

0308

1 UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

2

CASE NO.: 08-CV-80119-MARRA/JOHNSON

3

4 JANE DOE NO. 2,
5 Plaintiff,

6 -vs- VOLUME III OF III

7 JEFFREY EPSTEIN,
8 Defendant.

9

Related cases:

10 08-80232, 08-08380, 08-80381, 08-80994,
11 08-80993, 08-80811, 08-80893, 09-80469,
12 09-80591, 09-80656, 09-80802, 09-81092

13

14 VIDEO-CONFERENCED AND VIDEOTAPED DEPOSITION OF
15 JANE DOE NO. 4

16

17 Tuesday, October 27, 2009
18 11:11 - 6:05 p.m.

19

20 250 Australian Avenue South
21 Suite 115

22 West Palm Beach, Florida 33401

23

24

25 Reported By:

26 Cynthia Hopkins, RPR, FPR
27 Notary Public, State of Florida
28 Prose Court Reporting

29

30

31

0309

1 APPEARANCES:

2 On behalf of the Plaintiff, L.M. and E.W.:

3 MICHAEL J. WHEELER, ESQUIRE
4 ROTHSTEIN, ROSENFELDT, ADLER
5 401 East Las Olas Boulevard
6 Suite 1650

7 Fort Lauderdale, Florida 33301

8 Phone: [REDACTED]

9

10 On behalf of Jane Does 1 through 8:

11 ADAM D. HOROWITZ, ESQUIRE
12 STUART S. MERMELSTEIN, ESQUIRE
13 MERMELSTEIN & HOROWITZ, P.A.
14 18205 Biscayne Boulevard

15 Suite 2218

16 Miami, Florida 33160

17

11 Phone: [REDACTED]
E-mail: [REDACTED]

12
13 On behalf of C.M.A.:
14 RICHARD HORACE WILLITS, ESQUIRE
RICHARD H. WILLITS, P.A.
15 2290 10th Avenue North
Suite 404
16 Lake Worth, Florida 33461
Phone: [REDACTED]
17 (Via Telephone)

18 On behalf of the Defendant, Jeffrey Epstein:
19 ROBERT D. CRITTON, JR., ESQUIRE
MARK T. LUTTIER, ESQUIRE
20 BURMAN, CRITTON, LUTTIER & COLEMAN, LLP
303 Banyan Boulevard
21 Suite 400
West Palm Beach, Florida 33401
22 Phone: [REDACTED]

23
24 ALSO PRESENT: Jeffrey Epstein, via video conference
Jeff Abbott, Videographer
25 Visual Evidence, Incorporated

0310

1
2 I N D E X
3
4 WITNESS: DIRECT CROSS REDIRECT RECROSS
5 JANE DOE NO. 4
6 CONTINUED
7 BY MR. LUTTIER 311
8
9

10 E X H I B I T S
11 - - -
12
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0311

1 * * * * *
2 CONTINUED DIRECT EXAMINATION
3 THE VIDEOGRAPHER: It is the beginning of
4 Tape Number 3. We're back on the record at

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0313
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4:19.

BY MR. LUTTIER:

Q. All right. [REDACTED]

A. [REDACTED]

Q. [REDACTED]

A. [REDACTED]

Q. [REDACTED]

A. [REDACTED]

Q. [REDACTED]

A. [REDACTED]

Q. [REDACTED]

A. Yeah.

Q. [REDACTED]

A. [REDACTED]

Q. [REDACTED]

A. Yeah, I think so.

Q. [REDACTED]

A. Yeah.

Q. [REDACTED]

A. Yeah.

Q. [REDACTED]

A. Yeah.

Q. [REDACTED]

A. [REDACTED]

Q. [REDACTED]

A. [REDACTED]

Q. [REDACTED]

A. [REDACTED]

Q. [REDACTED]

A. Yeah.

Q. [REDACTED]

MR. MERMELSTEIN: Objection to form.

THE WITNESS: Yeah.

BY MR. LUTTIER:

Q. [REDACTED]

A. [REDACTED]

Q. [REDACTED]

A. Yes.

Q. [REDACTED]

A. [REDACTED]

A. Yes.

Q. [REDACTED]

7 A. Yes.
8 Q. Who?
9 A. [REDACTED]
10 Q. [REDACTED]
11 A. [REDACTED]
12 Q. [REDACTED]
13 A. [REDACTED]
14 Q. [REDACTED]
15 [REDACTED]
16 [REDACTED]

17 A. Yeah.
18 Q. [REDACTED]
19 [REDACTED]
20 A. Yeah, I did.
21 Q. [REDACTED]
22 [REDACTED]
23 A. [REDACTED]

24 MR. MERMELSTEIN: How about letting him
25 finish. Let him finish.

0314

1 BY MR. LUTTIER:
2 Q. [REDACTED]
3 [REDACTED]
4 [REDACTED]
5 [REDACTED]

6 MR. MERMELSTEIN: Objection, asked --

7 BY MR. LUTTIER:
8 Q. [REDACTED]
9 A. No.

10 MR. MERMELSTEIN: Asked and answered.

11 BY MR. LUTTIER:
12 Q. [REDACTED]
13 [REDACTED]

14 A. No.
15 Q. [REDACTED]
16 [REDACTED]

17 A. I don't remember.
18 [REDACTED] I don't remember -- I don't -- I don't
19 know.

20 Q. Prior to having sexual intercourse with
21 [REDACTED], did you have other types of sex with him?
22 Specifically did you have oral sex with [REDACTED]?

23 MR. MERMELSTEIN: I'm going to object.
24 This applies to our Rule 412 objection. Don't
25 answer the question.

0315

1 BY MR. LUTTIER:
2 Q. Did you have -- do you know a guy named
3 Mister -- a guy by the name of [REDACTED], last name
4 [REDACTED]

5 A. Yes.
6 Q. Did you have oral sex with him?

7 MR. MERMELSTEIN: Don't answer the
8 question.

9 BY MR. LUTTIER:

10 Q. When you -- how old were you when you --

11 MR. MERMELSTEIN: Same objection.

12 BY MR. LUTTIER:

13 Q. How old were you when you knew

14 Mr. [REDACTED]?

15 A. I was in middle, or middle school.

16 Q. What, middle school?

17 A. Yeah, I know him.

18 Q. Middle school?

19 A. Yeah.

20 Q. Do you know a [REDACTED] (phonetic)?

21 A. Yeah. They were best friends.

22 MR. MERMELSTEIN: The question is, do you
23 know him.

24 THE WITNESS: Yeah.

25

0316

1 BY MR. LUTTIER:

2 Q. And do you know what the relationship

3 between [REDACTED] and Mr. [REDACTED] was?

4 A. Friends.

5 Q. Okay. They pals or pal around together?

6 A. Friends.

7 Q. You knew them both?

8 A. Yeah.

9 Q. Did you have oral sex with both of them?

10 MR. MERMELSTEIN: Don't -- again, Rule 412
11 objection. Do not answer that question.

12 BY MR. LUTTIER:

13 Q. And, and did you associate with either of
14 these individuals once you got to high school?

15 A. Yeah.

16 Q. Did you have oral sex with Mr. [REDACTED]
17 and/or Mr. [REDACTED] before you went to see
18 Mr. Epstein?

19 MR. MERMELSTEIN: Objection, Rule 412. Do
20 not answer that question.

21 BY MR. LUTTIER:

22 Q. Do you know a fellow by the name of [REDACTED]?

23 A. That's [REDACTED].

24 Q. Okay. Did you have sexual intercourse
25 with either Mr. [REDACTED] or Mr. [REDACTED] at any time?

0317

1 MR. MERMELSTEIN: Objection, Rule 412. Do
2 not answer that question.

3 BY MR. LUTTIER:

4 Q. Did you have sexual intercourse with
5 Mr. [REDACTED] or Mr. [REDACTED] before you went to see
6 Jeffrey Epstein?

7 MR. MERMELSTEIN: Objection, Rule 412. Do
8 not answer the question.

9 BY MR. LUTTIER:

10 Q. All right. [REDACTED]

11 [REDACTED]
12 A. [REDACTED]
13 Q. [REDACTED]
14 [REDACTED]
15 [REDACTED]
16 A. (No verbal response.)
17 Q. Right?
18 A. [REDACTED]
19 Q. So --
20 A. [REDACTED]
21 Q. [REDACTED]
22 [REDACTED]
23 A. [REDACTED]
24 Q. [REDACTED]
25 A. Yeah.

0318
1 Q. Okay. [REDACTED]
2 A. I don't remember.
3 Q. [REDACTED]
4 A. [REDACTED]
5 [REDACTED]
6 Q. Okay. [REDACTED]
7 [REDACTED]
8 A. [REDACTED]
9 Q. [REDACTED]
10 A. [REDACTED]
11 Q. [REDACTED]
12 A. [REDACTED]
13 Q. [REDACTED]
14 A. [REDACTED]
15 Q. [REDACTED]
16 [REDACTED]
17 A. Yeah.
18 Q. [REDACTED]
19 A. [REDACTED]
20 Q. [REDACTED]
21 A. Yeah.
22 Q. [REDACTED]
23 A. [REDACTED]
24 Q. [REDACTED]
25 [REDACTED]

0319
1 A. Yeah.
2 Q. [REDACTED]
3 A. Yeah.
4 Q. Okay. [REDACTED]
5 [REDACTED]
6 A. Yeah.
7 Q. [REDACTED]
8 [REDACTED]
9 [REDACTED]
10 A. Yeah.
11 Q. Okay. [REDACTED]
12 [REDACTED]

13 A. [REDACTED]
14 Q. [REDACTED]

15 [REDACTED]
16 A. Yeah.
17 Q. [REDACTED]

18 [REDACTED]
19 A. No.
20 Q. [REDACTED]

21 A. No.
22 Q. [REDACTED]

23 A. [REDACTED]
24 Q. [REDACTED]
25 A. [REDACTED]

0320
1 Q. [REDACTED]

2 A. Yeah.
3 Q. Do you --

4 A. [REDACTED]

5 Q. Well, did you?
6 MR. MERMELSTEIN: Be certain of your
7 answer.

8 BY MR. LUTTIER:

9 Q. Yeah, take your time.
10 A. Yeah, I think so. Yeah. [REDACTED]

11 [REDACTED]
12 [REDACTED] I don't
13 remember.

14 Q. Okay.

15 A. [REDACTED]
16 [REDACTED]
17 [REDACTED]

18 MR. MERMELSTEIN: Make sure you're sure of
19 your answer before you give it. If you need to
20 pause for a minute after the question is asked,
21 do so, but make, make sure you're -- you know,
22 before you blurt out your answer, make, make
23 sure you, you recall correctly. Okay?

24 BY MR. LUTTIER:

25 Q. [REDACTED]

0321
1 [REDACTED]
2 [REDACTED]

3 A. Yeah.
4 Q. [REDACTED]

5 [REDACTED]
6 A. Yeah.

7 Q. [REDACTED]
8 [REDACTED]

9 A. There. What you mean, there?

10 Q. Well, you've got to get the actual --

11 A. [REDACTED]
12 Q. Okay. [REDACTED]
13 [REDACTED]

14 A. Yeah.

15 Q. [REDACTED]
16 A. [REDACTED]
17 Q. [REDACTED]
18 A. [REDACTED]
19 [REDACTED]
20 Q. [REDACTED]
21 [REDACTED]
22 A. [REDACTED]
23 [REDACTED]
24 Q. [REDACTED]
25 [REDACTED]

0322
1 A. No. [REDACTED]
2 [REDACTED]
3 [REDACTED]
4 Q. [REDACTED]
5 [REDACTED]
6 [REDACTED]
7 A. [REDACTED]
8 Q. [REDACTED]
9 A. Yeah.
10 Q. [REDACTED]
11 A. Yeah.
12 Q. [REDACTED]
13 A. [REDACTED]
14 Q. [REDACTED]
15 A. No.
16 Q. [REDACTED]
17 A. [REDACTED]
18 [REDACTED]
19 [REDACTED]
20 [REDACTED]
21 Q. [REDACTED]
22 A. No.
23 Q. [REDACTED]
24 [REDACTED]
25 [REDACTED]

0323
1 A. Yeah.
2 Q. [REDACTED]
3 [REDACTED]
4 A. [REDACTED]
5 Q. [REDACTED]
6 [REDACTED]
7 A. No.
8 [REDACTED]
9 [REDACTED]
10 Q. [REDACTED]
11 [REDACTED]
12 A. No.
13 Q. [REDACTED]
14 [REDACTED]
15 A. No.
16 Q. [REDACTED]

17 [REDACTED]
18 A. Yeah.
19 Q. [REDACTED]
20 A. [REDACTED]
21 [REDACTED]
22 Q. [REDACTED]
23 [REDACTED]
24 A. No.
25 [REDACTED]

0324
1 [REDACTED]
2 Q. [REDACTED]
3 [REDACTED]
4 [REDACTED]
5 A. [REDACTED]
6 Q. Right?
7 A. Yeah.
8 Q. [REDACTED]
9 [REDACTED]
10 [REDACTED]
11 A. [REDACTED]
12 [REDACTED]
13 Q. [REDACTED]

14 MR. MERMELSTEIN: Objection, form.
15 Objection, argumentative.
16 BY MR. LUTTIER:
17 Q. [REDACTED]
18 A. Yeah.
19 MR. MERMELSTEIN: Objection, argumentative
20 again.
21 BY MR. LUTTIER:
22 Q. Is that correct?
23 A. Yeah.
24 Q. [REDACTED]
25 A. [REDACTED]

0325
1 Q. [REDACTED]
2 A. [REDACTED]
3 Q. [REDACTED]
4 A. Yeah.
5 Q. [REDACTED]
6 A. [REDACTED]
7 Q. [REDACTED]
8 A. Yeah.
9 Q. [REDACTED]
10 A. Yeah.
11 Q. [REDACTED]
12 A. I don't remember.
13 Q. [REDACTED]
14 [REDACTED]
15 A. No. Yeah, it was.
16 Q. [REDACTED]
17 [REDACTED]
18 A. [REDACTED]

19 [REDACTED]
20 [REDACTED]
21 [REDACTED]
22 Q. [REDACTED]
23 [REDACTED]
24 [REDACTED]
25 A. [REDACTED]

0326
1 [REDACTED]
2 [REDACTED]
3 [REDACTED]
4 [REDACTED]
5 Q. [REDACTED]
6 [REDACTED]
7 A. [REDACTED]
8 [REDACTED]
9 Q. Okay. [REDACTED]
10 [REDACTED]
11 A. [REDACTED]
12 [REDACTED]
13 [REDACTED]
14 [REDACTED]
15 [REDACTED]
16 [REDACTED]
17 Q. [REDACTED]
18 [REDACTED]
19 A. [REDACTED]
20 Q. [REDACTED]
21 [REDACTED]
22 A. [REDACTED]
23 Q. [REDACTED]
24 A. [REDACTED]
25 Q. [REDACTED]

0327
1 A. I don't remember.
2 Q. [REDACTED]
3 [REDACTED]
4 A. Yeah. [REDACTED]
5 Q. Okay. [REDACTED]
6 MR. MERMELSTEIN: Objection to form,
7 argumentative.
8 BY MR. LUTTIER:
9 Q. [REDACTED]
10 MR. MERMELSTEIN: Objection to form.
11 BY MR. LUTTIER:
12 Q. [REDACTED]
13 [REDACTED]
14 A. Yeah.
15 Q. [REDACTED]
16 [REDACTED]
17 MR. MERMELSTEIN: Objection to form.
18 BY MR. LUTTIER:
19 Q. Correct?
20 A. Yeah.

