

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

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

JANE DOE NO. 2,

Plaintiff,

-vs-

VOLUME I

JEFFREY EPSTEIN,

Defendant.

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Related cases:

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

VIDEO-CONFERENCED AND VIDEOTAPED  
DEPOSITION OF JANE DOE

Wednesday, September 30, 2009  
9:37 a.m. - 6:10 p.m.

One Clearlake Centre  
250 South Australian Avenue, 1st Floor  
West Palm Beach, Florida 33401

Reported By:  
Pamela J. Sullivan, RPR, FPR, CLR  
Prose Reporting Agency, Inc.

- - -

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APPEARANCES:

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On behalf of the Defendant, Jeffrey Epstein:

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On behalf of Jane Does 1 through 8:

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On behalf of the Plaintiff [REDACTED]:

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On behalf of the B.B.:

ADAM J. LANGINO, ESQUIRE  
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ALSO PRESENT:

Jeffrey Epstein, via video conference  
Stan Sanders, Videographer

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BY MR. CRITTON 5

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(\* Marked off the record.)

PROCEEDINGS

Deposition taken before Pamela J. Sullivan,  
Registered Professional Court Reporter and Notary Public  
in and for the State of Florida at Large, in the above  
cause.

(Discussion held off the record.)

MR. CRITTON: Let's get started.  
MR. EDWARDS: Brad Edwards, and I represent  
Jane Doe.  
MR. HILL: Jack Hill, on behalf of [REDACTED].  
MR. HOROWITZ: Adam Horowitz, on behalf of  
Jane Does 2 through 8.  
MR. LANGINO: Adam Langino, on behalf of B.B.  
MR. CRITTON: Bob Critton, on behalf of  
Jeffrey Epstein.  
MR. EDWARDS: And, Mr. Critton, I don't think  
we've had this Court Reporter before, so maybe we  
want to instruct as to how we're dealing with the  
names, how they're going to be typed up.  
MR. CRITTON: Pamela, are you familiar with  
how Cindy did the names at all?  
COURT REPORTER: Let's go over it.  
MR. CRITTON: All right. What we -- what

1 we've done in the past is, as with regard to anyone  
2 who's identified as a Plaintiff in the case, and  
3 only that group, you know, absent some other  
4 agreement amongst the, the clients or the parties  
5 and their attorneys is, is we will refer to them by  
6 initials only, such as Jane Doe, who's seated in  
7 front of us. She will be -- well, except she's  
8 gone as Jane Doe, so we should keep her as Jane  
9 Doe. So much for that exception, but...

10 And Mr. Hill's client, [REDACTED], will be  
11 referred to as [REDACTED], because that's how  
12 we referred to her, and she has -- she gave up  
13 anonymity.

14 Jane Doe's 2 through 8, we may use their real  
15 names, and then we'll just use, if it's  
16 Sally Jones, it would be S.J. And then what you do  
17 is, is on a separate piece of paper, as Cindy did,  
18 you will give us a key that ties in with any name  
19 that we've designated by a first or a last name --  
20 or both.

21 MR. EDWARDS: All right. And one other thing  
22 I want to -- I want to put on the record, I know  
23 that you disagreed last time, but I think that  
24 it's, to make the record clear, we feel strongly  
25 that this deposition and the transcript and the

1 transcript.

2 [REDACTED], you claimed all sorts of privileges  
3 and, and other objections and instructed her not to  
4 answer. Obviously, the judge has to consider a  
5 transcript.

6 MR. EDWARDS: Agreed.

7 MR. CRITTON: So I would say as to the  
8 transcript, no, and with the transcript that Pamela  
9 is going to prepare, it's going to have -- it won't  
10 disclose Jane Doe's name or Jane Doe's name. All  
11 right. So with regard to the video, as I -- as I  
12 indicated to you to the extent that the video would  
13 be necessary to be filed for any purpose or to use  
14 for any purpose, you have 15 days to file  
15 something. If, in fact, the video was used, I  
16 would do that which was necessary so that  
17 Jane Doe's face would not be disclosed, so that no  
18 one could identify her.

19 MR. EDWARDS: Okay. Well, I -- if you're  
20 only talking about blocking out her face as the  
21 only way to protect her anonymity, we, we wouldn't  
22 feel that that would be accommodating enough to, to  
23 secure her anonymity.

24 But now I'm understanding that you're saying  
25 you may file this with the court, which I have much

1 video remain confidential, and that the witness's  
2 anonymity is protected, absent some court order  
3 directing otherwise, as we feel that's consistent  
4 with the court orders that have already been  
5 entered, as well as the instructions of the various  
6 judges presiding over these cases.

7 I'm assuming, if you are in disagreement of  
8 that, then you will allow me 15 days to file a  
9 motion in that regard, if you think that's  
10 necessary.

11 MR. CRITTON: Yeah. Well, we, we had this  
12 discussion at the deposition of [REDACTED].

13 MR. EDWARDS: Right.

14 MR. CRITTON: And you dealt specifically with  
15 the video, not the transcript, is my recollection.  
16 And I said it, with regard to the video, there's --  
17 there are orders granting your client, and in her  
18 case [REDACTED], and I think in Jane Doe, anonymity. And  
19 as such, we don't plan to violate that court order  
20 to the extent that the transcript -- and a perfect  
21 example of it is, is, if you think that the -- that  
22 the [REDACTED] transcript can't be filed, it's absurd,  
23 because [REDACTED] claimed the Fifth Amendment about 30  
24 to 50 times. So in order to get some ruling from  
25 the Court, the Court's going to have to look at the

1 less a problem with than you posting it on the  
2 Internet or using some other device to post it to  
3 the public, which is what was implied last time.  
4 And I think the example you gave was that another  
5 attorney has posted your client's deposition on the  
6 Internet.

7 MR. CRITTON: All right. Let, let's deal  
8 exactly what the issue is. If Spencer Kuvin, for  
9 publicity, and for no other reason, contacted  
10 Jose A. Lambiet, who in turn then put it on his  
11 website so that everyone could view the question,  
12 and he did it to embarrass, to humiliate, it was  
13 improper, it was inappropriate, I hope I wouldn't  
14 use the same [REDACTED] conduct or what I would say lack  
15 of professionalism to do something like that.

16 MR. EDWARDS: Well, but, obviously, the  
17 difference is Mr. Epstein's anonymity has not been  
18 protected in this case, and these victims have.  
19 So...

20 MR. CRITTON: So it's okay to humiliate and  
21 embarrass someone and to be unprofessional?

22 MR. EDWARDS: This has nothing to do with me  
23 or my clients.

24 MR. CRITTON: All right.

25 MR. EDWARDS: So are we not on the same page,

1 and I need to file a motion to protect the  
2 confidentiality of the video and the deposition  
3 transcript, or do you agree that it's -- it should  
4 remain confidential, but for whatever motions you  
5 have to file and attachments you have to make to  
6 the court file.

7 MR. CRITTON: You, you need to file whatever  
8 motion you think is appropriate. I'm going to do  
9 nothing to breach the anonymity order that has been  
10 entered by the Court. So if you -- if you think  
11 that some additional order is necessary, you have  
12 15 days to file something with the Court, and then  
13 I'll respond to it, Brad.

14 MR. EDWARDS: Okay. Thanks.

15 MR. CRITTON: Okay.

16 And Sid Garcia showed up.

17 MR. GOLDBERGER: What am I?

18 MR. CRITTON: And Jack Goldberger, too.

19 Sorry, you're not just a potted plant here.

20 Thereupon,

21 JANE DOE,

22 Having been first duly sworn or affirmed, was examined  
23 and testified as follows:

24 THE WITNESS: Yes.  
25

1 Q. At the address where you're currently  
2 residing, does anyone live with you?

3 A. Yes.

4 Q. Who?

5 A. My daughter and my boyfriend.

6 Q. Are you living in an apartment, a house?  
7 What kind of accommodations?

8 A. A house.

9 Q. What city is the house located in?

10 MR. EDWARDS: Don't answer.

11 She's not going to answer any other questions  
12 about the location of her address or the location  
13 where she's residing, just out of fear for her own  
14 safety and the safety of her daughter.

15 MR. CRITTON: Okay.

16 BY MR. CRITTON:

17 Q. Ma'am, has, has anything occurred since  
18 you've been represented by Mr. Edwards that causes you  
19 concern about your safety or well-being?

20 A. Yes.

21 Q. What?

22 A. I have seen a lot of cars passing by my  
23 house, watching, looking at my house, and going by very  
24 slowly, several times a day. There have been cars that  
25 were parked across the street from my house on several

1 DIRECT EXAMINATION

2 BY MR. CRITTON:

3 Q. Would you please tell us your full name,  
4 please.

5 A. Jane Doe.

6 Q. And you're going to need to speak up, ma'am,  
7 because I could barely hear you. All right.

8 A. Jane Doe.

9 Q. What's your date of birth?

10 A. [REDACTED]

11 Q. And where do you currently reside?

12 MR. CRITTON: Don't answer.  
13 She's not going to give her current address,  
14 and it's out of fear for her safety. And that's  
15 the only question you're likely not going to get an  
16 answer to today.

