

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

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

JANE DOE NO. 2,

Plaintiff,

vs.

JEFFREY EPSTEIN,

Defendant.

-----/
RELATED CASES:

08-80232, 08-08380, 08-80381,
08-80994, 08-80993, 08-80811,
08-80893, 09-80469, 09-80591,
09-80656, 09-80802, 09-81092

DEPOSITION OF [REDACTED]

Tuesday, May 11, 2010
9:16 A.M. - 10:59 A.M.

PROSE COURT REPORTING AGENCY, INC.
3111 West Dr. Martin Luther King, Jr. Boulevard
Suite 100
Tampa, Florida 33607

REPORTED BY:

MICHELLE OLSEN BADEN, RPR, FPR
Notary Public, State of Florida at Large
Prose Job No.: 1998

[REDACTED] PROSE COURT REPORTING AGENCY, INC. [REDACTED]

1 APPEARANCES:

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7 Attorney for Plaintiff in Related
8 Case No 08-80893
9 (Appeared via telephone conference call)

10 STUART S. MERMELSTEIN, ESQUIRE
11 MERMELSTEIN & HOROWITZ, P.A.
12 18205 Biscayne Boulevard, Suite 2218
13 Miami, Florida 33160

14 Attorney for Plaintiffs in related cases
15 08-80069, 08-80119, 08-80232, 08-80380, 08-80381,
16 08-80993, 08-80994
17 (Appeared via telephone conference call)

18 MICHAEL J. PIKE, ESQUIRE
19 BURMAN CRITTON LUTTIER & COLEMAN
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22 Attorney for Defendant, JEFFREY EPSTEIN
23 (Appeared via telephone conference call)
24
25

1 The deposition of [REDACTED] was taken
2 pursuant to Subpoena by counsel for the Defendant on
3 Tuesday, May 11, 2010, commencing at 9:16 A.M. at PROSE
4 COURT REPORTING AGENCY, INC., 3111 West Dr. Martin
5 Luther King, Jr. Boulevard, Suite 100, Tampa, Florida
6 33607. Said deposition was reported by Michelle Olsen
7 Baden, RPR, Notary Public, State of Florida at Large.
8 -----

9 WHEREUPON:

10 THE REPORTER: Please raise your right hand.

11 Do you solemnly swear or affirm that the
12 testimony you give today in this matter will be the
13 truth, the whole truth and nothing but the truth?
14

15 THE WITNESS: Yes.

16 [REDACTED]
17 a witness, having been duly sworn to tell the truth, the
18 whole truth and nothing but the truth, was examined and
19 testified as follows:

20 EXAMINATION

21 BY MR. PIKE:

22 Q Morning, Ms. [REDACTED] My name is Michael
23 Pike. Can you hear me clearly?

24 A Yes.

25 Q I'm taking your deposition today via
26 telephone. Usually, when we have a telephone

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1 deposition, it's very easy for me to talk over you and
2 vice versa. So, during this telephone deposition,
3 please allow me to finish my questions and I will allow
4 you to finish your answers, that way you and I can hear
5 each other clearly.

6 If at any time you do not understand my
7 question, please stop and ask me to repeat the question
8 and I will do so, especially given the fact that we are
9 on the telephone. Okay?

10 A No problem.

11 Q Okay. Would you please state your name for
12 the record.

13 A [REDACTED]

14 Q And would you please spell your last name.

15 A [REDACTED]

16 Q Ms. [REDACTED] where is your current residence?

17 A I live at [REDACTED]
18 [REDACTED]

19 Q And how long have you lived in [REDACTED]?

20 A I moved [REDACTED] right before [REDACTED].

21 Q And what is your date of birth?

22 A [REDACTED]

23 Q And how old are you today?

24 A I am [REDACTED]

25 Q What is your current telephone number, both

1 home and cell phone?
 2 A I only have a cell, there is no home, and it
 3 is [REDACTED].
 4 Q How long have you had that cellular telephone?
 5 A As long as I have lived in [REDACTED].
 6 Q And, I'm sorry, what was the date that you
 7 moved to [REDACTED], just the year?
 8 A Roughly, September or -- wait. October, I'm
 9 sorry.
 10 Q Of 2009 or 2008?
 11 A Right before [REDACTED] so --
 12 Q Where do you currently work?
 13 A I am not working.
 14 Q Where was your last place of employment?
 15 A I worked at [REDACTED] as [REDACTED].
 16 [REDACTED].
 17 Q What type of business is that?
 18 A It was a [REDACTED].
 19 Q Where was that located?
 20 A [REDACTED].
 21 [REDACTED].
 22 Q Is that also in [REDACTED]?
 23 A Yes, sir.
 24 Q And before that where did you work,
 25 Ms. [REDACTED]?

1 A Nowhere. That was my first job -- or no, I'm
 2 sorry. I worked at [REDACTED] or [REDACTED].
 3 Q So [REDACTED] was your first place of
 4 employment?
 5 A Yes, sir.
 6 Q I'm going to ask you whether or not you know
 7 certain individuals, and I would just like you to answer
 8 me yes, you know them or no, you do not know them. And
 9 the ones that you do know we'll come back to later on,
 10 after I finish figuring out who it is that you know and
 11 who it is you don't know. Okay?
 12 A Okay.
 13 Q Do you know a female by the name of
 14 Jane Doe 2?
 15 A No.
 16 Q Do you know a female by the name of
 17 Jane Doe 3?
 18 A No.
 19 Q Do you know a female by the name of
 20 Jane Doe 4?
 21 A No.
 22 Q Sometimes pronounced Jane Doe 4?
 23 A No.
 24 Q Do you know a female by the name of
 25 Jane Doe 5?

1 A I worked at [REDACTED].
 2 Q Where was that [REDACTED] located?
 3 A [REDACTED]. Not exactly sure of the
 4 street, maybe [REDACTED], somewhere along there.
 5 Q And before [REDACTED] where were you employed?
 6 A I worked at [REDACTED] in [REDACTED].
 7 [REDACTED].
 8 Q And before [REDACTED] [REDACTED] [REDACTED]
 9 A I worked at [REDACTED] in [REDACTED].
 10 Q And where is that [REDACTED] located,
 11 street-wise?
 12 A It's [REDACTED] right there on [REDACTED] and
 13 [REDACTED].
 14 Q What was your position at [REDACTED]?
 15 A I was a [REDACTED].
 16 Q Okay. How long did you work for [REDACTED]?
 17 A I would say a couple months.
 18 Q And before [REDACTED] in [REDACTED] where did
 19 you work?
 20 A I worked at -- I'm not sure of the name -- I
 21 want to say [REDACTED].
 22 Q How long did you work for the [REDACTED]?
 23 A I would say maybe a month, month or two.
 24 Q And before [REDACTED] where did you
 25 work?

1 A No.
 2 Q Do you know a female by the name of
 3 Jane Doe 6?
 4 A Yes.
 5 Q Do you know a female by the name of
 6 Jane Doe 7?
 7 A No.
 8 Q Do you know a female by the name of
 9 Jane Doe 8?
 10 A No.
 11 Q Do you know a female by the name of [REDACTED]?
 12 A No.
 13 Q Have you ever met [REDACTED]?
 14 A No. Never heard the name.
 15 Q Do you know a female by the name of [REDACTED]?
 16 [REDACTED]?
 17 A No.
 18 Q Do you know a female by the name of [REDACTED]?
 19 A No.
 20 Q Do you know a female by the name of
 21 Jane Doe II?
 22 A No.
 23 Q Do you know a female by the name of Jane Doe?
 24 A Yes.
 25 Q Do you know a female by the name of [REDACTED]?

1 A Yes.
 2 Q Do you know a female by the name of [REDACTED]
 3 A Yes.
 4 Q Do you know a female by the name of [REDACTED]?
 5 A Yes.
 6 Q Do you know a female by the name of [REDACTED]
 7 A No.
 8 Q Give me one second. Ms. [REDACTED] how is it
 9 that you know Jane Doe 6?
 10 A She lives in the neighborhood I use to hang
 11 out in.
 12 Q And what neighborhood is that?
 13 A [REDACTED]
 14 Q Would you spell that for the record.
 15 A [REDACTED] I believe.
 16 Q How long have you known Jane Doe 6?
 17 A I would say since I was 15.
 18 Q Did you guys go to school together?
 19 A No.
 20 Q How did you meet her?
 21 A She was just hanging out with friends, I
 22 believe. Just everybody hanging out and we met.
 23 Q Have you remained friends since the time you
 24 first met her?
 25 A Yes.

1 Q When was the last time you spoke to her?
 2 A I spoke to her -- what is today, Tuesday. I
 3 talked to her on Sunday.
 4 Q When you spoke to her on Sunday did you speak
 5 about this case?
 6 A No.
 7 Q Have you ever spoken to Jane Doe 6 about this
 8 case?
 9 A I never knew she had anything to do with this
 10 until she told me the other day.
 11 Q Would that be Sunday?
 12 A No. We -- I just got back from [REDACTED]
 13 Q So when you were in [REDACTED] you saw her face
 14 to face?
 15 A Yes.
 16 Q And where did you guys meet in [REDACTED]?
 17 A I saw her at her house. I came to say hi.
 18 Q What did you guys talk about relative to this
 19 case?
 20 A All I said was that I can't -- I'm not talking
 21 to [REDACTED] because I have to do a deposition and she just
 22 said that she had something to do with it but that's --
 23 she didn't go into detail.
 24 Q Did she ever talk to you about a gentleman by
 25 the name of Jeffrey Epstein?

