



THE STATE OF FLORIDA, )  
COUNTY OF PALM BEACH. )

IN RE:

JEFFREY EPSTEIN.

SWORN STATEMENT OF [REDACTED]

Friday, March 21, 2008  
4:00 p.m. - 4:20 p.m.

[REDACTED]

Reported By:  
Judith F. Consor, FPR  
Notary Public, State of Florida  
Censor & Associates Reporting and Transcription  
West Palm Beach Office  
Phone - [REDACTED]

1 Statement taken before Judith F. Consor,  
2 Court Reporter and Notary Public in and for the State of  
3 Florida at Large, in the above cause.

4  
5 Thereupon,

6 [REDACTED]  
7 having been first duly sworn or affirmed, was examined  
8 and stated as follows:

9 THE WITNESS: I do.

10 BY MR. GOLDBERGER:

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

13 A. [REDACTED]

14 Q. Okay. [REDACTED], where do you live now?

15 A. Address?

16 Q. Sure.

17 A. [REDACTED]

18  
19 Q. Do you live there alone or do you live with  
20 somebody there?

21 A. [REDACTED]

22 Q. Very good. And are you working now or not  
23 working? Sometimes you work and sometimes you don't?

24 A. When I want to.

25 Q. Okay. And how old are you today?

1 APPEARANCES:

2 On behalf of the Defendant:  
3 JACK A. GOLDBERGER, ESQ.  
4 ATTERBURY, GOLDBERGER & WEISS  
5 [REDACTED]

6 ALSO PRESENT  
7 LILLY ANN SANCHEZ, ESQ.  
8 FOWLER WHITE, ATTORNEYS AT LAW  
9  
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11  
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1 A. [REDACTED]

2 Q. Very good.

3 What we're going to do today is we're going  
4 to take what's know as a sworn statement from you. And  
5 my court reporter just put you under oath. So all I want  
6 you to do is tell the absolute truth today.

7 A. Right.

8 Q. I don't want you to color what you're  
9 saying in any way. Really, the only thing that will be  
10 of any use to anyone is if you just tell the absolute  
11 truth.

12 A. Right.

13 Q. So those are the instructions, okay?

14 A. Okay.

15 Q. All right. And sometimes -- I've been  
16 doing this for a lot of years and sometimes I talk like a  
17 lawyer too much, and if you don't understand what I'm --

18 A. That's your job.

19 Q. I guess. But if you don't understand what  
20 I'm saying at some point, just say, "Jack, say it in  
21 English," and I'll make it better for you. Okay?

22 A. Okay.

23 Q. So tell me how you first met Jeffrey

24 Epstein.

25 A. [REDACTED] introduced me to him.



1 Q. And [REDACTED] was a friend of yours at the  
 2 time?  
 3 A. Yes.  
 4 Q. Okay. And tell me a little bit about the  
 5 introduction, how [REDACTED] introduced you to Jeffrey.  
 6 A. Well, she told me that I could go over  
 7 there and give him a massage --  
 8 Q. Okay.  
 9 A. -- and he'd pay me for it and that he was a  
 10 respectful guy.  
 11 Q. Okay. So let's break that down a little  
 12 bit.  
 13 She told you you could go over there to  
 14 Jeffrey Epstein's house and give a massage?  
 15 A. Right.  
 16 Q. When she said go give a massage did she  
 17 tell you what she meant by that?  
 18 A. Just are -- no. Just a massage. She didn't  
 19 really give me any details.  
 20 Q. Okay. Let me ask it to you another way.  
 21 A. Okay.  
 22 Q. Was there any suggestion that what you were  
 23 being offered the opportunity to do would be sexual in  
 24 any way?  
 25 A. No.

1 A. No.  
 2 Q. And she didn't e-mail you about that?  
 3 A. No.  
 4 Q. She didn't send you a text message like you  
 5 guys do?  
 6 A. No.  
 7 Q. Okay. She just simply saw you in person  
 8 one day and said, "Do you want to go over to  
 9 Mr. Epstein's house and do a massage?"  
 10 A. Yes.  
 11 Q. And I take it you said okay and you went  
 12 over there?  
 13 A. Yes.  
 14 Q. All right. Now at the time that you went  
 15 over there, you were not yet 18, but you were almost 18?  
 16 A. Yes.  
 17 Q. You were within a couple of months of being  
 18 18 years old?  
 19 A. Yes, I do believe so.  
 20 Q. Okay. And what did [REDACTED] tell you about if  
 21 asked, how old you should tell anyone you were when you  
 22 went over to his house?  
 23 Was that a bad question?  
 24 A. Repeat that.  
 25 Q. Sure. Okay.