17 BY MR. CRITTON:

18 Q. Let me ask you this: Do you -- you, you have  
19 resided over the years at [REDACTED]  
20 [REDACTED]; true?

21 A. Yes.

22 Q. All right. And whose address is that?

23 A. [REDACTED]

24 Q. And her name is?

25 A. [REDACTED]

1 different occasions, cars that I had never seen before.  
2 There have been people who have gone to speak to my  
3 friends and my family members and ask them questions  
4 about me.

5 Q. So why -- why -- well, let's start with the  
6 cars. On how many occasions since you -- well, on how  
7 many occasions have you seen what you thought were  
8 suspicious cars, as distinct from just like -- as  
9 distinct from just cars driving by?

10 A. There have been so many, I can't -- I can't  
11 count.

12 Q. Can you identify any of those suspicious  
13 cars? Color? Make? Model?

14 A. For one, there is a blue Durango SUV that  
15 comes by a lot. I, I have taken pictures of it. I have  
16 taken pictures of all the cars.

17 Q. Oh, you have? And where, where are those  
18 pictures? Did you take them on a digital camera?

19 A. Yes.

20 Q. Okay. And what did you do with those  
21 pictures?

22 A. I sent them to Brad.

23 Q. And Brad, Mr. Edwards?

24 A. Yes.

25 Q. Are you aware whether he's filed any motion

1 with the Court, to try to identify who, to keep those  
2 cars away from you?

3 A. Not that I'm aware of.

4 Q. Okay. How many pictures have you taken?

5 A. Four or five.

6 Q. And, and in terms of parked cars, have you  
7 taken pictures of any of the parked cars?

8 A. One.

9 Q. What was that car? Was that the blue  
10 Durango?

11 A. No. It was a silver -- I'm not sure what  
12 kind of car it was.

13 Q. Okay. Do you still have -- do you still have  
14 your photographs of those cars on your camera?

15 A. Not on my camera.

16 Q. Did you take -- how did you send them to  
17 Mr. Edwards?

18 A. I have them on a disk.

19 Q. All right. And tell us -- tell the members  
20 of the jury how many times you've called the police  
21 about this.

22 A. I haven't called the police, because  
23 they -- nobody ever came out and harassed me. I just  
24 saw the cars passing my.

25 Q. All right. So no one's harassed you; no

1 talked to families and friends, where they have -- let  
2 me strike that.

3 You indicated various individuals had done --  
4 had talked or had spoken with family and friends about  
5 you --

6 A. Yes.

7 Q. -- correct?

8 All right. Tell me which family members have  
9 been contacted and asked questions about you.

10 A. The only one that I really know of is my  
11 sister.

12 Q. And who's that?

13 A. [REDACTED]

14 Q. And what did [REDACTED] tell you?

15 A. She just told me that me some people went to  
16 her house and asked her some questions about me.

17 Q. When did [REDACTED] tell you that?

18 A. I'm not sure how long ago it was. She  
19 actually sent me a text message.

20 Q. Was it within the last week? Was it in the  
21 last month? Was it a year ago? Give me your best  
22 estimate.

23 A. Probably a month, maybe two months.

24 Q. And did she tell you who the people were that  
25 talked to her?

1 one's intimidated you. All you've seen is cars that you  
2 can't identify driving by and/or parking across the  
3 street; is that correct?

4 MR. EDWARDS: Object to the form.

5 MR. CRITTON: You can go ahead and answer.

6 MR. EDWARDS: Well, I'm going to object --

7 MR. CRITTON: No, no.

8 MR. EDWARDS: -- and ask her not to answer --

9 MR. CRITTON: It's form.

10 MR. EDWARDS: -- if it is attorney-client  
11 privilege information. Because you're acting like  
12 she can't identify them, when, in reality, she may  
13 have been able to identify them.

14 MR. CRITTON: Is that a form objection?

15 MR. EDWARDS: I'm telling her not to answer.  
16 It's attorney/client information.

17 MR. CRITTON: Would you read my question  
18 back --

19 MR. EDWARDS: (Inaudible) her attorney.

20 MR. CRITTON: -- please.

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

23 THE WITNESS: Yes.

24 BY MR. CRITTON:

25 Q. All right. Now, you said some people have

1 A. No.

2 Q. Did you ask her?

3 A. Yes, I did.

4 Q. And what did she say?

5 A. She said that they worked for  
6 Jeffrey Epstein.

7 Q. And did she say how those people got in  
8 contact with her?

9 A. They went to her house and knocked on her  
10 door.

11 Q. And did she tell you what she said to them?

12 A. No.

13 Q. Did she tell you whether she spoke with  
14 her -- spoke with them?

15 A. She said she did talk to them.

16 Q. She did not?

17 A. She did.

18 Q. All right. Did she say where -- did she talk  
19 to them at the house?

20 A. Yes.

21 Q. And did she -- and did you say, well, what  
22 did you say about me?

23 A. Yes, I did.

24 Q. Okay. And did you say, what questions did  
25 they ask?

1 A. Yes, I did.  
 2 Q. And when you said, what questions did they  
 3 ask, what did she say?  
 4 A. She, she said she doesn't really know. I  
 5 guess she doesn't remember. She says that she was asked  
 6 if she knew about my going to Jeffrey Epstein's house,  
 7 and she told them that she gave me a ride there before.  
 8 Q. And was that true?  
 9 A. Yes.  
 10 Q. Okay. On how many times did your sister,  
 11 [REDACTED], give you a ride to Jeffrey Epstein's home?  
 12 A. Three, maybe four.  
 13 Q. And I assume you knew that she had driven you  
 14 to Mr. Epstein's house, separate and apart from her  
 15 telling you that the other day, or a month ago.  
 16 A. Excuse me?  
 17 Q. I assume you were aware that your sister,  
 18 [REDACTED], drove you to Mr. Epstein's house prior to the  
 19 last month or two; is that correct?  
 20 A. Yeah.  
 21 Q. And that is, her telling you that did not  
 22 refresh your recollection; you knew that [REDACTED] had  
 23 driven you to Mr. Epstein's home; true?  
 24 A. Yes, I knew that.  
 25 Q. Okay. Did she say how long she had spoken to

1 the people?  
 2 A. No.  
 3 Q. She, meaning [REDACTED].  
 4 Did she -- other than saying she gave a ride  
 5 to you to go to Mr. Epstein's house, did she tell the  
 6 individuals who came to her home anything else?  
 7 A. Not that I know of.  
 8 Q. Okay. How long did you -- well, let me  
 9 strike that.  
 10 I assume you have a good relationship with  
 11 your sister, [REDACTED]?  
 12 A. It's on and off. We fight often.  
 13 Q. Are you on a good relationship with her now?  
 14 A. Right now I am.  
 15 Q. Has that been true for the last six months?  
 16 A. No.  
 17 Q. Okay. Was it [REDACTED] sometime within the last  
 18 six months?  
 19 A. Yeah.  
 20 Q. When was that?  
 21 A. I'm not sure exactly how long ago it was.  
 22 I --  
 23 Q. Let me -- let me rephrase my question. We're  
 24 in the year 2009, almost at the end of September 30th  
 25 today. You're aware of that?

1 A. Yes.  
 2 Q. All right. So we've had nine months in '09.  
 3 Of, of the -- of the nine months in 2009, what portion  
 4 or what months can you identify that you did not have a  
 5 good relationship with [REDACTED]?  
 6 A. I have only been on speaking terms with  
 7 [REDACTED] for the past maybe three months.  
 8 Q. So the past three months, which would be  
 9 basically June-ish, beginning of June --  
 10 A. Yeah.  
 11 Q. -- through today, you're on good terms with  
 12 her?  
 13 A. Yes.  
 14 Q. All right. And good terms means you're  
 15 acting like sisters -- like I would say more normal  
 16 sisters would, have a nice conversation, you can talk to  
 17 her, you're supportive of each -- of one another,  
 18 et cetera?  
 19 A. Yes.  
 20 Q. All right. Do you have any other sisters?  
 21 A. Yes.  
 22 Q. Okay. First of all, [REDACTED], what's her  
 23 date of birth?  
 24 A. [REDACTED]. I don't know what year.  
 25 Q. How old is she?

1 A. She's six years older than I am.  
 2 Q. So do you have another sister?  
 3 A. Yes.  
 4 Q. Older or younger?  
 5 A. Older.  
 6 Q. What's her name?  
 7 A. [REDACTED].  
 8 Q. How old is [REDACTED]?  
 9 A. She is two years older than I am.  
 10 Q. And you're how old today?  
 11 A. [REDACTED].  
 12 Q. And [REDACTED] is [REDACTED]?  
 13 A. She will be on [REDACTED].  
 14 Q. She's [REDACTED] now. And [REDACTED] is, you said, was  
 15 how old, how many years --  
 16 A. Two years older than me.  
 17 Q. So she's [REDACTED]?  
 18 A. Yes.  
 19 Q. All children of the same marriage, with the  
 20 same mother and father?  
 21 A. My sister, [REDACTED], has a different father.  
 22 Q. What's her father's name?  
 23 A. I don't know.  
 24 Q. Does she know?  
 25 A. No.

