14 A. Probably because of my grandmother.

15 Q. Because your grandmother, Ms. Brewer, is your  
16 father's --

17 A. Mother.

18 Q. -- mother. Right.

19 But you, in fact, saw your father kick and  
20 physically abuse Joey to the point where that young man  
21 died in 1999; isn't that true?

22 A. I never saw him kick Joey.

23 Q. Okay. So, but you've given -- you gave a  
24 statement -- we'll get to that later -- that you  
25 actually saw your father physically abuse Joey.

1 really. I never --

2 Q. I also saw in the records that your father  
3 and your mother had a very violent relationship --

4 A. I've been told --

5 Q. -- are you aware of that?

6 A. I've been told that, yes.

7 Q. Okay. And then your mother, with a  
8 subsequent person named Veet -- am I saying that right?

9 A. Tom Veet.

10 Q. -- Veet, they also had a very violent,  
11 abusive relationship; are you aware of that?

12 A. No.

13 Q. Did your mother ever tell you about that?

14 A. No.

15 Q. Do you know Mr. Veet?

16 A. Yes.

17 Q. Okay. What's your impression of him?

18 A. I --

19 MR. EDWARDS: Object to the form.

20 THE WITNESS: I don't like him.

21 BY MR. CRITTON:

22 Q. Does he have the same type of drug/alcohol  
23 problems that your mother has always had?

24 A. I don't know.

25 Q. Have you ever seen him use drugs, and I mean

1 MR. EDWARDS: You're going to get to it  
2 later, or we're going to -- or you want her to  
3 answer -- answer the question?

4 MR. CRITTON: No, we're going to get -- I  
5 want an answer to that now, but [REDACTED] going to come  
6 back to it later.

7 MR. EDWARDS: Gotcha.

8 THE WITNESS: Yes, I did see him abuse Joey.

9 BY MR. CRITTON:

10 Q. Okay. And you're aware that, as a result of  
11 his physical abuse to Joey, Joey died?

12 A. Yes, I am.

13 Q. And that has had a huge psychological and  
14 emotional impact on you since you were a young child, up  
15 through and including even today; isn't that true?

16 MR. EDWARDS: Form.

17 THE WITNESS: Yes.

18 BY MR. CRITTON:

19 Q. [REDACTED] sorry?

20 A. Yes.

21 Q. Because your father has been in prison since  
22 sometime in, what, '99, one place or another?

23 A. Yes.

24 Q. Has he been able to provide any support for  
25 you, or does the support all come from his mother,

1 Ms. Brewer?

2 A. Yes, all from --

3 Q. All from grandma --

4 A. Yes.

5 Q. -- your grandmother?

6 All right. During the -- the second half of  
7 your second stint, second year that you took eighth  
8 grade in '03, then ninth, tenth grade, you -- were you  
9 in school in ninth and tenth grade, too?

10 A. No. I went to -- I, I didn't go to school  
11 because of running away. And so I went to another  
12 school called Jaega Middle School.

13 Q. Jaega?

14 A. Yes.

15 Q. Spell it for me.

16 A. J-a-e-g-a.

17 Q. J-a-e-j --

18 A. G-a.

19 Q. Is that a public school, or a private school?

20 A. It's a public school.

21 Q. Where is that located?

22 A. West Palm Beach.

23 Q. How long were you -- what grade was that, and  
24 how long were you there?

25 A. I was in there for the eighth grade again,

1 and I didn't go there for very long, maybe a month.

2 Q. How far did you get in school?

3 A. I only went to the eighth grade, until I got  
4 my GED.

5 Q. When did you get your GED?

6 A. When I went to a program for girls.

7 Q. Was that at Milton?

8 A. Yes.

9 Q. How long were you at Milton?

10 A. Five months, one week and three days.

11 Q. Sounds like you have a very good recollection  
12 of that.

13 A. Yes.

14 Q. Where is Milton located?

15 A. In Milton, Florida.

16 Q. Which is where?

17 A. Which is near Okaloosa County.

18 Q. [REDACTED] sorry?

19 A. Near Okaloosa.

20 Q. Where is Okaloosa?

21 A. In the Panhandle.

22 Q. And were you required to go there?

23 A. Yes.

24 Q. That's like a sentence?

25 A. Yes.

1 Q. For what? What had you done that brought  
2 about you getting sent to Milton?

3 MR. EDWARDS: Form.

4 THE WITNESS: I crashed my grandmother's car.

5 BY MR. CRITTON:

6 Q. [REDACTED] sorry?

7 A. I crashed my grandmother's car.

8 Q. You were charged, at least initially, with  
9 grand theft auto for that; weren't you?

10 A. Yes.

11 Q. And did you do a plea deal as a juvenile?

12 A. No.

13 Q. What happened?

14 A. I was sent to the program.

15 Q. Okay. Did you plead guilty, guilty to having  
16 stolen a car?

17 MR. EDWARDS: Object to the form.

18 BY MR. CRITTON:

19 Q. And then they essentially said, okay, you can  
20 go to the program, and that will be your sentence?

21 A. I don't know.

22 Q. Did you have an attorney that represented you  
23 in those proceedings?

24 A. I don't know.

25 Q. All you know is that you ended up at Milton

1 for five months, one week and three days?

2 A. Yes.

3 Q. Give me a time period for that, that is when  
4 you were there.

5 A. It was -- I went there in July.

6 Q. Of what year?

7 A. When I was 17. And I -- I came out in  
8 December, close to --

9 Q. And so that would have been in '05, July of  
10 '05?

11 A. I -- I guess so, if I was 17 in that year.

12 Q. Well, you were born in '88; right? So 17 and  
13 88 is what?

14 A. I don't know.

15 Q. '05.

16 Let me go back to -- [REDACTED] just trying to  
17 figure out where you were living there in the time  
18 that -- when you went to -- when you were -- first went  
19 to -- say you went to Mr. Epstein's house, you would  
20 have been living with Ms. Brewer; right?

21 A. Yes.

22 Q. Okay. How long, then, did you live with  
23 Ms. Brewer? Did you -- what years did you live with  
24 Ms. Brewer? I know the beginning of '03. At least by  
25 '03 you were living with her, January of '03. How long

1 did you stay with her?  
 2 A. I -- I was a runaway at that time in '03.  
 3 Q. You had already run away. You weren't  
 4 staying with your grandmother at that point?  
 5 A. I was with my mother, and I ran away.  
 6 Q. At the time that you had the conversation  
 7 with Tat -- with Justin Sprague about [REDACTED] going over  
 8 and get -- doing something with an older man and getting  
 9 money, were you already a runaway?  
 10 A. No.  
 11 Q. You were living with your grandma?  
 12 A. I was a runaway until my dad's trial. And  
 13 after that, I was living with -- I was living with my  
 14 mother, and then she put me in a shelter for runaways.  
 15 And then after that my grandmother got custody of me,  
 16 and I lived with her after that.  
 17 Q. Do you know when you lived with your  
 18 grandmother?  
 19 A. I don't know exactly what day it was.  
 20 Q. Was it before you went -- well, I don't need  
 21 an exact date. Just give me a month and a year.  
 22 A. I don't remember.  
 23 Q. Were you living with your grandmother at the  
 24 time you were sentenced to Milton?  
 25 A. Yes, I was.

1 A. I don't know.  
 2 Q. A month? A week?  
 3 A. I don't know.  
 4 Q. Did you ever -- and what did [REDACTED] say to you?  
 5 A. She told me that she wanted me to go with her  
 6 to this guy's house and -- pretty much she just told me  
 7 that she wanted me to go with her, and that I would get  
 8 money for going with her.  
 9 Q. Did [REDACTED] tell you how long she had been  
 10 going?  
 11 A. No.  
 12 Q. Did [REDACTED] come to your house to tell you this?  
 13 Were you at the trailer -- her trailer with Justin  
 14 Sprague?  
 15 A. She came to my house.  
 16 Q. And you were living then with?  
 17 A. Grandmother.  
 18 Q. And would it be a correct statement that  
 19 during the entire time you went to Mr. Epstein's house,  
 20 that period you were always living with your  
 21 grandmother?  
 22 A. Yes.  
 23 Q. And so [REDACTED] said, why don't you come with me.  
 24 Did she tell you what the man's name was?  
 25 A. I don't remember if she told me at that time.

1 Q. Okay. How long had you been living with your  
 2 grandmother?  
 3 A. I don't know.  
 4 Q. A year?  
 5 A. I don't know. I -- I don't know.  
 6 Q. Were you a runaway because you didn't want to  
 7 testify in your dad's trial?  
 8 A. I was a runaway because I didn't want to live  
 9 with my mom.  
 10 Q. You also didn't want to testify in your dad's  
 11 trial; did you?  
 12 A. Yes, I did.  
 13 Q. Let's go back to Justin Sprague. You had the  
 14 conversation with -- with Justin Sprague? Okay. When  
 15 is the next time that the issue -- any issues involving  
 16 Mr. Epstein came up -- or, or an older man?  
 17 A. I don't know.  
 18 (Whereupon, Ms. Cadwell joined the  
 19 proceedings.)  
 20 MR. CRITTON: This is Jessica Cadwell. She's  
 21 my paralegal.  
 22 THE WITNESS: I guess not until [REDACTED] came  
 23 over to ask me if I would go with her.  
 24 BY MR. CRITTON:  
 25 Q. How much time passed?