21 MR. MERMELSTEIN: Objection to form.

22 BY MR. LUTTIER:

23 Q. [REDACTED]

24 A. Yeah. [REDACTED]

25 [REDACTED]

0328

1 Q. [REDACTED]

2 [REDACTED]

3 [REDACTED]

4 A. Yeah.

5 Q. [REDACTED]

6 [REDACTED]

7 MR. MERMELSTEIN: Objection to form.

8 THE WITNESS: [REDACTED]

9 [REDACTED]

10 BY MR. LUTTIER:

11 Q. Did you -- did he -- had you told him
12 prior to that or before that occasion that you had
13 been sexually active with men?

14 A. I told him, yeah.

15 Q. When did you first tell your dad you were
16 being sexually active with men?

17 A. Well, I think my dad kind of -- they -- I
18 think my dad asked me, and I told him the truth.

19 Q. This was when?

20 A. I don't remember.

21 Q. At 15, at 14, at 12?

22 A. I don't remember.

23 Q. When did you first become sexually active?

24 MR. MERMELSTEIN: Objection to the form.

25 It's been asked and answered so many times

0329

1 already.

2 BY MR. LUTTIER:

3 Q. Just an age is all I'm looking for.

4 A. I don't remember. I've already told you.

5 Q. How long were you sexually active before
6 you told your dad you were sexually active?

7 A. I don't remember because I don't remember
8 when my dad told me.

9 Q. You were telling your dad, remember?

10 A. Yeah, when I asked -- when I told my dad,
11 sorry.

12 Q. Did you -- you've had a couple of
13 boyfriends since then, right?

14 A. Yeah.

15 Q. [REDACTED]

16 [REDACTED]

17 A. Yeah. Well, yeah.

18 Q. Are you sure?

19 A. Yeah.

20 Q. [REDACTED]

21 [REDACTED]

22 A. Yes.

23 Q. Have you had oral sex with your current
24 boyfriend?

25 MR. MERMELSTEIN: Objection, Rule 412. Do
0330

1 not answer that question.

2 BY MR. LUTTIER:

3 Q. [REDACTED]

4 [REDACTED]

5 A. Yeah.

6 [REDACTED]

7 [REDACTED]

8 A. No.

9 Q. [REDACTED]

10 A. Never asked.

11 Q. [REDACTED]

12 [REDACTED]

13 A. [REDACTED]

14 Q. [REDACTED]

15 [REDACTED]

16 MR. MERMELSTEIN: Objection.

17 THE WITNESS: No, I've never, like gone
18 out with -- no, I mean --

19 BY MR. LUTTIER:

20 Q. [REDACTED]

21 [REDACTED]

22 [REDACTED]

23 [REDACTED]

24 [REDACTED]

25 A. Yes.

0331

1 Q. [REDACTED]

2 MR. MERMELSTEIN: Just listen to the --

3 THE WITNESS: Wait.

4 MR. MERMELSTEIN: Listen to the question
5 that he -- make sure you listen -- before you
6 answer, make sure you listen to the question
7 and answer it.

8 Can you read back --

9 THE WITNESS: Sorry.

10 MR. MERMELSTEIN: -- the prior question?

11 (The requested portion of the record was
12 read by the reporter.)

13 MR. MERMELSTEIN: Well --

14 THE WITNESS: What is --

15 BY MR. LUTTIER:

16 Q. If you need to correct something, go
17 ahead. There's no tricks here.

18 A. Yeah, can you ask the question one more
19 time?

20 MR. MERMELSTEIN: We'll go to the first
21 question there and answer. I just wanted to
22 make sure you think about it before you blurt
23 it out.

24 BY MR. LUTTIER:

25 Q. Is the answer, correct? If you want to

0332

1 change it, go ahead and change it if it's wrong.

2 I'm not trying to trick you or anything. [REDACTED]

3 [REDACTED]

7 A. [REDACTED]

8 Q. [REDACTED]

9 A. Yeah.

10 Q. Okay. Now --

11 MR. MERMELSTEIN: That's why you have to

12 be careful when you're answering the question.

13 Make sure you understand the question, and,

14 and, and think about it before you answer it.

15 Okay?

16 THE WITNESS: Uh-huh.

17 BY MR. LUTTIER:

18 Q. Now, your parents know about this lawsuit,

19 right?

20 A. Yeah.

21 Q. Did you tell your parents about the

22 lawsuit before you filed it?

23 A. Yes.

24 Q. Does your sister know about the lawsuit?

25 A. Yes.

0333

1 Q. Did you tell her before you filed it?

2 A. No.

3 Q. And why did you tell your sister?

4 A. Why didn't I?

5 Q. Why did you?

6 A. Because it was something I didn't -- well,

7 something that I thought she should know.

8 Q. Now, you mentioned that in [REDACTED]

9 [REDACTED] there's a close group of all you girls that

10 were going to see Mr. Epstein; is that right?

11 MR. MERMELSTEIN: Objection to form.

12 BY MR. LUTTIER:

13 Q. Correct? You said all of you were, that

14 you went to school together and you were all

15 friends?

16 A. I wasn't friends with everyone that went

17 there, no.

18 Q. Okay. But, but all the girls that went to

19 Epstein that you know, they all know you filed this

20 lawsuit, right?

21 A. I don't know.

22 Q. People down at [REDACTED] know you

23 filed the lawsuit, right?

24 A. No.

25 Q. Well, didn't they come to the [REDACTED]

0334

1 [REDACTED] to interview you?

2 A. Yeah, they went -- well, then, yeah, [REDACTED]

3 [REDACTED] knows.

4 Q. [REDACTED]

5 [REDACTED]

6 [REDACTED]

7 A. [REDACTED]

8 [REDACTED]

9 Q. So, so he knew because the cops came

10 and --

11 A. I don't know.

12 Q. -- had to tell him why they were there to

13 see you, right?

14 A. I don't know what the cops told him, so I

15 don't know what information he knew.

16 Q. Well, you eventually told him what was

17 going on, didn't you?

18 A. No.

19 Q. You never told him?

20 A. No.

21 Q. You never told him you were in the

22 lawsuit?

23 A. Never. I don't -- no.

24 Q. Who else now have you told that you're in

25 the lawsuit?

0335

1 A. My mom and my dad, my sister, my current

2 boyfriend.

3 Q. Current boyfriend is who?

4 A. [REDACTED]

5 Q. Okay.

6 A. My ex-boyfriend [REDACTED], and who else -- and

7 friends, Jane Doe No. 7, [REDACTED]. That's it.

8 Q. Who is your closet friend?

9 A. Jane Doe No. 7.

10 Q. Okay. So she knows?

11 A. Yeah.

12 Q. Who's your second-closest friend?

13 A. My boyfriend.

14 Q. He knows?

15 A. Yeah.

16 Q. Who's your third-closest friend?

17 A. I don't hang out -- I just have a click.

18 That's it. That's all. I already told you the

19 people that I --

20 Q. Is there any -- doesn't everybody that's

21 close to you or you're close to know that you filed

22 the lawsuit?

23 MR. MERMELSTEIN: Objection to form.

24 THE WITNESS: I don't know.

25

0336

1 BY MR. LUTTIER:

2 Q. Well, who is it that you consider to be

3 very close to you that doesn't know you filed the
4 lawsuit?

5 A. My --

6 MR. MERMELSTEIN: Objection to form. Go
7 ahead.

8 THE WITNESS: My boyfriend and my family
9 and my best friend, which is Jane Doe No. 7.

10 BY MR. LUTTIER:

11 Q. I thought you said they all knew?

12 A. What do you mean?

13 Q. My question was who --

14 MR. MERMELSTEIN: Be careful.

15 THE WITNESS: Sorry.

16 BY MR. LUTTIER:

17 Q. Who that you're close to does not know
18 that you filed this lawsuit, if anybody?

19 A. I don't know.

20 Q. I mean, the word spread out in [REDACTED]
21 [REDACTED] among the people that live there that these
22 lawsuits were filed and that you were involved,
23 correct?

24 A. Yeah.

25 MR. MERMELSTEIN: Objection to form.

0337

1 BY MR. LUTTIER:

2 Q. If you went back to your old neighborhood,
3 pretty much everybody knows that you are in this
4 lawsuit, correct?

5 A. Yeah.

6 Q. Pretty much everybody knows that these
7 other people, Jane Doe No. 7 and these other girls
8 are involved in this lawsuit, correct?

9 MR. MERMELSTEIN: Objection to form.

10 THE WITNESS: I don't, I don't know if
11 they know, but if you are the -- I don't know
12 if they know. I don't know who knows, but I'm
13 sure if you go back in [REDACTED], they know
14 who used to hang out. And what was it,
15 whenever the cop made statements, it's like
16 [REDACTED], well, hmm, like
17 who, who in [REDACTED] that hung out that was
18 acquaintances with [REDACTED]? Well,
19 it's kind of commonsense.

20 So I don't know who knows and who doesn't
21 know, but if I went back to my hometown, people
22 aren't idiots.

23 BY MR. LUTTIER:

24 Q. They would --

25 A. They would put two and two, two and two

0338

1 together.

2 Q. They know that you filed a lawsuit and
3 you're involved in this?

4 A. I don't know if they're --

5 MR. MERMELSTEIN: Objection to form.
6 Calls for speculation. Go ahead.

7 THE WITNESS: I don't know.

8 BY MR. LUTTIER:

9 Q. So, who, who that you care about doesn't
10 know, if anybody, that you're in this lawsuit?

11 A. People that I care about know that I am.

12 Q. Okay. Now, you mentioned this current
13 boyfriend, [REDACTED].

14 A. Yes.

15 Q. What's his last name?

16 A. [REDACTED]

17 Q. [REDACTED] And you are saying he's -- do
18 you know whether or not he's a drug dealer?

19 A. No.

20 Q. You don't know or you're saying he's not?

21 A. He's not.

22 Q. Okay. And you're sure of that?

23 A. Yeah.

24 Q. By the way, when's the last time you were
25 arrested?

0339

1 A. Last weekend. Or, no, not last weekend.

2 I don't know, like two weeks ago, maybe.

3 Q. You were arrested two weeks ago?

4 A. Uh-huh.

5 Q. Who were you arrested by?

6 A. [REDACTED] cops.

7 Q. What for?

8 A. Domestic violence.

9 Q. Well, if you were arrested, you must have
10 been the person that committed the act of domestic
11 violence.

12 MR. MERMELSTEIN: Well, you're assuming
13 she was guilty.

14 BY MR. LUTTIER:

15 Q. Someone thought you were --

16 A. I can't --

17 MR. MERMELSTEIN: It's a presumption of
18 innocence, right?

19 THE WITNESS: And I can't talk about it
20 either. All right?

21 BY MR. LUTTIER:

22 Q. Who told you you can't talk about it?

23 It's a matter of public record.

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

25 Q. So, who told you couldn't talk about it?

0340

1 A. Nobody did. I'm just assuming that
2 myself.

3 Q. So, you were arrested --

4 MR. MERMELSTEIN: He can ask you questions
5 about it.

6 THE WITNESS: Oh.

7 BY MR. LUTTIER:

8 Q. Tell me, this event happened on what day
9 of the week?

10 A. On a Friday.

11 Q. Friday night?

12 A. Yeah.

13 Q. And, and can we assume that because the
14 [REDACTED] police were summoned, it happened someplace
15 in [REDACTED]?

16 A. Yeah.

17 Q. And what time did it happen?

18 A. Probably like around 1:00.

19 Q. A.m.?

20 A. Yeah.

21 Q. And where did it happen?

22 A. [REDACTED] house.

23 Q. Which is where?

24 A. In [REDACTED].

25 Q. Okay. I mean, do you have an address?

0341

1 A. [REDACTED]

2 Q. Do you know anything more than [REDACTED]
3 [REDACTED]? It's a big street.

4 A. [REDACTED]

5 Q. [REDACTED] Do you live with him?

6 A. No.

7 Q. Were you staying there?

8 A. Yes.

9 Q. Do you stay there with any degree of
10 regularity?

11 A. What do you mean, regularity?

12 Q. On any kind of regular basis, like, I go
13 up there for the weekends, or --

14 A. Yeah.

15 Q. Is that where you go on the weekends when
16 you're not down at [REDACTED]?

17 A. Why would I be at [REDACTED]?

18 Q. Well, I don't know if you were still
19 there. Are you still a student there?

20 A. No, I graduated.

21 Q. Okay. When did you graduate?

22 A. [REDACTED]

23 Q. [REDACTED]

24 A. [REDACTED]

25 Q. [REDACTED] What did you get a degree in?

0342

1 A. [REDACTED]

2 Q. [REDACTED]

3 A. [REDACTED]

4 Q. [REDACTED]

5 A. Yeah.

6 Q. And --

7 MR. MERMELSTEIN: [REDACTED]

8 BY MR. LUTTIER:

9 Q. Wait. Okay. [REDACTED]
10 We'll settle for that. Bachelor's Degree in
11 [REDACTED] right?
12 A. Uh-huh.
13 Q. How did you do? Did you do well?
14 A. Yeah.
15 Q. Do you know what your GPA was?
16 A. Like a [REDACTED].
17 Q. And do you have plans to go further with
18 your education?
19 A. Yes.
20 Q. What are your plans?
21 A. To get my Master's.
22 Q. Master's?
23 A. Yes.
24 Q. Have you applied?
25 A. Yes.

0343

1 Q. Where?
2 A. [REDACTED].
3 Q. Been accepted?
4 A. Yes.
5 Q. When will you start?
6 A. I am not going to go to [REDACTED] -- or I
7 was -- maybe spring.
8 Q. Spring. By the way, you went to [REDACTED]
9 [REDACTED] undergrad on a scholarship?
10 A. Yeah.
11 Q. Who paid for this? Who sponsored you?
12 Who gave you the scholarship?
13 A. [REDACTED]
14 Q. Okay. Are you going to be scholarshipped
15 for your Master's?
16 A. No. I signed up for my graduate
17 assistance program.
18 Q. So, you plan to teach while you're taking
19 your Master's?
20 A. No, it's where you work for [REDACTED]
21 [REDACTED] and they pay for your Master's.
22 Q. Okay. And do you have plans after you get
23 your Master's?
24 A. Yeah, to work.
25 Q. Okay. And you've got some plan --

0344

1 A. Yeah.
2 Q. -- kind of a general plan of what you want
3 to do in life?
4 A. Yeah, yeah, I want to be a [REDACTED]
5 Q. Okay. [REDACTED]
6 A. [REDACTED]
7 [REDACTED]
8 Q. Okay. Let's go back to this domestic
9 violence thing. Had you and your boyfriend been
10 someplace on this Friday night when this happened?

11 A. At home.
12 Q. And were you anyplace earlier that night?
13 A. Yeah.
14 Q. Where were you?
15 A. [REDACTED]
16 Q. Where?
17 A. [REDACTED]
18 Q. [REDACTED] is that the name of a bar or
19 something?
20 A. Yeah.
21 Q. Where?
22 A. [REDACTED]
23 Q. Had you been anyplace else?
24 A. Yeah, we went to [REDACTED] for dinner.
25 Q. [REDACTED], where is that?

0345

1 A. In [REDACTED].
2 Q. Anyplace else?
3 A. No.
4 Q. Had you been out looking for anybody that
5 night?
6 A. No.
7 Q. Had you been down south to [REDACTED]
8 that night?
9 A. No.
10 Q. Had you been down south to [REDACTED]
11 at any time in the week prior to that?
12 A. No.
13 Q. Okay. So tell me what happened. What was
14 the -- what, what occurred at this incident that
15 occurs at 1:00 at [REDACTED] house?
16 A. It was just, it was over something silly.
17 I don't -- it was -- just got in an argument about
18 being out in the beginning of the night.
19 Q. What do you mean?
20 A. Nothing. It was just, like, like, real --
21 being in a relationship you fight over stupid
22 things, and whenever he was -- I don't know,
23 whenever you have alcohol in your system, you know,
24 it brings up, like, silly little fights become big
25 dramatic.