1 A No.
 2 Q And when I ask that question I mean, from the
 3 time that you have known her up until today's date, has
 4 she ever mentioned to you the name Jeffrey Epstein?
 5 A No.
 6 MR. EDWARDS: I'm sorry is the "her" that
 7 we're talking about Jane Doe 6 still?
 8 MR. PIKE: Yes.
 9 THE WITNESS: Yeah, no, I never heard anything
 10 about it. She's never mentioned that name.
 11 BY MR. PIKE:
 12 Q Did you ever come to learn that Jane Doe 6 had
 13 gone to Mr. Epstein's home for any reason?
 14 A No.
 15 Q Did Jane Doe 6 ever tell you that she went to
 16 Mr. Epstein's home in Palm Beach to give Mr. Epstein a
 17 massage?
 18 A No. She said she went there, when I last
 19 talked to her, but no details.
 20 Q Did Jane Doe 6 ever tell you that Mr. Epstein
 21 forced her to do anything against her will?
 22 A No, sir.
 23 MR. MERMELSTEIN: Object to form the question.
 24 BY MR. PIKE:
 25 Q And, Mr. [REDACTED] there are two other lawyers

1 on the phone and they are going to be making legal
 2 objections. Basically what that is is an attempt to
 3 preserve the record. Those objections aren't directed
 4 at you. Those objections are directed at my questions.
 5 So when you do hear a lawyer make an objection. Please
 6 hold off until we finish our dialogue and then I'll come
 7 back to you and ask you to finish your answer. Okay?
 8 A Okay.
 9 Q Did Jane Doe 6 ever tell you that she
 10 experienced any traumatic events at Jeffrey Epstein's
 11 home?
 12 MR. MERMELSTEIN: Objection to form.
 13 THE WITNESS: No.
 14 BY MR. PIKE:
 15 Q Did Jane Doe 6 ever tell you that she provided
 16 Mr. Epstein a massage while her bra was off?
 17 A No, sir.
 18 Q Is Jane Doe 6 one of your best friends?
 19 A I wouldn't say best friend but she is a
 20 friend.
 21 Q Is she a close friend?
 22 A I mean, when I go to [REDACTED] I go and say hi
 23 but that's about it.
 24 Q Since you moved to [REDACTED] how often do you
 25 speak to Jane Doe 6?

1 A Only when I go down there, so I would call her
 2 before I go down there and say "Hi," but other than that
 3 we don't talk.
 4 Q Do you know of any traumatic events that
 5 Jane Doe 6 has experienced in her lifetime?
 6 MR. MERMELSTEIN: Objection to form.
 7 BY MR. PIKE:
 8 Q And your answer was, Ms. [REDACTED]?
 9 A No.
 10 Q Do you know whether or not any one of her
 11 boyfriends ever [REDACTED]?
 12 A Yes.
 13 Q Would you consider that a traumatic event?
 14 A Yeah.
 15 Q And your answer was, Ms. [REDACTED]?
 16 A Yes.
 17 Q What boyfriend was that, to your knowledge,
 18 that [REDACTED]?
 19 A I have no idea.
 20 Q Did Jane Doe 6 ever discuss that traumatic
 21 event with you?
 22 A No. I heard from somebody else.
 23 Q Who did you hear from?
 24 A I have no idea. Just gossip around the
 25 neighborhood. I have no idea.

1 Q Did you ever have any sexual experiences with
 2 Jane Doe 6?
 3 A No.
 4 Q Did you ever learn that Jane Doe 6 was an
 5 [REDACTED] at the age of [REDACTED]?
 6 A No.
 7 MR. MERMELSTEIN: Objection to form.
 8 BY MR. PIKE:
 9 Q Do you know whether or not Jane Doe 6 is a
 10 [REDACTED]?
 11 A I knew she [REDACTED] but I don't see it
 12 any farther than that.
 13 Q Do you know whether or not she has a
 14 relationship with her mother?
 15 A She does, as far as I know.
 16 Q Based upon your experience, do you know
 17 whether or not it is a good relationship or a bad
 18 relationship?
 19 A I would say good.
 20 Q Where does her mother live, to your knowledge?
 21 A [REDACTED]
 22 Q What about her relationship with her father,
 23 do you know anything about that?
 24 A I guess they have a good relationship.
 25 Q Do you know where her father lives?

1 A [REDACTED]
 2 Q Do you know of any other close friends that
 3 have died in Jane Doe 6 lifetime?
 4 A No -- or yes.
 5 Q And who was that?
 6 A [REDACTED]
 7 Q And who is that to Jane Doe 6?
 8 A Good friend.
 9 Q Would you consider that a traumatic experience
 10 for her?
 11 MR. MERMELSTEIN: Objection to form.
 12 BY MR. PIKE:
 13 Q You can answer.
 14 A Slightly, yes, a little bit, yeah.
 15 Q And how did Mr. [REDACTED] die?
 16 A He [REDACTED]
 17 Q And did they ever [REDACTED]
 18 [REDACTED]?
 19 A Yes.
 20 Q And is that person [REDACTED]?
 21 A Yes.
 22 Q Do you know whether or not Jane Doe 6 has ever
 23 done drugs in front of you? And by "drugs" I mean
 24 marijuana, amphetamine or any kind of painkillers?
 25 A Yes.

1 Q And what drugs has she done, to your
 2 knowledge?
 3 A Marijuana in front of me.
 4 Q What other drugs?
 5 A She's never done anything else in front of me.
 6 Q To your knowledge, do you know whether she has
 7 done any other drugs, separate and apart from marijuana?
 8 A I'm not sure.
 9 Q Do you know whether or not Jane Doe 6 drinks
 10 alcohol?
 11 A No.
 12 Q When she did marijuana in front of you, how
 13 old was she and how old were you?
 14 A 15 and I don't know how old she was.
 15 Q Have you ever met Jane Doe 6's child?
 16 A Yes.
 17 Q And what is [REDACTED] name?
 18 A [REDACTED]
 19 Q Have you ever met the father?
 20 A Yes.
 21 Q And what is his name? ...
 22 A [REDACTED]
 23 Q And his last name?
 24 A I have no idea.
 25 Q Do you know who Jane Doe 6 currently dates?

1 A [REDACTED]
 2 Q And does [REDACTED] live in [REDACTED]?
 3 A Yes.
 4 Q And what does he do?
 5 A I'm not sure. [REDACTED] or something.
 6 Q With regard to the women that you said you
 7 knew, were you aware as to whether or not any of those
 8 women ever went to Jeffrey Epstein's home in Palm Beach?
 9 A I only knew about Jane Doe and [REDACTED].
 10 Q Did you ever go to Jeffrey Epstein's home?
 11 A No, sir.
 12 Q Did you ever drop anyone off at Jeffrey
 13 Epstein's home by vehicle?
 14 A No. I can't drive.
 15 Q And why can't you drive?
 16 A I don't have a license and I am afraid of the
 17 road.
 18 Q Have you ever had a license?
 19 A No, sir.
 20 Q Why is it that you are afraid of the road?
 21 A I got in a car accident when I was [REDACTED].
 22 Q Who was in the car with you?
 23 A My friend, [REDACTED].
 24 Q And what is her last name?
 25 A [REDACTED].

1 Q Anyone else?
 2 A No, sir.
 3 Q Is [REDACTED] still living today, that is did she
 4 die as a result of the car accident?
 5 A No. She's still living.
 6 Q When you saw Jane Doe 6 on Sunday, did she
 7 seem happy to you?
 8 A I don't know. We just stopped by and said
 9 "Bye" so -- she was just watching a movie.
 10 Q You said you stopped by and said "Bye"?
 11 A Yeah, because we were driving back to [REDACTED].
 12 Q Who was with you?
 13 A My boyfriend.
 14 Q What is his name?
 15 A [REDACTED].
 16 Q Does he live in [REDACTED]?
 17 A Yes.
 18 Q How long did you visit with Jane Doe 6 for?
 19 A I saw her a couple of times since I was there,
 20 just hung out for a little and then I was mainly at my
 21 mom's.
 22 Q When you hung out with Jane Doe 6, where did
 23 you go?
 24 A We were at her house.
 25 Q Any other places?

1 A No. We went to the store.
 2 Q During the times that you hung out with her,
 3 was she ever crying?
 4 A No.
 5 Q During the times you hung out with her
 6 recently, did she ever make any mention or complaint
 7 about Jeffrey Epstein?
 8 A No.
 9 Q Did she seem depressed to you?
 10 A No.
 11 Q Did she discuss any emotional issues that she
 12 was having with you?
 13 A No, sir.
 14 Q Did she discuss at all any happy times in her
 15 life, of the times that you visited with her most
 16 recently?
 17 A No.
 18 Q What did you guys talk about?
 19 A I don't know. It was just -- we were
 20 [REDACTED] our friend's [REDACTED].
 21 [REDACTED]
 22 Q And that would be Mr. [REDACTED]?
 23 A Yes, sir.
 24 Q How long ago did [REDACTED] ?
 25 A He [REDACTED].