1 Q. What did she tell you she did? Did you say,  
 2 well, why -- why do I want to go there? I mean, she  
 3 said, I want you to come to the house to meet this older  
 4 guy, and he'll pay you some money; right?  
 5 A. Yes.  
 6 Q. Okay. And what did she tell you? Did you  
 7 say, well, why?  
 8 A. That's what she told me.  
 9 Q. Okay. And what -- and did you say, well, why  
 10 is he going to pay me money?  
 11 A. No.  
 12 Q. I mean, you were a street smart girl at that  
 13 time. You had run away a number of times; you know, you  
 14 had been in shelters; you had done various programs; you  
 15 had, you know, a mother who had significant problems;  
 16 you had a dad who had significant problems. You  
 17 considered yourself pretty street smart at that point;  
 18 fair statement?  
 19 MR. EDWARDS: Object to the form.  
 20 THE WITNESS: At that point I thought that  
 21 she was going to pay me for going with her.  
 22 BY MR. CRITTON:  
 23 Q. Did she tell you --  
 24 A. I didn't -- she didn't tell me she was going  
 25 to take me to meet somebody. She didn't tell me all of

1 that.  
 2 Q. Okay. What did she tell you? She just  
 3 said --  
 4 A. Go with me, and you'll get this money.  
 5 Q. And how much did she promise you?  
 6 A. \$200.  
 7 Q. Okay. And did you say, okay, what do I  
 8 get -- what do I have to do for \$200, why is somebody  
 9 going to give me 200 -- was she going to give you the  
 10 money, or was somebody else supposed to give you the  
 11 money?  
 12 A. I don't know. She just said, go with me, and  
 13 you'll get the money. That's it.  
 14 Q. And did she tell you what she had to do?  
 15 A. No.  
 16 Q. What you were supposed to do?  
 17 A. No.  
 18 Q. You just thought, I go with her, I go over to  
 19 this person's house, and I get 200 bucks?  
 20 A. Yes.  
 21 Q. And you didn't know who was going to give you  
 22 the 200 bucks; correct?  
 23 A. I thought that [REDACTED] was going to give it to  
 24 me.  
 25 Q. And how did you get -- well, and did she tell

1 you how many -- did you say, what do you do when you go  
 2 over to this house?  
 3 A. Did I ask her that?  
 4 Q. Right.  
 5 A. No.  
 6 Q. Say, where's the house?  
 7 A. No.  
 8 Q. Did you say, are you getting -- what do you  
 9 get money for, [REDACTED]?  
 10 A. No, I didn't.  
 11 Q. Was anybody else present when she --  
 12 A. No.  
 13 Q. Was that the -- and when she told you that,  
 14 is this the first time she had ever asked you?  
 15 A. Yes.  
 16 Q. So without asking any questions, you  
 17 basically said, okay, I'll go to the house, and I get  
 18 \$200 from you?  
 19 A. Yes.  
 20 Q. Did they tell you where the house was?  
 21 A. No.  
 22 Q. How did you get there the first time?  
 23 A. Cab.  
 24 Q. What cab?  
 25 A. Yellow Cab.

1 Q. And what did you talk about on the way over  
 2 there?  
 3 A. I don't know.  
 4 Q. What did you wear?  
 5 A. I don't remember.  
 6 Q. All right. You got to the house. You went  
 7 over to the house. Do you remember what the address  
 8 was?  
 9 A. No.  
 10 Q. Do you remember what the house looked like?  
 11 A. I -- yes.  
 12 Q. What did it look like from the outside?  
 13 A. It was a big, pink house.  
 14 Q. Big, pink house. All right.  
 15 And as you got there, the cab let you off?  
 16 A. Yes.  
 17 Q. Did you pay the cab, or did [REDACTED] pay the cab?  
 18 A. No. After we walked inside, somebody else  
 19 went outside and paid the cab.  
 20 Q. And did you -- when you went inside, who did  
 21 you meet? A man? A woman?  
 22 A. A woman.  
 23 Q. Okay. And where did you go -- where did you  
 24 enter the house from?  
 25 A. The kitchen.

1 Q. And what did the kitchen look like -- well,  
 2 let me strike that.  
 3 Is there a -- is there an entrance to the  
 4 kitchen?  
 5 A. Yes.  
 6 Q. Is that around where, in relationship to the  
 7 house?  
 8 A. The side of the house on the --  
 9 Q. Did you ever -- oh, [REDACTED] sorry. Go ahead.  
 10 A. It was like right -- right off the driveway,  
 11 like on the side of the house. And it was a, like,  
 12 whole glass door, like it had some white around.  
 13 Q. Okay. And I think it's your testimony that  
 14 you don't remember what you were wearing?  
 15 A. I was wearing some pants, probably, and a  
 16 shirt. I don't know.  
 17 Q. But you don't remember whether it was long  
 18 pants or short pants?  
 19 A. It was long pants.  
 20 Q. Okay. Do you remember the colors?  
 21 A. Jeans.  
 22 Q. All right. And the top, what kind of top did  
 23 you have on?  
 24 A. I don't know. I had Sponge Bob socks on.  
 25 Q. You're sure?

1 A. Yeah.  
 2 Q. Did you have shoes?  
 3 A. Yeah.  
 4 Q. What kind of shoes?  
 5 A. I don't remember.  
 6 Q. What did [redacted] have on?  
 7 A. I don't know.  
 8 Q. So the door opens, and did you say it was you  
 9 were greeted by a man or a woman?  
 10 A. A woman.  
 11 Q. And did she tell you what her name was?  
 12 A. I don't remember.  
 13 Q. Did you ever see her again?  
 14 A. Yes.  
 15 Q. Did she ever introduce her -- introduce  
 16 herself, or did you ever come to learn her name?  
 17 A. The first time that I went there, I believe I  
 18 had met a blond woman. And I don't think she told me  
 19 her name at that point, but later I learned her name was  
 20 Sarah. And after I started to go back to  
 21 Jeffrey Epstein's house by myself, I met a woman named  
 22 [redacted] who I saw often there.  
 23 Q. Okay. And Sarah was a blond-headed girl?  
 24 A. Yes.  
 25 Q. How about [redacted] describe -- Sarah, how -- in

1 fact, [redacted] describe [redacted] for me.  
 2 A. She's very thin, with brown hair, and she had  
 3 a thick accent.  
 4 Q. Again, first time, so it was the girl that  
 5 you ultimately identified as Sarah?  
 6 A. Yes.  
 7 Q. And you both came into the kitchen area?  
 8 A. Yes.  
 9 Q. And describe the kitchen for me.  
 10 A. It was like white tile with -- with like  
 11 wood, but it was like really light colored.  
 12 Q. Wood on the walls? Wood on the floor? Wood  
 13 on the cabinets? What are you talking about, wood  
 14 where?  
 15 A. On the cabinets, I believe it was.  
 16 Q. Did you sit in the kitchen at all?  
 17 A. Not really. I only saw the kitchen for like  
 18 a second and --  
 19 Q. What did the blond-headed -- did the  
 20 blond-headed woman say anything?  
 21 A. She just, I guess, told [redacted] like to go  
 22 upstairs or whatever. And there was like a door in the  
 23 kitchen, I think it was, and there were some stairs in  
 24 there.  
 25 Q. [redacted] sorry?

1 A. There were stairs behind the door in the  
 2 kitchen. And then we walked up to the -- up the stairs  
 3 and through a hallway, where there were pictures like on  
 4 the walls of like bodies.  
 5 Then we walked through, I guess, what would  
 6 be Jeffrey Epstein's bedroom and into the smaller room,  
 7 where there was like a shower and a steam room and a  
 8 massage table and a small couch.  
 9 Q. Okay. Let me stop you for just a minute.  
 10 The blond-headed girl, as you were walking  
 11 into the kitchen, says to [redacted], you can go upstairs?  
 12 A. Yes.  
 13 Q. All right. And did you say to [redacted] is, whoa?  
 14 Why didn't you just say, it's okay, I'll wait down here?  
 15 MR. EDWARDS: Form.  
 16 THE WITNESS: I don't know. She -- she sort  
 17 of like waved her hand at me like --  
 18 BY MR. CRITTON:  
 19 Q. Who's she?  
 20 A. [redacted]  
 21 Like come on, you know, waved her hand at me.  
 22 So I just followed her.  
 23 Q. Why didn't you call [redacted] over to the side and  
 24 say, hey, you need to tell me a little bit more. What's  
 25 going on?