0346

1 Q. What was the fight about?
2 A. [REDACTED]
3 [REDACTED]
4 [REDACTED]
5 [REDACTED]
6 [REDACTED]
7 [REDACTED]
8 Q. So, did this argument turn physical?
9 A. Yeah.
10 Q. What happened?
11 A. [REDACTED]
12 [REDACTED]

13 [REDACTED]
14 [REDACTED]
15 [REDACTED]
16 [REDACTED]
17 [REDACTED]
18 [REDACTED]
19 [REDACTED]
20 [REDACTED]
21 [REDACTED]
22 [REDACTED]
23 [REDACTED]
24 [REDACTED]

25 MR. MERMELSTEIN: Before you go on, let me
0347

1 know. You said, I'm sorry, I just realized I
2 should ask you, somebody told you not to talk
3 about what happened?

4 THE WITNESS: Yeah.

5 MR. MERMELSTEIN: Was it a lawyer?

6 THE WITNESS: Yeah.

7 MR. MERMELSTEIN: All right. I -- I'm
8 going to plead the Fifth then. If she's
9 already gotten advice by a lawyer, I'm going to
10 plead the Fifth.

11 MR. LUTTIER: Well, she has to -- she's
12 going to --

13 THE WITNESS: I'm going to have to plead
14 the Fifth. I have a lawyer and I'm not
15 supposed to talk about it.

16 BY MR. LUTTIER:

17 Q. Are you charged with criminal -- a crime?

18 A. Yeah, well, the State's picking up -- he's
19 not charging -- press, he's not press -- charging
20 these things, but I'm sure this automatically in
21 domestic violence in the State of Florida, they
22 automatically -- it doesn't get dropped, the State
23 automatically picks it up.

24 MR. MERMELSTEIN: Is it civil or is it
25 criminal?
0348

1 THE WITNESS: Civil, I think. I don't
2 know.

3 MR. MERMELSTEIN: Well, I'm going to --
4 I'm going to --

5 BY MR. LUTTIER:

6 Q. The State attorney -- has the State
7 attorney advised you whether they're going to charge
8 you or not?

9 A. Not -- no, I think -- well, I don't know.
10 They said that he's not charging me. I have a
11 lawyer. Am I allowed to talk about it? I don't
12 know.

13 MR. MERMELSTEIN: Well, he's not -- if
14 your lawyer -- if you could talk about it, you

15 should have your lawyer, yeah.
16 THE WITNESS: Yeah, I have a lawyer.
17 BY MR. LUTTIER:
18 Q. Who is your lawyer?
19 A. [REDACTED] (phonetic).
20 Q. Okay. When you say he's not charging me,
21 he didn't go get an injunction against --
22 A. No.
23 Q. -- domestic violence against you?
24 A. No.
25 Q. While we're speaking about injunctions

0349
1 against domestic violence, let me get you something.
2 A. I mean, what is that? I don't know.
3 MR. MERMELSTEIN: Let him follow up and
4 ask a question.
5 MR. LUTTIER: Is this Exhibit 3?
6 THE COURT REPORTER: Yes.
7 MR. LUTTIER: Let me just --
8 (Defendant's Exhibit No. 3 was marked for
9 identification.)

10 BY MR. LUTTIER:
11 Q. Let me show you what has been marked as
12 Exhibit 3 which purports to be a Petition for
13 Injunction for a Protection Against Dating Violence.
14 And referring to the first page, it says, I, full
15 name, Jane Doe No. 4, do you see the first page?
16 A. Yeah.
17 Q. All right. Is this, is this handwriting
18 on here yours?
19 A. Yeah.
20 Q. Let's go to the second page. Is this your
21 handwriting?
22 A. Yeah.
23 Q. Third page your handwriting?
24 A. Yeah.
25 Q. Fourth page?

0350
1 A. Yeah.
2 Q. Fifth page?
3 A. Yeah.
4 Q. Okay. So did you complete this whole
5 form?
6 A. Yeah.
7 Q. And was it true and correct when you
8 completed it?
9 A. Yeah.
10 Q. Those were the representations you were
11 making to The Court, right?
12 A. Yeah.
13 Q. And then you had a hearing? You went to
14 court?
15 A. Yeah.
16 Q. And [REDACTED] was there at court, [REDACTED]?

17 A. I don't remember.
18 Q. And you got an order that for a year, that
19 was an injunction against domestic violence against
20 him, correct?
21 A. Yeah.
22 Q. So he couldn't come around you for a year;
23 isn't that right?
24 A. Yeah.
25 Q. Okay. Let's take a look at Page 2,

0351

1 Section 1. It says down here in section, section
2 Roman Numeral III, No. 1, where it says, describe
3 the nature of your relationship. It says, [REDACTED]
4 [REDACTED], relationship began. That was you writing
5 to the court that your relationship with [REDACTED]
6 [REDACTED] began [REDACTED], correct?

7 A. Yeah.

8 Q. And then you wrote, [REDACTED]
9 relationship became intimate. That is you were
10 writing to the court, that on [REDACTED] your
11 relationship with [REDACTED] became intimate,
12 right?

13 A. Yeah.

14 Q. That's a specific date, [REDACTED].

15 A. Uh-huh.

16 Q. Well, what did you mean when you say,
17 relationship became intimate?

18 A. I don't know. Kissing, I'm going to say.
19 I mean, kissing, holding hands, like, cuddling. I
20 don't know.

21 Q. Well, what you meant when you wrote this
22 was you were having sexual relations with him --

23 MR. MERMELSTEIN: Objection to form,
24 argumentative.

25 THE WITNESS: I don't remember.

0352

1 BY MR. LUTTIER:

2 Q. Is that true or false?

3 A. Yeah.

4 Q. Okay. So as of [REDACTED], you had
5 sexual relations with [REDACTED], correct?

6 A. No. I don't remember. No.

7 Q. Well, why did you write on here intimate?

8 A. Intimate --

9 MR. MERMELSTEIN: Objection, asked and
10 answered.

11 THE WITNESS: Intimate, I mean, intimate
12 can mean anything, like holding hands. When
13 I'm intimate with somebody that means, I mean,
14 anybody. I mean, it's not like, it's not sex.
15 I don't see where it says, oh, I became -- had
16 started having sex with him. At that time I
17 was 15, so intimate meant making out in the
18 movies.

19 BY MR. LUTTIER:

20 Q. Now, do you recall previously you
21 testified that about four or five months after you
22 first dated [REDACTED] you began having sexual
23 relations with him?

24 A. What? Repeat that.

25 Q. Do you remember earlier you testified that

0353

1 about four or five months after you began dating
2 [REDACTED], you had sexual relations with him?

3 A. Yeah, about four or five months.

4 Q. So that would be about the same as this
5 time period here from [REDACTED], wouldn't
6 it?

7 A. Yeah, but, I mean, intimate, like, to me,
8 when I was that young, intimate, like, meant like
9 going to the movies and making out with your
10 boyfriend in the movie theater. Intimate to me back
11 then wasn't sexual intercourse.

12 Q. Okay. I just want to make sure we're
13 clear. I want you to tell the ladies and gentlemen
14 of the jury in that camera that when you filled this
15 form out that's been marked as Exhibit 3, and you
16 wrote [REDACTED], relationship became intimate,
17 that you didn't mean sexual intercourse. Is that
18 right?

19 MR. MERMELSTEIN: Objection to form.

20 BY MR. LUTTIER:

21 Q. Tell the ladies and the gentlemen of the
22 jury that's not what you meant.

23 MR. MERMELSTEIN: Objection to the form
24 again. Go ahead.

25 THE WITNESS: Yeah, that's not what I

0354

1 meant.

2 BY MR. LUTTIER:

3 Q. Not what you meant. Now, when we ask your
4 mom what you meant, what's she going to say?

5 MR. MERMELSTEIN: Objection to form.

6 That's speculative.

7 THE WITNESS: I don't know.

8 BY MR. LUTTIER:

9 Q. [REDACTED]
10 [REDACTED]

11 MR. MERMELSTEIN: Speculative. Objection.

12 MR. LUTTIER: Can we agree --

13 THE WITNESS: Is that a question?

14 BY MR. LUTTIER:

15 Q. [REDACTED]
16 [REDACTED]

17 MR. MERMELSTEIN: I think it was.

18 BY MR. LUTTIER:

19 Q. [REDACTED]
20 [REDACTED]

20 A. That what?

21 Q. [REDACTED]
22 [REDACTED]
23 MR. MERMELSTEIN: Objection,
24 argumentative.
25 THE WITNESS: Yeah.

0355

1 BY MR. LUTTIER:
2 Q. All right. So tell me, if [REDACTED]
3 [REDACTED] wasn't when you started having sexual
4 relationships with him, or sexual relations, when
5 did you start having a sexual relationship with him?
6 THE WITNESS: I don't remember.
7 MR. MERMELSTEIN: Objection, asked and
8 answered.

9 BY MR. LUTTIER:
10 Q. When was the first time you gave him oral
11 sex?
12 A. I don't remember.
13 Q. When was the first time he stuck his penis
14 in you and ejaculated?
15 A. I don't remember.
16 Q. Was it a significant event --
17 A. Was that even a question?
18 Q. Yeah.
19 A. What did you say?
20 Q. When --
21 A. Can you repeat that question?
22 Q. When did he stick his penis in you and
23 ejaculate --
24 A. I don't remember.
25 Q. -- in any orifice?

0356

1 A. I don't remember.
2 MR. MERMELSTEIN: Objection.
3 BY MR. LUTTIER:
4 Q. [REDACTED]
5 [REDACTED]
6 MR. MERMELSTEIN: Objection to form.
7 BY MR. LUTTIER:
8 Q. Can we agree with that?
9 A. Yeah.
10 Q. So, you still want to stand on your answer
11 to the jury that when you said, became intimate, you
12 weren't referring to sexual intercourse?
13 MR. MERMELSTEIN: Objection to form.
14 THE WITNESS: Yeah.
15 BY MR. LUTTIER:
16 Q. Okay. Now, let's go to Paragraph 6, the
17 next page. Can you read out loud what you told the
18 court occurred on [REDACTED] at [REDACTED]
19 [REDACTED]. First it says, respondent, that
20 means [REDACTED], right?
21 A. Hold on. I'm not following what page
22 you're on.

23 Q. Paragraph 6, Page 3. This is in your
24 handwriting, right?

25 A. (No verbal response.)

0357

1 Q. Correct?

2 A. Uh-huh.

3 Q. All right. It says, respondent; that's

4 [REDACTED], right?

5 A. Uh-huh.

6 Q. Now, read to the ladies and gentlemen of

7 the jury what you wrote occurred on [REDACTED]

8 [REDACTED] with Mr. [REDACTED].

9 A. [REDACTED]

10 [REDACTED]

11 [REDACTED]

12 [REDACTED]

13 [REDACTED]

14 Q. [REDACTED]

15 A. [REDACTED]

16 [REDACTED]

17 [REDACTED]

18 [REDACTED]

19 [REDACTED]

20 [REDACTED]

21 [REDACTED]

22 [REDACTED]

23 [REDACTED]

24 Q. And then did you continue it onto the next

25 page?

0358

1 A. We were --

2 Q. No, onto the next page. Turn onto what's

3 called a continuation. What else did you write?

4 A. [REDACTED]

5 [REDACTED]

6 [REDACTED]

7 [REDACTED]

8 [REDACTED]

9 [REDACTED]

10 [REDACTED]

11 [REDACTED]

12 [REDACTED]

13 [REDACTED]

14 [REDACTED]

15 Q. He humiliated you on [REDACTED]

16 didn't he?

17 MR. MERMELSTEIN: Objection to form.

18 THE WITNESS: Humiliated me in front of --

19 BY MR. LUTTIER:

20 Q. He humiliated you, didn't he?

21 MR. MERMELSTEIN: Objection to form again.

22 THE WITNESS: For what? Is that your --

23 BY MR. LUTTIER:

24 Q. Do you know --

25 A. Is that your opinion?

0359

1 Q. Do you know what humiliation is?

2 A. Is that your --

3 Q. Yes.

4 A. Yeah, I do, but in, in front of who?

5 Q. What --

6 A. Like humiliation is humiliating in front

7 of a crowd of people.

8 MR. MERMELSTEIN: Don't argue with him.

9 Just, just answer.

10 BY MR. LUTTIER:

11 Q. Just humiliate. To yourself, what's

12 humiliate mean to you?

13 A. Yeah, embarrassing.

14 Q. Is that all it means?

15 A. Yeah.

16 Q. I mean, he treated you worse than an

17 animal, didn't he?

18 MR. MERMELSTEIN: Objection to form,

19 argumentative.

20 THE WITNESS: An animal?

21 BY MR. LUTTIER:

22 Q. Would you treat a dog like this?

23 MR. MERMELSTEIN: Objection to form.

24 THE WITNESS: No.

25

0360

1 BY MR. LUTTIER:

2 Q. No human being ought to be treated like

3 this, should they?

4 A. No.

5 MR. MERMELSTEIN: Objection to form.

6 BY MR. LUTTIER:

7 Q. So, were you humiliated by his --

8 A. Yeah.

9 Q. -- conduct toward you? Did it make you

10 feel bad?

11 A. Of course.

12 Q. Did it make you feel low?

13 MR. MERMELSTEIN: Objection to form.

14 THE WITNESS: Yeah.

15 BY MR. LUTTIER:

16 Q. Did it make you feel like you were

17 worthless?

18 MR. MERMELSTEIN: Objection to form.

19 THE WITNESS: Yeah.

20 BY MR. LUTTIER:

21 Q. Did it make you feel so bad that you went

22 and got a court order that said he couldn't come

23 near you for a year?

24 A. Yeah.

25 Q. Jeffrey Epstein never made you feel like

0361

1 that, did he?

2 A. No, but just a lot worse.

3 Q. He was nice to you, wasn't he?

4 A. Yeah, really nice.

5 Q. And by the way, did you -- did you ever

6 touch Mr. Epstein's penis?

7 A. No.

8 Q. You had seen a man's penis before you went

9 to Jeffrey Epstein the first time, hadn't you?

10 A. Yes.

11 Q. Matter of fact, had you touched a man's
12 penis before you went to Jeffrey Epstein?

13 A. I don't remember.

14 Q. Had you placed a man's penis in your mouth
15 before you had gone to see Jeffrey Epstein?

16 A. I don't remember.

17 Q. Had you placed a man's penis in your

18 vagina before you went to Jeffrey Epstein?

19 A. I don't remember.

20 Q. When you made the videotape of you and

21 [REDACTED] having sexual relations, what acts were

22 recorded on the videotape?

23 A. On the tape?

24 Q. Yeah. The tape --

25 A. Sex.

0362

1 Q. -- you made. And you made that tape,

2 right?

3 A. Yeah.

4 Q. [REDACTED]

5 A. [REDACTED]

6 Q. [REDACTED]

7 A. [REDACTED]

8 Q. [REDACTED]

9 A. [REDACTED]

10 Q. [REDACTED]

11 [REDACTED]

12 A. [REDACTED]

13 Q. [REDACTED]

14 A. [REDACTED]

15 Q. [REDACTED]

16 A. [REDACTED]

17 Q. [REDACTED]

18 A. [REDACTED]

19 Q. And how old were you at the time?

20 A. I don't remember.

21 Q. Sixteen?

22 A. I don't remember.

23 Q. Seventeen?

24 A. I don't remember.

25 Q. No more than 17, right?

0363

1 A. I don't remember.

2 Q. But you remember whether you were older

3 than 17, don't you?

4 A. No, I don't remember.

5 Q. [REDACTED]

6 [REDACTED]
7 A. I don't remember.