1 Q In [REDACTED]
 2 A Yes, sir.
 3 Q I'm sorry, you testified that Mr. [REDACTED] was
 4 [REDACTED] is that correct?
 5 A Yes.
 6 Q What were the circumstances surrounding how he
 7 was [REDACTED]?
 8 A They say a lot of stories, like [REDACTED].
 9 They say they [REDACTED] but he got basically
 10 [REDACTED] and then the
 11 people ran.
 12 Q Where was he living at the time that he was
 13 [REDACTED] if you know?
 14 A [REDACTED].
 15 Q Do you know if Mr. [REDACTED] was in a gang?
 16 A No, I don't.
 17 Q Do you know if Jane Doe 6 was ever in a gang?
 18 A I don't believe so but I don't know everybody
 19 she knows. I live here now.
 20 Q Did Jane Doe 6 ever talk to you about her
 21 being a prostitute?
 22 A No.
 23 Q Do you know whether Jane Doe 6 ever was a
 24 prostitute?
 25 A No.

1 Q That is no you don't know one way or the
 2 other?
 3 A No, I don't know.
 4 Q Do you know whether or not Jane Doe 6 ever
 5 worked at any strip clubs and/or gentlemen's clubs?
 6 A No.
 7 Q That is no, you do not know?
 8 A No, I do not know.
 9 Q Do you know if she ever hung out at any strip
 10 clubs or gentlemen's clubs?
 11 MR. MERMELSTEIN: Objection to form.
 12 BY MR. PIKE:
 13 Q You can answer.
 14 A I don't know.
 15 Q Do you know if Jane Doe 6 was ever involved in
 16 a car accident?
 17 A I believe so, when she was younger.
 18 Q What do you know about that car accident?
 19 A I believe it was a [REDACTED] That is all I
 20 remember.
 21 Q Do you know if anybody passed away in her
 22 vehicle?
 23 A I don't know.
 24 Q Do you know if anybody came close to dying
 25 that was in her vehicle?

1 MR. MERMELSTEIN: Objection to form.
 2 THE WITNESS: I don't know.
 3 BY MR. PIKE:
 4 Q Let's talk about [REDACTED] You said you knew [REDACTED];
 5 is that correct?
 6 A I met [REDACTED].
 7 Q How did you meet [REDACTED].
 8 A Once again, just everybody knows everybody and
 9 she was hanging out one night and I met her.
 10 Q Where did you meet her?
 11 A [REDACTED] at the beach, I believe.
 12 Q How long have you known her?
 13 A I met her on my 15th birthday, I believe.
 14 Q Okay. So you have known her for, what, [REDACTED]
 15 years, approximately?
 16 A Well, I have only -- in that whole time, I
 17 have only hung out with her for maybe like three times.
 18 So that is why I don't say like she's a friend. She's
 19 just an acquaintance. I met her.
 20 Q When you hung out with her for those three
 21 times, where did you guys hang out?
 22 A We were at the beach. The other times we were
 23 just, I don't know. I know she was at Jane Doe's once.
 24 And then I don't know.
 25 Q Did you guys ever go out to clubs together?

1 A No, sir.
 2 Q Were you ever out anywhere a [REDACTED]
 3 where you saw [REDACTED] at a club?
 4 A No.
 5 Q Did you talk to [REDACTED] on the phone?
 6 A No.
 7 Q When was the last time you talked to [REDACTED]
 8 A I saw her at Wal-Mart when I was, probably,
 9 18.
 10 Q You said you saw her at Wal-Mart?
 11 A Yeah.
 12 Q I didn't hear you if you testified to this,
 13 I'm sorry. How long ago was that?
 14 A I'd say when I was 18. I went down to visit
 15 [REDACTED] and she was at Wal-Mart eating at the food
 16 court and I said, "Hi."
 17 Q Has [REDACTED] ever discussed Jeffrey Epstein with
 18 you?
 19 A No, sir.
 20 Q If I remember correctly, you said you knew
 21 that [REDACTED] was going to Jeffrey Epstein's home?
 22 A I heard Jane Doe mention it but don't know
 23 details.
 24 Q When you say "Jane Doe" you mean Jane Doe?
 25 A Yes, sir.

1 Q What did Jane Doe mention that you are
 2 talking about now?
 3 A She said that she was at the house that.
 4 Q That [REDACTED] was at Mr. Epstein's house?
 5 A Yeah.
 6 Q Have you ever discussed [REDACTED] going to
 7 Mr. Epstein's house with [REDACTED].?
 8 A No.
 9 Q What, if anything, do you know about [REDACTED]
 10 going to Mr. Epstein's home?
 11 MR. EDWARDS: Form.
 12 THE WITNESS: I don't know anything besides
 13 that she went there.
 14 BY MR. PIKE:
 15 Q Do you know whether or not she did anything of
 16 sexual in nature at Mr. Epstein's home?
 17 A I have no idea.
 18 Q I know that you said you didn't hang out with
 19 [REDACTED] that much, but I have to ask you these questions
 20 and I'll try to make them short.
 21 Did [REDACTED] discuss with you any traumatic events
 22 that happened to her at Mr. Epstein's home?
 23 A No, sir.
 24 Q Has [REDACTED] called you to discuss at all any
 25 emotional issues that she allegedly has by virtue of

1 having visited Mr. Epstein's home?
 2 A No.
 3 Q Do you know whether or not [REDACTED] worked at
 4 strip clubs?
 5 A I don't know.
 6 Q As you sit here today, your testimony is you
 7 don't know whether or not [REDACTED] ever worked as a stripper
 8 at a strip club?
 9 A I have no idea.
 10 Q Did Jane Doe ever tell you that [REDACTED] ever
 11 worked at any strip club?
 12 A No.
 13 Q Do you know whether or not [REDACTED] is an admitted
 14 prostitute?
 15 A I don't know.
 16 MR. MERMELSTEIN: Form.
 17 BY MR. PIKE:
 18 Q Do you know whether or not [REDACTED] ever sold her
 19 body for sex?
 20 MR. EDWARDS: Objection to form.
 21 THE WITNESS: I have no idea.
 22 BY MR. PIKE:
 23 Q Do you know whether or not [REDACTED] ever [REDACTED]
 24 [REDACTED] when she was [REDACTED] years old?
 25 A I have no idea.

1 MR. EDWARDS: Objection to the form of that
 2 question as well.
 3 BY MR. PIKE:
 4 Q Do you know whether or not [REDACTED] is a
 5 prostitute?
 6 A I don't know.
 7 MR. EDWARDS: Same objection.
 8 BY MR. PIKE:
 9 Q Had you ever heard that [REDACTED] as a
 10 prostitute?
 11 A No.
 12 Q Do you know who [REDACTED] is currently dating?
 13 A No.
 14 Q What else can you tell me about [REDACTED], if
 15 anything, that we haven't discussed during your
 16 deposition today?
 17 A I can say nothing because I don't talk to her.
 18 I've only hung out with her a couple times and didn't
 19 really, you know, talk-talk. Just hung out. I don't
 20 know her. I don't know anything.
 21 Q Do you know whether or not [REDACTED] currently
 22 works at a place called [REDACTED] right by
 23 [REDACTED] in [REDACTED]?
 24 A I don't know.
 25 MR. EDWARDS: Object to form.

1 BY MR. PIKE:
 2 Q Have you ever been to [REDACTED] in [REDACTED]
 3 [REDACTED]?
 4 A No, sir.
 5 Q Do you know what [REDACTED] is?
 6 A A gentlemen's club.
 7 Q Do you know that nextdoor to that gentlemen's
 8 club is a place called [REDACTED] is?
 9 A I don't even know [REDACTED] is located.
 10 Q Have you ever heard the term "jack shack"?
 11 A Yeah. Movies.
 12 Q What -- how do you understand that term?
 13 A I guess, basically, a place where you go and
 14 sell yourself.
 15 Q Do you know whether or not [REDACTED] has ever
 16 worked at any jack shacks?
 17 A No.
 18 MR. EDWARDS: Object to the form.
 19 BY MR. PIKE:
 20 Q That is no, you don't know?
 21 A No, I don't know.
 22 Q All right let's move on to [REDACTED]. You did
 23 testify earlier that you knew her, correct?
 24 A Yes.
 25 Q How do you know [REDACTED].?