1 MR. EDWARDS: Form.  
 2 THE WITNESS: I didn't do that at first, but  
 3 when we got into the room with him --  
 4 BY MR. CRITTON:  
 5 Q. That's -- I want to stay -- I want to stay  
 6 downstairs for a minute, before you ever enter the  
 7 stairway. Okay?  
 8 When the blond-headed lady said, okay,  
 9 [redacted] -- or, okay, you can go upstairs, why didn't you  
 10 call [redacted] aside and say, hey, wait a minute, I need to  
 11 understand a little bit more what's going on here?  
 12 Because you're saying [redacted] never told you anything, just  
 13 that you were going to get 200 bucks; right?  
 14 A. Yes.  
 15 Q. Okay. So why didn't you say is, wait a  
 16 minute, what's -- [redacted], what's going on here? And you,  
 17 you know, [redacted] been a runaway, [redacted] been on -- I don't  
 18 want to say on the street, but you had certainly been a  
 19 runaway and had a lot of experiences in your life for  
 20 a -- for your age --  
 21 MR. EDWARDS: Object to the form.  
 22 BY MR. CRITTON:  
 23 Q. -- right?  
 24 So why didn't you say, [redacted], come on over  
 25 here?

1 A. I don't know.  
 2 Q. You just didn't?  
 3 A. I just didn't.  
 4 Q. But you could have?  
 5 MR. EDWARDS: Object to the form.  
 6 BY MR. CRITTON:  
 7 Q. Right?  
 8 A. Sure.  
 9 Q. Okay. And you could have chosen not to go  
 10 and never have gotten in the cab with [REDACTED] that day;  
 11 true?  
 12 A. Yeah.  
 13 Q. So you go up the -- you said you went through  
 14 a door, and then a stairway; correct?  
 15 A. Yeah. [REDACTED] pretty sure that there was a door.  
 16 Q. In order to get into the stairway?  
 17 A. Yes. And we walked through the hallway --  
 18 Q. Let me ask you this -- oh, [REDACTED] sorry. You  
 19 know, I just want to -- I want to work my way up.  
 20 Did the door to the stairway open toward the  
 21 stairs, or did it open into the kitchen?  
 22 A. I don't remember.  
 23 Q. Were the stairs carpeted, wood, or some other  
 24 surface?  
 25 A. [REDACTED] pretty sure they were carpeted.

1 Q. Did the -- did the stairway have a rail, or  
 2 was the stairway built into the walls? And when I say  
 3 that, you know there was a stairway between two walls.  
 4 A. There was walls next to it.  
 5 Q. Were -- were there any types of photographs  
 6 or art on the walls?  
 7 A. Yes, there were pictures of people's bodies.  
 8 Q. Okay. And that's what I was trying to figure  
 9 out where you said bodies, when you said...  
 10 Have you ever seen art books before?  
 11 A. Yes.  
 12 Q. Okay. Is that what you're talking about;  
 13 there were like art pictures or photographs of people's  
 14 bodies in different positions?  
 15 A. Yes. Yes.  
 16 Q. And the pictures of the -- of people's  
 17 bodies, what did they look like?  
 18 A. They were like gray and black and whitish.  
 19 Q. And of -- of the bodies, were they clothed  
 20 bodies, were they partially clothed bodies, were they --  
 21 A. They were --  
 22 Q. -- completely clothed bodies?  
 23 A. They were nude.  
 24 Q. Okay. The pictures were completely of nude  
 25 bodies?

1 A. Nude bodies.  
 2 Q. All right. And all appeared to be adults?  
 3 A. They were like little pieces of like a  
 4 person's body. I couldn't -- I don't know.  
 5 Q. Okay. So you couldn't tell -- they could  
 6 have been whatever age? I mean, they didn't -- but they  
 7 appeared to be adult people's bodies in pieces --  
 8 MR. EDWARDS: Object to the form.  
 9 BY MR. CRITTON:  
 10 Q. -- is that a fair statement?  
 11 A. I don't know.  
 12 Q. Okay. When you say they were adult pieces of  
 13 bodies, you mean it was -- it was almost like a -- like  
 14 a -- like a crossword puzzle --  
 15 MR. EDWARDS: Object to the form.  
 16 BY MR. CRITTON:  
 17 Q. -- the pieces? Describe --  
 18 A. They were like men's and women's bodies. And  
 19 I don't know if somebody was like old or young in those  
 20 pictures. I don't know.  
 21 Q. But they appeared to be something that you --  
 22 clearly, where they were art -- art photographs?  
 23 MR. EDWARDS: Object to the form.  
 24 BY MR. CRITTON:  
 25 Q. That is, somebody had worked with those

1 pictures to create a certain image?  
 2 A. I don't know.  
 3 Q. Pardon?  
 4 A. I don't know.  
 5 Q. Well, I asked earlier whether you thought  
 6 they were art photographs, and you said, yeah?  
 7 A. Well, there were art books.  
 8 Q. You mean, where, on the stairway?  
 9 A. There -- there was like a table with some  
 10 books on it. They looked like art books or something to  
 11 me.  
 12 Q. The photographs that you saw of the bodies,  
 13 describe the size. How many -- how many photographs did  
 14 you see? And this is in the stairway?  
 15 MR. EDWARDS: Object to the form.  
 16 THE WITNESS: No, this is after the stairway.  
 17 BY MR. CRITTON:  
 18 Q. Okay. Just a minute ago I asked you whether  
 19 there are any photographs or any pictures as you walked  
 20 up the stairway, and you said, the bodies, that's where  
 21 the bodies were. I thought that's what you said.  
 22 So let me ask it again so I --  
 23 MR. EDWARDS: Form.  
 24 BY MR. CRITTON:  
 25 Q. Were the photographs -- or the, [REDACTED] say,

1 white, black and grayish photographs that you saw, were  
2 they on the stairway, or were they at the top of the  
3 stairs?

4 A. They were at the top of the stairs.

5 Q. All right. So it would be a correct  
6 statement that you didn't see any type of art,  
7 photographs on the stairway on either side of the wall  
8 as you walked up; true?

9 A. I cannot recall --

10 Q. Okay.

11 A. -- at this --

12 Q. As you sit here today, would it be a correct  
13 statement that the only photographs or art that you  
14 recall being on the walls was at the top of the  
15 stairway, and not on the walls on the stairway leading  
16 up to the top; is that correct?

17 MR. EDWARDS: Object to the form.

18 THE WITNESS: I absolutely remember them  
19 being at the top. I don't remember whether there  
20 were anything on the walls in the stairway.

21 BY MR. CRITTON:

22 Q. On the photographs or of the art that you saw  
23 on the walls when you got to the top of the stairs, when  
24 you got to the top of the stairs, did you go to get to  
25 Mr. Epstein's, what you thought was his bedroom, did you

1 Q. Is that his bedroom?

2 A. To the left you would see his bed -- like a  
3 bed. I don't know if it was his bed. And in front of  
4 you, you would see -- I think it was like a bookshelf.  
5 And then to the left of the bookshelf I think there were  
6 doors, or they may have been on the side of the bed. I  
7 can't remember exactly.

8 Q. Now, before you got into his room, when you  
9 get to the top of the stairs you make a right turn;  
10 correct?

11 A. Yes.

12 Q. Were there any rooms on the left or the right  
13 side before you get to the threshold of his bedroom?

14 A. I don't know.

15 Q. Okay. How many pictures of bodies, art  
16 pictures, did you see at the top of the stairs?

17 A. I don't remember.

18 Q. Was there one, or two, or three, or you don't  
19 have any recollection?

20 A. I don't remember exactly how many there were.  
21 I can remember specifically like two of them.

22 Q. Describe the first picture that you can  
23 recall. Tell me exactly what it looked like.

24 A. It looked like this portion of a woman's  
25 body.

1 go to the right or to the left?

2 A. To the right.

3 Q. And did you have to pass any doors before you  
4 got into his room?

5 A. Yes.

6 Q. Okay. How many doors were -- were the doors  
7 on the left, or the right?

8 A. -- pretty sure the doors were like on  
9 the far right side.

10 Q. The far right side. So you came up the  
11 stairway. When you hit the top of the stairway, you  
12 made a right turn, and then there were two -- there was  
13 one or two doors that you passed before you got into  
14 Mr. Epstein's bedroom?

15 A. There's one door you pass, or you just walk  
16 in or whatever. I mean, I don't -- I don't remember if  
17 we had to go through one or two doors, but it was a  
18 single door. And when we walked into his bedroom, like,  
19 if you were facing forward, like at his bedroom door, as  
20 you were looking --

21 Q. As you're just stepping through the  
22 threshold?

23 A. Yes.

24 Q. Okay. You're looking straight ahead?

25 A. Yes.

1 Q. The hip? You're pointing to the -- your  
2 right hip area?

3 A. Yes.

4 Q. Okay.

5 A. Like --

6 Q. And that's all you could see?

7 A. -- the side, yes.

8 Q. All right. So that's --

9 A. And --

10 Q. -- sorry. That was the first picture?

11 A. Yes.

12 Q. And -- and it was only basically the woman's  
13 hip from, basically, I would say, waist down to her  
14 thigh, but you saw only a side view; correct?