1 Q. No one knows?  
 2 A. No.  
 3 Q. So your mother -- your mother -- obviously,  
 4 same mother?  
 5 A. Yes.  
 6 Q. Okay. And your mother's name is what?  
 7 A. [REDACTED]  
 8 Q. Last name?  
 9 A. [REDACTED]  
 10 Q. Where does she live?  
 11 A. I don't know her address.  
 12 Q. When is the last time you saw her?  
 13 A. About a week or so ago.  
 14 Q. Where did you see her?  
 15 A. She came to my house.  
 16 Q. So at least you -- you at least told your mom  
 17 where you live?  
 18 A. Yeah.  
 19 Q. All right. Now, [REDACTED] what -- what's her  
 20 date of birth?  
 21 A. [REDACTED]  
 22 Q. Good relationship with [REDACTED]?  
 23 A. We don't speak on a regular basis, but we are  
 24 nice to each other, I guess.  
 25 Q. Where does she live?

1 A. Alabama.  
 2 Q. Do you know her address?  
 3 A. No, I do not.  
 4 Q. Is she married?  
 5 A. No.  
 6 Q. Any children?  
 7 A. Yes.  
 8 Q. How many?  
 9 A. Two.  
 10 Q. And ever been married?  
 11 A. No.  
 12 Q. What does she do for a living? How does she  
 13 support herself?  
 14 A. I -- I'm not sure.  
 15 Q. Okay. [REDACTED] where does she live?  
 16 A. [REDACTED]  
 17 Q. Which is where?  
 18 A. It's off of [REDACTED]  
 19 Q. West Palm Beach?  
 20 A. Yes.  
 21 Q. Does she live there with anyone?  
 22 A. Yes.  
 23 Q. Do you know her address, exact address?  
 24 A. No.  
 25 Q. Do you know her phone number?

1 A. She does not have a home phone number.  
 2 Q. Does she have a cell phone?  
 3 A. Yes.  
 4 Q. Do you consider a cell phone a phone number?  
 5 A. Yes, but not her home number.  
 6 Q. All right. What's her cell phone number?  
 7 A. [REDACTED]  
 8 Q. What's your cell phone number?  
 9 A. My cell phone number?  
 10 Q. Yes, ma'am.  
 11 MR. EDWARDS: Don't answer.  
 12 I mean, you're not going to call her, so I'm,  
 13 I'm objecting and, and instructing the witness not  
 14 to give out her cell phone number on the record  
 15 right now.  
 16 BY MR. CRITTON:  
 17 Q. Okay. Why don't you want to -- well, you're  
 18 going to follow your lawyer's instruction? If he tells  
 19 you not to answer a question, you're going to follow  
 20 that instruction?  
 21 A. Yes.  
 22 Q. Okay. And --  
 23 (Discussion held off the record.)  
 24 BY MR. CRITTON:  
 25 Q. How long have you -- the current cell phone

1 that you have now, how long have you had it?  
 2 A. About two years.  
 3 Q. Did you have a cell phone before that time?  
 4 A. Yes.  
 5 Q. Okay. How long did you have that cell phone?  
 6 A. I'm not sure. I didn't have it for very  
 7 long, and I lost it.  
 8 Q. What was that number?  
 9 A. [REDACTED]  
 10 Q. Did you ever use a cell phone to call  
 11 Mr. Epstein's home?  
 12 A. Yes.  
 13 Q. Okay. Is that the number you would have  
 14 used, the [REDACTED]?  
 15 A. No.  
 16 Q. Okay. Did you have a prior cell phone  
 17 number?  
 18 A. Yes.  
 19 Q. All right. What was that number?  
 20 A. I don't remember the full number. I remember  
 21 that it started with 352.  
 22 Q. Was it your own? Was it under your name?  
 23 A. No.  
 24 Q. Whose name was it under?  
 25 A. [REDACTED]

1 Q. [REDACTED]?

2 A. Yes.

3 Q. Does she still have that same cell phone?

4 A. No.

5 Q. Who was the service provider, her number?

6 A. Sprint, I believe.

7 Q. Who's your service provider right now?

8 A. Metro.

9 Q. I'm sorry?

10 A. Metro PCS.

11 Q. Have you used your cell phone -- [REDACTED] is a

12 friend of yours?

13 A. Yes.

14 Q. Okay. [REDACTED] is a friend of yours?

15 A. Yes.

16 Q. Okay. Are you aware of any other individuals

17 who are Plaintiffs in -- and are suing Mr. Epstein for

18 money?

19 A. No.

20 Q. Do you call -- do you have a home phone?

21 A. Yes.

22 Q. A land line?

23 A. Yes.

24 Q. All right. I assume you've called both [REDACTED]

25 and [REDACTED] on your cell phone?

1 At some point, Mr. Edwards came to represent

2 you; true?

3 A. Yes.

4 Q. All right. And when did Mr. Edwards -- when

5 did you hire Mr. Edwards to represent you?

6 A. I'm not sure exactly what day that was.

7 Q. Clearly, it was before the lawsuit was filed,

8 which was August 13th; correct?

9 A. Uh-huh. Yeah.

10 Q. All right. How many months prior to that

11 lawsuit being filed did Mr. Edwards begin to represent

12 you?

13 A. I'm not exactly sure.

14 Q. Okay. There was another suit that was filed

15 in [REDACTED] Court, Jane Doe. It dealt with a claim of,

16 of asserting some sort of victim rights. Were you that

17 Jane Doe?

18 A. I don't know.

19 Q. Okay. Well, are you aware of any other

20 lawsuit that's been filed -- that was ever filed on your

21 behalf, where Mr. Edwards represented you, other than

22 the current lawsuit, Jane Doe versus Jeffrey Epstein?

23 A. I don't know.

24 Q. Okay. So you -- you're unaware of any

25 lawsuit that Mr. Edwards has ever filed on your behalf,

1 A. Yes.

2 Q. All right. And I assume that you talked to

3 them about your cases from time to time; true?

4 A. No.

5 Q. You -- so if I ask you is it your testimony,

6 as you sit here today, that since the time you filed the

7 lawsuit against Mr. Epstein, you have never discussed

8 your lawsuit with [REDACTED]?

9 A. No.

10 Q. That's not true -- that's not correct?

11 A. What is not correct?

12 Q. All right. Listen -- let me ask the question

13 again.

14 Is it a correct statement, that is what I'm

15 going to say, is this true, that since the time you

16 filed your lawsuit in August of 2008, you have not

17 discussed your lawsuit with [REDACTED]; is that correct?

18 A. That is correct.

19 Q. And you've not discussed either your lawsuit

20 or any aspect of your lawsuit or your interaction with

21 Mr. Epstein with [REDACTED] since August 13th, 2008; is that

22 correct?

23 A. Yes.

24 Q. All right. Since August 13th -- well, let me

25 strike that.

1 other than Jane Doe versus Jeffrey Epstein; is that

2 correct?

3 A. Well, I would probably be aware, but I'm

4 obviously not a lawyer, so I don't really know.

5 Q. You're -- before Mr. Edwards filed your

6 lawsuit here, in this instance, you had to give him

7 authority; didn't you?

8 A. Yeah.

9 Q. Okay. Have you ever given Mr. Edwards

10 authority to file any other lawsuit anyplace on your

11 behalf; yes or no?

12 A. I don't know.

13 Q. Okay. Well, you can't answer that -- just so

14 for the jury -- ladies and gentlemen of the jury, you

15 can't answer that question yes or no; is that what

16 you're telling us?

17 MR. EDWARDS: She's not going to answer the

18 question because you're asking attorney/client

19 privilege information.

20 MR. CRITTON: She's already asked -- she

21 already answered the question, so you waived the

22 attorney/client privilege. So now --

23 MR. GARCIA: Right.

24 MR. EDWARDS: That's your -- that's your

25 opinion, but she's not going to answer -- answer

1 any more questions along this line. So --  
 2 MR. CRITTON: Okay.  
 3 MR. GARCIA: -- you can ask as many questions  
 4 as you want.  
 5 MR. CRITTON: She's not your client --  
 6 MR. GARCIA: That's right.  
 7 MR. CRITTON: -- all right, Mr. Garcia?  
 8 She -- she --  
 9 MR. GARCIA: You made a misstatement of the  
 10 law. You can't waive attorney-client privilege.  
 11 MR. CRITTON: Sure, you can.  
 12 MR. GARCIA: It has to be knowing and  
 13 intelligence. And she -- she --  
 14 MR. CRITTON: Well, you know -- okay. Is  
 15 your objection as to form?  
 16 MR. GARCIA: I'm just saying it's a  
 17 misstatement of the law.  
 18 MR. CRITTON: Fine. Then you can object to  
 19 form.  
 20 BY MR. CRITTON:  
 21 Q. Have you hired any other lawyers, or at any  
 22 time did you hire any other lawyers than Mr. Edwards to  
 23 pursue your claim?  
 24 A. No.  
 25 Q. Okay. Do you know a person by the name of

1 A. Last Thursday.  
 2 Q. You say he's at Okaloosa?  
 3 A. Right now he's in Martin County, but he was  
 4 at Okaloosa Prison.  
 5 Q. Okay. And he's serving a sentence for having  
 6 murdered a young boy [REDACTED] true?  
 7 A. Yes.  
 8 Q. And that occurred when you were how old?  
 9 A. Twelve.  
 10 Q. How long have you had the tattoo, ma'am?  
 11 A. Since I was 18.  
 12 Q. Where did you get the tattoo done?  
 13 A. At the 45th Street flea market.  
 14 Q. Do you remember the name of the place?  
 15 A. No.  
 16 Q. Do you have any other tattoos?  
 17 A. Yes.  
 18 Q. Where?  
 19 A. On my legs.  
 20 Q. And what are they of? Are they visible?  
 21 A. Yes.  
 22 Q. Okay. Could I see them, please?  
 23 A. (Witness standing.)  
 24 That's my nephews (indicating).  
 25 Q. [REDACTED]?