1 Q. Okay. So as far as you understood it and  
 2 as far as what [REDACTED] told you, you would be going over to  
 3 Mr. Epstein's house and just giving him a normal  
 4 therapeutic massage?  
 5 A. Right.  
 6 Q. Okay. And I assume [REDACTED] told you you would  
 7 be paid for it?  
 8 A. Yes.  
 9 Q. Did she tell you how much you would be  
 10 paid?  
 11 A. Yes. Two hundred.  
 12 Q. Okay. When was the first time that you  
 13 went to Jeffrey Epstein's house? Was it after you spoke  
 14 to [REDACTED]?  
 15 A. Yes.  
 16 Q. Okay. And the first time that you went to  
 17 Mr. Epstein's house, that was in response to [REDACTED]  
 18 talking to you in person. In other words, she said --  
 19 you saw her somewhere, be it at the store that you worked  
 20 at or around the neighborhood, she said to you in person,  
 21 "Do you want to go over to Jeffrey Epstein's house?"  
 22 Right?  
 23 A. Uh-huh.  
 24 Q. She didn't call you on the telephone and  
 25 offer you the opportunity?

1 Before you went over to Jeffrey's house  
 2 after you met [REDACTED] in person, did she tell you if anyone  
 3 asked you how old you were, how old you were supposed to  
 4 say you were?  
 5 A. Yes.  
 6 Q. What did she tell you?  
 7 A. Yes. She told me to say that I was 18 if  
 8 it was asked.  
 9 Q. She didn't give you a script and say as  
 10 soon as you walk in the house you're supposed to say,  
 11 "I'm 18," right?  
 12 A. No.  
 13 Q. She just said that if anyone ever asked,  
 14 you should say that you were 18 years of age.  
 15 A. Right.  
 16 Q. And I assume if you were asked, you wanted  
 17 to be convincing that you were over the age of 18,  
 18 because you wanted to do the work, right?  
 19 A. Right.  
 20 Q. By the way, were you ever asked?  
 21 A. Eventually.  
 22 Q. Okay.  
 23 A. Not the first day, I don't believe.  
 24 Q. Okay. Was it Jeffrey or someone else that  
 25 asked you whether you were over the age of 18?



Page 9

1 A. It was probably Jeffrey. I don't remember  
2 very clearly.  
3 Q. Whoever asked you, though, you clearly said  
4 when asked, "I'm 18."  
5 A. Uh-huh.  
6 Q. And you were very believable in saying that  
7 you were over 18?  
8 A. Yes.  
9 Q. Okay. Now the first time that you went to  
10 Jeffrey's house did you give him a massage that day?  
11 A. Uh-huh.  
12 MS. SANCHEZ: Answer yes or no so the  
13 record is clear.  
14 THE WITNESS: Yes. Okay.  
15 (Discussion held off the record.)  
16 BY MR. GOLDBERGER:  
17 Q. Okay. So you go to Jeffrey's house and you  
18 meet him and you're going to do a massage that day,  
19 right?  
20 A. Yes.  
21 Q. Now were you -- you were not forced to give  
22 a massage, correct?  
23 A. No.  
24 Q. You were not forced to do anything that you  
25 didn't want to do?

Page 10

1 A. Right.  
2 Q. No one coerced you or threatened you in any  
3 way?  
4 A. No way.  
5 Q. No one offered you any drugs to do a  
6 massage?  
7 A. No.  
8 Q. No one offered you any alcohol to do a  
9 massage?  
10 A. No.  
11 Q. And prior to going over to Jeffrey's house  
12 the first time there was no e-mail message from him?  
13 A. No.  
14 Q. In any way?  
15 A. No way.  
16 Q. There was no text mail message from him?  
17 A. No.  
18 Q. There was no fax from him?  
19 A. No.  
20 Q. Okay. And the same questions: There was  
21 no e-mail from anyone that worked for Jeffrey before you  
22 went over there?  
23 A. No.  
24 Q. No text messages from anybody?  
25 A. No.