15 A. That's one that I can specifically remember.

16 Q. The second picture that you saw, what did  
17 that depict?

18 A. A man's body.

19 Q. Okay. And what portions of the man's body  
20 did you see?

21 A. The chest area.

22 Q. The chest?

23 A. Yes.

24 Q. And that was the only part that was depicted  
25 in the photograph --

1 A. Yeah.  
 2 Q. -- of the -- the art that was on the wall;  
 3 correct?  
 4 A. Yes.  
 5 Q. Okay. And moving fast forward, on all the  
 6 other occasions that you went to Mr. Epstein's home --  
 7 and I think you said earlier that you at least told the  
 8 FBI it was approximately 20 -- did that artwork on the  
 9 walls ever change, that is from the bottom of the stairs  
 10 up until you went through the threshold of his room --  
 11 A. I don't know.  
 12 Q. -- or is it always the same?  
 13 A. I don't know. There were like three  
 14 different ways to get into that room.  
 15 Q. Okay. And did you always come up the  
 16 stairway in the kitchen?  
 17 A. No.  
 18 Q. Okay. Did you come up a different way --  
 19 other ways in the house?  
 20 A. Yes.  
 21 Q. Which other ways did you come up in the  
 22 house?  
 23 A. I had gone up through the -- I guess what  
 24 would be like that main staircase, which was like after  
 25 you walk through the kitchen and go to your right, I

1 A. Yes.  
 2 Q. Okay. And back to my question was, is: As  
 3 far as you can recall, the only two photographs of the  
 4 artwork that you saw were the two that you described to  
 5 us, during the entire time you ever went to  
 6 Mr. Epstein's house, at least for the back staircase?  
 7 A. Those are two things that I can specifically  
 8 remember. There were other things. I just can't  
 9 remember specifically what they were.  
 10 Q. All right. So you get to the top of the  
 11 stairs the first time, and you're walking towards what  
 12 you found out later was his bedroom. Did you ever grab  
 13 [REDACTED] or say, [REDACTED], come here, I need to talk to you,  
 14 you know, what's going on here, I -- you need to explain  
 15 this to me? Did you ever do that?  
 16 A. No.  
 17 Q. Okay. When you went into his bedroom, and  
 18 then you went -- I think you said you went around to the  
 19 left?  
 20 A. Uh-huh.  
 21 Q. Is that correct?  
 22 A. Yes.  
 23 Q. Okay. And then you went -- went into an area  
 24 that you said had a -- like a steam and a shower and a  
 25 massage table and a small couch. Was the -- the blond

1 don't know what room it was in, but you would see the  
 2 staircase. And it had like clear -- like on the rail it  
 3 had like clear things. I don't -- I don't remember like  
 4 if it was all clear, but I remember --  
 5 Q. Are you talking about rails?  
 6 A. Yes.  
 7 Q. All right. And then you -- and so you --  
 8 your testimony, at least, you came up the kitchen  
 9 stairs, you came up the -- what you described as the  
 10 main staircase. Any other way that you ever got into  
 11 the bedroom?  
 12 A. Yes, there was -- there was like a balcony on  
 13 the side. I mean, [REDACTED] not exactly sure where it was,  
 14 but it was like -- like in the area where the pool was.  
 15 And like the balconies, I guess, there was a staircase  
 16 where you go up. And there's a -- I believe there was  
 17 like a small balcony. And then there was one door on  
 18 each side of where there would -- there was like a sink  
 19 and like a big counter, where he had a lot of stuff on  
 20 that counter. And --  
 21 Q. I don't want to really to get into the --  
 22 that's fine. I just want -- so you came up three  
 23 different ways is what you're telling me?  
 24 A. Yes. Yes.  
 25 Q. That's it?

1 lady there --  
 2 A. No.  
 3 Q. -- who you later described? And so it was  
 4 just you and [REDACTED]?  
 5 A. Yes.  
 6 Q. Okay. Did you then pull [REDACTED] aside and say,  
 7 [REDACTED], what's going on here? You need to tell me. You  
 8 know, you said I was going to get 200 bucks. What --  
 9 what's going on?  
 10 MR. EDWARDS: Object to the form.  
 11 THE WITNESS: She told me that I was going to  
 12 meet this guy, and like he was really nice and  
 13 stuff like that. And she told me like that -- I  
 14 don't know; she just pretty much told me that he  
 15 was a nice guy. So I just like sat in there with  
 16 her, and then --  
 17 BY MR. CRITTON:  
 18 Q. Did she sit down on the couch?  
 19 A. Yes.  
 20 Q. Okay. And did you just go, well, wait a  
 21 minute, [REDACTED] in here, [REDACTED] going to meet a nice guy; who's  
 22 paying me the 200 bucks? Did you say that to her?  
 23 A. No.  
 24 Q. Did you say, why am I getting \$200 to just  
 25 sit here and meet a nice guy?

1 A. No.  
 2 Q. Okay. Did you say, I think this is odd, you  
 3 know, weird; I think I want to get out of here?  
 4 A. No.  
 5 Q. Okay. You could have, though; couldn't you?  
 6 A. I don't know.  
 7 Q. Well, nobody --  
 8 A. I probably could not have found myself out of  
 9 that house at that time.  
 10 Q. No, but you could have said [REDACTED], I don't  
 11 want to stay here, let's -- let's go. You could have  
 12 said that; couldn't you?  
 13 A. I guess.  
 14 Q. All right. And you made a voluntary decision  
 15 from the time that [REDACTED] said, do you want to go with me,  
 16 up until the time you were in that room? It was all  
 17 voluntary. You knew -- you knew that you had made a --  
 18 or you have made decision to go with [REDACTED] to get 200  
 19 bucks, and there you were in the room, you and [REDACTED];  
 20 correct?  
 21 A. Yes.  
 22 Q. All right. What happened next?  
 23 A. Jeffrey walked in and --  
 24 Q. But you didn't know he was Jeffrey then?  
 25 A. No, I did not.

1 Q. A man walked in?  
 2 A. A man walked in.  
 3 Q. Describe him for me.  
 4 A. Had gray hair. He had sweat pants and like a  
 5 T-shirt on. I don't know. He was old; he was an older  
 6 man. And --  
 7 Q. What did he say to you?  
 8 A. He said --  
 9 Q. Well, in fact, let me -- let me strike that.  
 10 Who did he speak with? He walked in. You  
 11 described what he was wearing.  
 12 A. He talked to [REDACTED]. And [REDACTED] said, you know,  
 13 this is my friend, Jane Doe. And he shook my hand. He  
 14 said that his name was Jeffrey, and then -- I don't  
 15 know. I don't know what else he said, but he started to  
 16 walk out of the room. And as he was walking out of the  
 17 room, he said that we needed to take our clothes off.  
 18 Q. You say he walked up to [REDACTED]. Did he have a  
 19 private conversation with [REDACTED].?  
 20 A. Yes.  
 21 Q. Okay. And when he walked into the room  
 22 dressed as he did, did she go up to him at all?  
 23 A. Yes.  
 24 Q. Did she give him a hug?  
 25 A. I don't think so.

1 Q. Very friendly?  
 2 A. Yes.  
 3 Q. Okay. And she seemed to be happy to see him?  
 4 A. Yes.  
 5 Q. Okay. And did -- from everything that she  
 6 had told you about Mr. Epstein, she said he's a nice  
 7 guy, he's very polite; right?  
 8 A. Yes.  
 9 Q. Okay. And did she tell you, she said, look,  
 10 you -- you -- you can feel very safe around him?  
 11 A. No.  
 12 Q. Okay. Did she tell you don't worry?  
 13 A. Those were not words that she used, no.  
 14 Q. Well, what words did she use? She said he's  
 15 a nice guy?  
 16 A. Yeah.  
 17 Q. That you'll like him?  
 18 A. No. She just said that he was a nice guy.  
 19 Q. Okay. Did you say, so [REDACTED] meeting a nice  
 20 guy, so what's going on here, [REDACTED].?  
 21 A. No, I didn't.  
 22 Q. All right. So she goes up to Jeffrey. And  
 23 did -- do you remember, did she give him a hug?  
 24 A. No, I don't think so.  
 25 Q. She just went up, and she looked happy?