1 Jay Howell?  
 2 A. No.  
 3 Q. Okay. Ever heard of the name Jay Howell?  
 4 A. No.  
 5 Q. Have you authorized him to represent you?  
 6 A. No.  
 7 Q. Ms. Jane Doe, I notice you have a tattoo on  
 8 your right arm, your right, upper arm; is that correct?  
 9 A. Yes.  
 10 Q. And what does it say?  
 11 A. [REDACTED]  
 12 Q. [REDACTED], that's what it spells, [REDACTED]?  
 13 A. That's what it would spell, but it's actually  
 14 [REDACTED].  
 15 Q. That's [REDACTED]?  
 16 A. Yes.  
 17 Q. When did you -- [REDACTED], where does he  
 18 currently reside?  
 19 A. Martin County jail.  
 20 Q. And he's serving a sentence there; correct?  
 21 A. Um, actually, he's, um -- he's down from  
 22 Okaloosa Prison for a hearing.  
 23 Q. Did you see him when he was here?  
 24 A. Yes.  
 25 Q. When did you last see him?

1 A. That's my other sister's two children, niece  
 2 and nephew (nephew).  
 3 Q. All right. And they -- [REDACTED] is whose child?  
 4 A. [REDACTED]  
 5 Q. And she has one child?  
 6 A. Yes.  
 7 Q. Okay. And the other tattoos on your left --  
 8 around your left ankle are your -- [REDACTED] children?  
 9 A. Yes.  
 10 Q. All right. When -- when did you receive, or  
 11 when did you have the [REDACTED] tattoo of [REDACTED] put on?  
 12 A. That was my first one, and so I got it after  
 13 I turned 18.  
 14 Q. Where? Where did you get it?  
 15 A. On my right leg.  
 16 Q. I'm sorry?  
 17 A. On my right --  
 18 Q. No, no. I, I saw that. Where,  
 19 location-wise, did you have the tattoo put on?  
 20 A. I had them all done at the same place.  
 21 Q. 45th Street flea market?  
 22 A. Yes.  
 23 Q. And where is the 45th Street flea market?  
 24 A. On 45th Street.  
 25 Q. I gathered that, but where? Is it toward

1 [REDACTED] Trail? Is it toward the dump? Is it toward  
 2 45th Street toward -- toward -- toward the east?  
 3 A. Um, it's -- it's west of the hospital.  
 4 Q. Pardon?  
 5 A. West of the hospital, St. Mary's, that is  
 6 also on 45th Street.  
 7 Q. All right. Do you know where [REDACTED] is?  
 8 A. Not exactly.  
 9 Q. Do you know what [REDACTED] is?  
 10 A. Yes, I do.  
 11 Q. Okay. What is [REDACTED]?  
 12 A. [REDACTED]  
 13 Q. Okay. Are you aware it's a gentlemen's club?  
 14 A. Excuse me?  
 15 Q. Are you aware it's a gentlemen's club?  
 16 A. No. I --  
 17 Q. Adult entertainment?  
 18 A. Yes.  
 19 Q. Okay. So in addition to being [REDACTED]  
 20 it's also -- it has adult entertainment, with -- with  
 21 women who take off their clothes, strippers; true?  
 22 A. What does that have to do with anything?  
 23 Q. Can you answer my question, yes or no?  
 24 A. I, I would guess that that is true, yes.  
 25 Q. Okay. Well, you're familiar with gentlemen's

1 clubs; true?  
 2 A. Yes.  
 3 Q. Adult entertainment?  
 4 A. Yes.  
 5 Q. Because you've worked at them; true?  
 6 A. Yes.  
 7 Q. And so when you said [REDACTED] was a [REDACTED]  
 8 [REDACTED], you also knew at the time you answered that  
 9 question that it had adult entertainment; that is, it  
 10 was a strip club, as well; true?  
 11 A. I have never been to [REDACTED] before, so, no,  
 12 I wouldn't know that.  
 13 Q. But you know that from general -- from just  
 14 having been in the business, so to speak, that [REDACTED]  
 15 as well, in addition to serving food, as well, is a  
 16 strip club; true?  
 17 A. How would I know that?  
 18 Q. All right. You can tell me you don't know  
 19 that. I'm okay with that answer, too. I just want the  
 20 gentlemen -- the ladies and gentlemen of the jury to  
 21 understand that you -- that today is the first time that  
 22 you learned that [REDACTED] actually had adult  
 23 entertainment; is that correct?  
 24 A. Yes.  
 25 Q. All right. 45th Street flea market, so it's

1 east of the hospital?  
 2 A. West.  
 3 Q. West of the hospital. And it's actually on  
 4 45th Street?  
 5 A. Yes.  
 6 Q. Okay. Is -- do you know where the Oakwood  
 7 Center is, what used to be the 45th Street Community  
 8 Mental Health Center?  
 9 A. No.  
 10 Q. Okay. Do you know where Australian Avenue is  
 11 on 45th Street?  
 12 A. Yes.  
 13 Q. Okay. So the flea market would be between  
 14 Congress and Australian?  
 15 A. I think it might be before that. I'm not --  
 16 I haven't been there in a long time.  
 17 Q. Okay. When you had the tattoos put on, the  
 18 three tattoos, two around your ankle and one on your  
 19 right, upper arm, were they all put on at the same time?  
 20 A. No.  
 21 Q. Did they have you fill out a form each time?  
 22 A. I don't remember.  
 23 Q. Okay. Over what period of time did you have  
 24 the three tattoos put on?  
 25 A. In between 18 and 19.

1 Q. Do you have any other tattoos, other than the  
 2 three?  
 3 A. No.  
 4 Q. Were you required to show a form of ID?  
 5 A. Yes.  
 6 Q. All right. Did you show them your driver's  
 7 license?  
 8 A. No.  
 9 Q. What did you show them?  
 10 A. My ID card.  
 11 Q. And when you say your ID card, what's an ID  
 12 card?  
 13 A. It's a card with your picture on it and your  
 14 name.  
 15 Q. All right. And what's it -- and where did  
 16 you get your ID card?  
 17 A. At the DMV.  
 18 Q. All right. So do you have a driver's  
 19 license?  
 20 A. No.  
 21 Q. All right. Have you ever had a driver's  
 22 license?  
 23 A. No.  
 24 Q. How long have you had a D -- an ID card?  
 25 A. Since I was 17.

1 Q. Do you have the same card now?  
 2 A. Yes.  
 3 Q. Do you have it with you today?  
 4 A. Yes.  
 5 Q. Could I see it so we can mark it as an  
 6 exhibit, make a copy and mark it as an exhibit?  
 7 MR. CRITTON: Go ahead.  
 8 THE WITNESS: (Handing to Mr. Edwards.)  
 9 BY MR. CRITTON:  
 10 Q. What you've handed me and what we'll mark as  
 11 Exhibit 1, is that a true and accurate -- well, is that  
 12 the only ID card you've ever had?  
 13 A. Yes.  
 14 MR. GOLDBERGER: It's a duplicate.  
 15 THE WITNESS: Yes, it's a duplicate.  
 16 BY MR. CRITTON:  
 17 Q. Okay. And why is it a duplicate? So do you  
 18 have another card, as well?  
 19 A. No, I lost it.  
 20 Q. And this obviously doesn't have your current  
 21 address on it, because that's the address that you won't  
 22 disclose; correct?  
 23 A. Yes.  
 24 Q. All right. And the [REDACTED]  
 25 address is not your current address; correct?

1 MR. EDWARDS: Objection. She's not going to  
 2 answer the question.  
 3 MR. CRITTON: Well -- well, we'll get a copy.  
 4 If you will just leave that out, Ms. Jane Doe,  
 5 we're going to make a copy of that, and then we'll  
 6 attach that to the -- to the deposition.  
 7 (Whereupon, Mr. Garcia left the proceedings.)  
 8 BY MR. CRITTON:  
 9 Q. Ms. Jane Doe, how many fake ID's have you  
 10 had?  
 11 A. Zero.  
 12 Q. It's your testimony that you've never had a  
 13 fake ID?  
 14 A. Yes.  
 15 Q. Okay. So if there will be witnesses in this  
 16 case that will testify that you had a fake ID, they  
 17 would be lying; is that true?  
 18 A. Absolutely.  
 19 Q. Have you ever had an adult entertainment  
 20 card?  
 21 A. No.  
 22 Q. But you worked at adult entertainment  
 23 establishments; true?  
 24 A. Yes.  
 25 Q. Did -- did -- well, let me ask you this:

1 Where -- what adult entertainment establishments have  
 2 you worked at?  
 3 A. [REDACTED].  
 4 Q. I'm sorry?  
 5 A. [REDACTED].  
 6 Q. Where?  
 7 A. [REDACTED].  
 8 Q. All right. Where else?  
 9 A. [REDACTED].  
 10 Q. Where is that located?  
 11 A. West Palm Beach.  
 12 Q. What's the address for [REDACTED]?  
 13 A. I don't know.  
 14 Q. Do you know what street it's on?  
 15 A. It's on [REDACTED].  
 16 Q. And [REDACTED], where is that located in  
 17 [REDACTED]?  
 18 A. I think [REDACTED].  
 19 Q. During what time period -- well, let me ask  
 20 you this: With [REDACTED], were you required to show  
 21 the individuals who hired you that you had an adult  
 22 entertainment card?  
 23 A. No.  
 24 Q. Wasn't an adult entertainment card required  
 25 at that time?