8 Q. [REDACTED]

9 A. [REDACTED] I
10 don't remember when, and when, I am -- like you
11 already stated, I have been --

12 Q. Okay. Did you --

13 MR. MERMELSTEIN: You're okay. You're
14 doing fine.

15 BY MR. LUTTIER:

16 Q. [REDACTED]

17 [REDACTED]
18 MR. MERMELSTEIN: Objection to form.
19 THE WITNESS: I don't remember.

20 BY MR. LUTTIER:

21 Q. [REDACTED]

22 [REDACTED]
23 A. I don't remember.

24 Q. [REDACTED]

25 [REDACTED]

0364

1 [REDACTED]

2 [REDACTED]

3 A. Yes.

4 Q. [REDACTED]

5 [REDACTED]

6 MR. MERMELSTEIN: Objection to form.

7 BY MR. LUTTIER:

8 Q. Tell the ladies and gentlemen, look in the
9 camera and tell the ladies and gentlemen of the jury
10 you don't know if you were in high school when you
11 made this tape.

12 MR. MERMELSTEIN: Objection to form,
13 argumentative.

14 THE WITNESS: I was in high school when I
15 made this with [REDACTED].

16 BY MR. LUTTIER:

17 Q. Okay. All right. Way too young to be
18 doing this kind of stuff, right?

19 MR. MERMELSTEIN: Objection to form,
20 argumentative.

21 BY MR. LUTTIER:

22 Q. Right? Do you agree with me?

23 A. Yeah.

24 MR. MERMELSTEIN: Objection.

25 [REDACTED]

0365

1 BY MR. LUTTIER:

2 Q. All right. [REDACTED]

3 [REDACTED]

4 A. [REDACTED]

5 Q. [REDACTED]
6 A. Yeah.
7 Q. [REDACTED]
8 A. Yes.
9 Q. [REDACTED]
10 A. [REDACTED]
11 Q. [REDACTED]
12 [REDACTED]
13 A. [REDACTED]
14 Q. [REDACTED]
15 [REDACTED]
16 [REDACTED]
17 [REDACTED]?

18 MR. MERMELSTEIN: You know, I'm going to
19 object to that, again Rule 412, and ask you not
20 to -- It's just going too far.
21 MR. LUTTIER: Well, this is a videotape
22 that she admitted she showed Mr. Epstein, so --
23 MR. MERMELSTEIN: Yeah, but you're --
24 MR. LUTTIER: -- it's clear --
25 MR. MERMELSTEIN: -- asking her to

0366
1 describe the acts --
2 MR. LUTTIER: Yeah.
3 MR. MERMELSTEIN: -- on the videotape?
4 MR. LUTTIER: It's clear. It's within the
5 gambit. We're coming back. And I mean, I am
6 not going to argue, but I mean you're going
7 to -- we're going to come for fees and costs,
8 because there isn't any question about whether
9 that's a legitimate area of inquiry. So I
10 would respectfully suggest you rethink your
11 position on that.

12 MR. MERMELSTEIN: You're asking her what
13 was on the videotape in terms of sex acts.
14 MR. LUTTIER: You bet. You bet. The tape
15 that she showed Jeffrey Epstein. And there is
16 no question about whether that's fair game.
17 MR. MERMELSTEIN: I'm going to give you a
18 little bit of leeway.
19 MR. LUTTIER: Okay, fair enough.
20 THE WITNESS: Of us having sex.

21 BY MR. LUTTIER:
22 Q. I want to know the specific acts. Did it
23 reflect oral sex?
24 A. Sure.
25 Q. Were you, did it reflect you having

0367
1 [REDACTED] penis in your mouth?
2 A. Yeah.
3 Q. Were you giving him what we would -- a
4 typical vernacular, that would be giving him a head
5 job, right?
6 MR. MERMELSTEIN: Come on. I mean, come

7 on. She just --
8 BY MR. LUTTIER:
9 Q. -- in the slang?
10 MR. MERMELSTEIN: There is no need to go
11 to slang. She just told you what they --

12 BY MR. LUTTIER:
13 Q. Did it -- did it show him licking your
14 vagina?

15 A. Yeah.
16 Q. Did, did he ejaculate in your mouth?

17 A. I don't remember.
18 Q. Did it show that on the tape?

19 A. I don't remember.
20 Q. Do you recall him ever ejaculating in your
21 mouth?

22 A. Ever? What does that have to do with the
23 tape?

24 Q. Ever. Ever.
25 MR. MERMELSTEIN: Okay. Ever, whether

0368
1 it's on the tape or not?
2 MR. LUTTIER: Any time.
3 MR. MERMELSTEIN: Okay. Don't answer that
4 question. Rule 412.

5 BY MR. LUTTIER:
6 Q. Did it -- did he insert his penis in your
7 vagina on this tape?

8 A. Yeah.
9 Q. And what position were you in at the time?

10 A. I don't know. I don't remember.
11 Q. Do you remember being on all -- what they
12 call all fours?

13 A. Could have been on all fours. Could have
14 been on my back. I don't remember.

15 Q. And, and other than him inserting his
16 penis in your vagina and in your mouth, did he
17 insert his penis in any other orifice of yours?

18 A. No.
19 Q. And did you perform any other sex acts on
20 him other than giving him oral sex on this tape?

21 A. No.
22 Q. What -- is there anything else depicted on
23 this tape?

24 A. No, not that I --
25 MR. MERMELSTEIN: Objection to form,

0369
1 overbroad.
2 THE WITNESS: Not that I remember, no.

3 BY MR. LUTTIER:
4 Q. [REDACTED]
5 [REDACTED]
6 [REDACTED]
7 [REDACTED]

8 A. Yeah.

9 Q. Was there anybody else that you showed the
10 tape to?

11 A. No.

12 Q. Show it to any of your girlfriends?

13 A. No.

14 Q. Was there anybody else present when you
15 showed it --

16 A. No.

17 Q. -- to Mr. Epstein?

18 MR. MERMELSTEIN: You got -- you got to
19 wait until he finishes the question.

20 BY MR. LUTTIER:

21 Q. [REDACTED]

22 A. No.

23 Q. [REDACTED]

24 A. Yeah.

25 Q. [REDACTED]

0370

1 [REDACTED]

2 [REDACTED]

3 MR. MERMELSTEIN: Objection to form.

4 THE WITNESS: [REDACTED]

5 [REDACTED]

6 [REDACTED]

7 [REDACTED]

8 MR. MERMELSTEIN: No. [REDACTED]

9 [REDACTED]

10 MR. LUTTIER: Yeah.

11 MR. MERMELSTEIN: [REDACTED]

12 [REDACTED]

13 BY MR. LUTTIER:

14 Q. [REDACTED]

15 A. [REDACTED]

16 [REDACTED]

17 [REDACTED]

18 Q. [REDACTED]

19 A. Yeah, I think so. Yeah.

20 Q. [REDACTED]

21 A. It was before, yeah.

22 Q. [REDACTED]

23 A. [REDACTED]

24 Q. [REDACTED]

25 [REDACTED]

0371

1 A. [REDACTED]

2 [REDACTED]

3 [REDACTED]

4 [REDACTED]

5 [REDACTED]

6 Q. [REDACTED]

7 [REDACTED]

8 A. [REDACTED]

9 [REDACTED]

10 [REDACTED]

11 Q. [REDACTED]
12 A. [REDACTED]
13 [REDACTED]
14 [REDACTED]
15 [REDACTED]

16 Q. [REDACTED]
17 A. [REDACTED]

18 Q. [REDACTED]
19 [REDACTED]
20 [REDACTED]
21 [REDACTED]

22 A. [REDACTED]

23 Q. Okay. And was it [REDACTED] idea or your
24 idea?

25 A. [REDACTED] idea.

0372

1 Q. Where is that tape today?

2 A. I don't have it. It's ruined.

3 Q. Who ruined it?

4 A. I did.

5 Q. And when did you ruin it?

6 A. A while, I don't remember. A while ago.

7 Q. You didn't ruin it until after you filed

8 this lawsuit, did you?

9 MR. MERMELSTEIN: Objection to form.

10 THE WITNESS: No, I did. It was before.

11 BY MR. LUTTIER:

12 Q. But how do you know that?

13 A. Because I don't -- I just -- it was

14 definitely not after. I don't even know, no.

15 Q. Well, I don't understand. First you're

16 saying you don't know when you did it, now you're

17 saying you did it --

18 MR. MERMELSTEIN: No, no, no.

19 THE WITNESS: No, I, I was -- I remember

20 it was before I filed my lawsuit, but I don't

21 remember the exact date that I ruined it, but

22 it was before I was even in this lawsuit.

23 BY MR. LUTTIER:

24 Q. Other than the videotape you made of

25 having sex and other sexual acts with

0373

1 [REDACTED], and the photograph of you in your

2 underwear with this other girl when you were in high

3 school, have you been depicted in any other

4 videotapes performing sex acts?

5 A. No.

6 Q. Have you been depicted in any other

7 photographs in any state of undress, that is, either

8 topless or completely naked?

9 A. No.

10 Q. You said that at some point in time after

11 you went to Mr. Epstein's and you, you voluntarily

12 removed your under pants, correct? Remember that

13 testimony?

14 A. Yes.

15 Q. And do you recall at what point whether
16 you were [REDACTED] when you were
17 removing your pants and doing complete nude
18 massages to --

19 A. No, I was, I was -- yeah. Sorry. Ask the
20 question. I completely interrupted you.

21 Q. Where [REDACTED] were you when you
22 were giving complete nude massages to Mr. Epstein?

23 A. [REDACTED]
24 [REDACTED]

25 Q. Okay. You said there came a point in

0374

1 time, something about a vibrator.

2 A. Yeah.

3 Q. What happened with the vibrator?

4 A. He used it on my clit.

5 Q. What do you mean, he used it on your clit?

6 A. He turned the vibrator on and would put it
7 by my vagina.

8 Q. Okay. Did you have your underwear on or
9 off?

10 A. They were -- they were off.

11 Q. Okay. And when did this happen?

12 A. [REDACTED]
13 Q. Everything happened in [REDACTED]
14 [REDACTED]?

15 MR. MERMELSTEIN: Objection,
16 argumentative.

17 THE WITNESS: Yeah, it, like I said, first
18 time I visit, second time I visit. It got
19 where, it got to the point where he would use a
20 vibrator on me, and then he started fingering
21 me, then he started using both on me, and then
22 he would ejaculate. I mean, after I had all my
23 clothes off, I mean it was -- I mean, it was
24 always the same thing. It was --
25

0375

1 BY MR. LUTTIER:

2 Q Did he ask you to use the vibrator on you?

3 A. Yeah.

4 Q. And did you say okay?

5 A. Yeah.

6 Q. So, you did that voluntarily, too,
7 correct?

8 A. Yeah.

9 MR. MERMELSTEIN: Objection.

10 BY MR. LUTTIER:

11 Q. Was there ever a point in time that you
12 said no to the use of a vibrator?

13 A. No.

14 Q. You, you know what an orgasm is, I assume?

15 A. Yeah.
16 Q. Did you ever have an orgasm while you were
17 at Mr. Epstein's?
18 A. Yeah.
19 Q. More than once?
20 A. Yeah.
21 Q. You enjoyed those?
22 MR. MERMELSTEIN: Objection,
23 argumentative.
24 BY MR. LUTTIER:
25 Q. Did you not?
0376
1 A. Yeah.
2 Q. You told him you enjoyed them, didn't you?
3 A. I didn't tell him. It was pretty obvious.
4 Q. You kept coming back because you enjoyed
5 it, didn't you?
6 MR. MERMELSTEIN: Objection.
7 BY MR. LUTTIER:
8 Q. Plus you were getting paid money.
9 A. Yeah.
10 Q. All right. Did you have an orgasm when
11 you were at Mr. Epstein's when he used the vibrator
12 on you?
13 A. Yeah.
14 Q. Yeah. And how many occasions did you go
15 back after the first time that he used the vibrator
16 on you?
17 A. Whenever he would call me up I would go.
18 Q. Do you know how many times that was?
19 A. After that, every single time he was in
20 town, two to three times a week.
21 Q. From [REDACTED] how
22 many times did you go to Mr. Epstein and he used the
23 vibrator on you?
24 MR. MERMELSTEIN: Objection. Objection to
25 form.
0377
1 THE WITNESS: From [REDACTED]?
2 BY MR. LUTTIER:
3 Q. [REDACTED]
4 A. I don't -- I don't know.
5 Q. More than once?
6 A. Yeah.
7 MR. MERMELSTEIN: Objection.
8 BY MR. LUTTIER:
9 Q. Did you have orgasms more than one time
10 between [REDACTED]
11 A. Yeah.
12 MR. MERMELSTEIN: Objection to form.
13 BY MR. LUTTIER:
14 Q. Now, did there come a time -- sorry.
15 MR. MERMELSTEIN: Focus. You know, he's
16 asking about specific dates, so make sure

17 you're sure of your answer.
18 THE WITNESS: I don't know how many times
19 in [REDACTED].
20 BY MR. LUTTIER:
21 Q. Did there come a time that you say -- huh?
22 A. I don't know how many times I've been
23 there.
24 MR. MERMELSTEIN: No, well, he's asking
25 you a very specific date, so make sure you're

0378

1 sure of your answer.
2 THE WITNESS: From like, [REDACTED] --
3 MR. MERMELSTEIN: He's now asking you
4 [REDACTED] --
5 MR. LUTTIER: All right. Let's not have a
6 speaking objection.
7 MR. MERMELSTEIN: -- [REDACTED]
8 [REDACTED].
9 MR. LUTTIER: She knows how to answer and
10 that's a speaking objection.
11 MR. MERMELSTEIN: No, she doesn't.
12 MR. LUTTIER: Oh, she knows, trust me.
13 She, she is very streetwise and knows exactly
14 what's being asked of her.
15 BY MR. LUTTIER:
16 Q. Was there ever a time --
17 MR. MERMELSTEIN: Objection to that
18 characterization.
19 BY MR. LUTTIER:
20 Q. Was there ever a time that you told
21 Mr. Epstein not to use the vibrator on you?
22 A. No.
23 Q. Were there times that you asked him to use
24 the vibrator on you?
25 A. No.

0379

1 Q. Did there come a time that Mr. Epstein
2 gave you a vibrator?
3 A. Yeah.
4 Q. Do you remember what kind of vibrator?
5 A. A Rocket Pocket.
6 Q. Okay. And what did you do with the Rocket
7 Pocket?
8 A. I have -- I had the Rocket Pocket in my
9 drawer at school. I don't know.
10 Q. The drawer at school? What school?
11 A. I have it with -- I had it with my --
12 where I lived.
13 Q. Did you say you had the vibrator at your
14 drawer at school?
15 A. I had it at home and then I had it where I
16 lived. I, it was mine. So, with all my belongings
17 to my current address that I was staying at, that's
18 where I have it.