1 A. I don't know -- I don't know if she gave him  
 2 a hug or not. I don't remember.  
 3 Q. All right. Did she -- but she appeared to be  
 4 very comfortable with him as she -- because she --  
 5 MR. EDWARDS: Objection. Asked and answered.  
 6 BY MR. CRITTON:  
 7 Q. Let me strike that.  
 8 Did she appear to be comfortable around him  
 9 when she greeted him?  
 10 MR. EDWARDS: Same objection.  
 11 THE WITNESS: I don't know.  
 12 BY MR. CRITTON:  
 13 Q. Well, did she appear to be uncomfortable?  
 14 A. No.  
 15 Q. Okay. Well, I mean, you -- you would have  
 16 sensed if she felt -- you didn't see any fear in her  
 17 eyes or any anxiety; did you --  
 18 MR. EDWARDS: Objection to the form.  
 19 BY MR. CRITTON:  
 20 Q. -- in either her mannerisms or her face?  
 21 MR. EDWARDS: Form.  
 22 THE WITNESS: No.  
 23 BY MR. CRITTON:  
 24 Q. Okay. And she certainly hadn't told you  
 25 anything that would cause you to be fearful or scared or

1 anxious; true?  
 2 A. I guess not.  
 3 Q. All right. But you were anxious, because you  
 4 didn't know what was -- at least, based on your  
 5 testimony, because you weren't sure what was going to  
 6 happen --  
 7 A. Yes.  
 8 Q. -- at least by your testimony? I don't know  
 9 what -- whether [REDACTED] will say that, but that's your  
 10 testimony; right?  
 11 MR. EDWARDS: Object to the form.  
 12 THE WITNESS: Yes.  
 13 BY MR. CRITTON:  
 14 Q. Now, so as he leaves, you said he said what?  
 15 A. He said that we need to take our clothes off.  
 16 Q. Okay. And then did he leave the room?  
 17 A. Yes.  
 18 Q. Where did he go?  
 19 A. I don't know.  
 20 Q. He just left?  
 21 A. Yes.  
 22 Q. Okay. And did you turn to [REDACTED] and say  
 23 something?  
 24 A. [REDACTED] kind of turned to me and like, I don't  
 25 know, she kind of just told me that I should do it.

1 Q. Was [REDACTED] taking her clothes off?  
 2 A. Yes.  
 3 Q. Okay. And what -- and you -- I think you  
 4 told me you don't remember what [REDACTED] had on?  
 5 A. No.  
 6 Q. Did [REDACTED] -- and what clothes did [REDACTED] take  
 7 off in your presence?  
 8 A. All of them.  
 9 Q. How many times had you seen [REDACTED] naked before  
 10 this first time that you had been to Mr. Epstein's home?  
 11 A. I don't know. We were friends for a long  
 12 time. We changed in front of each other.  
 13 Q. Okay. Because you were kid friends  
 14 together --  
 15 A. Yeah.  
 16 Q. -- so you probably had seen each other's  
 17 bodies at some point when you were changing clothes or  
 18 running from the shower; right?  
 19 A. Yes.  
 20 Q. Okay. Had you ever seen [REDACTED] naked in the  
 21 presence of another person? And I don't mean another,  
 22 you know, girls were all, you know, after PE or sports  
 23 together or something like that. Had you ever seen her  
 24 in the presence of a naked man before?  
 25 A. No.

1 Q. Okay. Had you ever seen her or observed her  
 2 in any kind of sexual activity with a man before?  
 3 A. No.  
 4 Q. Were you aware that [REDACTED] was sexually active  
 5 at that point?  
 6 A. No.  
 7 Q. Well, she was living with Justin Sprague.  
 8 What did you think was going on?  
 9 MR. EDWARDS: Object to the form.  
 10 BY MR. CRITTON:  
 11 Q. When the two were living together, did you  
 12 think that was a platonic -- if I say -- if I use the  
 13 word platonic, do you know what that means?  
 14 A. Yes, I do.  
 15 Q. Okay. Platonic means probably no sexual  
 16 activity.  
 17 A. I know what it means.  
 18 Q. Okay. You understood, or at least you  
 19 surmised that Justin Sprague and [REDACTED], who were living  
 20 in the trailer together, were sexually active; true?  
 21 MR. EDWARDS: Object to the form.  
 22 BY MR. CRITTON:  
 23 Q. It's not rocket science. You understood that  
 24 to be a fact; didn't you?  
 25 MR. EDWARDS: Object to the form.

1 THE WITNESS: I didn't -- I don't know.  
 2 BY MR. CRITTON:  
 3 Q. Come on. Ms. Jane Doe, are you saying that  
 4 you know -- you were aware that [REDACTED] and Justin Sprague  
 5 were living together in a trailer, and had been for a  
 6 number of months, and you don't believe they had any  
 7 type of sexual relationship between one another; is that  
 8 what you're telling the members of the jury?  
 9 MR. EDWARDS: Object to the form.  
 10 THE WITNESS: [REDACTED] not saying that I don't  
 11 believe that. [REDACTED] saying that I do not know that.  
 12 BY MR. CRITTON:  
 13 Q. So now we're back at Mr. Epstein's home.  
 14 [REDACTED] starts taking off her clothes. Mr. Epstein had  
 15 said, you guys can take off your clothes. What did you  
 16 say to [REDACTED]?  
 17 A. I didn't say anything to her. She just  
 18 turned to me and told me that I should do it.  
 19 Q. And you -- or at least by what you've told us  
 20 so far, is you thought you were going to go over, meet  
 21 an older man, and [REDACTED] was going to pay you 200 bucks;  
 22 right?  
 23 A. Yes.  
 24 Q. Okay. So when he says, take off your  
 25 clothes, and she says -- she -- she, [REDACTED], starts taking

1 off her clothes, does like the proverbial red flag go up  
 2 to you or a light come on to say, well, wait a minute,  
 3 [REDACTED], what's going on here?  
 4 A. I didn't say anything to her.  
 5 Q. Why not?  
 6 A. I don't know why not.  
 7 Q. Okay. Jane Doe, prior to this first occasion  
 8 that you had been in Mr. Epstein's house, on how many  
 9 occasions had you taken your clothes off in the presence  
 10 of a man who was not -- or a male who was not a parent?  
 11 A. Excuse me?  
 12 Q. Okay. Well, let me -- let me ask: Did  
 13 you -- as [REDACTED]'s taking all of her clothes off, did you  
 14 then take all of your clothes off?  
 15 A. Yeah, when she told me that I should, yes, I  
 16 did.  
 17 Q. Well, she could tell you to jump off the  
 18 building, but it doesn't mean -- I mean, you're your own  
 19 person. You already told me that; right?  
 20 MR. EDWARDS: Object to the form.  
 21 THE WITNESS: Yes.  
 22 BY MR. CRITTON:  
 23 Q. And you were your own person back in 2003;  
 24 weren't you?  
 25 MR. EDWARDS: Object to the form.

1 BY MR. CRITTON:  
 2 Q. All right. And you had been through the  
 3 whole -- a number of depositions and court proceedings  
 4 involving your father; correct?  
 5 MR. EDWARDS: Object to the form.  
 6 THE WITNESS: Yes.  
 7 BY MR. CRITTON:  
 8 Q. All right. Did you take off all of your  
 9 clothes?  
 10 A. Yes, I did.  
 11 Q. And now my question again is, is: Prior to  
 12 that occasion at Mr. Epstein's house, had you ever  
 13 completely taken off your clothes for -- in the presence  
 14 of a male who was not a family member?  
 15 A. No.  
 16 Q. Were you sexually active prior to the time  
 17 that you first went to Mr. Epstein's home?  
 18 A. No.  
 19 Q. Had you ever had any type of sexual activity  
 20 with a male --  
 21 MR. EDWARDS: Object to the form.  
 22 BY MR. CRITTON:  
 23 Q. -- prior to being at Mr. Epstein's home?  
 24 A. No.  
 25 Q. Had you ever -- and let me define sexual

1 THE WITNESS: Yes.  
 2 BY MR. CRITTON:  
 3 Q. And you knew the difference between, in your  
 4 mind, at least, right and wrong; correct?  
 5 A. No, I didn't.  
 6 Q. You had found a way to run away from home and  
 7 go live with various people and to survive; correct --  
 8 MR. EDWARDS: Object to the form.  
 9 BY MR. CRITTON:  
 10 Q. -- prior to ever meeting Mr. Epstein?  
 11 A. Yeah.  
 12 Q. Right. And you had been through some rather  
 13 significant psychological and emotional events in your  
 14 life prior to ever meeting Mr. Epstein --  
 15 A. Yes.  
 16 Q. -- including not only the murder of Joey, but  
 17 as well what you learned to be domestic abuse between  
 18 your mother and your real father, Mr. Dial; correct?  
 19 MR. EDWARDS: Object to the form.  
 20 THE WITNESS: I never witnessed any abuse.  
 21 BY MR. CRITTON:  
 22 Q. I know that, but you were aware that it  
 23 existed, because you heard about it; true?  
 24 MR. EDWARDS: Object to the form.  
 25 THE WITNESS: I was told, yes.