1 A. Excuse me?  
 2 Q. Was there a requirement within the County  
 3 that you have an adult entertainment card at the time  
 4 you worked at [REDACTED]?  
 5 A. I don't know.  
 6 Q. How about [REDACTED], did they ever require  
 7 an adult entertainment card?  
 8 A. No. I only showed ID.  
 9 Q. And that's the same ID that you have with you  
 10 today that, I assume, is the duplicate, except you have  
 11 the original?  
 12 A. Yes.  
 13 Q. Okay. And when did you get your duplicate?  
 14 A. I'm not sure.  
 15 Q. All right. Was it within the last six  
 16 months, within the last year?  
 17 A. I'm not -- I'm not sure where -- when I got  
 18 it.  
 19 Q. I want to go back to a question I asked you  
 20 earlier. I asked you whether you had any  
 21 conversations -- well, let me strike that.  
 22 Now, I asked you when you retained the  
 23 services of Mr. Edwards. And I think you told me you  
 24 didn't know. All you know, it was sometime before the  
 25 lawsuit was filed in August, on or about August 13th of

1 2008; correct?  
 2 A. Yes.  
 3 Q. Okay. How many months prior to the filing of  
 4 the lawsuit had you hired Mr. Edwards?  
 5 A. I don't know.  
 6 Q. A month? A week?  
 7 MR. EDWARDS: Objection. Asked and answered.  
 8 BY MR. CRITTON:  
 9 Q. Two months? Your best estimate.  
 10 MR. EDWARDS: Object to the form.  
 11 THE WITNESS: I don't know.  
 12 BY MR. CRITTON:  
 13 Q. Did you hire Mr. Edwards in 2007?  
 14 A. I don't know what year it was.  
 15 Q. Do you know if it was in 2006 that you hired  
 16 Mr. Edwards?  
 17 A. I don't know.  
 18 Q. Okay. So you don't know whether you hired  
 19 Mr. Edwards in 2006, 2007 or 2008; is that your  
 20 testimony?  
 21 A. Yes.  
 22 Q. At the time that you hired Mr. Edwards, was  
 23 he representing either [REDACTED] or [REDACTED]?  
 24 A. I don't -- I don't know.  
 25 Q. How did you get to Mr. Edwards?

1 A. I, I got his card somehow. I guess he had  
 2 spoken to somebody else and gave them his card, and they  
 3 gave it to me.  
 4 Q. Okay. Who was the person who gave you  
 5 Mr. Edwards' card?  
 6 A. I don't remember.  
 7 Q. This is the person who gave you a card for a  
 8 lawyer, now your lawyer, Mr. Edwards, and you don't  
 9 remember or have any idea who that person was; is that  
 10 correct?  
 11 A. Yes.  
 12 Q. All right. And you don't remember whether  
 13 that was in 2006, 2007 or 2008; correct?  
 14 A. Yes.  
 15 Q. Do you remember whether it was a man or a  
 16 woman, male or female that gave you the card?  
 17 A. No, I don't remember who it was.  
 18 Q. Do you remember how they happened to give you  
 19 the card; that is, what was the event or circumstance  
 20 that caused them to give you the card?  
 21 A. Um, there were, I guess, people who worked  
 22 for the FBI who were going to my house and my mother's  
 23 house and my sister's house, trying to find me, to speak  
 24 to me.  
 25 Q. Which sister?

1 A. [REDACTED]  
 2 Q. So people -- you say there were people that  
 3 were going to those houses?  
 4 A. People who worked for the FBI.  
 5 Q. All right. So the FBI was coming to your  
 6 mother's house, your sister's house and your  
 7 grandmother's house; did you say?  
 8 A. Yes.  
 9 Q. And how did you learn that fact? From them?  
 10 A. They left cards. They spoke to my family  
 11 members who told me about it.  
 12 Q. Okay. Anyone else? That is, other than your  
 13 grandmother, [REDACTED], your mother, [REDACTED]; and your  
 14 sister, [REDACTED] did the FBI talk to anyone else --  
 15 MR. EDWARDS: Object to the form.  
 16 BY MR. CRITTON:  
 17 Q. -- that you're aware of, about -- about you?  
 18 A. I don't know.  
 19 Q. All you remember is that [REDACTED] and  
 20 your grandmother told you that the FBI had come to their  
 21 house, asking questions about you --  
 22 A. Yes.  
 23 Q. -- and had left their card?  
 24 A. Yes.  
 25 Q. Who were the people from the FBI; do you

1 know -- that were leaving cards?  
 2 A. One of their names was Jason.  
 3 Q. And --  
 4 A. There was a woman, but I don't remember her  
 5 name.  
 6 Q. Were those cards given to you by --  
 7 A. Yes.  
 8 Q. -- by any of your family members?  
 9 A. Yes.  
 10 Q. Do you still have them today?  
 11 A. No.  
 12 Q. What did you do with them?  
 13 A. I don't know.  
 14 Q. How do you know you don't have them, then?  
 15 A. Because I use my wallet often.  
 16 Q. All right. And the cards were in your  
 17 wallet?  
 18 A. Yes.  
 19 Q. Did you -- do you remember the timeframe that  
 20 the FBI was coming, trying to contact you, that is going  
 21 to your family members' houses to contact you?  
 22 A. I was pregnant.  
 23 Q. All right. And you have a daughter?  
 24 A. Yes.  
 25 Q. And what's her name?

12 (Pages 42 to 45)

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1 [REDACTED]  
2 [REDACTED]  
3 [REDACTED]  
4 [REDACTED]  
5 [REDACTED]  
6 Q. How pregnant were you with [REDACTED] the time  
7 that the -- you were hearing from your family members  
8 that Jason and some other female FBI agent were  
9 interested in speaking with you?

10 A. I heard that they had been there months  
11 before when I was not pregnant. And when I had actually  
12 spoken to them, I was three or four months pregnant --  
13 three and a half months pregnant.

14 Q. You're sure of that?

15 A. Yes.

16 Q. Okay. And how are you sure you were only  
17 three and a half months pregnant?

18 A. Because I went to a doctor.

19 Q. All right. Okay. When -- when do you  
20 believe your -- that -- that you first became pregnant?  
21 Just give me a time that you believe that conception  
22 occurred, I guess, is probably the best way to describe  
23 it.

24 A. I don't know.

25 Q. All right. Do you know the date that you

1 A. Yes.  
2 Q. An individual who identified herself as an  
3 FBI, at least on her card?

4 A. Yes.

5 Q. All right. Did you ever return any of the  
6 phone calls to these individuals?

7 A. Yes, I did.

8 Q. At what point in time did you contact them?  
9 And just give me that -- well, I think you said -- well,  
10 let me strike that.

11 You said you met with them three and a  
12 half -- you were approximately three and a half months  
13 pregnant at the time; correct?

14 A. Yes.

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

16 A. Yes.

17 Q. All right. And who did you call; which FBI  
18 person did you call?

19 A. I don't remember.

20 Q. Okay. And why did you call the FBI person?

21 A. I don't know.

22 Q. At time that the FBI contacted you, had you  
23 heard anything about anyone contemplating a lawsuit for  
24 money damages against Mr. Epstein?

25 A. No.

1 met, actually met with FBI individuals?

2 A. I do not know the exact date.

3 Q. Did you meet with the FBI individuals on more  
4 than one occasion?

5 A. No.

6 Q. Let me just go back. So you heard from  
7 family members that the FBI -- certain individuals from  
8 the FBI, one person being Jason someone, because you had  
9 a card at one point in time, wanted to speak with you,  
10 and that was approximately four or five months before  
11 they ultimately spoke with you?

12 MR. EDWARDS: Form.

13 THE WITNESS: Yes.

14 BY MR. CRITON:

15 Q. All right. Did -- did your -- who -- who  
16 gave you the FBI cards?

17 A. [REDACTED] and my -- my mother and my  
18 sister.

19 Q. I'm sorry?

20 A. [REDACTED], my mother and my sister.

21 Q. Were all the cards from the same people?

22 A. No.

23 Q. There were different cards?

24 A. One was from a woman.

25 Q. But an FBI person?

1 Q. Okay. At the time that you contacted the  
2 FBI, based on the cards that were given to you, had you  
3 spoken with anyone about what you allege occurred at  
4 Mr. Epstein's home -- with anyone, anyone from law  
5 enforcement?

6 A. No.

7 Q. Had you ever been contacted by the -- by the  
8 Palm Beach County State Attorney's office?

9 A. I don't know.

10 Q. Have you ever spoken with anyone from the  
11 Palm Beach County -- Palm Beach County State Attorney's  
12 office?