1 A I met her. She lived in [REDACTED] and
 2 [REDACTED].
 3 Q And what [REDACTED] was that?
 4 A [REDACTED].
 5 Q And did you go to that [REDACTED] for [REDACTED]
 6 years?
 7 A No.
 8 Q How long did you go [REDACTED] for?
 9 A [REDACTED] years.
 10 Q And how long did [REDACTED] go to that school for?
 11 A I'm not sure.
 12 Q What [REDACTED] were you in when you first met
 13 [REDACTED].?
 14 A I was [REDACTED] I believe.
 15 Q Did you guys [REDACTED]
 16 A No.
 17 Q How did you meet her?
 18 A I met her brother and then I went to her house
 19 and met her.
 20 Q How did you meet her brother?
 21 A Just around the neighborhood, like everybody
 22 knows everybody.
 23 Q Did you ever date her brother?
 24 A No.
 25 Q Did you ever have any sexual experiences with

1 her brother?
 2 A No.
 3 Q Did you ever have any sexual experiences with
 4 [REDACTED].?
 5 A No.
 6 Q Are you aware that [REDACTED]. and [REDACTED]. are friends?
 7 A Yes.
 8 Q How are you aware of that?
 9 A Because [REDACTED]. hung out with me and then she
 10 started hanging out with [REDACTED]., and then we basically
 11 didn't talk any more. We went separate ways.
 12 Q Did [REDACTED]. ever tell you that [REDACTED]. ever worked
 13 at [REDACTED].?
 14 A No. I haven't talked to [REDACTED]. maybe since I
 15 was 15.
 16 Q And why did you stop talking to [REDACTED].?
 17 A Well, she always came to hang out with me and
 18 then, I don't know, we went our separate ways and, I
 19 don't know, we just lost contact.
 20 Q Did [REDACTED]. ever discuss whether she went to
 21 Mr. Epstein's home in Palm Beach?
 22 A No, sir.
 23 Q She never discussed that with you?
 24 A No.
 25 Q Did [REDACTED]. ever tell you that she worked at

1 [REDACTED]
 2 A No.
 3 Q How long were you friends with [REDACTED].?
 4 A Well, I have known her -- I met her when I was
 5 like [REDACTED] and we hung out for a couple of years, and then
 6 we just didn't hang out any more, so two years.
 7 Q I'm sorry?
 8 A Like two years.
 9 Q So you knew her for two years?
 10 A Yeah.
 11 Q And during that two-year period, did she ever
 12 tell you that she worked at [REDACTED].?
 13 A No.
 14 Q Did you ever come to learn at any time, even
 15 up through today's date, that she worked at [REDACTED].?
 16 A Yeah.
 17 Q How did you learn that?
 18 A Jane Doe.
 19 Q What did Jane Doe tell you about that?
 20 A She just told me she works [REDACTED].
 21 Q Did she tell you which [REDACTED].?
 22 A No.
 23 Q Did she tell you that [REDACTED]. ever worked at any
 24 jack shacks?
 25 A No.

1 MR. EDWARDS: Form.
 2 BY MR. PIKE:
 3 Q When was the last time -- I know you said you
 4 haven't spoke to [REDACTED]. in a while. When was the last
 5 time you spoke to her?
 6 A I talked to her, I would say, maybe two years
 7 ago on the phone. She was with Jane Doe, I believe, and
 8 I just said "Hi" you know, caught up and asked how we
 9 were doing and that was it.
 10 Q Did she tell you what she was up to workwise
 11 in that telephone call?
 12 A No.
 13 Q How long did that telephone call last?
 14 A I would say maybe five, 10 minutes. I was at
 15 a store, I had to go.
 16 Q How did you learn or did you ever learn that
 17 [REDACTED]. went over to her home in [REDACTED].?
 18 A Basically you told me. I had no idea.
 19 Q So you had no idea -- you had no idea up until
 20 today's date?
 21 A Yes, no idea.
 22 Q Did Jane Doe or anyone ever tell you that [REDACTED].
 23 had some sort of experience with Mr. Epstein?
 24 A No.
 25 Q Did anyone ever tell you that [REDACTED]. ever gave

1 Mr. Epstein massages in exchange for money?
 2 A No.
 3 Q Do you know whether or not, during the time
 4 that you were friends with [REDACTED]. that she ever used
 5 drugs?
 6 A Marijuana.
 7 Q And how old was she when she was using
 8 marijuana?
 9 A 15, 14.
 10 Q Do you know whether or not she used marijuana
 11 on a weekly basis or on a daily basis during that time?
 12 A I think it was just like a weekend thing.
 13 Q Do you know whether or not she ever did
 14 Ecstasy?
 15 A I have no idea.
 16 Q What about [REDACTED]., do you know whether or not
 17 she did Ecstasy?
 18 A I have no idea.
 19 Q And Jane Doe 6, do you know whether or not she
 20 ever did Ecstasy?
 21 A I don't think so.
 22 Q Other than marijuana, are you aware at any
 23 time, even up until today's date, whether or not [REDACTED].
 24 used any other drugs?
 25 A No.

1 Q No, you are not aware?
 2 A No, I don't know. I'm not aware.
 3 Q The last time you spoke with [REDACTED], which was
 4 approximately two years ago, did she discuss whether or
 5 not she was experiencing any emotional or traumatic
 6 experiences in her life?
 7 A No, sir.
 8 Q Give me one second.
 9 A Okay.
 10 Q Did [REDACTED] ever ask you to go to Mr. Epstein's
 11 home?
 12 A No.
 13 Q Were you ever asked by anyone to go to
 14 Mr. Epstein's home?
 15 A Yes, by Jane Doe.
 16 Q And was [REDACTED] around at the time that Jane Doe
 17 asked you that?
 18 A No.
 19 Q Did [REDACTED] ever attempt to persuade you in any
 20 way to go to Mr. Epstein's home?
 21 A No.
 22 Q Let's talk about Jane Doe. When was the first
 23 time you came to know Jane Doe?
 24 A [REDACTED]
 25 Q Did you guys live close to each other?

1 A [REDACTED]
 2 Q Would you consider yourselves to be best
 3 friends?
 4 A We were.
 5 Q So how long were you best friends?
 6 A Since I was [REDACTED] and then I moved here and we
 7 just don't talk too much any more. We don't talk any
 8 more.
 9 Q So is it a fair statement that you were best
 10 friends for approximately [REDACTED] years?
 11 A Yes.
 12 Q And that would be approximately from the time
 13 that you both were [REDACTED] up until the time that you were
 14 about [REDACTED]
 15 A Yeah. I would say [REDACTED]
 16 Q And why aren't you best friends today?
 17 A Well, I would consider her my best friend but
 18 then we went separate ways. I moved here and I just
 19 haven't talked to her. Since I've moved here I have
 20 only talked to her a couple of times.
 21 Q I want to talk a little bit about Jane Doe and
 22 her childhood. What traumatic experiences are you aware
 23 of that she experienced in her childhood?
 24 MR. EDWARDS: I object to the form of the
 25 question.

1 BY MR. PIKE:
 2 Q You can answer.
 3 A Oh. [REDACTED]
 4 Q And are you aware as to why [REDACTED]
 5 A [REDACTED] or something along
 6 those lines.
 7 Q Now, are you aware as to whether or not he was
 8 [REDACTED]
 9 A I think so.
 10 Q And do you know the circumstances surrounding
 11 [REDACTED]?
 12 A No.
 13 Q Do you know whether or not Jane Doe witnessed
 14 anything related to that [REDACTED]
 15 [REDACTED]
 16 A I believe she was there when it happened.
 17 Q What, to your knowledge, happened?
 18 A I heard that a [REDACTED] and she
 19 woke up and he was [REDACTED]
 20 Q And who was that [REDACTED], relative to
 21 Jane Doe?
 22 A [REDACTED]
 23 Q Do you know whether or not her [REDACTED]
 24 [REDACTED]
 25 A I don't know.

1 Q Do you know what -- did Jane Doe ever tell you
 2 that her [REDACTED]
 3 [REDACTED]
 4 A No.
 5 Q Do you know whether or not Jane Doe gave any
 6 depositions related to her [REDACTED]
 7 [REDACTED]?
 8 A I think so.
 9 Q Do you know whether or not she lied for her
 10 [REDACTED] in deposition?
 11 A I don't know.
 12 Q Did she ever tell you that she lied for her
 13 [REDACTED] in those depositions?
 14 A No, sir.
 15 Q Do you know how old the [REDACTED] was that
 16 [REDACTED]
 17 A [REDACTED] I don't know. I'm not sure.
 18 Q You testified that [REDACTED], as a
 19 result of this incident, as we speak today, correct?
 20 A Yes.
 21 Q Do you know whether or not Jane Doe has a
 22 relationship with her [REDACTED] today?
 23 A I don't know.
 24 Q Do you know whether or not she has gone to
 25 visit [REDACTED] in the last two years?

1 A No.
 2 Q No, she has not or no you don't know?
 3 A No, I don't know.
 4 Q Do you know whether or not her [REDACTED] was ever
 5 [REDACTED]
 6 A I don't know. I think so but I don't know for
 7 sure.
 8 Q Do you know, as you sit here today, what her
 9 [REDACTED] may have been [REDACTED]
 10 A No.
 11 Q Do you know whether or not Jane Doe has a
 12 relationship with her father?
 13 A No.
 14 Q Do you know whether or not her father ever
 15 [REDACTED]
 16 A I don't know.
 17 Q Did Jane Doe ever discuss with you her
 18 father's [REDACTED]?
 19 A No.
 20 Q Did Jane Doe ever discuss with you her
 21 father's [REDACTED]
 22 A No.
 23 Q Do you know a gentleman by the name of [REDACTED]
 24 [REDACTED]
 25 A Yes.