Page 11

1 Q. The reason you went there is because [REDACTED]  
2 [REDACTED] told you in person --  
3 A. Yes.  
4 Q. -- that if you wanted to -- it was all  
5 voluntary on your part -- you could go to Jeffrey's house  
6 and give him a massage.  
7 A. Right.  
8 Q. Okay. So did [REDACTED] tell you what to expect  
9 when you went there, as far as keeping your clothes on or  
10 taking your clothes off?  
11 A. She did say that he may ask me to take my  
12 clothes off and that he was very respectful about that  
13 and that if I didn't feel comfortable about it that I  
14 didn't have to.  
15 Q. All right.  
16 A. It was no problem. He wouldn't be upset.  
17 Q. All right. So [REDACTED] told you there would be  
18 no pressure on you whatsoever?  
19 A. Right.  
20 Q. You simply did what you wanted to do?  
21 A. Yes.  
22 Q. And if you didn't want to do something, you  
23 were free to say, "No. I don't want to do it"?  
24 A. Yes.  
25 Q. All right. And in your experiences with

Page 12

1 Mr. Epstein, by the way, was there ever a time when that  
2 didn't play out, when he tried to force you to do  
3 something that you didn't want to do?  
4 A. He never tried to force me to do anything.  
5 Q. If you said no to something, whatever that  
6 might be, he would respect that?  
7 A. Yes.  
8 Q. All right.  
9 Now the first time that you went there do  
10 you remember whether you gave Jeffrey a massage with your  
11 clothes on or your clothes off?  
12 A. At the beginning, it was with all my  
13 clothes on.  
14 Q. Uh-huh.  
15 A. But the most that -- I mean I was still in  
16 my bra and panties.  
17 Q. Okay. The whole time?  
18 A. Yes.  
19 Q. Right.  
20 A. I'm pretty sure, yes.  
21 Q. Did you see during that massage -- did he  
22 try and touch you in any way during that massage?  
23 A. No.  
24 Q. Did he use any kind of device on you in any  
25 way during that massage?

Page 13

1 A. No.  
2 Q. Do you know -- he was wearing a towel  
3 through that massage?  
4 A. Yes.  
5 Q. Do you know whether he touched himself in  
6 any way, his penis or anything like that, during the  
7 massage?  
8 A. Yeah, like towards the end.  
9 Q. Okay. Do you know whether he masturbated?  
10 A. Oh, my gosh.  
11 Q. If you don't know, you don't know.  
12 A. I mean probably, but I don't know. I can't  
13 remember exactly. It was so long ago.  
14 Q. Okay. There was nothing that you were  
15 uncomfortable with in this massage?  
16 A. No. Yeah. And like I said, he also, you  
17 know, reassured if I wasn't comfortable with anything,  
18 then just tell him and --  
19 Q. He would stop?  
20 A. -- that would be the end of it.  
21 Q. Okay. Now after that first time you met at  
22 Jeffrey's house, you left. And did there come other  
23 times that you went to Jeffrey's house?  
24 A. Yes.  
25 Q. And how would that occur? How would that

Page 14

1 happen?  
2 A. [redacted], one of his assistants, would call me  
3 and ask me if I would like to come over and give a  
4 massage, because he would be in town.  
5 Q. So would it be primarily [redacted] that would  
6 call or would there be others?  
7 A. Most of the time.  
8 Q. And would it be a message that would be  
9 left for you or would it be you would talk to [redacted] or one  
10 of the other as assistants directly?  
11 A. I mean generally it would be directly.  
12 Q. Okay.  
13 A. Unless I didn't answer my phone.  
14 Q. And if I think I understand what you're  
15 saying, you would talk to [redacted] or another assistant and  
16 they would say, "Listen, Jeffrey's going to be in town.  
17 Would you like to come over and give a massage?" Right?  
18 A. Yes.  
19 Q. Was there ever any suggestion in any of  
20 those phone calls where you made arrangements to go to  
21 Jeffrey's house that there would be anything sexual that  
22 would occur at the house?  
23 A. No.  
24 Q. Was it always if there was a phone call,  
25 that this was whether you wanted to come and give a

Page 15

1 massage or not?  
2 A. Yes, it was always that.  
3 Q. Okay. And there was never any discussion,  
4 "Well, we really want you to come over because we want  
5 you to have sex with Jeffrey," or anything like that?  
6 A. Right. No way.  
7 Q. Never, ever suggested, right?  
8 A. No.  
9 Q. Okay. The only thing that ever occurred on  
10 any of these phone calls was, "Are you willing to come  
11 over," or, "Would you like to come over and give a  
12 massage?"  
13 A. Right.  
14 Q. Okay. And the phone calls from Jeffrey --  
15 well, you never spoke to Jeffrey on the phone, right?  
16 A. No.  
17 Q. Okay. The phone call from [redacted] or any  
18 other assistant would always -- it would be sporadic,  
19 right? They always said, "Jeffrey's going to be in town.  
20 Do you want to come over this afternoon at four o'clock?"  
21 A. Yeah, yeah. It wasn't --  
22 Q. There was nothing regular about it?  
23 A. No.  
24 Q. Okay. Other than [redacted], who else would have  
25 called you to ask whether you wanted to come over and