13 A. I don't know.

14 Q. Okay. Well, when I say, spoken with them  
15 about, obviously about your -- similar to the  
16 allegations that you've made in your complaint directed  
17 to Mr. Epstein. So what I meant, saying, have you  
18 spoken with anybody at the State Attorney's office or  
19 anyplace else, I'm interested as to the allegations that  
20 you've raised in this complaint; do you understand that?

21 A. Yes, I understand that.

22 Q. Have you ever spoken with anyone who  
23 represented themselves to be a State Attorney with the  
24 Palm Beach County State Attorney's office about  
25 Mr. Epstein?

1 A. Not that I know of.  
 2 Q. Well, you'd know if you spoke with someone --  
 3 MR. EDWARDS: Object to the form.  
 4 BY MR. CRITTON:  
 5 Q. -- from the State Attorney's office; wouldn't  
 6 you?  
 7 A. Excuse me?  
 8 Q. I said, you would know if someone said, I'm  
 9 from -- I'm Sam Smith from the State -- Palm Beach  
 10 County State Attorney's office, I want to talk to you.  
 11 You would remember that; wouldn't you?  
 12 MR. EDWARDS: Form.  
 13 THE WITNESS: There were a lot of people that  
 14 came to my house, wanting to talk to me.  
 15 BY MR. CRITTON:  
 16 Q. You need to answer my question. Okay? Would  
 17 you like it read back to you?  
 18 A. I don't remember.  
 19 Q. Have you ever spoken at any time in your life  
 20 about anything with a State -- the State Attorney or an  
 21 Assistant State Attorney from Palm Beach County -- about  
 22 anything?  
 23 A. I don't know.  
 24 Q. Okay. Well, you've been in trouble with the  
 25 law before; correct?

1 A. Yes.  
 2 Q. Okay. And have you had to deal with State  
 3 Attorneys under those circumstances?  
 4 MR. EDWARDS: Object to the form.  
 5 THE WITNESS: I don't know.  
 6 BY MR. CRITTON:  
 7 Q. The State Attorneys, though, you -- you  
 8 understand those are the ones that prosecute you --  
 9 would have prosecuted you; true?  
 10 A. Yes.  
 11 Q. All right. Okay. Have you -- and it's your  
 12 testimony you can't remember -- it's -- you have no  
 13 recollection of having spoken with anyone from the Palm  
 14 Beach County State Attorney's office?  
 15 A. No, I do not.  
 16 Q. That's correct.  
 17 All right. Did you ever speak with anyone  
 18 from the Palm Beach Police Department regarding any of  
 19 your allegations that are set forth in your complaint  
 20 directed to Mr. Epstein?  
 21 A. No.  
 22 Q. Did you ever speak with a United States --  
 23 well, let me strike that.  
 24 Did you ever speak with an assistant attorney  
 25 or an attorney from -- who represented him or herself to

1 be from the office of the United States Attorney?  
 2 A. No. I don't -- I don't remember if I did or  
 3 not.  
 4 Q. So the, the only individuals, at least  
 5 governmental, either [REDACTED] or state or local  
 6 officials, that you've ever discussed any of the  
 7 allegations that you've alleged in your complaint  
 8 against Mr. Epstein would have been with the FBI --  
 9 MR. EDWARDS: Object to the form.  
 10 BY MR. CRITTON:  
 11 Q. -- is that correct?  
 12 MR. EDWARDS: Form.  
 13 THE WITNESS: Yes.  
 14 BY MR. CRITTON:  
 15 Q. Is that correct? I'm sorry.  
 16 A. Yes.  
 17 Q. As a result of the cards that you received,  
 18 did you contact one of those individuals? That is, your  
 19 family gave you cards for the FBI; then you contacted  
 20 them?  
 21 A. Yes.  
 22 Q. Okay. Had your mother, your sister or your  
 23 grandmother told the FBI where you could be found?  
 24 A. I don't know.  
 25 Q. Where were you living at the time?

1 A. With a friend.  
 2 Q. Who?  
 3 A. [REDACTED].  
 4 Q. Okay. You were living with [REDACTED] at the time.  
 5 Where does [REDACTED] reside -- or where was she living at  
 6 that time?  
 7 A. [REDACTED].  
 8 Q. Address, please?  
 9 A. I don't know the address.  
 10 Q. What street?  
 11 A. I don't know the name of the street.  
 12 Q. How did you know how to get there?  
 13 A. I knew what the neighborhood looked like.  
 14 Q. Okay. You don't drive a car?  
 15 A. No.  
 16 Q. Okay. Have you ever had a car, owned a car?  
 17 A. No.  
 18 Q. Have you ever driven a car?  
 19 A. Yes.  
 20 Q. All right. So you have driven a car, but you  
 21 haven't had a license?  
 22 A. Yes.  
 23 Q. All right. Do you still drive a car, say  
 24 over the past year, without a license?  
 25 A. No.

1 Q. How would you get around when you were living  
 2 with [REDACTED]?

3 A. She would take me.

4 Q. How long -- how long had you been living with  
 5 [REDACTED] -- well, let me strike that.

6 On how many occasions have you lived with  
 7 [REDACTED]?

8 A. Two.

9 Q. During what time -- you and [REDACTED] have been  
 10 childhood friends?

11 A. No.

12 Q. When did you meet [REDACTED]?

13 A. I believe I was 13 when I met her.

14 Q. Do you know what [REDACTED]'s date of birth is?

15 A. No, I do not.

16 Q. Do you know what month she is born in, or  
 17 day?

18 A. I'm not positive, no.

19 Q. Okay. You and [REDACTED] are still best friends;  
 20 aren't you?

21 MR. EDWARDS: Object to the form.

22 THE WITNESS: No, I have not spoken to [REDACTED].

23 BY MR. CRITTON:

24 Q. Okay. Were you best friends at the time you  
 25 were living with her?

1 MR. EDWARDS: Object to the form.

2 THE WITNESS: No.

3 BY MR. CRITTON:

4 Q. Was [REDACTED] charging you rent?

5 A. No.

6 Q. So you've known [REDACTED] since 13. During what  
 7 time periods have you lived with her?

8 A. Excuse me?

9 Q. You said you had lived with her on two  
 10 separate occasions.

11 A. Yes.

12 Q. What are those two occasions? Give me the  
 13 approximate timeframes.

14 A. The first time, I had just turned 18 and --

15 Q. You say the first time, or...

16 A. I just turned 18, yes.

17 Q. Did you say the first time? I'm sorry. I  
 18 was thinking about something else.

19 A. Yes.

20 Q. Okay. You had just turned 18, so that would  
 21 have put -- 18, that would have put you approximately  
 22 June or July of 2006; right?

23 A. Yes.

24 Q. And how long did you live with [REDACTED]?

25 A. A few months.

1 Q. A few months?

2 A. Yes.

3 Q. What does a few months mean you to? Three or  
 4 four, five, six?

5 A. About three.

6 Q. Did you -- and was she -- was she living at  
 7 the same place in [REDACTED]?

8 A. No.

9 Q. Where was she living at that time?

10 A. She was living in -- I don't remember the  
 11 name of the apartments that she lived in. It was in  
 12 West Palm Beach, though.

13 Q. Was she living with anyone, other than -- was  
 14 she living with anyone at the time?

15 A. Her boyfriend.

16 Q. And his name was?

17 A. I'm not -- I -- I don't know who.

18 Q. I'm sorry?

19 A. I'm not sure who he was.

20 Q. Did she have more than one boyfriend living  
 21 with her during the time, those few months that you were  
 22 living with her, when you had just turned 18?

23 A. No, it was none of my business.

24 Q. That's not my question. I assume that you,  
 25 when you were living there, you were literally living

1 there for those few months; correct?

2 MR. EDWARDS: Object to the form.

3 BY MR. CRITTON:

4 Q. You were staying there, sleeping overnight?

5 A. Yes.

6 Q. Okay. So if she had more than one boyfriend,  
 7 you would know; wouldn't you? I mean, you -- I assume  
 8 you, if you would see a --

9 A. No, I wouldn't know.

10 Q. -- a male in the house, you'd go, hi, I'm  
 11 Jane Doe?

12 A. No.

13 Q. So you would just, if you would see someone,  
 14 you would turn your head and walk back into your room?

15 A. I mostly was in my own room.

16 Q. Okay. Were you working at that time?

17 A. I did.

18 Q. Where?

19 [REDACTED]

20 [REDACTED]

21 [REDACTED]

22 [REDACTED]

23 Q. Were you also working at --

24 A. No.

25 Q. -- [REDACTED] at that time or [REDACTED]?

1 A. No.  
 2 Q. Okay. At any time during the time you were  
 3 living with [REDACTED], were you working at [REDACTED] or  
 4 [REDACTED] -- the first time?  
 5 A. Not the first time.  
 6 Q. Okay. Had you -- when you were working at  
 7 [REDACTED], had you -- well, let me strike that.  
 8 When you worked at I -- how long did you  
 9 worked at [REDACTED]?  
 10 A. About two months.  
 11 Q. Had you worked at either of the strip clubs  
 12 before you worked at [REDACTED]?  
 13 A. No.  
 14 Q. Okay. You worked at the strip clubs after  
 15 you worked at [REDACTED]?  
 16 A. Yes.  
 17 Q. Okay. Had you -- when you started working,  
 18 [REDACTED] was the first one?  
 19 A. Yes.  
 20 Q. Okay. How -- how many months did you work  
 21 there?  
 22 A. I don't know.  
 23 Q. Well, did you work a day? Did you work a  
 24 month? Did you work a year?  
 25 A. Probably like eight months.