1 Q Who is that?
 2 A Her ex-boyfriend.
 3 Q Do you know how long they dated for?
 4 A I would say over a year.
 5 Q And how old was Jane Doe when she started
 6 dating Mr. [REDACTED]?
 7 A I would say 16 -- no, 16, 17, maybe, yeah.
 8 16, 17.
 9 Q Do you know whether or not she had intercourse
 10 with Mr. [REDACTED] during the time that she was dating
 11 him?
 12 A Yes.
 13 Q The answer is, yes, she did have intercourse?
 14 A Yes.
 15 Q Do you know whether or not she ever gave oral
 16 sex to Mr. [REDACTED]?
 17 A I don't know.
 18 Q Did she ever discuss that with you?
 19 A No.
 20 Q Do you know whether or not Mr. [REDACTED] ever
 21 performed oral sex on her?
 22 A I don't know.
 23 Q Did she ever discuss that with you?
 24 A No.
 25 Q Who else are you aware -- actually, let's back

1 up. Did you ever witness any verbal or physical
 2 altercations between Mr. [REDACTED] and Jane Doe?
 3 A No.
 4 Q Do you know whether or not Mr. [REDACTED] ever
 5 [REDACTED] Jane Doe?
 6 A No, I don't know.
 7 Q What other gentleman are you aware of that
 8 Ms. Jane Doe dated, from age 13 up until today's date?
 9 A Umm.
 10 Q Let's start from the age 13 and move forward.
 11 A Wow. Well, she dated -- I don't know. The
 12 people she dated was only for a little and I didn't
 13 even -- I don't know. Let's see. She dated. Oh, she
 14 dated [REDACTED]
 15 Q How long did she date him for?
 16 A Not too long, couple months.
 17 Q How old was she when she was dating
 18 Mr. [REDACTED]?
 19 A 14, 13.
 20 Q Did she have intercourse with Mr. [REDACTED]?
 21 A Yes.
 22 Q Do you know how many times she had intercourse
 23 with Mr. [REDACTED]?
 24 A No.
 25 Q Do you know how many times she had intercourse

1 with Mr. [REDACTED]?
 2 A No.
 3 Q Do you know whether or not she performed oral
 4 sex on Mr. [REDACTED]?
 5 A I don't know.
 6 Q Do you know whether or not he performed oral
 7 sex on her?
 8 A I don't know.
 9 Q How did you become aware that Jane Doe had
 10 intercourse with Mr. [REDACTED] and Mr. [REDACTED]?
 11 A She told me but that's about it. No details.
 12 Q As you sit here today, do you know whether or
 13 not she had intercourse with Mr. [REDACTED] more than five
 14 times?
 15 A Probably.
 16 Q And, as you sit here today, do you know
 17 whether or not she had sexual intercourse with
 18 Mr. [REDACTED] more than five times?
 19 A Probably.
 20 Q Do you know whether or not she did any drugs
 21 with Mr. [REDACTED] and Mr. [REDACTED]?
 22 MR. EDWARDS: Object to form.
 23 THE WITNESS: Marijuana.
 24 BY MR. PIKE:
 25 Q So your testimony is that you have seen her do

1 marijuana with Mr. [REDACTED] and Mr. [REDACTED]?
 2 A Yeah.
 3 MR. EDWARDS: Object to the form.
 4 BY MR. PIKE:
 5 Q Let me rephrase the question. Have you seen
 6 Jane Doe do marijuana with Mr. [REDACTED] and Mr. [REDACTED]?
 7 A Yes.
 8 Q And how old was she, approximately, when you
 9 witnessed these events?
 10 A 14 and 16, roughly, yeah. 14, 16.
 11 Q So we've talked about Mr. [REDACTED] and
 12 Mr. [REDACTED]?
 13 A Uh-huh.
 14 Q I want you to think a bit and tell me who else
 15 you can recall that Jane Doe dated?
 16 A Some kid named [REDACTED]. That was a long time
 17 ago and that only lasted for a little while.
 18 Q Do you know whether or not she had sexual
 19 intercourse with [REDACTED]?
 20 A No, I don't know.
 21 Q How long ago was it that she dated Mr. [REDACTED]?
 22 A 15. She was 15.
 23 Q Do you know how long she dated Mr. [REDACTED] for?
 24 A Not long at all.
 25 Q Do you know [REDACTED] last name?

1 A No idea. Don't even know his real first name.
 2 Q I figured that. Do you know who Jane Doe is
 3 currently dating?
 4 A Somebody named [REDACTED].
 5 Q Is that his real name?
 6 A I have no idea.
 7 Q Do you know whether or not they live together?
 8 A I think so, yes.
 9 Q Where does Jane Doe currently live, to your
 10 knowledge?
 11 A [REDACTED]
 12 Q Do you know whether or not she still lives
 13 with [REDACTED]?
 14 A Yes.
 15 Q And does Mr. [REDACTED] live there with them in that
 16 residence?
 17 A I'm not positive but as far as I know.
 18 Q How did she meet Mr. [REDACTED]?
 19 A No idea.
 20 Q Do you know whether or not Mr. [REDACTED] has
 21 been -- has ever been [REDACTED]
 22 [REDACTED]?
 23 A I have no idea.
 24 Q Does Jane Doe ever tell you that Mr. [REDACTED] was
 25 [REDACTED]?

1 A No.
 2 MR. EDWARDS: Object to form.
 3 MR. PIKE: For the record, if the form is I
 4 don't mean [REDACTED].
 5 THE WITNESS: Yeah. No. Since she's been
 6 with [REDACTED], I haven't talked to her.
 7 BY MR. PIKE:
 8 Q And how long has it been since you've last
 9 spoken to Jane Doe?
 10 A I saw her when [REDACTED]
 11 [REDACTED]
 12 Q Do you know whether or not Jane Doe ever [REDACTED]
 13 [REDACTED]
 14 A Yes.
 15 Q And how old was she when she [REDACTED]?
 16 A The time I know about, I think, she was [REDACTED]
 17 Q Okay. And what were the reasons why she [REDACTED]
 18 [REDACTED] to your knowledge?
 19 A I think they were [REDACTED]
 20 Q What do you mean by that?
 21 A I don't know. [REDACTED]
 22 [REDACTED]
 23 Q And when you say "they," who do you mean?
 24 A [REDACTED]
 25 Q And do you know why they were trying to [REDACTED]

1 [REDACTED], in your words?
 2 A No.
 3 Q Have you ever heard of the term [REDACTED]?
 4 A Yes.
 5 Q Were they trying to [REDACTED]?
 6 A I not sure. Might have, but I don't know. I
 7 was young too so I just -- I don't know.
 8 Q And do you know, when she [REDACTED]
 9 [REDACTED]?
 10 A She came to [REDACTED]
 11 Q And at that time were both of your parents
 12 [REDACTED] or was it just one parent?
 13 A It was just [REDACTED] and she didn't know the
 14 situation.
 15 Q Did Jane Doe ever [REDACTED] for a
 16 period of time?
 17 A I mean, you could say [REDACTED]
 18 [REDACTED]. We were just always together.
 19 Q Let me try -- was there a time that she ever
 20 [REDACTED] due
 21 to her [REDACTED]?
 22 A I would say a couple of days [REDACTED] with
 23 me.
 24 Q At the time that you testified that her
 25 parents were [REDACTED], do you know whether

1 or not she was doing drugs or alcohol?
 2 A I don't think it was her parents trying to [REDACTED]
 3 [REDACTED]. I think it was [REDACTED]. But I don't think
 4 so. Maybe, if it was, marijuana.
 5 Q Do you know whether or not Jane Doe was ever
 6 arrested at any time?
 7 A I think [REDACTED]
 8 Q What was she arrested for?
 9 A I think [REDACTED] she said.
 10 Q Do you know what she [REDACTED]
 11 A No.
 12 Q Do you know whether or not Jane Doe was ever
 13 arrested for [REDACTED]?
 14 A No.
 15 Q Do you know whether or not Jane Doe ever [REDACTED]
 16 [REDACTED]?
 17 A Oh, yes. Yes.
 18 Q How many times?
 19 A [REDACTED]
 20 Q And was she arrested for that?
 21 A I believe so, now that you mention it.
 22 Q So there is another arrest that you weren't
 23 aware of, correct?
 24 A Well, now that you bring it up I'd say yes, I
 25 was aware of it, but I didn't even remember that.

1 Q You understand you are under oath today,
 2 correct?
 3 A Yes, sir.
 4 Q And that oath is for you to tell the truth?
 5 A Yes.
 6 Q So I'm going to ask you a question. I want
 7 you to take some time and think about this question.
 8 As you sit here today, having known Jane Doe
 9 from the time that you were 13 up until today's date,
 10 other than the two arrests that we have just discussed,
 11 are you aware and do you recall any other arrests?
 12 A No, sir.
 13 Q Are you aware whether or not Jane Doe ever
 14 worked at [REDACTED]?
 15 A Yes.
 16 Q What [REDACTED] are you aware of that she
 17 worked at?
 18 A [REDACTED].
 19 Q What others?
 20 A I don't know.
 21 Q But you are aware that there were other [REDACTED]
 22 [REDACTED] but you don't know the names; is that correct?
 23 A I think one other one but I don't know the
 24 name.
 25 Q Okay. Did Jane Doe tell you that she gave men

1 hand jobs for money [REDACTED]?
 2 A No, sir.
 3 Q Have you ever heard of the term of the
 4 [REDACTED]?
 5 A I have heard the term, yes.
 6 Q Do you know whether or not Jane Doe worked in
 7 a [REDACTED]?
 8 A I don't know.
 9 Q Have you ever heard the term [REDACTED]?
 10 A No.
 11 Q Have you ever heard the term [REDACTED]?
 12 A Yes.
 13 Q Do you know whether or not Jane Doe ever gave
 14 [REDACTED] to men in exchange for money?
 15 A I don't know.
 16 Q She never told you?
 17 A No.
 18 Q Okay. What did Jane Doe discuss with you
 19 about working at these two s [REDACTED], that you are
 20 aware of?
 21 A All she said is she works there. I don't talk
 22 to her much at all. I say, "Hey, what are you doing?"
 23 She says, "Hey, I work here," and I leave it like that
 24 because I don't want to know the details.
 25 Q Would she tell you how much money she made?