Page 16

1 give a massage?  
2 A. If it wasn't [redacted], then I believe [redacted],  
3 maybe one other person I don't know the name of. Just --  
4 I mean it was mostly [redacted]. And [redacted] I spoke to a time  
5 or two.  
6 Q. Okay. Now when you would go over to  
7 Jeffrey's house after getting a phone call, you would go  
8 and you'd go to give him a massage, right?  
9 A. Yes.  
10 Q. And occasionally would there be more than a  
11 massage that occurred?  
12 A. It happened a few times.  
13 Q. Okay. And the few times that it happened,  
14 though, it was very sporadic and it was nothing that was  
15 planned?  
16 A. No way.  
17 Q. It just occurred?  
18 A. Right.  
19 Q. So it wasn't like there was a phone call,  
20 you know, "Today we want you to come over and do more  
21 than just a massage with Jeffrey?"  
22 A. Right.  
23 Q. When anything more occurred you'd be over  
24 there and it would be totally voluntary on your part?  
25 A. Yes; definitely consensual.



Page 17

1 Q. Okay. Now when we're talking about more  
 2 than just a massage, what sort of conduct are we talking  
 3 about that might have occurred?  
 4 A. It was probably mostly -- maybe not, not  
 5 particularly oral, but, I mean there's just random  
 6 things, but not sex.  
 7 Q. Okay. So let's put it into perspective.  
 8 You certainly never had intercourse with him, right?  
 9 A. No.  
 10 Q. And did you actually ever really have oral  
 11 sex with him?  
 12 A. Maybe once or twice. I barely even  
 13 remember that.  
 14 Q. Okay.  
 15 A. I mean it was all just mostly --  
 16 Q. I'm sorry. Mostly what?  
 17 A. Mostly like hand oriented.  
 18 Q. Okay. So on occasion you would touch his  
 19 penis with your hand?  
 20 A. It's happened a few times.  
 21 Q. Okay. And anytime that occurred it would  
 22 be totally voluntary on your part?  
 23 A. Yes.  
 24 Q. Consensual on your part?  
 25 A. Yes. He would never make me do anything.

Page 18

1 Q. And it would just be totally random and it  
 2 would occur during the moment?  
 3 A. Uh-huh.  
 4 Q. Okay. There was nothing that was planned  
 5 in advance concerning that?  
 6 A. No.  
 7 Q. And it didn't become every time you went  
 8 over there that would happen, right?  
 9 A. Yeah. No.  
 10 Q. No, no. I mean just you would go over and  
 11 give a massage one day and the phone call would be the  
 12 same, "Do you want to come over and give a massage," and  
 13 maybe --  
 14 A. Yes.  
 15 Q. -- maybe another time you would get a phone  
 16 call, "Do you want to come over and give a massage," and  
 17 just because of the day it was or whatever was going on,  
 18 it may have gone a little further where they may have  
 19 been some touching, correct?  
 20 A. Right.  
 21 Q. And then the next time you could go over  
 22 there and it could have been a regular massage again,  
 23 right?  
 24 A. Uh-huh.  
 25 Q. Okay. So the point that I guess I'm trying

Page 19

1 to make was that there were never phone calls that would  
 2 come to you and they would say, "Do you want to come over  
 3 and give a massage," and you just assumed it would be to  
 4 go have sex? That was not the case?  
 5 A. No.  
 6 Q. Never, never, never, right?  
 7 A. Yes.  
 8 Q. All right. There were times when you would  
 9 be away and not be in Palm Beach and -- I mean you very  
 10 much thought that Jeffrey was your friend? You treated  
 11 him as a friend?  
 12 A. Yes, definitely. I felt that he was my  
 13 friend.  
 14 Q. And there were times when maybe you were  
 15 out of town and for whatever reason, you found yourself  
 16 in a situation where you needed some money, correct?  
 17 A. Yes.  
 18 Q. Okay. And you felt that the relationship  
 19 was such that you could call Jeffrey and it never had  
 20 anything to do with a massage or anything. You would  
 21 say, "Listen, I could use a couple of dollars. I have a  
 22 problem."  
 23 A. Yes.  
 24 Q. And would he ever hesitate to help you out?  
 25 A. No.