1 activity.  
 2 Had you ever been with a male, where you  
 3 placed your hand on his penis?  
 4 A. No.  
 5 Q. Had a male ever touched your breast or --  
 6 your breast at any time, prior to the time you went to  
 7 Mr. Epstein's?  
 8 A. No.  
 9 Q. Had you ever -- had a male ever touched any  
 10 part of your genitalia --  
 11 A. No.  
 12 Q. -- prior to ever being at Mr. Epstein's?  
 13 A. No.  
 14 Q. Had you ever given a male oral sex at anytime  
 15 prior to being at Mr. Epstein's?  
 16 A. No.  
 17 Q. Had you ever had sexual intercourse with a  
 18 male prior to your first time you ever went to  
 19 Mr. Epstein's?  
 20 A. No.  
 21 Q. Had you ever had any type of anal sex prior  
 22 to the time you first went to Mr. Epstein's?  
 23 A. No.  
 24 Q. And it's your testimony -- well, let me ask  
 25 you this: Had you ever disrobed in any state, just

1 taking your top off so that you would have exposed your  
 2 breasts to a male --  
 3 A. No.  
 4 Q. -- other -- other than a family member, prior  
 5 to coming to Mister -- prior to going to Mr. Epstein's  
 6 home on the first occasion?  
 7 A. No.  
 8 Q. So when [REDACTED] says to you -- or Mr. Epstein  
 9 says, take off your clothes, and then he leaves the  
 10 room, why didn't you say to [REDACTED] at that point, what is  
 11 going on here?  
 12 MR. EDWARDS: Object to the form.  
 13 THE WITNESS: I don't know. I didn't -- I  
 14 didn't really know what else to do or say. I just  
 15 thought that I had to do it. I didn't know I had a  
 16 choice.  
 17 BY MR. CRITTON:  
 18 Q. No -- no one was forcing you to do anything  
 19 at that point; were they?  
 20 MR. EDWARDS: Form.  
 21 THE WITNESS: No, but I didn't know that  
 22 there was a choice there, that I could say, no. I  
 23 didn't know that at that time.  
 24 BY MR. CRITTON:  
 25 Q. Sure you did, because you knew that all you

1 Q. Sure, you did.  
 2 A. No.  
 3 MR. EDWARDS: Object to the form.  
 4 BY MR. CRITTON:  
 5 Q. You could have said to [REDACTED] at that point in  
 6 time, [REDACTED], I want to go home.  
 7 MR. EDWARDS: Object to the form.  
 8 BY MR. CRITTON:  
 9 Q. True?  
 10 A. The point is that I didn't know that then.  
 11 Q. True --  
 12 A. Yeah, now, that's true; I know that now. But  
 13 then? No, I didn't know that.  
 14 Q. Did you say to [REDACTED], [REDACTED], I don't want to  
 15 stay here?  
 16 A. No.  
 17 Q. Was [REDACTED] your friend?  
 18 A. Yes.  
 19 Q. She was a good friend?  
 20 A. Yes.  
 21 Q. All right. Did you say, [REDACTED], why did you  
 22 bring me here? I don't want to do that?  
 23 A. No, I didn't.  
 24 Q. But you could have?  
 25 MR. EDWARDS: Object to the form.

1 had to --  
 2 MR. EDWARDS: Objection. Argumentative.  
 3 MR. CRITTON: I need to ask the question  
 4 first.  
 5 MR. EDWARDS: Well, you're just telling her a  
 6 comment and arguing with her. Ask a question.  
 7 MR. CRITTON: Want me to read back Arod and  
 8 Alessie's (phonetic) deposition?  
 9 MR. EDWARDS: Sure. Into this record?  
 10 MR. CRITTON: No.  
 11 MR. EDWARDS: Yes, please.  
 12 MR. CRITTON: You know your questions -- or  
 13 let me say your statements... Well, let me go back  
 14 to my question.  
 15 BY MR. CRITTON:  
 16 Q. Ma'am, you had -- you had a choice at the  
 17 time Mr. Epstein left the room, and he had said, okay,  
 18 take your clothes off, or whatever you say he said to  
 19 you and [REDACTED]. You could say, this isn't for me, [REDACTED],  
 20 what's going on. You could have done that, and you  
 21 chose not to; true?  
 22 A. At this point I know, yeah, I could have done  
 23 that.  
 24 Q. At that point you could have?  
 25 A. I did not know that.

1 THE WITNESS: I didn't know that.  
 2 BY MR. CRITTON:  
 3 Q. You could have, whether you -- I understand  
 4 that you're saying you -- you didn't know you could.  
 5 But I -- my question is, is: You could have done -- you  
 6 had a choice that you could have said, I don't want to  
 7 do this, [REDACTED] not taking my clothes off. Sorry.  
 8 [REDACTED] out of here.  
 9 MR. EDWARDS: Object to the form.  
 10 BY MR. CRITTON:  
 11 Q. You could have chosen that; true?  
 12 A. That's true, but I didn't know that at that  
 13 time.  
 14 Q. Did you tell [REDACTED], I don't want to do this,  
 15 [REDACTED]?  
 16 MR. EDWARDS: Same objection, form.  
 17 THE WITNESS: I didn't know that I had a  
 18 choice at that time.  
 19 BY MR. CRITTON:  
 20 Q. Okay.  
 21 A. Now I know that I could have said, no, and I  
 22 could have left. But when I was there at that time and  
 23 place, I had no idea that I could have said, you know  
 24 what, I -- I want to leave.  
 25 Q. [REDACTED] takes off her clothes. Did you wait

1 till she was fully disrobed before you took your clothes  
 2 off?  
 3 A. No.  
 4 Q. Did you say, hey, can I leave on my  
 5 underwear, my bra and my panties? Did you have a bra?  
 6 A. Yes.  
 7 Q. Okay. Did you say, [redacted] just -- [redacted] feel more  
 8 comfortable if I didn't take my clothes off?  
 9 A. No.  
 10 Q. Okay. Didn't she tell you, look, you don't  
 11 have to do anything you don't want to do?  
 12 A. No, she did not.  
 13 Q. So if she says that, she's lying? She -- if  
 14 [redacted] says, I told Jane Doe, as I told all the other  
 15 girls that I took, is if they didn't want to do  
 16 something or if they felt uncomfortable, they didn't  
 17 have to do that?  
 18 MR. EDWARDS: Object to the form.  
 19 BY MR. CRITTON:  
 20 Q. She told you that; didn't she?  
 21 A. No.  
 22 Q. So if she -- if [redacted] testifies that that's  
 23 what she told you, you're saying [redacted] lied to me --  
 24 MR. EDWARDS: Object to the form.  
 25

1 so...  
 2 BY MR. CRITTON:  
 3 Q. You need to answer my question. [redacted] asking  
 4 you to assume --  
 5 MR. EDWARDS: Object to the form.  
 6 BY MR. CRITTON:  
 7 Q. -- that [redacted] has testified under oath that  
 8 she told you that you didn't have to do anything you  
 9 didn't want to do.  
 10 A. She did not tell me that.  
 11 Q. All right. So if she's testified that that's  
 12 what she did tell you, that's a lie; correct?  
 13 MR. EDWARDS: The witness has answered the  
 14 question. Object to the form, again.  
 15 THE WITNESS: She did not tell me that.  
 16 BY MR. CRITTON:  
 17 Q. So if she's testified -- if she testifies or  
 18 has testified that she said that, that would be a lie;  
 19 is that correct?  
 20 MR. EDWARDS: Object to the form.  
 21 THE WITNESS: Yes.  
 22 BY MR. CRITTON:  
 23 Q. All right. Take your clothes off; [redacted] now  
 24 has her clothes off. What happens next?  
 25 A. Jeffrey walked back in with only a towel on.

1 BY MR. CRITTON:  
 2 Q. -- that's a lie; right?  
 3 MR. EDWARDS: Object to the form. Compound  
 4 question.  
 5 BY MR. CRITTON:  
 6 Q. Let me reask it so it's clear: If [redacted] has  
 7 testified that she told you that you didn't have to do  
 8 anything that you weren't comfortable with doing, your  
 9 testimony would be is [redacted]'s a liar --  
 10 MR. EDWARDS: Object to the form.  
 11 BY MR. CRITTON:  
 12 Q. -- is that correct?  
 13 A. I just know that [redacted] did not say that to me.  
 14 So if you're telling me that, then you're a liar.  
 15 Q. No. If [redacted] telling you that that's what [redacted]  
 16 has testified that she told you --  
 17 A. How do I know that, though?  
 18 Q. [redacted] asking you to assume it. It's what's  
 19 called a hypothetical question.  
 20 Okay. If [redacted] testified, I told Jane Doe  
 21 that she didn't have to do anything she didn't want to  
 22 at Mr. Epstein's house, if I asked you to assume that as  
 23 being true, you would say [redacted] is a liar; correct?  
 24 MR. EDWARDS: Object to the form.  
 25 THE WITNESS: [redacted] didn't say that to me,

1 Q. Like a bath towel?  
 2 A. Yes.  
 3 Q. Okay. Around his waist?  
 4 A. Yes.  
 5 Q. All right. And what happens next?  
 6 A. He laid down on his belly on the massage  
 7 table, and we rubbed his back and his legs.  
 8 Q. Okay. And who told you to do that?  
 9 A. [redacted] did.  
 10 Q. And did [redacted], when she was out -- I -- [redacted]  
 11 sorry -- when he was out of the room, did [redacted] tell  
 12 you -- did you say, what's -- what are we doing? Now, I  
 13 got my clothes off. Now, what's next?  
 14 A. No.  
 15 Q. Okay. Did you know you were going to give  
 16 him a massage?  
 17 A. No.  
 18 Q. Okay. Had you ever given a man a massage  
 19 before?  
 20 A. No.  
 21 Q. Given anyone a massage before?  
 22 A. No.  
 23 Q. Did -- so he comes in, he lies down, he still  
 24 has his towel on; right?  
 25 A. Yes.