1 A No.
 2 Q Did she ever tell you that she sold her body
 3 for sex?
 4 A No.
 5 Q Back when you were 14 to 17, who did Jane Doe
 6 live with?
 7 A [REDACTED]
 8 Q And where was her [REDACTED] to your knowledge,
 9 at this time period?
 10 A At her house.
 11 Q When you say "her house" do you mean the
 12 [REDACTED] house or a separate home?
 13 A No. A separate home.
 14 Q Why did Jane Doe and her [REDACTED] live apart?
 15 A They have never got along. I'm not sure the
 16 reason why they -- she left but they have never got
 17 along, basically.
 18 Q Do you know whether or not Jane Doe has a [REDACTED]
 19 [REDACTED]?
 20 A No.
 21 Q Do you know whether or not [REDACTED] is
 22 married?
 23 A Oh, wait. Yes. I don't know if she's married
 24 but it's a guy named [REDACTED] if I'm correct with the name.
 25 Q Okay. Do you know whether or not [REDACTED] and Jane

1 Doe had a relationship, good relationship?
 2 A I don't think they got along either.
 3 Q Do you know why?
 4 A No. I think he was just a mean guy.
 5 Q Did he ever do anything mean to Jane Doe?
 6 MR. EDWARDS: Object to the form.
 7 BY MR. PIKE:
 8 Q You said he was a mean guy, so I just want to
 9 know did he ever do anything mean to Jane Doe, to your
 10 knowledge?
 11 A No. Maybe just be an ass. Sorry for my
 12 language.
 13 Q Have you ever witnessed any altercations
 14 between Jane Doe and her mother --
 15 A No.
 16 Q -- between the ages of 13 and 17?
 17 A No.
 18 Q Do you know whether or not Jane Doe ever
 19 kicked [REDACTED]?
 20 A No.
 21 Q Have you ever seen Jane Doe physically hurt
 22 [REDACTED]?
 23 A No.
 24 Q Have you ever seen Jane Doe physically touch
 25 [REDACTED] in an aggressive manner?

1 A No.
 2 Q Have you ever known Jane Doe to do drugs in
 3 [REDACTED] home?
 4 A No.
 5 Q As you sit here today, your testimony is that
 6 you do not know that Jane Doe has ever done drugs in her
 7 [REDACTED] home?
 8 A Well, marijuana. And that was when we were
 9 like 15 -- no, not even 15. 14, 13.
 10 Q How many times?
 11 A I don't know. More than once. Like four
 12 times, couple times.
 13 Q And who was with you guys at the time you were
 14 doing marijuana? That is, who else was doing it with
 15 you, if anyone?
 16 A It was just us.
 17 Q And back in those days, where would you
 18 purchase the marijuana?
 19 A I don't know. She got it.
 20 Q Do you have any idea where she got it from?
 21 A No. We would just hang out after school.
 22 Q Do you know whether or not her [REDACTED]
 23 did not want her around because she worked at [REDACTED]
 24 [REDACTED] and did drugs?
 25 A No. When -- last time I even heard about [REDACTED]

1 we were like 14, 15 and -- yeah.
 2 Q Hold on one second, please.
 3 I want to backtrack a little bit. We talked
 4 about Mr. [REDACTED] and Mr. [REDACTED] and we talked about
 5 [REDACTED] and we talked about [REDACTED]?
 6 A Uh-huh.
 7 Q Having discussed them today, are you aware of
 8 anyone else that she's dated?
 9 A Off the top of my head, I can't think of
 10 anybody right now. I'm thinking but she was with --
 11 yeah, I think after -- yeah, after [REDACTED] she was still
 12 dating him when I moved to [REDACTED]
 13 Q And do you know whether or not Mr. [REDACTED] was
 14 verbally and physically abusive to her?
 15 A I don't know.
 16 MR. EDWARDS: Objection; form.
 17 BY MR. PIKE:
 18 Q You don't know?
 19 A I don't know.
 20 Q Do you know whether or not Jane Doe has ever
 21 tried cocaine?
 22 A I think -- yeah.
 23 Q Do you know whether or not she's ever tried
 24 Ecstasy?
 25 A Yes.

1 Q Do you know whether or not she's ever tried
 2 pain pills?
 3 A No.
 4 Q Do you know whether or not she's ever tried
 5 methamphetamines?
 6 A No.
 7 Q How do you know she tried cocaine?
 8 A She told me.
 9 Q How many times?
 10 A I'm not sure. Maybe a couple. I don't know.
 11 We were young. I don't know.
 12 Q Do you know how many times she tried Ecstasy?
 13 A I don't know.
 14 Q Were you with her when she tried Ecstasy?
 15 A Yeah.
 16 Q All right. Where were you guys?
 17 A Well, we were hanging outside and then we went
 18 to my house.
 19 Q So you guys were doing Ecstasy outside and at
 20 your house?
 21 A Yeah.
 22 Q How many times did you do Ecstasy with her?
 23 A A couple.
 24 Q Did you guys ever go to any raves?
 25 A No.

1 Q Where did you do Ecstasy?
 2 A We would take it and then we would go inside
 3 and hide from my mother.
 4 Q Did you purchase the Ecstasy?
 5 A No.
 6 Q Who got the Ecstasy for you?
 7 A I'm not even sure.
 8 Q Did Jane Doe get it?
 9 A I don't know. Maybe. I don't know how we got
 10 it.
 11 Q Do you know whether or not Jane Doe has ever
 12 done acid?
 13 A I don't think so.
 14 Q Do you know whether or not Jane Doe's [REDACTED]
 15 was a serious drug user?
 16 A I heard [REDACTED] did drugs.
 17 MR. EDWARDS: Form.
 18 BY MR. PIKE:
 19 Q Let me rephrase the question. Do you know
 20 whether or not Jane Doe's [REDACTED] ever did drugs?
 21 A Yeah.
 22 Q What do you know about that?
 23 A I think Jane Doe said [REDACTED].
 24 Q Do you know for how long [REDACTED]
 25 [REDACTED]

1 A I'm not sure.
 2 Q What is her [REDACTED] name?
 3 A Oh, my gosh, I can't even think of it right
 4 now.
 5 Q Is it [REDACTED]?
 6 A Yes.
 7 Q Do you know whether or not Jane Doe was ever
 8 forcibly taken from her home by her [REDACTED]
 9 A I have no idea.
 10 Q Did you know whether or not her mother and her
 11 father had several physical fights in front of Jane Doe?
 12 A No.
 13 Q Do you know whether or not there was any
 14 [REDACTED] in Jane Doe's home?
 15 A No, I don't know.
 16 Q Do you know whether or not there was ever an
 17 incident back in [REDACTED] where [REDACTED] or Jane Doe threatened
 18 to, quote, [REDACTED] that
 19 she currently lived in?
 20 A No, I have no idea.
 21 Q Do you know Jane Doe's [REDACTED] name?
 22 A [REDACTED]
 23 Q And the [REDACTED] as his
 24 name [REDACTED]
 25 A I believe so.

1 Q Do you know where [REDACTED] What
 2 I mean by that is state and county or just the county?
 3 A I just know [REDACTED]
 4 Q Do you know how old Jane Doe was at the time
 5 she [REDACTED]
 6 A Younger than [REDACTED]
 7 Q Did she ever discuss that with you?
 8 A She said she woke up and [REDACTED]
 9 and that's all I know.
 10 Q Do you know whether or not that was
 11 psychologically impacting for her?
 12 MR. EDWARDS: Object to form.
 13 THE WITNESS: Probably.
 14 BY MR. PIKE:
 15 Q And, once again, I'm just going to ask the
 16 question. Did she ever discuss the incident with you at
 17 all?
 18 A Yeah.
 19 Q And what did she discuss with you separate and
 20 apart from telling you that she woke up and [REDACTED]
 21 [REDACTED] there?
 22 A Oh, well that's it. She said she woke up and
 23 there was a [REDACTED]
 24 and said "Oh, my gosh, look" or something and she looked
 25 up and saw [REDACTED]

1 Q Is that it?
 2 A Yes, sir.
 3 Q Let me ask you this question. Did she ever
 4 tell you that that [REDACTED] was [REDACTED]
 5 [REDACTED] and that her [REDACTED] was
 6 becoming angry as a result of that?
 7 A No.
 8 Q Did Jane Doe ever tell you that she saw that
 9 [REDACTED] was not [REDACTED] that evening and that
 10 she went to her [REDACTED] to tell him the
 11 same?
 12 A No.
 13 Q Did Jane Doe ever discuss with you the taped
 14 statement that she gave to [REDACTED] in or around [REDACTED]
 15 A No, sir.
 16 Q Do you know whether or not Jane Doe ever
 17 testified that her [REDACTED]
 18 A I know she testified but I have no idea what
 19 happened.
 20 Q Do you know whether or not her [REDACTED] ever
 21 [REDACTED] regularly?
 22 A No, I don't know.
 23 Q Did Jane Doe ever tell you that her [REDACTED]
 24 [REDACTED]?
 25 A No.