Page 20

1 Q. And in fact, did he not tell you that,  
 2 listen -- he would talk to you about life and about --  
 3 A. Yes.  
 4 Q. -- about what you wanted to do with your  
 5 life?  
 6 A. Yes.  
 7 Q. And he said, "If you ever find yourself in  
 8 trouble, you have a friend in me and you can give me a  
 9 call?"  
 10 A. Yes.  
 11 Q. Okay. If you had to guess -- and  
 12 recognizing that there can be no accuracy here -- if you  
 13 had to guess, how many times do you think you went over  
 14 to Jeffrey's house?  
 15 A. I would say at least five, less than ten.  
 16 Q. Okay. I think that's kind of a fair range.  
 17 And during those five to ten times that you  
 18 went there, was there ever anything uncomfortable, in  
 19 your mind, that occurred over at Jeffrey's house?  
 20 A. No.  
 21 Q. Okay. I know we've touched on this, but  
 22 just Lilly, the detail person, makes sure that we get  
 23 everything. After you met Jeffrey the first time did you  
 24 ever talk to him on the telephone about arranging a  
 25 massage or anything like that?



Page 21

1 A. No.  
 2 Q. Okay. And you never e-mailed him or  
 3 anything like that?  
 4 A. No, no.  
 5 Q. Never text-messed him?  
 6 A. No.  
 7 Q. Okay. Now at times when you would go over  
 8 to give a massage, Jeffrey, while he was getting the  
 9 massage, would be preoccupied doing a lot of things,  
 10 right?  
 11 A. Yes, very often.  
 12 Q. He was a busy guy?  
 13 A. Yes.  
 14 Q. He would be on the telephone talking to  
 15 folks while you were giving a massage?  
 16 A. Yes. Sometimes it would be just a massage  
 17 and he'd be pretty much doing business the whole time.  
 18 Q. Right. Certainly it wasn't sex or anything  
 19 like that?  
 20 A. No.  
 21 Q. He would be doing business and you'd be  
 22 massaging him?  
 23 A. Yes.  
 24 Q. Okay. Give me one second.  
 25 (Discussion held off the record.)

Page 22

1 BY MR. GOLDBERGER:  
 2 Q. Every time you went back to Jeffrey's house  
 3 you went back there because you wanted to, right?  
 4 A. Uh-huh, yes.  
 5 Q. No one -- certainly Mr. Epstein never tried  
 6 to persuade you or induce you or entice you or coerce you  
 7 to engage in any kind of sex?  
 8 A. No.  
 9 Q. And no one representing Jeffrey Epstein  
 10 ever tried to persuade or induce you to engage in sex?  
 11 A. No.  
 12 Q. All right. And I think you told me when we  
 13 first started talking that you were very, very close to  
 14 your 18th birthday, and when asked, you in fact said you  
 15 were 18 and tried to be very, very convincing of that.  
 16 A. Yeah. I didn't mean that -- all I said was  
 17 I was 18.  
 18 Q. Okay.  
 19 A. Like there was no ifs, ands or buts about  
 20 that.  
 21 Q. There was a time when there was a concert  
 22 or a show down in Fort Lauderdale and Jeffrey got you  
 23 tickets to go to that show because it was your birthday,  
 24 right?  
 25 A. Correct.

Page 23

1 Q. Okay. I assume, based on what you're  
 2 telling me, Jeffrey didn't know at the time that it was  
 3 your 18th birthday. He must have --  
 4 A. No. It was kind of like -- it was my 19th  
 5 birthday.  
 6 Q. Okay. And you made it pretty clear to him  
 7 that it was your 19th birthday and not your 18th  
 8 birthday?  
 9 A. Yeah. I tried not to like even touch upon  
 10 that.  
 11 Q. But I know you didn't try and touch upon  
 12 it --  
 13 A. Yes.  
 14 Q. -- but was it clear to him, based on what  
 15 you know, that he thought it was your 19th birthday?  
 16 A. Yes.  
 17 Q. Okay. Great.  
 18 Here's the lawyer talking now.  
 19 I didn't try to influence you in any way to  
 20 say anything, did I?  
 21 A. No.  
 22 Q. In fact, all I asked you to do is tell me  
 23 the absolute truth here today?  
 24 A. Yes.  
 25 Q. And that's what you've done?

Page 24

1 A. Yes.  
 2 Q. Okay. And you've understood all my  
 3 questions, have you?  
 4 A. Yes.  
 5 MR. GOLDBERGER: Okay. I thank you very  
 6 much for coming in today and it really made it  
 7 much easier for us to do it this way. So thanks a  
 8 lot.  
 9 (Thereupon, the sworn statement was  
 10 concluded at 4:20 p.m.)  
 11 - - -  
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