1 Q. Were you still working at the [REDACTED] at that  
 2 point?  
 3 A. No.  
 4 Q. Did you have any other jobs?  
 5 A. No.  
 6 Q. Just working strictly at [REDACTED] --  
 7 A. Yes.  
 8 Q. -- for approximately eight months?  
 9 A. Yes.  
 10 Q. When's the second time -- and during the time  
 11 that you worked with [REDACTED], did you work anyplace else,  
 12 other than [REDACTED]?  
 13 I'm sorry; that may not have been clear.  
 14 During the first time that you lived with  
 15 [REDACTED] at her house -- or was it an apartment and not a  
 16 home?  
 17 A. Apartment.  
 18 Q. -- apartment in West Palm Beach, did you work  
 19 anyplace else, other than [REDACTED]?  
 20 A. No.  
 21 Q. So there must have been a time that you were  
 22 living with [REDACTED] that you also were unemployed?  
 23 A. Yes.  
 24 Q. Did she make you pay any rent?  
 25 A. No.

1 Q. Why? That is -- well, let me strike that.  
 2 Where --  
 3 MR. EDWARDS: Object to the form.  
 4 BY MR. CRITTON:  
 5 Q. Where did you get -- how did you -- other  
 6 than working at [REDACTED], how did you support yourself in  
 7 terms of food, entertainment, recreation, things of that  
 8 nature?  
 9 A. [REDACTED].  
 10 Q. Did she give you money?  
 11 A. Yes.  
 12 Q. Does she still give you money?  
 13 A. No.  
 14 Q. All right. After the first time you lived  
 15 with [REDACTED], you were -- you had just turned 18. You were  
 16 there a few months. Then when were you -- when did you  
 17 next live with [REDACTED].?  
 18 A. Must have been a year later.  
 19 Q. Sometime in 2007?  
 20 A. Yes.  
 21 Q. Okay. And how long did you live -- and this  
 22 was now at the [REDACTED] address; correct?  
 23 A. Yes.  
 24 Q. By the way, when you were at the apartment,  
 25 what was [REDACTED]'s boyfriend's name?

1 MR. EDWARDS: Objection. Asked and answered.  
 2 BY MR. CRITTON:  
 3 Q. Well, you said she had one boyfriend. Who  
 4 was that?  
 5 MR. EDWARDS: Answer, if you know.  
 6 MR. CRITTON: Is that a form objection?  
 7 MR. EDWARDS: If you know.  
 8 MR. CRITTON: Don't -- don't key her, so she  
 9 can say, I don't know. Just it's a form; is that  
 10 right?  
 11 MR. EDWARDS: Yeah, it's a form objection.  
 12 MR. CRITTON: All right.  
 13 MR. EDWARDS: We've gone through this again  
 14 and again, so...  
 15 THE WITNESS: Jessie.  
 16 BY MR. CRITTON:  
 17 Q. Jessie. So you do know his name. What's his  
 18 last name?  
 19 A. I don't know his last name.  
 20 Q. Was he the only boyfriend that you saw at  
 21 [REDACTED]'s house during the time -- I'm sorry -- apartment  
 22 during the time, those few months you lived there?  
 23 A. Yes.  
 24 Q. And did he live there with her?  
 25 A. I guess so.

1 Q. Did you continue to see him afterwards? By  
 2 see, see him, I don't mean see him in a relationship.  
 3 A. Yes, I did.  
 4 Q. Okay. Does [REDACTED] still see Jessie?  
 5 A. No.  
 6 Q. By the way, let me make a couple of things  
 7 clear. I get to ask you a bunch of questions. I  
 8 think -- I'm confident Mr. Edwards, being the lawyer he  
 9 is, has told you about this procedure. So you have an  
 10 idea that I get to ask you questions, and you get to  
 11 give me answers. And same with the other lawyers that  
 12 are here; true? You understand that?  
 13 A. Yes.  
 14 Q. All right. If you don't understand a  
 15 question, I'll be happy to rephrase it or to repeat it;  
 16 do you understand that?  
 17 A. Yes.  
 18 Q. Okay. And if you answer a question, I'm  
 19 going to assume that you understood it and answered it  
 20 truthfully. That's fair; isn't it?  
 21 A. Yes.  
 22 Q. Okay. If you don't know an answer to a  
 23 question, you can tell me you don't know, or you -- or  
 24 you can -- well, let me strike that.  
 25 If you don't know an answer, you can tell me

1 that. You understand that, as well?  
 2 A. Yeah.  
 3 Q. All right. So you don't need Mr. Edwards to  
 4 say if you know or you don't know. If you don't know  
 5 something, you're going to tell me you don't know  
 6 something; fair?  
 7 A. Yeah.  
 8 Q. Okay. Second time you lived with [REDACTED]. how  
 9 long?  
 10 A. A month.  
 11 Q. And where had you been living before this one  
 12 month that you went to live with [REDACTED].?  
 13 A. [REDACTED].  
 14 Q. And why did you leave?  
 15 A. I don't know.  
 16 Q. How long had you been living at your  
 17 grandmother's house -- house on Edge Hill Road in  
 18 West Palm Beach before you went to [REDACTED]'s for the second  
 19 time?  
 20 A. I lived there since I moved out of [REDACTED]'s the  
 21 first time.  
 22 Q. All right. So sometime in the latter part of  
 23 2006 you moved back to [REDACTED]'s -- I'm sorry -- you moved  
 24 from [REDACTED]'s apartment in West Palm Beach, so the latter  
 25 part of 2006 to sometime in 2007, you were living back

1 with your grandmother; correct?  
 2 A. Yes.  
 3 Q. And during the time that you were there --  
 4 well, let me strike that.  
 5 Had you been living with your grandmother  
 6 before the first time you went to stay with [REDACTED].?  
 7 A. Yes.  
 8 Q. Okay. Had there been some event in 2006 that  
 9 had caused you to leave grandma's -- grandmother's  
 10 house, [REDACTED] house, and go to [REDACTED]'s, that is a  
 11 fight, a battle, something that made you unhappy, so off  
 12 you went?  
 13 A. Yes.  
 14 Q. What? What had occurred in 2006 that caused  
 15 you to go to [REDACTED]'s?  
 16 A. I broke up with my boyfriend.  
 17 Q. And his name was --  
 18 A. [REDACTED].  
 19 Q. [REDACTED] what?  
 20 A. [REDACTED].  
 21 Q. I'm sorry?  
 22 A. [REDACTED].  
 23 Q. [REDACTED].?  
 24 A. Yes.  
 25 Q. Is Mr. [REDACTED] the father of your child?

1 A. No.  
 2 Q. Is Mr. [REDACTED] -- have you seen him since you  
 3 stopped dating him in 2006?  
 4 A. No.  
 5 Q. Does he still live in West Palm Beach; do you  
 6 know?  
 7 A. No.  
 8 Q. Do you know where he is -- where he lives or  
 9 resides now?  
 10 A. I have been told that he lives in  
 11 [REDACTED].  
 12 Q. Is he in school there?  
 13 A. No.  
 14 Q. What does he do?  
 15 A. I don't know.  
 16 Q. Do you know what his middle name is?  
 17 A. No.  
 18 Q. Do you know what his date of birth is?  
 19 A. No.  
 20 Q. Well, you may not know the year he -- well,  
 21 let me strike that.  
 22 How long did you date this -- how long did  
 23 you date [REDACTED].?  
 24 A. From the time I was 16.  
 25 Q. Until you were just a little over 18;

1 correct?  
 2 A. Yes.  
 3 Q. A little over two years?  
 4 A. Yes.  
 5 Q. Okay. And you're telling the members of the  
 6 jury you don't remember his birth date?  
 7 MR. EDWARDS: Object to the form.  
 8 BY MR. CRITTON:  
 9 Q. Not the year, but you don't even remember the  
 10 month or the day; is that correct?  
 11 MR. EDWARDS: Form.  
 12 THE WITNESS: I haven't seen him in years.  
 13 BY MR. CRITTON:  
 14 Q. That's not my question. I just want the  
 15 members of the jury to understand that you don't  
 16 remember the person who you dated for over two years,  
 17 their birth date; is that correct?  
 18 MR. EDWARDS: Object to the form.  
 19 THE WITNESS: That's correct.  
 20 BY MR. CRITTON:  
 21 Q. When you stayed with [REDACTED] and were working at  
 22 IHOP, then you go back to [REDACTED] house, your  
 23 grandmother; correct --  
 24 A. Yes.  
 25 Q. -- sometime in 2006?