1 Q You testified earlier that you know of the
 2 name Jeffrey Epstein, correct?
 3 A Yes.
 4 Q And do you know whether or not Jane Doe had
 5 any dealings with Mr. Epstein?
 6 A Yeah.
 7 Q And what are you aware of?
 8 A I'm aware that she went to his house by taxi
 9 and went there and massaged him naked for money.
 10 Q And when you say she was naked, can you
 11 explain that for me? And what I mean is did she have
 12 her panties on and her bra off or everything off?
 13 A I heard everything.
 14 MR. EDWARDS: Object to the form of the
 15 question.
 16 BY MR. PIKE:
 17 Q You can answer. What do you mean by "naked"?
 18 A No clothes.
 19 Q What else did she, Jane Doe, tell you about
 20 having gone to Mr. Epstein's house?
 21 A That there were other girls there and that's
 22 it.
 23 Q Did Jane Doe tell you how many times she went
 24 to Mr. Epstein's home?
 25 A I don't know. All I know of is like two

1 times, three times.
 2 Q And other than giving him a massage, did Jane
 3 Doe say she would do anything else for Mr. Epstein?
 4 A No, sir.
 5 MR. EDWARDS: Object to the form.
 6 THE WITNESS: No, sir.
 7 BY MR. PIKE:
 8 Q Did Jane Doe ever tell you that Mr. Epstein
 9 forced her to do anything inappropriate?
 10 A No, sir.
 11 MR. EDWARDS: Object to the form.
 12 MR. PIKE: You didn't like that answer, did
 13 you, Brad?
 14 MR. EDWARDS: I didn't like your question.
 15 BY MR. PIKE:
 16 Q Did Jane Doe ever tell you that Mr. Epstein
 17 forced her to do anything?
 18 A No.
 19 Q Did Jane Doe tell you that she gave
 20 Mr. Epstein a massage in exchange for money?
 21 A Yes.
 22 Q What did she tell you, just that?
 23 A Yes.
 24 Q Do you know how much she claims Mr. Epstein
 25 gave you?

1 A No, sir.
 2 Q Did she seem happy about receiving the money?
 3 A I don't know. I don't even think I was there
 4 when -- she wasn't even around when she got the money.
 5 I have never even physically seen money.
 6 Q Did she ever seem upset about going
 7 Mr. Epstein's home?
 8 A Well, she wasn't with me when she went. She
 9 just told me, so I wasn't even around her.
 10 Q When she told you, did she seem upset?
 11 A Maybe a little, but I don't know. She just
 12 told me she went and that's it.
 13 Q Was she crying when she told you this?
 14 A No.
 15 Q Did she ever seem emotionally disturbed as a
 16 result of going to Mr. Epstein's home, to your
 17 knowledge?
 18 A Not to my knowledge.
 19 Q Did she seem to be under any emotional
 20 distress as a result of going to Mr. Epstein's home?
 21 MR. EDWARDS: Object to form.
 22 THE WITNESS: Not to my knowledge.
 23 BY MR. PIKE:
 24 Q Do you know whether or not Jane Doe attempted
 25 to recruit other girls to allegedly go to Mr. Epstein's

1 home?
 2 A She asked me and that is all I know.
 3 Q And at that time you were her best friend,
 4 correct?
 5 A Correct.
 6 Q And what did you say when she asked you to go
 7 to Mr. Epstein's home.
 8 A Absolutely not.
 9 Q Okay. And why did you make that decision?
 10 A Because I would never do that or put myself in
 11 a position to do anything like that.
 12 Q Did she tell you what she did for Mr. Epstein
 13 when she made this offer for you to go to his home?
 14 A Yeah, I knew the circumstances.
 15 Q Explain to me how you understood the
 16 circumstances at that time?
 17 A Well, she told me she would massage him naked
 18 and I said, "I'm never going. I would never do that."
 19 Q Did she ever say that she touched his penis?
 20 A No.
 21 Q And where would she massage him, to your
 22 knowledge?
 23 A In a room.
 24 Q In a room?
 25 A Yeah.

1 Q What body parts did she touch, to your
 2 knowledge, if at all?
 3 A I don't know if she touched anything. I don't
 4 know anything like that.
 5 Q So, to your knowledge, the massage was just a
 6 regular massage but naked?
 7 A Yes. To my knowledge, yes.
 8 Q Do you know whether or not Mr. Epstein ever
 9 touched her in a sexual nature?
 10 A I have no idea.
 11 Q Did she ever tell you that Mr. Epstein
 12 masturbated during any one of these alleged massages?
 13 A Yes.
 14 Q What did she tell you?
 15 A She said he masturbated while she massaged him
 16 or something.
 17 Q And when she told you this, was she laughing?
 18 A No.
 19 Q Was she crying?
 20 A No.
 21 Q Did she seem depressed?
 22 A No.
 23 Q How much money did she tell you she received
 24 as a result of this massage?
 25 A She never told me money amount.

1 Q So when she told you that she would give
 2 Mr. Epstein a massage naked and she invited you to come
 3 with her, she didn't tell you how much money you could
 4 make?
 5 A No, because I basically wanted to end the
 6 conversation because I don't want to hear about that.
 7 Q Do you know whether or not Jane Doe recruited
 8 any other girls?
 9 A I don't know.
 10 Q Do you know whether or not Jane Doe and [REDACTED]
 11 worked at the same [REDACTED]
 12 A I don't know.
 13 Q Do you know whether or not Jane Doe's drug use
 14 affected her memory?
 15 A I don't know.
 16 Q I'll have you assume that Jane Doe testified
 17 that she [REDACTED] on an every-day basis. Does that
 18 refresh your recollection as to whether or not Jane Doe
 19 was [REDACTED] on an every-day basis?
 20 MR. EDWARDS: Object to the form as it
 21 completely mischaracterizes the witness' testimony.
 22 If this witness is going to be basing her answer on
 23 a hypothetical then I'm going to object to all of
 24 those questions.
 25 BY MR. PIKE:

1 Q You can answer the question, if you recall.
 2 A I don't know about every day. I don't know
 3 about every day.
 4 Q What about every other day, do you have any
 5 knowledge as to that?
 6 A No.
 7 Q Have you ever done cocaine with Jane Doe?
 8 A Yes.
 9 Q And where did you do cocaine with Jane Doe
 10 venue-wise? Where was the location?
 11 A My house hiding from my mother.
 12 Q And did you ever do cocaine with Jane Doe at
 13 Jane Doe's [REDACTED] house?
 14 A No, sir.
 15 Q How many times did you do cocaine with Jane
 16 Doe?
 17 A I don't know. More than once.
 18 Q More than five times?
 19 A No. She stopped. She didn't like it anymore.
 20 Q After she stopped using cocaine, what other
 21 drugs, if any, did she continue to use?
 22 A I don't think any. Just marijuana, I think,
 23 if that.
 24 Q Did she ever tell you that Mr. Epstein
 25 threatened or intimidated her for any reason?

1 A No, sir.
 2 Q Did she ever tell you that Mr. Epstein forced
 3 her to do anything?
 4 A No.
 5 Q When she discussed having you potentially come
 6 over to Mr. Epstein's home, did she tell you you would
 7 have to lie about your age?
 8 A No.
 9 Q Did she discuss anything about your quote,
 10 age?
 11 A No.
 12 Q Do you know whether or not Jane Doe was seeing
 13 a psychologist or a counselor between the ages of [REDACTED] and
 14 today's date?
 15 A Maybe a counselor, but I don't know.
 16 Q Have you ever heard the term [REDACTED]
 17 [REDACTED]?
 18 A Yes.
 19 Q How did you come to learn about that term?
 20 A TV, just learning it.
 21 Q Did Jane Doe ever tell you that she suffered
 22 from [REDACTED]?
 23 A No.
 24 Q Did Jane Doe ever tell you that she had any
 25 emotional disorders?

1 A No.
 2 Q Did Jane Doe ever tell you that she had any
 3 emotional problems?
 4 A I mean, her life has been crazy. Her whole
 5 life, so --
 6 Q And what do you mean by that, if you could be
 7 a little more specific?
 8 A I mean, just her growing up and then the stuff
 9 with her [redacted] going on and [redacted] has nothing to do
 10 with her. The only person that cares for her is her
 11 [redacted], so, I don't know.
 12 Q Have you known Jane Doe since you were [redacted]?
 13 A Yes.
 14 Q Did you see any emotional change or emotional
 15 distress after you learned that Jane Doe was going to
 16 Mr. Epstein's home?
 17 A No.
 18 Q Do you know whether or not Jane Doe worked at
 19 a [redacted] called [redacted]?
 20 A I believe she might have mentioned that one,
 21 the [redacted] kind of rings a bell but I'm not sure.
 22 Q Do you know whether or not she ever worked at
 23 [redacted]?
 24 A I have no idea.
 25 Q What about [redacted]?