19 Q. When did he first give it to you?
20 A. I don't remember. I know I had it at my
21 house though when I was in high school.
22 Q. All right. And where did you keep it at
23 home?
24 A. In the drawer.
25 Q. Did your mom and dad know about it?
0380
1 A. No.
2 Q. Did you tell them about it?
3 A. No.
4 Q. Did you use it at home?
5 A. Yeah.
6 Q. Okay. You enjoy it?
7 A. Yeah.
8 Q. You had orgasms with it?
9 A. Yeah.
10 Q. Okay. Did you take it to college with
11 you?
12 A. Yeah.
13 Q. Did you use it at college?
14 A. Yeah.
15 Q. Did you enjoy it?
16 A. Yeah.
17 Q. Have orgasms with it?
18 A. Yeah.
19 Q. Still have it today?
20 A. No.
21 Q. Do you have a different one now?
22 A. A different one?
23 Q. Yeah, a different vibrator.
24 A. Yeah.
25 Q. Still use a vibrator today?
0381
1 A. Yeah.
2 Q. You think there's anything wrong with
3 using a vibrator?
4 A. No.
5 Q. Okay. You went out and bought your own,
6 right?
7 A. Yeah.
8 Q. Okay. All right. Then you said there was
9 a time, came a point in time that he put his finger
10 in your vagina?
11 A. Yeah.
12 Q. And when was that?
13 A. The next time, next visit after he used
14 the vibrator on me.
15 Q. How do you know that that was before you
16 were a [REDACTED] at [REDACTED] ?
17 A. Before I was a [REDACTED] ?
18 Q. Right.
19 A. [REDACTED]
20 [REDACTED]

21 [REDACTED]
22 Q. And did he ask to put his finger in your
23 vagina?
24 A. It wasn't quite like after he -- after I
25 was orgasming -- orgasming me from the vibrator, he

0382

1 flipped me around and I was on all fours, and he
2 stuck his finger in my vagina, and he didn't ask
3 questions. I was already orgasming, so it's not
4 like I told him stop.

5 Q. Did you say no?

6 A. No.

7 Q. Did you stop him?

8 A. No.

9 Q. Did you come back any time --

10 A. He didn't ask me though.

11 Q. Did you come back any time after the first
12 time he put his fingers in your vagina?

13 A. (No verbal response.)

14 Q. Did you ever come back after that?

15 A. Yeah.

16 Q. Did he put his fingers in your vagina any
17 time after that?

18 A. Yeah, pretty much every time after that.

19 Q. Did you ever tell him not to?

20 A. No.

21 Q. You enjoyed it, didn't you?

22 A. Yeah.

23 Q. It was all part of the orgasm, wasn't it?

24 MR. MERMELSTEIN: Objection.

25 THE WITNESS: Yeah.

0383

1 BY MR. LUTTIER:

2 Q. The reality here, the truth is that you
3 enjoyed going to Mr. Epstein's and having an orgasm
4 and getting paid \$200 for giving a massage; isn't
5 that the truth?

6 MR. MERMELSTEIN: Objection to form.

7 THE WITNESS: Yeah.

8 BY MR. LUTTIER:

9 Q. Okay. And you weren't traumatized by any
10 of it, were you?

11 MR. MERMELSTEIN: Objection to form, calls
12 for a conclusion.

13 BY MR. LUTTIER:

14 Q. What damages have you suffered as a result
15 of going to Mr. Epstein?

16 A. Honestly? Everything, like, emotionally.

17 MR. MERMELSTEIN: Take your time.

18 THE WITNESS: I mean, how does it make me,
19 emotionally, like, with my parents, disrespect
20 from my parents, family, friends. It's
21 relationship-wise, like trusting people-wise, I
22 don't know. I couldn't -- a lot of things, a

23 lot of different things emotionally, like, a
24 lot of things.

25
0384

1 BY MR. LUTTIER:

2 Q. Well, you, you kept going back to
3 Mr. Epstein. You never said no, I don't want to
4 come, did you?

5 A. I thought he was my friend.

6 MR. MERMELSTEIN: Objection,
7 argumentative.

8 BY MR. LUTTIER:

9 Q. You never once said to Mr. Epstein, I
10 don't want to come, did you?

11 A. No.

12 Q. As a matter of fact, you gave Mr. Epstein
13 a little feedback, didn't you?

14 MR. MERMELSTEIN: Take your time.

15 BY MR. LUTTIER:

16 Q. You gave him a little feedback, didn't
17 you?

18 A. What do you mean by that?

19 Q. You told him you liked what he was doing,
20 didn't you? Didn't you?

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

22 Q. Do you recall?

23 MR. LUTTIER: What are we on, No. 4?

24 THE COURT REPORTER: Yeah.

25 MR. LUTTIER: Let's mark that as 4.

0385

1 (Defendant's Exhibit No. 4 was marked for
2 identification.)

3 BY MR. LUTTIER:

4 Q. Let me show what's been marked as Exhibit
5 No. 4. Is that your handwriting?

6 A. No. Love always, Jane Doe No. 4. This
7 is, this, for a good time, call --

8 Q. Yes.

9 A. -- that's not my, that's not handwriting;
10 that's [REDACTED], that's [REDACTED] handwriting.

11 Q. Okay. And then below that the hearts and
12 then it's signed Jane Doe No. 4 and [REDACTED] That's
13 your handwriting, the hearts?

14 A. Yeah, the heart, the heart --

15 Q. Right.

16 A. -- the heart, and then heart, Jane Doe
17 No. 4, [REDACTED], that's me. But for a good time and
18 then I didn't, like, put my number there. That's
19 for a good time, call [REDACTED], that's [REDACTED]
20 handwriting. And then that's her heart and [REDACTED].

21 Q. Whose number is [REDACTED]

22 A. That was my number.

23 Q. Okay. So you were present when this note
24 was created?

25 A. Yeah, we both were there.

0386

1 Q. This is [REDACTED]?

2 A. Yeah.

3 Q. Okay. And so you both created this note
4 and left it for Mr. Epstein?

5 A. She wrote it there, and then I signed it,
6 yeah.

7 Q. You knew what you were doing, right?

8 MR. MERMELSTEIN: Objection, form,
9 argumentative.

10 THE WITNESS: No. I wasn't the one that
11 wrote it.

12 BY MR. LUTTIER:

13 Q. You knew what you were doing when you
14 signed it with hearts and put your name and left it
15 there, didn't you?

16 MR. MERMELSTEIN: Objection to form.

17 THE WITNESS: Yeah.

18 BY MR. LUTTIER:

19 Q. Nobody made you do that, did they?

20 A. No.

21 Q. You were telling him you wanted him to
22 call, you were having a good time, you wanted to
23 come back, weren't you?

24 MR. MERMELSTEIN: Objection to form.

25 THE WITNESS: Well, he was a very, like,

0387

1 sexual, like he was always joking around like
2 sex talk, like, I said, for example, he
3 would -- had me, like, go up to, like, joking
4 around like sexual, like, telling me how to
5 give head to a guy, or like always joking
6 around sexually.

7 So with [REDACTED] -- he was that way with a
8 lot of different girls, always joking around
9 sexually with girls.

10 So whenever -- I didn't write this, I
11 didn't tell [REDACTED] to write this. This was
12 [REDACTED] intentions, and I was just joking
13 around and signed it. I didn't -- my
14 intentions weren't to write this, for a good
15 time, call Jane Doe No. 4. This is [REDACTED]
16 intentions, not mine.

17 BY MR. LUTTIER:

18 Q. Wait a minute. Wait a minute. Let's back
19 up. You saw the words and you read the words when
20 it was handed to you to sign, didn't you?

21 A. Oh, she didn't tell me, sign it, I
22 joking --

23 Q. Oh, you did that voluntarily?

24 A. Yeah.

25 Q. So, she handed you this piece of paper,

0388

1 that is, [REDACTED]?

2 A. No, it was -- she wrote it. There was a
3 notepad --

4 Q. Okay.

5 A. -- on, on the table. She wrote it, and
6 picking up -- I just picked up the pen after she
7 wrote something, joking around, because everybody,
8 like jokes around with Jeffrey Epstein, like,
9 sexually like that, picked it up and signed my name.

10 Q. Okay. Let's go through it. When did this
11 happen, by the way?

12 A. I don't remember.

13 Q. You were already at [REDACTED] at
14 this time, or before that?

15 A. I don't remember.

16 Q. So your testimony is that [REDACTED] wrote on
17 a pad at Jeffrey Epstein's house, for a good time
18 call, and put your number, right?

19 A. Yeah.

20 Q. And did you put her number too?

21 A. No.

22 Q. Is that [REDACTED] her number?

23 A. It might have been her old number. I
24 don't remember.

25 Q. Okay. So she wrote all of that, right,

0389

1 first?

2 THE WITNESS: Can I have a tissue? Oh,
3 never mind. I have it right here.

4 BY MR. LUTTIER:

5 Q. Did she write all of the words that appear
6 in this notepad before you put anything on it?

7 A. Did she write anything before -- wait.
8 Ask me the question again.

9 Q. Did she write all the words that appear in
10 this notepad before you put anything on it?

11 A. No, she wrote, for a good time call.

12 Q. So when, when you originally got this
13 note, when you were standing there, this is down in
14 the kitchen of his house?

15 A. Yeah, I think so. I don't remember where
16 we were.

17 Q. Both of you were there for some reason?

18 A. Yeah.

19 Q. Had you both been there giving Mr. Epstein
20 a massage?

21 A. Yeah. She had gone there.

22 Q. But you were both there at the same time?

23 A. Yeah.

24 Q. Were you there -- were you both giving him
25 a massage at the same time?

0390

1 A. No.

2 Q. By the way, do you know what a three-way

3 is?

4 A. Yeah.

5 Q. Did you ever engage in a three-way?

6 A. A three-way phone call?

7 Q. No. Three-way sexual experience.

8 A. Yeah.

9 Q. That is, like, have you ever engaged in
10 those?

11 A. No.

12 Q. Have you ever had a sexual encounter with
13 another woman?

14 A. No.

15 Q. Okay. Now, when you were at
16 Mr. Epstein's, you and [REDACTED] are there. She writes
17 this pad out. She writes this note on this pad,
18 right?

19 A. Yeah.

20 Q. And then after she writes on it, you take
21 a pen and you draw these two hearts and you sign
22 your name?

23 A. Yeah.

24 Q. Nobody made you do that, right?

25 A. No.

0391

1 Q. You did it voluntarily.

2 A. Yeah.

3 Q. Thought it was funny?

4 A. Yeah.

5 Q. And you left it there for Mr. Epstein.

6 A. Yeah.

7 Q. Telling him, call me for a good time.

8 MR. MERMELSTEIN: Objection, form.

9 BY MR. LUTTIER:

10 Q. Right?

11 A. Yeah.

12 Q. And that's what you wanted him to do, was
13 to keep calling and have you come over, wasn't it?

14 MR. MERMELSTEIN: Objection to form.

15 BY MR. LUTTIER:

16 Q. Isn't that right? That's the truth, isn't
17 it?

18 A. That I wanted him to keep calling me?

19 Q. Yeah, and you wanted to keep going there;
20 isn't that the truth?

21 A. I knew he was going to keep calling me.

22 He told me I was his favorite in Florida, so it
23 wasn't something that I, ever crossed my mind.

24 Q. And you wanted him to keep calling you and
25 you wanted to keep going; isn't that the truth?

0392

1 MR. MERMELSTEIN: Objection, objection to
2 form, asked and answered.

3 BY MR. LUTTIER:

4 Q. Isn't that the truth, ma'am?

5 MR. MERMELSTEIN: Objection.

6 THE WITNESS: That -- yes.

7 BY MR. LUTTIER:

8 Q. And the only reason you quit going to
9 Jeffrey Epstein after you were already a [REDACTED] at
10 [REDACTED] was because you found out the police
11 were investigating him and they showed up at [REDACTED]
12 [REDACTED] and interviewed you; isn't that true?

13 MR. MERMELSTEIN: Objection to form.

14 THE WITNESS: No. I got in touch with.

15 Wait. Ask the question again.

16 BY MR. LUTTIER:

17 Q. The only reason you quit going to Jeffrey
18 Epstein was because the police showed up at [REDACTED]
19 [REDACTED] and interviewed you.

20 A. No, because I was still, Jeffrey was still
21 renting me a car. After I knew the police were
22 going to everybody and interviewing questions, like
23 he had rented me.

24 (Brief telephone interruption.)

25 THE WITNESS: I was still talking to him

0393

1 after he was interviewing cops. I still talked
2 to him after I got interviewed by the cops. I
3 talked to him about -- I talked to his lawyers.

4 BY MR. LUTTIER:

5 Q. Well, why didn't you go back and give him
6 more massages after you got interviewed by the --

7 A. Because he, like, he wasn't even -- he
8 didn't stay at his Palm Beach house. He like -- I
9 don't even know where he was at.

10 Q. You would have gone if he had asked you to
11 come back and give him a massage, wouldn't you?

12 MR. MERMELSTEIN: Objection to form.

13 Calls for speculation.

14 BY MR. LUTTIER:

15 Q. Would you have gone back?

16 A. I don't know. Probably more than likely.

17 I don't know.

18 Q. You would have --

19 A. I thought he was my friend.

20 Q. He never did anything to you, right?

21 MR. MERMELSTEIN: Objection to form.

22 BY MR. LUTTIER:

23 Q. He didn't do anything compared to what
24 [REDACTED] did to you, [REDACTED]
25 [REDACTED]

0394

1 MR. MERMELSTEIN: Objection to form --

2 MR. LUTTIER: -- treated you like dirt --

3 MR. MERMELSTEIN: -- argumentative.

4 BY MR. LUTTIER:

5 Q. Right? He never did anything like that to
6 you, did he?

7 MR. MERMELSTEIN: Objection.

8 BY MR. LUTTIER:

9 Q. And what you want in this lawsuit is
10 money, right?

11 A. No.

12 Q. That's why you sued him was for money.

13 A. No.

14 Q. And you were offered money to settle the
15 suit, but you don't want that. You want more money;
16 isn't that right?

17 A. No.

18 MR. MERMELSTEIN: Objection.

19 BY MR. LUTTIER:

20 Q. Well, if you don't want money, what are
21 you suing for?

22 A. For him to get punished.

23 Q. That's the only thing you can get in this
24 case is money, right? Your lawyers have explained
25 that to you, haven't they?

0395

1 MR. MERMELSTEIN: Objection to form.

2 Don't talk about what your lawyers have
3 explained to you.

4 BY MR. LUTTIER:

5 Q. That's the only thing you can get. Are
6 you under the impression that you can get some kind
7 of relief here other than money?

8 MR. MERMELSTEIN: Objection to form.

9 THE WITNESS: No. It's not for me. It's
10 so that he can get punished for things that
11 he's done to me and several other girls.

12 MR. LUTTIER: Let me show you the next
13 exhibit. What number is this?

14 THE COURT REPORTER: Five.

15 MR. LUTTIER: Okay.

16 (Defendant's Exhibit No. 5 was marked for
17 identification.)

18 BY MR. LUTTIER:

19 Q. Let me show you what's been marked as
20 Exhibit 5. It's entitled Psychological/Social
21 History. Do you recognize that document?

22 A. Yeah.

23 Q. Is that your handwriting on it?

24 A. Yeah.

25 Q. Is this a document that you completed?

0396

1 A. Yeah.

2 Q. And did you complete it on [REDACTED]

3 [REDACTED]?

4 A. Yeah.

5 Q. And do you remember why you completed this
6 document?

7 A. Yeah.

8 Q. Why?

9 A. Because I was, had an appointment with
10 [REDACTED].

11 Q. Okay. Were all of the answers that you
12 gave on this document true and correct?

13 MR. MERMELSTEIN: Look at them carefully.

14 (Ms. Doe and Mr. Mermelstein were
15 conducting a discussion off the record.)

16 THE COURT REPORTER: Is this off the
17 record?

18 MR. MERMELSTEIN: Well, we're kind of on
19 the record right now. So, have you read all
20 these?

21 THE WITNESS: No. I mean there's a few
22 that I have questions about, you know. There's
23 a few that I have questions about that I am
24 kind of like, I am looking at this now and I am
25 like --

0397

1 MR. MERMELSTEIN: Anything you need to
2 clarify. I think was -- what was the question?

3 BY MR. LUTTIER:

4 Q. My question was are all of the answers
5 that you gave on this document true and correct?

6 MR. MERMELSTEIN: So, now that's just Page
7 1. The whole thing.

8 BY MR. LUTTIER:

9 Q. Well, I should -- let me rephrase that.
10 Were all the answers that you gave on this document
11 true and correct as of [REDACTED] or
12 whatever date you completed this document?