1 Q. And he's lying on his stomach?  
 2 A. Yes.  
 3 Q. And what did [REDACTED] tell you to do?  
 4 A. She just told me to like give him a massage.  
 5 Q. Okay. And how did you know how to give him a  
 6 massage?  
 7 A. I don't know. I just like did what she was  
 8 doing.  
 9 Q. Okay. Was she standing next to you the  
 10 entire time?  
 11 A. Yes.  
 12 Q. And Mr. Epstein was what, was lying face  
 13 down?  
 14 A. Yes.  
 15 Q. And his face was where, pointed down toward  
 16 the floor on the massage table?  
 17 A. I don't know -- I don't remember.  
 18 Q. Okay. Where were his arms? To the side?  
 19 A. I don't know.  
 20 Q. Or was his leaning on them, like it was his  
 21 head on his arms?  
 22 A. He was laying down, getting a massage.  
 23 Q. All right. Were his arms at his side, or  
 24 were they over his shoulders?  
 25 A. I don't know.

1 Q. How long did this last?  
 2 A. Thirty or so minutes.  
 3 Q. And so you rubbed where? Where did you and  
 4 [REDACTED] start -- were you doing it in tandem, together?  
 5 A. His back and his legs.  
 6 Q. So you rubbed his back and his legs for  
 7 approximately how long?  
 8 A. Thirty minutes.  
 9 Q. And at the end of the 30 minutes, did you  
 10 both leave?  
 11 A. No.  
 12 Q. Okay. So you rubbed his back and his legs  
 13 for 30 minutes?  
 14 A. Yes.  
 15 Q. Did he talk to you at all?  
 16 A. Yes.  
 17 Q. Did you talk to him?  
 18 A. Yes.  
 19 Q. And what did -- what did you talk about? Was  
 20 he talking to [REDACTED], too?  
 21 A. Yes.  
 22 Q. Okay. What did he ask?  
 23 A. He asked me how old I was.  
 24 Q. And what did you tell him?  
 25 A. I told him that I was 15.

1 Q. And had you shown Mr. Epstein an ID at any  
 2 time?  
 3 A. No.  
 4 Q. Did you ever show him an ID?  
 5 A. No.  
 6 Q. You're sure of that? You didn't have a fake  
 7 ID?  
 8 A. You think he was ID'ing people? No.  
 9 Q. [REDACTED] just asking the questions, ma'am.  
 10 What else did you talk about?  
 11 A. I talked about school and -- I don't know. I  
 12 mean, I didn't talk much to him.  
 13 Q. Was [REDACTED] doing most of the talking?  
 14 A. I guess.  
 15 Q. Okay. He -- if he was looking down or away  
 16 from you, did you ever try to talk to [REDACTED] and say, you  
 17 know, this is odd, or I don't want to be here, or let's  
 18 go?  
 19 MR. EDWARDS: Object to the form.  
 20 THE WITNESS: No.  
 21 BY MR. CRITTON:  
 22 Q. You could have, though, said something to  
 23 her?  
 24 MR. EDWARDS: Object to the form.  
 25

1 BY MR. CRITTON:  
 2 Q. Right?  
 3 A. Yes.  
 4 Q. Okay. And you could have said, you know,  
 5 enough of the massage, [REDACTED] putting my clothes on, I'll  
 6 meet you downstairs?  
 7 MR. EDWARDS: Object to the form.  
 8 BY MR. CRITTON:  
 9 Q. Right?  
 10 A. Yes, I could have said that.  
 11 Q. At the end of 30 minutes, you've now massaged  
 12 his back and his legs?  
 13 A. Yes.  
 14 Q. Okay. What happened next?  
 15 A. [REDACTED] said that she was going to go downstairs  
 16 for a little bit, and she was going to come back.  
 17 Q. Okay. And when -- did she grab her clothes  
 18 and go?  
 19 A. Yes.  
 20 Q. So she -- [REDACTED] says, [REDACTED] going downstairs for  
 21 a bit. She takes her clothes and leaves?  
 22 A. She put her clothes on and left.  
 23 Q. Right in front of you?  
 24 A. Yes.  
 25 Q. And what were you doing all this time?

1 A. I don't know.  
 2 Q. Did you say to [REDACTED], you know, I -- [REDACTED] ready  
 3 to go, too?  
 4 A. No.  
 5 Q. Did you say, [REDACTED], don't leave me?  
 6 A. No.  
 7 Q. Did you say, I don't want to be left alone?  
 8 A. No.  
 9 Q. Did you say, I want to put my clothes back  
 10 on, too?  
 11 A. No.  
 12 Q. You could have done any of those things --  
 13 MR. EDWARDS: Object to the form.  
 14 BY MR. CRITTON:  
 15 Q. -- couldn't you?  
 16 A. I didn't know that at the time.  
 17 Q. Nobody was preventing you from putting your  
 18 clothes on or leaving that room; true?  
 19 A. No, but he should have given me that option.  
 20 Q. Answer my question: No one prevented you  
 21 from putting your clothes on and leaving with [REDACTED]; did  
 22 they?  
 23 MR. EDWARDS: Object to the form.  
 24 THE WITNESS: No.  
 25

1 BY MR. CRITTON:  
 2 Q. No one forced you to stay in the room with  
 3 Mr. Epstein; did they?  
 4 MR. EDWARDS: Object to the form.  
 5 THE WITNESS: No.  
 6 BY MR. CRITTON:  
 7 Q. No one tried to restrain you from leaving  
 8 that room; did they?  
 9 MR. EDWARDS: Form.  
 10 THE WITNESS: No.  
 11 BY MR. CRITTON:  
 12 Q. No physical force was ever used at any time  
 13 by Mr. Epstein directed to you; was it?  
 14 A. No.  
 15 Q. [REDACTED] leaves?  
 16 A. Uh-huh.  
 17 Q. He's still lying on his stomach?  
 18 A. No.  
 19 Q. All right. How much longer did you spend in  
 20 the room with Mr. Epstein?  
 21 A. About 30 minutes.  
 22 Q. So you were there approximately an hour the  
 23 first time?  
 24 A. Yes.  
 25 Q. Okay. What happened next?

1 A. He asked me to squeeze his nipples really  
 2 hard. So I did.  
 3 Q. All right. And then what happened?  
 4 A. And then he started masturbating, and I  
 5 just -- I don't know, I kind of just tried to like not  
 6 look at his face. And I just did whatever he said, and  
 7 waited until he was done, and left.  
 8 Q. Had you ever seen a man masturbate before?  
 9 A. No.  
 10 Q. Have you seen a man masturbate since?  
 11 MR. EDWARDS: Object to the form.  
 12 THE WITNESS: No.  
 13 BY MR. CRITTON:  
 14 Q. Okay. So Mr. Epstein -- Mr. Epstein is the  
 15 only person whom you've ever seen masturbate?  
 16 A. Yes.  
 17 Q. Okay. Have you ever been involved -- have  
 18 you ever given a man -- have you manually, with your  
 19 hand, given -- had a man -- masturbated a man to  
 20 ejaculation?  
 21 A. No.  
 22 Q. Had you ever seen a man's penis before?  
 23 A. Before --  
 24 Q. Before that first time you were at  
 25 Mr. Epstein's.