1 A I have no idea.
 2 Q What about [redacted]?
 3 A No idea. The only one I know is like [redacted].
 4 [redacted]
 5 Q Do you know whether or not Jane Doe's uncle
 6 took her to Mr. Epstein's home?
 7 A I have no idea.
 8 Q You said that you learned that Jane Doe went
 9 to Mr. Epstein's home by cab?
 10 A Yes.
 11 Q How did you learn that?
 12 A She told me.
 13 Q And did she tell you how many times she went
 14 to Mr. Epstein's home by cab?
 15 A No, sir.
 16 Q Do you know whether or not it was ever
 17 reported to the police that Jane Doe [redacted]
 18 [redacted]? Does that refresh your recollection?
 19 [redacted]
 20 A I have no idea.
 21 Q Do you know whether or not Jane Doe was ever
 22 [redacted]?
 23 A No.
 24 Q Other than the individuals we've discussed
 25 today, are you aware of anyone else that allegedly went

1 to Mr. Epstein's home?
 2 A No, sir.
 3 Q Give me one second. When was the last time
 4 you talked to Jane Doe?
 5 A Last time I talked to her is when somebody
 6 came to serve me these papers and I was in [redacted] and
 7 I called her and I asked why they were giving me papers.
 8 Q And what did she tell you?
 9 A She told me because I was her friend and they
 10 wanted to ask me questions.
 11 Q Have you ever been contacted by any
 12 investigators to discuss this matter?
 13 A No, sir.
 14 Q Have you been contacted by any lawyers at any
 15 time to discuss this matter?
 16 A No.
 17 Q Has Mr. Edwards ever talked with you over the
 18 phone or in person?
 19 A No.
 20 Q Has anyone by the name of Stuart Mermelstein,
 21 Adam Horowitz or Jessica Arbor (phonetic) ever talked to
 22 you over the phone or face to face?
 23 A No.
 24 Q Tell me exactly -- understanding that you're
 25 under oath, tell me exactly, ma'am, what Jane Doe talked

1 with you about relative to this case at any time?
 2 A Okay. She told me she would get in a cab and
 3 go to Palm Beach. There would be other girls at the
 4 house, and she would go in a room and massage him naked
 5 and he would give her money and she would leave. And
 6 that's all I know.
 7 Q Did she tell you that she filed a lawsuit
 8 against Mr. Epstein?
 9 A Yes.
 10 Q What did she tell you about that?
 11 A That's it. Just ended it right there at that.
 12 Q Did she tell you that she wanted to file a
 13 lawsuit or that she was convinced by lawyers to file a
 14 lawsuit?
 15 A She just said there was a lawsuit and that's
 16 all I know. Like I haven't talk to her.
 17 Q Have you talked to anyone, other than Jane Doe
 18 about this lawsuit?
 19 A I briefly scanned over to my family but not
 20 giving details, just because they asked why I was
 21 getting served papers.
 22 Q Let's talk about you for a minute. Have you
 23 ever been arrested?
 24 A No, sir.
 25 Q Have you ever been charged with a crime?

1 A No.
 2 Q Have you ever been detained by a police
 3 officer?
 4 A No, sir.
 5 Q Have you ever worked at any strip clubs?
 6 A No.
 7 Q What about jack shacks?
 8 A No.
 9 Q Have you ever sold your body for sex?
 10 A No.
 11 Q Has anyone offered you any money in this case
 12 relative to your testimony today?
 13 A No. Well, I have a \$45 witness fee. That's
 14 it.
 15 Q Thank you.
 16 A I just looked over to that.
 17 Q When you spoke to Jane Doe 6, did Jane Doe 6
 18 tell you that she was assaulted or humiliated by
 19 Jeffrey Epstein?
 20 MR. MERMELSTEIN: Objection to form.
 21 THE WITNESS: No.
 22 BY MR. PIKE:
 23 Q Did she ever tell you that?
 24 A No.
 25 Q Give me one second.

1 A Okay.
 2 Q Let me ask you this: What was -- if you
 3 recall, what was Jane Doe's reputation in high school?
 4 A She never went to high school with me.
 5 Q Do you know what her reputation was though?
 6 A No.
 7 Q Was she ever referred to as a girl that was
 8 easy to get sex from?
 9 A No.
 10 Q What about Jane Doe 6?
 11 A No.
 12 Q What about [REDACTED]?
 13 A I don't know. I don't even know her but no, I
 14 haven't heard anything.
 15 Q What about [REDACTED], to your knowledge, has her
 16 reputation ever been to be an easy girl?
 17 A No, not when I knew her.
 18 Q Tell me about [REDACTED], what do you know about
 19 her?
 20 A I had no idea she was even in this case, but I
 21 went to [REDACTED] with her.
 22 Q Tell me what you know about her, other than
 23 [REDACTED]
 24 A Absolutely nothing. I just know her from
 25 [REDACTED]. She use to come to my birthdays when

1 I was like [REDACTED] and I haven't talked to her probably
 2 since then.
 3 Q Did you talk with her at all while she was in
 4 [REDACTED]?
 5 A No.
 6 Q Do you know whether or not [REDACTED] does drugs or
 7 not?
 8 A I have no idea.
 9 Q When is the last time you spoke to her?
 10 A Probably when I was, like, [REDACTED]. Maybe like
 11 see her [REDACTED] and be like
 12 "Hi."
 13 Q What reputation, if any, do you recall her
 14 having in middle school?
 15 A I don't know. She was a good kid.
 16 Q Do you recall any of her boyfriends in middle
 17 school?
 18 A No.
 19 Q Do you know whether or not she had intercourse
 20 while she was in middle school?
 21 A I have no idea.
 22 Q Okay. I have no further questions.
 23 MR. EDWARDS: All right. I have a few.
 24 EXAMINATION
 25 BY MR. EDWARDS:

1 Q Melissa, this is Brad Edwards and I represent
 2 Jane Doe and I also report [REDACTED], and [REDACTED].
 3 A Uh-huh.
 4 Q My question is do you know how many girls
 5 Jeffrey Epstein has molested?
 6 A I have no idea.
 7 MR. PIKE: Object to forin on that.
 8 Hey, let's do the court reporter a favor.
 9 Let's kind of slow down the question and answer so I
 10 can get a "form" in.
 11 MR. EDWARDS: I'll just assume you are going
 12 to object to the form of every one of my questions
 13 consistent with form.
 14 MR. PIKE: I agree, I probably will. If the
 15 court reporter doesn't hear it, then madam court
 16 reporter let's put a form objection in there for
 17 each of his objections, but I will put one on the
 18 record as well. Okay.
 19 BY MR. EDWARDS:
 20 Q Melissa, do you know how many underage females
 21 that Jeffrey Epstein has performed oral sex on?
 22 MR. PIKE: Form.
 23 THE WITNESS: I have no idea.
 24 BY MR. EDWARDS:
 25 Q Do you know whether Jeffrey Epstein has

1 engaged in sex with underage transvestites?
 2 A Oh, no idea.
 3 Q Do you know whether that he's made comments to
 4 underage transvestite in the course of sexual
 5 interaction such as, "I love how young you are. You
 6 have a tight butt like a baby"?"
 7 MR. PIKE: Form.
 8 THE WITNESS: No idea.
 9 BY MR. EDWARDS:
 10 Q Do you know if Jeffrey Epstein has given or
 11 received anal sex from men?
 12 MR. PIKE: Form.
 13 THE WITNESS: I don't know.
 14 BY MR. EDWARDS:
 15 Q Do you know if Jeffrey Epstein has engaged in
 16 sexual intercourse with underaged females as young as 12
 17 years old?
 18 MR. PIKE: Form.
 19 THE WITNESS: I don't know.
 20 BY MR. EDWARDS:
 21 Q All right. Other than the individuals that we
 22 spoke about today, do you know of any of the names of
 23 the other young females that have been molested by
 24 Jeffrey Epstein in the last 20 years?
 25 MR. PIKE: Form.

1 THE WITNESS: No, sir.
 2 MR. EDWARDS: Okay. All right. I appreciate
 3 your time. That's all I've got.
 4 THE WITNESS: Okay.
 5 MR. MERMELSTEIN: This is Stuart Mermelstein.
 6 I have no questions.
 7 MR. PIKE: Okay. Ma'am, you have the option
 8 to read your deposition or waive that right. If you
 9 choose to read your deposition, you will be provided
 10 with a sheet called an errata sheet. You can read
 11 your deposition and look for corrections that you
 12 may find that were incorrect, or you can waive that
 13 right today if you feel that the testimony you have
 14 given today is truthful and you do not want to read
 15 your deposition to make any corrections.
 16 THE WITNESS: I believe it's truthful but I
 17 could reread it if -- I don't know. I mean,
 18 everything I said is truthful but --
 19 MR. PIKE: It's really your choice. You can
 20 read it or you can waive that right.
 21 THE WITNESS: I don't know. I'll waive it.
 22 MR. PIKE: Okay. Thank you very much.
 23 THE REPORTER: This is the court reporter.
 24 Does anybody need this transcript?
 25 MR. PIKE: Yes. I do, Michael Pike.

1 MR. EDWARDS: This is Brad Edwards. I'll take
 2 a copy. I don't need a mini, ASCII or anything
 3 else. I'll take a copy since Mr. Pike ordered it.
 4 MR. MERMELSTEIN: This is Stuart Mermelstein.
 5 I'm not going to order at the present time.
 6 Thank you.
 7 (At 10:59 a.m. no further questions were
 8 propounded to the witness.)
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1 CERTIFICATE OF REPORTER
 2
 3 STATE OF FLORIDA)
 4 COUNTY OF HILLSBOROUGH)
 5
 6 I, Michelle Olsen Baden, RPR, certify that I was
 7 authorized to and did stenographically report the
 8 deposition; that a review of the transcript was not
 9 requested; and that the foregoing pages are a true and
 10 complete record of my stenographic notes taken during
 11 said deposition.
 12
 13 I further certify that I am not a relative,
 14 employee, attorney, or counsel of any of the parties,
 15 nor am I a relative or employee of any of the parties'
 16 attorneys or counsel connected with the action, nor am I
 17 financially interested in the action.
 18
 19 Dated this 24th day of May, 2010.
 20
 21
 22
 23
 24 Michelle Olsen Baden
 Registered Professional Reporter
 Florida Professional Reporter
 25