13 A. On this one?

14 Q. Yeah.

15 MR. MERMELSTEIN: Okay. Go through each
16 page and look at that and refresh your mind.

17 BY MR. LUTTIER:

18 Q. In all due respect, the answer is yes or
19 no. You can't really consult with your lawyer about
20 it.

21 MR. MERMELSTEIN: If you're confused by
22 something then, then you have to qualify your
23 answer.

24 THE WITNESS: Okay.

25 MR. MERMELSTEIN: But, okay.

0398

1 THE WITNESS: Is everything -- well,
2 there's one thing --

3 MR. MERMELSTEIN: The question is, is
4 everything true and correct, that's, that's
5 written here, each page.

6 THE WITNESS: Well, I am going -- I
7 already know the answer to that question. I
8 have only gotten to the second page.

9 MR. MERMELSTEIN: Do you want to give your
10 answer and then you can go or --

11 THE WITNESS: Yeah, well, it says, did you
12 ever get in trouble while in school? Well,
13 yeah, when I was in high school I [REDACTED],
14 but I had circled no. But yeah, when I was in
15 high school I got in trouble.

16 BY MR. LUTTIER:

17 Q. Well, was this paper given to you by
18 [REDACTED] to complete?

19 A. Yeah.

20 Q. Did he tell you to give honest --

21 A. Yeah.

22 Q. -- and truthful answers?

23 A. Yeah.

24 Q. Well, why didn't you give him honest and
25 truthful answers?

0399

1 MR. MERMELSTEIN: Objection, form.

2 THE WITNESS: Because if you, if you read
3 up above, it says how far did you go in school.

4 MR. LUTTIER: Right.

5 THE WITNESS: I said attended college, but
6 did no graduate college. So I am guessing,
7 like, whenever I looked at this it said did you
8 ever get in trouble while in school, I think
9 while I was in college. I think my mind frame
10 was set to college, not in high school. And
11 that's why I'm looking at this now and I'm
12 thinking, well, I know in high school I got
13 into trouble. So, I know that's not true.

14 MR. LUTTIER: Well, did you --

15 THE WITNESS: And, like, whenever I look
16 at something, after reading 17, it says, like,
17 I am thinking, I was just thinking while I was
18 in college. I don't know.

19 BY MR. LUTTIER:

20 Q. Did [REDACTED] ask you after you completed
21 this, didn't he ask you whether you had any
22 questions about it?

23 A. I don't remember.

24 Q. Did you tell him you had questions and
25 didn't understand any of these?

0400

1 A. No, I don't remember.

2 Q. Did you tell him any of the answers
3 weren't right?

4 A. No, I don't remember.

5 Q. So, how is somebody supposed to know
6 whether you're telling the truth or lying?

7 MR. MERMELSTEIN: Objection to form,
8 argumentative.

9 BY MR. LUTTIER:

10 Q. How do, how does one know on what
11 occasions you're telling the truth and when you're
12 lying about something?

13 MR. MERMELSTEIN: Objection to form,
14 argumentative.

15 BY MR. LUTTIER:

16 Q How does somebody know?

17 MR. MERMELSTEIN: Objection.

18 THE WITNESS: They should know.

19 BY MR. LUTTIER:

20 Q. Well, first of all, you talked to the
21 police under oath, and you're telling us you lied to
22 the [REDACTED] Police, right?

23 MR. MERMELSTEIN: Objection, asked and
24 answered.

25

0401

1 BY MR. LUTTIER:

2 Q. Is that right? That's what you're telling
3 us.

4 MR. MERMELSTEIN: Asked and answered.

5 THE WITNESS: Yeah.

6 BY MR. LUTTIER:

7 Q. So, we don't really know, even when you're
8 under oath, whether you're telling the truth or
9 you're lying, do we?

10 A. No.

11 MR. MERMELSTEIN: Objection.

12 BY MR. LUTTIER:

13 Q. Okay. All right. So what other answers
14 are, do you say are incorrect on here,
15 notwithstanding the fact, that you gave to
16 [REDACTED] after he told you to answer truthfully?

17 MR. MERMELSTEIN: I'm going to object to
18 the form of that question.

19 THE WITNESS: It says have you had any
20 major changes in income during the last two
21 years.

22 BY MR. LUTTIER:

23 Q. What number is that?

24 A. Thirty.

25 Q. Okay.

0402

1 A. I said no, but during the summers I worked
2 at, like, I worked at [REDACTED], so I made a
3 little bit of money, but I put no because if you
4 read the question, it says no, increasing
5 significantly or decrease significantly. I only had
6 a summer job.

7 Q. Okay. Well, in 39 you reflect that you
8 had a summer job, right?

9 A. I'm sorry. I didn't read that far.

10 THE WITNESS: Can I ask a question? Yes,
11 or no?

12 MR. MERMELSTEIN: Huh?

13 THE WITNESS: Can I ask you a question?

14 MR. MERMELSTEIN: You really can't.

15 THE WITNESS: Okay.
16 MR. MERMELSTEIN: Again remember to keep
17 in mind what the question was that he
18 originally asked about.

19 THE WITNESS: Uh-huh. How would you --

20 BY MR. LUTTIER:

21 Q. What number?

22 A. Fifty-five, how would you describe your
23 illegal drug usage. I said I never used drugs.

24 Q. That wasn't true, was it?

25 A. No.

0403

1 Q. You lied to [REDACTED], right?

2 A. Yes.

3 Q. What should the answer have been?

4 A. I didn't --

5 MR. MERMELSTEIN: Objection, that's been
6 asked and answered.

7 BY MR. LUTTIER:

8 Q. What should the answer have been of those
9 choices?

10 A. Well, out of all those choices, it would
11 be two.

12 Q. Once or twice a year? And you didn't want
13 [REDACTED] to know that, did you?

14 A. No.

15 Q. You knew when you answered that question
16 you were giving him a false answer, didn't you?

17 A. It was --

18 MR. MERMELSTEIN: Objection.

19 BY MR. LUTTIER:

20 Q. You knew that when you answered the
21 question you were giving a false answer, didn't you?

22 MR. MERMELSTEIN: Objection to form.

23 THE WITNESS: Yeah.

24 MR. LUTTIER: Okay.

25 MR. CRITTON: You know, you could all go

0404

1 off the record.

2 MR. MERMELSTEIN: I suppose.

3 MR. CRITTON: We're just burning up tape
4 there. Just go ahead and finish looking.

5 MR. MERMELSTEIN: Are you ready?

6 THE WITNESS: No.

7 MR. LUTTIER: Did you have a question?

8 MR. MERMELSTEIN: Well --

9 THE WITNESS: If he's going to leave, can
10 I use the bathroom?

11 MR. LUTTIER: Well, no, I am not going to
12 leave. Okay. Go ahead.

13 MR. MERMELSTEIN: Yeah, because it's kind
14 of a question pending, so let's, let's just
15 finish this and then you can go to the
16 bathroom.

17 THE WITNESS: [REDACTED]
18 [REDACTED]
19 [REDACTED]

20 BY MR. LUTTIER:
21 Q [REDACTED]
22 A [REDACTED]
23 Q [REDACTED]
24 A [REDACTED]
25 Q [REDACTED]

0405
1 A. Yeah.
2 Q. And you knew when this question was asked
3 that [REDACTED],
4 didn't you?
5 A. Yeah.
6 Q. So you knew you were giving [REDACTED] a
7 false answer.
8 A. Yeah.
9 Q. You didn't want him to know [REDACTED]
10 [REDACTED], did you?
11 A. I didn't want anybody to know.
12 Q. You didn't want him to know, because you
13 were going to have to tell him [REDACTED]
14 [REDACTED], weren't you?

15 MR. MERMELSTEIN: Objection,
16 argumentative.
17 BY MR. LUTTIER:
18 Q And you didn't want to have to do that;
19 isn't that right?
20 A Yeah.
21 MR. MERMELSTEIN: Objection.
22 MR. CRITTON: Just so you know, you're not
23 getting it because she's got the paper in front
24 of her face.
25 MR. LUTTIER: Yeah, you have that.

0406
1 BY MR. LUTTIER:
2 Q. You didn't want to tell [REDACTED] that
3 you [REDACTED]
4 [REDACTED], right?

5 A. Yeah.
6 Q. And you didn't want to have to tell him
7 that, right?
8 MR. MERMELSTEIN: Objection to form.
9 THE WITNESS: Yeah.

10 BY MR. LUTTIER:
11 Q [REDACTED]
12 A. Yeah.
13 Q [REDACTED]
14 A. Yeah.
15 Q [REDACTED]
16 A. Yeah.
17 Q [REDACTED]
18 [REDACTED]

19 MR. MERMELSTEIN: Think about the question
20 before you answer. Objection to form.

21 THE WITNESS: Yeah.

22 BY MR. LUTTIER:

23 Q. [REDACTED]

24 [REDACTED]
25 A. Yeah.

0407

1 Q. [REDACTED]

2 [REDACTED]
3 A. (No verbal response.)

4 MR. MERMELSTEIN: Objection to form.

5 BY MR. LUTTIER:

6 Q. [REDACTED]

7 [REDACTED]
8 [REDACTED]

9 MR. MERMELSTEIN: Objection to form.

10 THE WITNESS: [REDACTED]

11 [REDACTED]
12 [REDACTED]

13 [REDACTED]
14 [REDACTED]

15 [REDACTED]
16 [REDACTED]

17 [REDACTED]
18 BY MR. LUTTIER:

19 Q. [REDACTED]

20 [REDACTED]
21 [REDACTED]

22 [REDACTED]
23 THE WITNESS: [REDACTED]

24 MR. MERMELSTEIN: Objection.

25

0408

1 BY MR. LUTTIER:

2 Q. [REDACTED]

3 [REDACTED]
4 [REDACTED]

5 A. [REDACTED]

6 [REDACTED]
7 [REDACTED]

8 [REDACTED]
9 [REDACTED]

10 [REDACTED]
11 [REDACTED]

12 Q. [REDACTED]

13 [REDACTED]

14 A. No.

15 Q. Have you now told me all the questions you
16 answered false?

17 A. What was --

18 Q. Have you now told me each of the questions
19 that appear in this exhibit that you answered false,

20 falsely?

21 A. Yeah.
22 Q. Well let's look at Question 52. Question
23 52 says which of the following have you used. And
24 it refers to 12 different drugs. What did you
25 answer?

0409

1 A. I stated that one. I already said that.

2 Q. And what should the answer -- you, you
3 wrote none, right?

4 A. Right.

5 Q. Or you circled it. And what should it
6 have been?

7 A. Cocaine.

8 Q. That would be two. What else?

9 A. Marijuana.

10 Q. Nine. What else?

11 MR. MERMELSTEIN: You've got the paper in
12 front of your face again. You might want to
13 try to hold it down just a bit.

14 BY MR. LUTTIER:

15 Q. Two and nine and what else?

16 A. What is barbit -- what is --

17 Q. Barbiturates.

18 A. Yeah, what are those?

19 Q. So if you didn't know, you would ask
20 [REDACTED] what that meant?

21 MR. MERMELSTEIN: Objection to form. Go
22 ahead and try.

23 BY MR. LUTTIER:

24 Q. At least two of these drugs you'd used,
25 you knew you'd used, and you just, you just gave a

0410

1 false answer to [REDACTED], right?

2 A. Yeah, I already told you that I --

3 Q. Okay. Let's take --

4 A. -- already told you that.

5 Q. Let's take 53. The question was, have you
6 ever, have you ever felt there was a time you drank
7 too much alcohol. You answered, yes, on one
8 occasion.

9 A. Yeah.

10 Q. That wasn't truthful, was it?

11 A. Actually, I drank alcohol on more than one
12 occasion. It didn't ask me if I ever thought I did.

13 Q. It says, have you ever felt there was a
14 time you drank too much alcohol, and you had four
15 choices. One of the choices was, yes, on several
16 occasions, one was yes on more than several
17 occasions. But you answered, yes, on one occasion.
18 That's a false answer, wasn't it?

19 A. No.

20 Q. There was more than one time in your life,
21 prior to the time you answered this that you felt
22 you drank too much, wasn't there?

23 A. Apparently not at that time, no.
24 Q. You'd been drunk a bunch of times before
25 you answered this, weren't you?

0411

1 MR. MERMELSTEIN: Objection to form.

2 THE WITNESS: Have you ever drank too much
3 alcohol? No, I -- yeah, I drank, but never got
4 to the point where I was, like, wasted.

5 BY MR. LUTTIER:

6 Q. You got completely drunk on more than one
7 occasion before this?

8 A. Yeah. I mean --

9 MR. MERMELSTEIN: Objection to form.

10 BY MR. LUTTIER:

11 Q. Just so we're clear, you didn't think that
12 meant that, that there was a time when you drank too
13 much alcohol, those occasions when you got
14 completely drunk?

15 A. I drank more -- yeah, I drank before, but
16 I guess, I am sorry, yeah.

17 Q. Okay. And then over on No. 57, it says --
18 or 87, I'm sure, what is the primary problem
19 bothering you. You answered other. So none of the
20 first 13 items applied, but there was some other
21 that you answered, but you didn't say what the other
22 was, right?

23 A. Yeah.

24 Q. Okay. That was a truthful answer, right?

25 A. Yeah.

0412

1 Q. And then 88 says, how long ago did you
2 begin to be troubled by this problem, and you had
3 circled, does not apply, and then you crossed that
4 out. And you just didn't answer that question,
5 right?

6 A. I didn't answer it.

7 Q. And then 89, rank the degree to which this
8 problem has affected your life. You initially had
9 circled a little, and then you changed it to does
10 not apply, correct, meaning that whatever problem it
11 was wasn't a problem that affected your life,
12 correct?

13 MR. MERMELSTEIN: Objection, form.

14 THE WITNESS: No.

15 BY MR. LUTTIER:

16 Q. Why do you say it doesn't apply then?

17 MR. MERMELSTEIN: Same objection.

18 THE WITNESS: I don't know.

19 BY MR. LUTTIER:

20 Q. What did you mean by that when it said
21 rate the degree to which this problem has affected
22 your life, and you answered, does not apply. What
23 did you mean?

24 A. I don't know why I didn't answer it. I

25 don't know why I didn't answer that question.

0413

1 Q. Well, you answered it. You answered with
2 a specific answer, does not apply. So, what were
3 you telling [REDACTED]?

4 A. It means that I don't want to answer that
5 question.

6 MR. MERMELSTEIN: Objection to form.

7 BY MR. LUTTIER:

8 Q. Mean what?

9 A. That I don't want to answer that question.

10 Q. Well, it doesn't say I don't want to
11 answer. It says it doesn't apply.

12 MR. MERMELSTEIN: Objection.

13 THE WITNESS: That's what I, that's
14 what --

15 MR. MERMELSTEIN: Objection.

16 THE WITNESS: Meaning I don't want to
17 answer that question.

18 BY MR. LUTTIER:

19 Q. Well, let's look at the next one, No. 90.
20 How often do you experience this problem? Again you
21 answered, does not apply, correct?

22 A. Yeah.

23 Q. Again you're saying it has no application
24 to your life; isn't that right?

25 MR. MERMELSTEIN: Objection to form.

0414

1 THE WITNESS: No.

2 BY MR. LUTTIER:

3 Q. Then the next one says what other kinds of
4 problems are bothering you, and there's 14 specific
5 items listed. You didn't answer any of those, and
6 you answered No. 15 does not apply.