1 A. No.  
 2 Q. Okay. Separate -- and, obviously, you've  
 3 seen pictures in books?  
 4 MR. EDWARDS: Object to the form.  
 5 BY MR. CRITTON:  
 6 Q. All right. But before you ever went to  
 7 Mr. Epstein's, you knew what a -- what a man's genitalia  
 8 looked like; fair statement? [REDACTED] seen, at least,  
 9 pictures in a book?  
 10 A. Yes.  
 11 Q. Okay. Is it your testimony that you had  
 12 never seen a man's penis before that?  
 13 A. Yes.  
 14 Q. But you've seen a man's penis since then;  
 15 true?  
 16 A. Yes.  
 17 Q. All right. Mr. Epstein's penis look any  
 18 different than others that you've seen? And assume that  
 19 women's breasts look different between women, I believe.  
 20 Anything different with Mr. Epstein's penis than you've  
 21 seen with other men's penises?  
 22 A. Yeah.  
 23 Q. What?  
 24 A. It was like -- I don't know. I mean, I guess  
 25 it was small and -- I don't know. It looked like he

1 like wasn't circumcised right or something.  
 2 Q. Okay. Let me ask you this: So after he  
 3 masturbated, did he ejaculate?  
 4 A. Yes.  
 5 Q. All right. And did you look, or did you turn  
 6 away?  
 7 A. I did not look. I turned away.  
 8 Q. All right. When that was complete, what  
 9 happened?  
 10 A. He got in the shower, and I put my clothes on  
 11 and left.  
 12 Q. Okay. Did he -- did you see him again before  
 13 you left -- Mr. Epstein?  
 14 A. Oh, yeah, I -- I went down -- downstairs to  
 15 where [REDACTED] was and sat with her for a second. And I  
 16 don't know how long it was, but he came into the kitchen  
 17 and like laughed with [REDACTED] about something -- I don't  
 18 know what it was. And I guess we were waiting for the  
 19 cab to come back and get us, and then we left.  
 20 Q. Did he give you any money? Did anyone give  
 21 you any money?  
 22 A. [REDACTED] gave me money.  
 23 Q. Once you got in the cab?  
 24 A. Yes.  
 25 Q. Okay. How much did she give you?

1 A. \$200.  
 2 Q. And when you were waiting downstairs, did you  
 3 have anything to eat or drink -- and by drink, I mean  
 4 like a soda or water or anything?  
 5 A. I didn't, but [REDACTED] did.  
 6 Q. Okay. Was she eating when you came down?  
 7 A. Yes.  
 8 Q. Was she eating and drinking something?  
 9 A. I don't know.  
 10 Q. Okay. You've never been -- on the occasions  
 11 that you've been at Mr. Epstein's house, you've never  
 12 had -- alcohol has never been served to you; has it?  
 13 A. No.  
 14 Q. Okay. And never any type of drugs,  
 15 prescription or otherwise, have ever -- or tobacco has  
 16 ever been used at Mr. Epstein's house; true?  
 17 MR. EDWARDS: Object to the form.  
 18 THE WITNESS: [REDACTED] sure I smoked cigarettes.  
 19 BY MR. CRITTON:  
 20 Q. Outside?  
 21 A. Outside of his house, yes.  
 22 Q. Okay. Mr. Epstein has never given you  
 23 tobacco or any type of alcohol or drugs, nor has anyone  
 24 in his house; true?  
 25 A. Yeah, that's true.

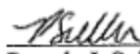
1 Q. All right. So you get -- you get in the cab.  
 2 Did you say -- have any conversation with [REDACTED] after you  
 3 came down, up until the time you got in the cab?  
 4 A. No. We actually ended up walking up his  
 5 street and flagging a cab driver down.  
 6 Q. All right. And as you're walking up the  
 7 street, what did you say to [REDACTED]?  
 8 A. I didn't talk to her about it.  
 9 Q. Pardon?  
 10 A. I did not talk to her about Jeffrey Epstein.  
 11 Q. Why not?  
 12 A. I did not feel comfortable.  
 13 Q. Did she already give you \$200 by that point?  
 14 A. Yes -- no -- well, [REDACTED] pretty sure that  
 15 whenever Jeffrey had come into the kitchen, when -- when  
 16 we were both in there, he asked her if she had given me  
 17 the money or not. And that --  
 18 Q. And she said?  
 19 A. That's when she gave it to me.  
 20 Q. Did -- did she tell you that she had gotten  
 21 money?  
 22 A. Yes.  
 23 Q. And why did she get money?  
 24 MR. EDWARDS: Object to the form.  
 25 THE WITNESS: I don't know.

1 BY MR. CRITTON:  
 2 Q. Did she ever tell you she got money because  
 3 she brought you?  
 4 A. I would assume that's why, but she never  
 5 actually said that to me, no.  
 6 Q. But you were able to make that assumption  
 7 pretty easily; weren't you?  
 8 A. Yes.  
 9 Q. All right. Did you ever say anything to her  
 10 that day?  
 11 A. No.  
 12 Q. Okay. As you're walking up the street, did  
 13 you say, I don't want the money, I don't -- I don't want  
 14 anything to do with Mr. Epstein?  
 15 A. No.  
 16 Q. Did you keep the money?  
 17 A. Yes.  
 18 Q. What did you do with it?  
 19 A. I don't know. I probably bought clothes with  
 20 it or something.  
 21 MR. CRITTON: Let's take a lunch break.  
 22 (A luncheon recess was taken.)  
 23 (Continued in Volume III of the same day.)  
 24 - - -  
 25

CERTIFICATE OF OATH  
THE STATE OF FLORIDA  
COUNTY OF PALM BEACH

I, the undersigned authority, certify that  
JANE DOE personally appeared before me and was duly  
sworn.

Dated this 13th day of October, 2009.

  
Pamela J. Sullivan, RPR, FPR, CLR  
Notary Public - State of Florida  
My Commission Expires: June 10, 2010  
My Commission No.: DD 560380



October 13, 2009  
JANE DOE  
C/O BRAD J. EDWARDS, ESQUIRE  
Rothstein, Rosenfeldt Adler  
Las Olas City Centre, Suite 1650  
401 East Las Olas Boulevard  
Fort Lauderdale, FL 33301

IN RE: SHORT STYLE  
CASE NO.: 08-civ-80119-MARRA/JOHNSON  
Dear Ms. Jane Doe:  
Please take notice that on Wednesday, the 30th of  
September, 2009, you gave your deposition in the above-referred  
matter. At that time, you did not waive signature. It  
is now necessary that you sign your deposition.

As previously agreed to, the transcript will be  
furnished to you through your counsel or counsel for  
Plaintiff. Please read the following instructions  
carefully:

At the end of the transcript you will find an  
errata sheet. As you read your deposition, any changes  
or corrections that you wish to make should be noted on  
the errata sheet, citing page and line number of said  
change. DO NOT write on the transcript itself. Once  
you have read the transcript and noted any changes, be  
sure to sign and date the errata sheet and return these  
pages to me.

If you do not read and sign the deposition within a  
reasonable time, the original, which has already been  
forwarded to the ordering attorney, may be filed with  
the Clerk of the Court. If you wish to waive your  
signature, sign your name in the blank at the bottom of  
this letter and return it to us.

Very truly yours,

Pamela J. Sullivan, RPR, FPR, CLR  
Prose Court Reporting Agency, Inc.  
One Clearlake Centre  
250 S. Australian Avenue, Suite 1500  
West Palm Beach, Florida 33401  
561.832.7500

I do hereby waive my signature.

JANE DOE  
JANE DOE

CERTIFICATE  
THE STATE OF FLORIDA  
COUNTY OF PALM BEACH

I, Pamela J. Sullivan, Registered Professional  
Court Reporter and Notary Public in and for the State of  
Florida at large, do hereby certify that I was  
authorized to and did report said deposition in  
stenotype, and that the foregoing pages are a true and  
correct transcription of my shorthand notes of said  
deposition.

I further certify that said deposition was taken at  
the time and place hereinabove set forth and that the  
taking of said deposition was commenced and completed as  
hereinabove set out.

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

The foregoing certification of this transcript does  
not apply to any reproduction of the same by any means  
unless under the direct control and/or direction of the  
certifying reporter.

Dated this 13th day of October, 2009.

  
Pamela J. Sullivan, RPR, FPR, CLR

CERTIFICATE  
---  
THE STATE OF FLORIDA  
COUNTY OF PALM BEACH

I hereby certify that I have read the foregoing  
deposition by me given, and that the statements  
contained herein are true and correct to the best of my  
knowledge and belief, with the exception of any  
corrections or notations made on the errata sheet, if  
one was executed.

Dated this \_\_\_ day of \_\_\_\_\_, 2009.

JANE DOE

1 ERRATA SHEET  
 2 IN RE: JANE DOE V. JEFFREY EPSTEIN  
 3 CR: PAMELA J. SULLIVAN, RPR, FPR, CLR  
 4 DEPOSITION OF: JANE DOE  
 5 DATE TAKEN: September 30, 2009  
 6 DO NOT WRITE ON TRANSCRIPT - ENTER CHANGES HERE  
 7 PAGE # LINE # CHANGE REASON

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 19 Please forward the original signed errata sheet to this  
 office so that copies may be distributed to all parties.  
 20  
 21 Under penalty of perjury, I declare that I have read my  
 deposition and that it is true and correct subject to  
 any changes in form or substance entered here.  
 22  
 23 DATE: \_\_\_\_\_  
 24  
 25 SIGNATURE OF DEPONENT: \_\_\_\_\_