7 A. Yeah.

8 Q. Indicating that none of those things
9 applied as a problem that was bothering you.

10 MR. MERMELSTEIN: Objection.

11 THE WITNESS: Because I don't want to
12 answer that question.

13 BY MR. LUTTIER:

14 Q. [REDACTED]

15 A. It doesn't mean that they don't apply.

16 Q. [REDACTED]

17 [REDACTED]

18 A. I don't know.

19 Q. [REDACTED]

20 A. I don't know.

21 Q. You have no knowledge about them?

22 A. No.

23 Q. Okay. And what drugs do you know from
24 your own personal knowledge that Jane Doe No. 7 has
25 used?

0415

1 A. I don't know.

2 Q. None? You don't know of any drugs that

3 Jane Doe No. 7 has used?

4 A. Maybe -- I don't know.

5 Q. Well, let's make sure we're clear here.

6 Are you telling me under oath that you don't know of

7 any drugs that Jane Doe No. 7 has used?

8 A. No, I don't know.

9 Q. Never seen her use any drugs? She's never

10 told you she used any drugs? You're sure?

11 A. Not like, hey, what kind of drugs do you

12 do. It's not like we're drug addicts. It's not

13 like --

14 Q. My question is under oath whether you're

15 aware, either from drugs you've seen her use or what

16 she's told you drugs she's used?

17 A. I have seen her drink.

18 Q. Okay.

19 A. Maybe smoke pot, maybe. Other than

20 that --

21 MR. MERMELSTEIN: Do you remember?

22 BY MR. LUTTIER:

23 Q. Well, what do you mean, maybe?

24 THE WITNESS: No, I don't remember.

25 MR. MERMELSTEIN: Okay.

0416

1 BY MR. LUTTIER:

2 Q. Your testimony under oath is you've never

3 seen Jane Doe No. 7 smoke pot?

4 MR. MERMELSTEIN: No, no.

5 THE WITNESS: No, I didn't say I've never

6 seen her. I just don't remember.

7 BY MR. LUTTIER:

8 Q. You may have seen her smoke pot?

9 A. When I was in high school, I hung out with

10 her at high school parties. I don't remember. I

11 mean, everybody -- I don't know. I don't remember.

12 Q. My question is very simple. You may have

13 seen her smoke pot?

14 A. Yeah.

15 Q. What other drugs do you know that Jane Doe

16 No. 7 has used?

17 A. I don't know.

18 Q. Don't have any idea?

19 A. No.

20 Q. How about Jane Doe No. 3, what other

21 drugs, what drugs have you, do you know that Jane

22 Doe No. 3 has used?

23 A. Drinking and smoke pot.

24 Q. Any others?

25 A. No.

0417

1 Q. Are you sure?

2 A. Yeah.

3 Q. Okay. [REDACTED]

4 [REDACTED]

5 A. I don't know.

6 Q. [REDACTED]

7 [REDACTED]

8 A. I don't know.

9 Q. You filled out a health insurance or a
10 health questionnaire at [REDACTED] saying that
11 a friend of yours had MRSA. Do you know what MRSA
12 is?

13 A. Yeah, it's where you get like in the
14 hospital after having, like, surgery.

15 Q. And who are you referring to when you said
16 you had a friend that had MRSA?

17 A. [REDACTED]

18 Q. [REDACTED]

19 A. At his, yeah, or -- yeah.

20 Q. How about any of your girlfriends that
21 went to Jeffrey Epstein's, were you referring to any
22 of them as having MRSA?

23 A. No.

24 Q. Do you know about any of the girls that
25 went to Jeffrey Epstein having MRSA?

0418

1 A. No.

2 Q. [REDACTED]

3 [REDACTED]

4 [REDACTED]

5 A. No.

6 Q. Have you suffered any economic loss; that
7 is, have you lost any money as a result of going to
8 see Jeffrey Epstein? And, obviously, you got paid
9 for what you went, but have you lost any money as a
10 result of going to see Jeffrey Epstein?

11 A. No.

12 Q. Okay. Do you know what a pimp is?

13 A. Yeah.

14 Q. A pimp is someone that gets paid money to
15 prostitute somebody or to, to facilitate the service
16 of a prostitute. Is that what you understand a pimp
17 is?

18 A. Yeah.

19 Q. Would you agree with me that you were, in
20 essence, acting as a pimp; that is, you got paid
21 money for taking [REDACTED] to Jeff Epstein?

22 MR. MERMELSTEIN: Objection,
23 argumentative.

24 THE WITNESS: Yeah.

25

0419

1 BY MR. LUTTIER:

2 Q. And were you a prostitute at one time?

3 A. No.

4 MR. MERMELSTEIN: Objection, form.

5 BY MR. LUTTIER:

6 Q. Did you ever consider yourself to have
7 been a prostitute?

8 A. No.

9 Q. Okay. You mentioned that, you were
10 talking about Mr. Epstein, and one other event that
11 you said was, you said, I think to use your
12 language, he licked your clit.

13 A. Yeah.

14 Q. When did that occur?

15 A. It happened one time.

16 Q. Was it after [REDACTED]?

17 A. [REDACTED]

18 Q. Of high school?

19 A. Yeah.

20 Q. How do you know it was in [REDACTED]
21 in high school?

22 A. Because after that moment, I said I never,
23 never again.

24 Q. Never what again?

25 A. Like he is not, like, licking my clit.

0420

1 Q. Did he ask you --

2 A. He kept begging me.

3 Q. Did he ask you to lick your clit?

4 A. Yeah, he kept begging me.

5 Q. And did you --

6 A. Finally, I gave in.

7 Q. Did you say, no?

8 A. No.

9 Q. Had you said --

10 A. Yes, I said no. And finally I said, yes.

11 Q. Had you said no on prior occasions?

12 A. No.

13 Q. He never asked you to lick your clit prior
14 to the time that, that he did it the first time?

15 A. No.

16 Q. Okay. So the first time he asked to lick
17 your clit, you said okay?

18 A. No, I said no. And then he kept begging
19 me and asking me to lick it that day. And finally
20 after saying no, like, three or four times, I said,
21 okay.

22 Q. Okay. So every time you said no, he
23 didn't do it, right? When you said no, he didn't
24 lick your clit?

25 A. Yeah.

0421

1 Q. And then when you said yes, then you say
2 he licked your clit?

3 A. Yeah.

4 Q. And for how long did this go on?

5 A. A couple of seconds.

6 Q. A couple of seconds. Now, you had had

7 your clit licked before that event, had you not?

8 A. Yeah.

9 Q. [REDACTED] had done it, right?

10 A. Yeah.

11 Q. Other boys had done it, right?

12 A. No.

13 MR. MERMELSTEIN: Objection.

14 BY MR. LUTTIER:

15 Q. And, and then, while he was licking your
16 clit, did you tell him you wanted him to stop?

17 A. Yeah.

18 Q. And did he stop?

19 A. Yeah.

20 Q. Okay. And when you say he licked your
21 clit, did he penetrate your vagina or just lick your
22 clitoris?

23 A. No, he licked my clit.

24 Q. Okay. And, and how were you positioned at
25 the time that this happened?

0422

1 A. I was standing. There was a massage table
2 to the right of me and there was a couch to the left
3 of me, and I had my right leg lifted up on the
4 massage table, and he was on his knees.

5 Q. So, you had positioned yourself for this?

6 A. Yeah, I was -- yeah, I guess. I didn't
7 position it for me to go like that. He kept begging
8 me and begging me.

9 Q. Well, you --

10 A. Yeah, well, then, yes, I did.

11 Q. You had to put your leg up on the massage
12 table, right?

13 A. Yeah.

14 Q. And open up your vagina, right, your
15 legs --

16 MR. MERMELSTEIN: Objection.

17 BY MR. LUTTIER:

18 Q. -- so he could lick your clit, right?

19 MR. MERMELSTEIN: Objection.

20 BY MR. LUTTIER:

21 Q. That took you some time to do, right?

22 A. Yeah.

23 Q. So you did all that voluntarily, right?

24 A. Yeah.

25 Q. You could have said, no, and that would

0423

1 have been the end of it, right?

2 A. Yeah.

3 Q. You -- at any time while you were going to
4 see Jeffrey Epstein, you could have just said, no,
5 I'm not going back anymore, couldn't you?

6 A. Yeah.

7 Q. Nobody coerced you to do it. You were
8 going voluntarily, correct?

9 A. Yeah.
10 Q. Okay. [REDACTED]
11 [REDACTED]
12 [REDACTED]
13 A. No.
14 Q. Why not?
15 A. [REDACTED]
16 [REDACTED]
17 Q. Did you, you told [REDACTED] that you were
18 uncomfortable with, what you referred to as, your
19 body. I think the words used was "down there"; do
20 you remember that?
21 A. Yeah.
22 Q. Are you talking about your vagina or your
23 crotch area?
24 A. Yeah.
25 Q. Okay. And you said you'd been

0424
1 uncomfortable with it for some period of time.
2 A. Yeah.
3 Q. And you said that it didn't -- you,
4 something about you looked at other girls and you
5 thought yours looked different or something like
6 that?
7 A. Yeah.
8 Q. What is it you're referring to?
9 A. The way that my vagina is shaped compared
10 to other girls.
11 Q. And what is it that's different about your
12 vagina that's --
13 A. My lips are a lot larger than other girls'
14 lips are. They come out more, and that's why
15 Jeffrey Epstein said that I was his favorite girl in
16 [REDACTED].
17 Q. Okay. And, and that's been true your
18 whole life?
19 A. Uncomfortable? Yeah.
20 Q. Didn't prevent you from having sex with
21 other men, right?
22 A. You mean with [REDACTED]?
23 Q. With anybody else. Your lawyer hadn't let
24 you answered about the other people you've had sex
25 with.

0425
1 A. Maybe that's -- maybe that's why I've been
2 with him for on and off with him for five or six
3 years. So yeah, I was uncomfortable with other
4 guys.
5 Q. Your current boyfriend, you had sex with
6 him, right?
7 A. After being with somebody that's abused me
8 for like seven year, five years, do you think I'm
9 comfortable -- do you think I would go back to being
10 with him if I was comfortable with my body?

11 MR. MERMELSTEIN: Take it easy. Answer
12 the question.

13 BY MR. LUTTIER:

14 Q. By the way, even after you went and got an
15 injunction against domestic violence because of all
16 the horrible things that [REDACTED] did, you
17 then [REDACTED]

18 [REDACTED] didn't you?

19 A. [REDACTED]

20 [REDACTED]

21 Q. [REDACTED]

22 A. Yeah.

23 Q. [REDACTED]

0426
1 [REDACTED]

2 A. Yeah.

3 Q. [REDACTED]

4 [REDACTED]

5 MR. MERMELSTEIN: Objection.

6 THE WITNESS: [REDACTED]

7 [REDACTED]

8 BY MR. LUTTIER:
9 Q. [REDACTED]

10 [REDACTED]

11 [REDACTED]

12 MR. MERMELSTEIN: Objection, form.

13 BY MR. LUTTIER:

14 Q. Is that right?

15 A. Yeah.

16 Q. I mean, wouldn't -- have you discussed
17 that with this psychiatrist that you said you had
18 gone to in [REDACTED]

19 [REDACTED]?

20 A. [REDACTED]?

21 Q. Yeah. Have you talked to him a little bit
22 about that?

23 A. I haven't got a chance to.

24 Q. Well, how many times have you been to him?

0427
1 A. Well, yeah, I mean, I don't remember. We
2 talked about several different things. So I am
3 sure, yeah.

4 Q. How many times have you been to him?

5 A. How many times have I been?

6 Q. Yeah, how many times have you been to him?

7 A. To [REDACTED]?

8 Q. Yeah.

9 A. Yeah. I don't know, but I have been going
10 there since [REDACTED], maybe once or twice a week I've
11 been going to see him. I don't know, maybe [REDACTED]
12 times.

13 Q. Have you, has everything that you told him
14 been the truth?

15 A. Yes.

16 Q. I'm going to tell you, we're going to get
17 his records.

18 A. Yeah.

19 Q. All right. And have you told him the
20 whole truth?

21 A. Yeah.

22 MR. MERMELSTEIN: Objection.

23 BY MR. LUTTIER:

24 Q. Told him about [REDACTED], right?

25 A. Yeah.

0428

1 Q. Told him about [REDACTED]?

2 MR. MERMELSTEIN: Objection.

3 BY MR. LUTTIER:

4 Q. Did you tell him [REDACTED] was violent
5 towards you? Did you tell him that?

6 A. Yeah.

7 Q. Did you tell him everything that you've
8 told me in this deposition?

9 MR. MERMELSTEIN: Objection, form,
10 overbroad.

11 THE WITNESS: Not every single -- he knows
12 a broad, broad information about certain
13 things.

14 BY MR. LUTTIER:

15 Q. Okay. Who's paying his bill?

16 A. I am.

17 Q. Okay. And where is his office?

18 A. [REDACTED]

19 Q. [REDACTED] How would you get to [REDACTED]
20 [REDACTED] to get this fellow [REDACTED]? How did you get
21 to him? Who referred you to him?

22 A. I have somebody that I -- my boyfriend's
23 mother.

24 Q. Who is that?

25 A. [REDACTED]

0429

1 Q. By the way, this guy that you had the
2 domestic violence with that you got arrested for --

3 A. That was my ex-boyfriend.

4 Q. -- are you still living with him?

5 A. No, I live in [REDACTED]

6 Q. Did you go hunting recently for
7 [REDACTED]?

8 A. Hunting for [REDACTED]?

9 Q. Yeah.

10 A. No.

11 Q. Did you go try to find her at her place of
12 employment?

13 A. No.

14 Q. Do you know why anybody would say you were

15 at her place of employment looking for her?

16 A. No.

17 Q. Do you -- do you know where she works?

18 A. Yeah.

19 Q. You know where she works, don't you?

20 Where does she work?

21 A. [REDACTED].

22 Q. [REDACTED] located where?

23 A. In [REDACTED].

24 Q. Okay. And that's where you went Friday
25 night and the domestic violence thing, isn't it?

0430

1 A. I didn't go there looking for her. [REDACTED]

2 [REDACTED]
3 [REDACTED]
4 [REDACTED]
5 [REDACTED]

6 Q. [REDACTED]

7 A. [REDACTED]

8 [REDACTED]

9 Q. Did you tell --

10 A. [REDACTED]

11 [REDACTED]

12 Q. Did you tell anybody when you were at the
13 [REDACTED] that you were working for [REDACTED]?

14 A. No, I didn't even bring up [REDACTED] name.

15 Q. Do you know why a message would have been
16 left if you were looking for her?

17 A. No, because I never even brought up her
18 name.

19 Q. Okay. Now, you say -- what's this [REDACTED]
20 [REDACTED], or whatever this boyfriend's name is,
21 what's his mother's name?

22 A. [REDACTED].

23 Q. [REDACTED] (sic) what?

24 A. [REDACTED].

25 Q. [REDACTED] what?

0431

1 A. I don't know her last name. She has been
2 remarried.

3 Q. Well, where do you find this lady?

4 A. She lives in [REDACTED]. I don't
5 know.

6 Q. How, how is it, how is it you got ahold of
7 her?

8 A. I didn't get ahold of her. She didn't
9 tell me. She gave [REDACTED] the, the name, and I got
10 the name through [REDACTED].

11 Q. [REDACTED]

12 [REDACTED]

13 A. [REDACTED]

14 [REDACTED]

15 Q. Have you ever talked to her on the phone?

16 A. Have I talked to her on the phone? Yeah.

17 Q. Do you know her phone number?

18 A. No.

19 Q. Have you got it in your cellphone?

20 A. No.

21 Q. [REDACTED]

22 [REDACTED]

23 [REDACTED]

24 A. [REDACTED]

25 [REDACTED]

0432

1 [REDACTED]

2 Q. [REDACTED]

3 [REDACTED]

4 A. [REDACTED]

5 [REDACTED]

6 Q. So, what really happened was [REDACTED] was
7 going to this --

8 A. Uh-huh.

9 Q. -- psychiatrist, and that's really where
10 you got the name was from [REDACTED], not from his
11 mother --

12 A. Yeah.

13 Q. -- isn't that right?

14 A. Yeah. Well, his mother is the one that
15 referred him, and so I got the name from his mother,
16 not from [REDACTED].

17 Q. The person that you, first told you about
18 it was [REDACTED], wasn't it?

19 A. Yeah.

20 Q. Not his mother. [REDACTED] told you who he was
21 going to?

22 A. No, like, yeah.

23 Q. Yeah, right?

24 A. Yeah, [REDACTED] and his mother.

25 Q. So, so [REDACTED] then told you that he was

0433

1 going to this doctor --

2 A. [REDACTED]

3 [REDACTED]

4 [REDACTED]

5 [REDACTED]

6 [REDACTED]

7 [REDACTED]

8 MR. MERMELSTEIN: Wait for a question.

9 BY MR. LUTTIER:

10 Q. So, you told [REDACTED] mom about this
11 situation, too. She's another person that knows
12 about this situation.

13 A. No, she doesn't know about the situation;

14 [REDACTED]

15 [REDACTED]

16 Q. I thought you told me you told her about
17 it?

18 A. I didn't tell her about it. [REDACTED]

19 [REDACTED]
20 [REDACTED]

21 Q. Well, she's know about Jeffrey Epstein,
22 didn't you say?

23 A. No.

24 Q. Didn't you just say she did?

25 A. No.

0434

1 Q. Okay. So what really happened was you and
2 [REDACTED] went to this Dr. [REDACTED] because of problems
3 that you two had; isn't that right?

4 A. No.

5 Q. And the two of you went to see him
6 together?

7 A. No.

8 Q. You didn't do that?

9 A. No.

10 Q. [REDACTED]

11 A. [REDACTED]

14 Q. Okay.

15 A. [REDACTED]

17 Q. [REDACTED]

18 A. [REDACTED]

19 Q. Okay.

20 [REDACTED]

21 [REDACTED]

22 A. [REDACTED]

23 [REDACTED]

24 Q. [REDACTED]

25 [REDACTED]

0435

1 [REDACTED]

2 A. [REDACTED]

3 [REDACTED]

4 Q. [REDACTED]

5 [REDACTED]

6 A. [REDACTED]

7 Q. Okay.

8 [REDACTED]

9 A. [REDACTED]

10 [REDACTED]

11 Q. [REDACTED]

12 [REDACTED]

13 A. [REDACTED]

14 Q. [REDACTED]

15 A. [REDACTED]

16 Q. [REDACTED]

17 [REDACTED]

18 A. [REDACTED]

19 Q. [REDACTED]

20 [REDACTED]

21 A. [REDACTED]
22 Q. [REDACTED]
23 A. [REDACTED]
24 Q. [REDACTED]
25 [REDACTED]

0436
1 A. [REDACTED]
2 Q. [REDACTED]
3 A. [REDACTED]
4 Q. [REDACTED]
5 [REDACTED]
6 A. [REDACTED]
7 Q. [REDACTED]
8 A. [REDACTED]
9 Q. [REDACTED]
10 A. [REDACTED]
11 [REDACTED]
12 [REDACTED]
13 Q. [REDACTED]
14 A. [REDACTED]
15 Q. [REDACTED]
16 A. [REDACTED]
17 Q. And how often do you go for these
18 sessions?
19 A. Like once or twice a week.
20 Q. And where in [REDACTED] is this office?
21 A. [REDACTED].
22 Q. Do you have an address?
23 A. No, I just know exactly where it's at from
24 driving there.
25 Q. Okay. Well, I want to make sure I have

0437
1 this. It's [REDACTED] (sic).
2 A. Yeah, best of my knowledge.
3 Q. Is he a psychiatrist or psychologist or
4 neither?
5 A. No, he's, he's a psychiatrist.
6 Q. Is he -- can he prescribe medication?
7 A. I think so, yeah.
8 Q. Has he prescribed any medication for you?
9 A. No.
10 Q. Has he prescribed any medication for
11 [REDACTED]?
12 A. No.
13 Q. Are you on any medication at the present
14 time?
15 A. No.
16 Q. And how much does he charge you for each
17 of these visits?
18 A. Like \$50 a visit.
19 Q. Okay. 45 minute session?
20 A. An hour.
21 Q. An hour session. Have you ever seen
22 Jeffrey Epstein's penis?

23 A. Yes.
24 Q. Had you seen a man's penis before you saw
25 Jeffrey Epstein's penis?

0438

1 A. I don't remember.

2 Q. You don't remember?

3 A. You've already asked me this question, and

4 I don't remember whenever I saw [REDACTED], so I

5 don't remember. Yeah, I think so.

6 Q. Okay.

7 MR. MERMELSTEIN: Make sure of, sure your

8 answer. Don't just answer for the sake of

9 answering.

10 THE WITNESS: For him, yeah, I don't

11 remember.

12 BY MR. LUTTIER:

13 Q. Did -- was there ever anything that you

14 said that you saw Mr. Epstein at some point

15 masturbate. I think your terms were jerking off, to

16 be exact. Do you recall that testimony?

17 A. Yeah.

18 Q. And when did that first occur?

19 A. After I started getting naked after, like,

20 my fifth or sixth visit. After I had already, like,

21 whenever I started taking clothings off.

22 Q. Did he ask you if he could do that?

23 A. No.

24 Q. Did you tell him not to do that?

25 A. No.

0439

1 Q. Was anyone else ever present for your

2 sessions between you and Mr. Epstein?

3 A. No.

4 Q. Did you ever tell Mr. Epstein you didn't

5 want him to masturbate?

6 A. No.

7 Q. Did Mr. Epstein ever penetrate any orifice

8 of your body with a vibrator?

9 A. No.

10 Q. He just put it on the top of your clit?

11 A. Yeah.

12 Q. Did Mr. Epstein ever penetrate your anus

13 with any object?

14 A. No.

15 Q. Did he ever penetrate your anus with any

16 organ of his body?

17 A. No.

18 Q. Did you ever tell Mr. Epstein on any of

19 these sessions that you had with him that you

20 enjoyed it?

21 A. Not that I remember.

22 Q. Did you ever use any words to that effect

23 with him --

24 A. Not that I remember.

25 Q. -- saying that that was great or I enjoyed
0440

1 it.

2 MR. MERMELSTEIN: Objection to form.

3 THE WITNESS: I don't remember.

4 BY MR. LUTTIER:

5 Q. Did you ever tell anyone that you wished
6 your boyfriend was more like Mr. Epstein, in
7 particularly that you would like it if your
8 boyfriend was rougher like Mr. Epstein in having
9 sex?

10 MR. MERMELSTEIN: Objection to form.

11 THE WITNESS: No, I don't remember.

12 BY MR. LUTTIER:

13 Q. Do you recall telling [REDACTED] that?

14 A. No, I don't remember saying that.

15 Q. If, if you told him that, it was true,
16 wasn't it?

17 MR. MERMELSTEIN: Objection to form,
18 speculation.

19 THE WITNESS: I don't remember saying
20 that, so like, I don't know.

21 BY MR. LUTTIER:

22 Q. Do you remember telling [REDACTED] that you --

23 A. No, I don't remember saying that to
24 [REDACTED].

25 Q. You and [REDACTED] were talking about
0441

1 it, and you and the other girls and you kid that you
2 wished your boyfriends were more like, more like
3 Mr. Epstein.

4 A. I don't remember talking to him about it,
5 no. I'm sorry.

6 Q. But you did talk to your girlfriends about
7 your -- communicatively you-all talked about your
8 sexual experiences with Mr. Epstein?

9 A. Girlfriends? Yeah, we did.

10 Q. Yeah. The other girls that were going to
11 see him.

12 A. Yeah.

13 Q. And you-all knew what each other were
14 doing, right?

15 A. Yeah.

16 Q. You knew who was letting them finger them,
17 to use your words?

18 A. No, not -- not exactly.

19 Q. Who was doing what?

20 A. No, we just knew -- I mean, pretty much,
21 if you got \$200, you weren't doing things. If you
22 got \$300, you're doing more than just giving him a
23 massage and leaving. So if you say, how much money
24 did you get, and then that referred to, oh, you must
25 have done something --

0442

1 Q. And you knew --

2 A. -- and just referring, because you knew
3 what you've done, so not saying, oh, this is, this
4 is me giving you details, Jane Doe No. 7, of what
5 I've done, no. It was, you know, oh, how much money
6 did you get, oh, okay. So then it was kind of like
7 in the back of your mind you're -- you know.

8 MR. LUTTIER: Well, I'm going to have to
9 stop now because I've got another appointment
10 that I have to get to, so this would be a good
11 place to stop as any.

12 THE VIDEOGRAPHER: Going off the record.
13 It is 6:04. It's the end of Tape 3 of 3.

14 MR. LUTTIER: We're just adjourning the
15 depo.

16 MR. MERMELSTEIN: We understand that.

17 MR. LUTTIER: Okay.

18 MR. MERMELSTEIN: And I understand that
19 you had a discussion before regarding the
20 seven-hour time limit with Mr. Horowitz here.

21 MR. LUTTIER: Well, no, we didn't have any
22 discussions at all before about it.

23 MR. CRITTON: He raised the seven-hour
24 time limit, and I told him if he looked at the
25 consolidation order, the consolidation order

0443

1 did not limit, visa vis it was removed.

2 MR. MERMELSTEIN: I don't think so. Well,
3 the seven-hour time limit is by rule within the
4 Federal Rules.

5 MR. LUTTIER: Yeah, but there's an order
6 that's been entered since then.

7 MR. MERMELSTEIN: Yes, it gives you a
8 one-day deposition. And a one-day deposition
9 in the Federal -- in the Federal Rules is seven
10 hours, so our position is you have seven hours.

11 MR. LUTTIER: I understand.

12 MR. CRITTON: I'm telling you that Judge
13 Marra, in the consolidation order, is very
14 specific with regard to the seven-hour rule
15 with regard to this case.

16 MR. MERMELSTEIN: You turn into a pumpkin
17 at seven hours. If you want, if you want more,
18 you're going to have to go back to the judge.

19 MR. CRITTON: So the judge has entered an
20 order; you're saying you're not going to obey
21 that order?

22 MR. MERMELSTEIN: I am saying the judge
23 had -- show me an order where he says you get
24 more than seven hours. The consolidation order
25 you refer to, I have it right here in my hand,

0444

1 it says you get one day. That to me is seven
2 hours. The Federal Rules provide seven hours.

3 I think it's clear.
4 MR. CRITTON: Let me read it. Let me read
5 it.
6 MR. LUTTIER: I think the only reference
7 to specific hours is when he said that.
8 MR. MERMELSTEIN: Yeah, let me read it.
9 Let me read it. As to each of the ten above
10 styled cases, the Defendant is limited to a
11 single deposition of each Plaintiff.
12 MR. LUTTIER: Single deposition, it
13 doesn't say that. At any rate, everybody knows
14 what the other person's interpretation is.
15 MR. MERMELSTEIN: Right. Well, yeah. I
16 mean, but to say that there's a clear order
17 here which gives you the right to take a longer
18 deposition, that's not the case.
19 MR. CRITTON: This is an order, and just
20 so it's clear, this is Docket Entry 86. There
21 was a subsequent order that he entered.
22 MR. LUTTIER: Okay.
23 MR. CRITTON: Or a prior order.
24 MR. MERMELSTEIN: If that's the case,
25 provide it to me. I mean, you refer to the

0445

1 consolidation of --
2 MR. CRITTON: I'm not going to provide you
3 that, but I'll refer to you -- I'll send you
4 the document.
5 MR. MERMELSTEIN: We're supposed to
6 cooperate. I mean, if I'm missing something,
7 then --
8 MR. CRITTON: No, no, listen to me,
9 Stuart.
10 MR. MERMELSTEIN: -- let me know.
11 MR. CRITTON: Listen to me, Stuart.
12 MR. MERMELSTEIN: What?
13 MR. CRITTON: I said what I will do is
14 I'll reference the docket number so you can
15 look it up because it will be in your file.
16 MR. MERMELSTEIN: That, that's fine.
17 MR. LUTTIER: Give me a chance. It's like
18 your witness. If you listen to the question,
19 you're going to get an answer. Okay?
20 MR. MERMELSTEIN: All right.
21 MR. CRITTON: You guys are gone. We're
22 going to stay here until I know. I am assuming
23 I am going to give you three minutes to escape
24 from the building.
25 MR. MERMELSTEIN: Five minutes.

0446

1 MR. CRITTON: Yeah, yeah.
2 THE COURT REPORTER: Are you ordering
3 this?
4 MR. CRITTON: Yes.

5 (Witness excused.)
6 (Deposition was adjourned.)
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0447

1 CERTIFICATE OF OATH
2 THE STATE OF FLORIDA
3 COUNTY OF PALM BEACH
4

5 I, the undersigned authority, certify that
6 JANE DOE NO. 4 personally appeared before me and was
7 duly sworn on the 27th day of October, 2009.
8

9 Dated this 6th day of November, 2009.
10
11
12
13

14 _____
Cynthia Hopkins, RPR, FPR
Notary Public - State of Florida
15 My Commission Expires: February 25, 2011
My Commission No.: DD 643788
16
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0448

1 C E R T I F I C A T E
2 THE STATE OF FLORIDA
3 COUNTY OF PALM BEACH
4

5 I, Cynthia Hopkins, Registered Professional
6 Reporter, Florida Professional Reporter and Notary
7 Public in and for the State of Florida at large, do
8 hereby certify that I was authorized to and did
9 report said deposition in stenotype; and that the
10 foregoing pages are a true and correct transcription
11 of my shorthand notes of said deposition.

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

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

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

25 Dated this 6th day of November, 2009.

18
19
20
21

Cynthia Hopkins, RPR, FPR

22
23
24
25

0449

1 DATE: November 6th, 2009
2 TO: JANE DOE NO. 4
3 c/o Adam D. Horowitz, Esquire
4 MERMELSTEIN & HOROWITZ, P.A.
5 18205 Biscayne Boulevard
6 Suite 2218
7 Miami, Florida 33160

5

IN RE: Jane Doe No. 2 vs. Epstein

6

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

7

8 Please take notice that on Tuesday, the 27th of
9 October, 2009, you gave your deposition in the
10 above-referred matter. At that time, you did not
11 waive signature. It is now necessary that you sign
your deposition.

12 As previously agreed to, the transcript will be
13 furnished to you through your counsel. Please read
14 the following instructions carefully:

15 At the end of the transcript you will find an

11

12 errata sheet. As you read your deposition, any
13 changes or corrections that you wish to make should
14 be noted on the errata sheet, citing page and line
15 number of said change. DO NOT write on the
16 transcript itself. Once you have read the
17 transcript and noted any changes, be sure to sign
18 and date the errata sheet and return these pages to
19 me.

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

22 Very truly yours,

23 _____
24 Cynthia Hopkins, RPR, FPR

25 I do hereby waive my signature.

26 _____
27 JANE DOE NO. 4

0450

1 C E R T I F I C A T E

2

- - -

3

THE STATE OF FLORIDA

4

COUNTY OF PALM BEACH

5

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

11

12 Dated this ____ day of _____,
13 2009.

14

15

16

17

18

19 _____
20 JANE DOE NO. 4

21

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0451

1 E R R A T A S H E E T

2

IN RE: JANE DOE NO. 2 VS. EPSTEIN

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CR: Cynthia Hopkins

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DEPOSITION OF: JANE DOE NO. 4

TAKEN: October 27, 2009.

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Please forward the original signed errata sheet to this office so that copies may be distributed to all parties.

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.

DATE: _____

SIGNATURE OF DEPONENT: _____