1 A. Yes.  
 2 Q. And you stayed there for a number of months  
 3 into 2007; correct?  
 4 A. Yes.  
 5 Q. And then -- and then for some reason you left  
 6 and went back to [REDACTED]'s house, this time -- or back with  
 7 [REDACTED] in [REDACTED], true?  
 8 A. Yes.  
 9 Q. Okay. And what occurred at grandpa's  
 10 house -- at your grandmother's house, that caused you to  
 11 leave and go back to [REDACTED], what event at that time?  
 12 A. Nothing.  
 13 Q. You just decided to pick up and leave?  
 14 A. Yes.  
 15 Q. And you stayed with [REDACTED] for a month?  
 16 A. Yes.  
 17 Q. What time period was that? Give me a  
 18 approximate date.  
 19 A. I don't know.  
 20 Q. Was it early? Were you pregnant at the time?  
 21 A. No.  
 22 Q. Which kind of takes me back to the question:  
 23 When you were with Ms. [REDACTED], either in 2006 or 2007, had  
 24 the FBI contacted her?  
 25 A. Not that I know of.

1 Q. At the time in 2007, I think you said  
 2 earlier, when your family members told you the FBI was  
 3 looking for you or looking to talk with you, you were  
 4 living with [REDACTED]; correct?  
 5 A. Yes.  
 6 Q. All right. And this was in 2007, and you  
 7 were not pregnant at that time, so would it be a correct  
 8 statement you didn't call the FBI back in 2007; you  
 9 called them back sometime in 2008?  
 10 MR. EDWARDS: Object to the form.  
 11 THE WITNESS: That's possible.  
 12 BY MR. CRITTON:  
 13 Q. Why didn't you contact -- when you heard the  
 14 FBI was looking for you, why didn't you call them back?  
 15 A. Because I didn't want to talk to them.  
 16 Q. Why not?  
 17 A. I don't know.  
 18 Q. At that point in time, did you tell [REDACTED] --  
 19 that is, when you were with [REDACTED], did you tell her that  
 20 the FBI was looking for you, or wanted to talk with you?  
 21 A. No.  
 22 Q. So as you're living with [REDACTED], you knew  
 23 that -- well, let me strike that.  
 24 You had been to Mr. Epstein's house a number  
 25 of times; true?

1 A. Yes.  
 2 Q. Prior to 2006?  
 3 A. Yes.  
 4 Q. You knew that [REDACTED] had been to Mr. Epstein's  
 5 home, as well?  
 6 A. Yes.  
 7 Q. Did [REDACTED] ever tell you that -- that the FBI  
 8 was looking to talk with her or to speak with her?  
 9 A. She probably did.  
 10 Q. And, to your knowledge, did she ever talk  
 11 with the FBI?  
 12 A. No.  
 13 Q. You -- well, that's a [REDACTED] question.  
 14 Did she ever talk -- did she tell you she  
 15 talked with the FBI?  
 16 A. She did not tell me that she did.  
 17 Q. Okay. Did she tell you she did not talk with  
 18 the FBI, or was not going to talk to the FBI?  
 19 A. No.  
 20 Q. What did she tell you, if anything?  
 21 A. She didn't really say anything.  
 22 Q. So at the time that your family members are  
 23 telling you she's going to talk -- the FBI is looking to  
 24 talk with you, you had -- this was the second time now  
 25 you're living with [REDACTED], which you said would have been

1 sometime in 2007 because you weren't pregnant, and you  
2 didn't want to talk to them; correct?

3 A. Yes.

4 Q. All right. And it's your testimony you  
5 didn't tell [REDACTED] that the FBI was looking to talk to  
6 you; correct?

7 A. Yes, not at that time I didn't.

8 Q. At the time -- at the time that the FBI was  
9 trying to talk with you in 2007, did you have a lawyer  
10 at that time? Did you talk to a lawyer about anything,  
11 I mean, other than related to any criminal or arrest  
12 issue that you had?

13 MR. EDWARDS: Object to the form.

14 THE WITNESS: The first time I spoke to the  
15 FBI I did not have a lawyer.

16 BY MR. CRITTON:

17 Q. All right. And with -- I think you told me  
18 earlier that your best recollection is sometime in 2008  
19 you spoke with the FBI --

20 MR. EDWARDS: Object to the form.

21 BY MR. CRITTON:

22 Q. -- correct?

23 A. I was three and a half months pregnant.

24 Q. Okay. And what -- what makes you know that  
25 you were three and a half months pregnant?

1 A. Because I went to a doctor.

2 Q. No, I understand that. But did you go talk  
3 to the FBI the same day that you talked to the FBI?

4 MR. EDWARDS: Object to the form, if that's a  
5 question. Did you talk to the FBI the same day you  
6 talked to the FBI; that's the question?

7 MR. CRITTON: Oh, I'm sorry. That may have  
8 been the question. That was not the intended  
9 question.

10 MR. EDWARDS: I can answer that for you.  
11 It's yes.

12 BY MR. CRITTON:

13 Q. The day that you spoke, you're -- you're  
14 convinced that you were three and a half months pregnant  
15 at the time. So had you been to a doctor that said  
16 you -- you know, I -- by our calculations, you're three  
17 and a half months pregnant, and then you remember that  
18 because that ties in with you saw the FBI within a few  
19 days?

20 A. Yes.

21 Q. All right. Who was your doctor, your -- your  
22 OB/GYN doctor?

23 A. [REDACTED]

24 Q. And you're already -- we've already  
25 established that you only talked with the FBI once;

1 correct?

2 A. Yes.

3 Q. When you spoke with the FBI -- and you told  
4 us you didn't have a lawyer at that time -- was it --  
5 did the FBI tell you or give you the card, Mr. Edwards'  
6 card, and say, this is someone whom you should contact?

7 A. No.

8 Q. Was it before or after you talked to the FBI  
9 that someone gave you Mr. Edwards' card?

10 A. After.

11 Q. And do you remember where you were when  
12 Mr. Edwards' card was given to you?

13 A. No.

14 Q. Do you remember how long after you spoke with  
15 the FBI you received Mr. Edwards' card?

16 A. Not long.

17 Q. Within a week or so? Two weeks?

18 A. Maybe a month or two.

19 Q. If the person that -- what occurred that  
20 someone would give you a lawyer's card? Does that make  
21 sense to you? That is, let's say you're working at  
22 [REDACTED] and someone goes, here, I want to give you  
23 Mr. Edwards' card. Did that --

24 A. Well, obviously --

25 Q. Okay. There has to be some reason why

1 someone would give you a lawyer's card. So my question  
2 to you is: Where are you -- where were you -- what's  
3 your recollection as to why -- how you came to be in  
4 possession of Mr. Edwards' card?

5 A. Well, it must have been somebody who the FBI  
6 spoke to and who had his card.

7 Q. So it must -- another female?

8 MR. EDWARDS: Object to the form.

9 THE WITNESS: I'm not -- I don't remember who  
10 it was who gave me the card.

11 BY MR. CRITTON:

12 Q. Well, how -- how would a lawyer's card end up  
13 in your hand? In this instance, it was Mister --  
14 happened to be Mr. Edwards' card. What -- you had to  
15 have said something to someone who would have said, you  
16 need a lawyer, here's a lawyer's card. And that's what  
17 I'm trying to find out. What -- what occurred that  
18 someone gave you that card? Were you talking to [REDACTED]?  
19 Were you talking to [REDACTED]?

20 A. I don't know.

21 Q. All right. So you're telling the  
22 gentlemen -- ladies and gentlemen of the jury you have  
23 no recollection of how you got Mr. Edwards' card?

24 MR. EDWARDS: Object to the form.  
25

1 BY MR. CRITTON:  
 2 Q. Just that it was sometime after you spoke  
 3 with the FBI?  
 4 A. Yes.  
 5 Q. Okay. And it's your testimony that -- that  
 6 the F -- that none of the FBI individuals or the people  
 7 who interviewed you gave you Mr. Edwards' card; is that  
 8 your testimony here under oath?  
 9 A. Yes.  
 10 Q. Did someone call you and refer you to  
 11 Mr. Edwards, say, I'm going to send you a card, this is  
 12 a lawyer you need to see?  
 13 A. No. I don't remember who it was who gave me  
 14 the card.  
 15 Q. When you met with the FBI, who was it?  
 16 MR. EDWARDS: Object to the form. Asked and  
 17 answered.  
 18 BY MR. CRITTON:  
 19 Q. That is a man and a woman?  
 20 A. Yes.  
 21 Q. Okay. Was Jason one of those people?  
 22 A. Yes.  
 23 Q. And you don't recall the woman's name?  
 24 A. No.  
 25 Q. Describe Jason for me.

1 coming?  
 2 A. Yes.  
 3 Q. Okay. Who -- who else was living with  
 4 Ms. Brewer, in addition to yourself, at that time?  
 5 A. I'm not sure.  
 6 Q. Okay. Well, was the father of your child --  
 7 A. Yes.  
 8 Q. -- excuse me -- living there at the time?  
 9 A. Yes.  
 10 Q. Okay. So -- and he's someone that, until I  
 11 asked whether he was there, you didn't recall whether he  
 12 was living there?  
 13 A. He was living there, but I don't think he was  
 14 there.  
 15 Q. All right. I'm just asking who was living at  
 16 [REDACTED] home at the time that the FBI came. And  
 17 when I say, who was living in the house, not necessarily  
 18 they were there when the FBI interviewed you, but who  
 19 was living at the house. There was Ms. Brewer, your --  
 20 the father of the child [REDACTED]?  
 21 A. Yes.  
 22 Q. Okay. And the father obviously has a name.  
 23 What's his name?  
 24 A. [REDACTED]  
 25 Q. [REDACTED]?

1 A. He was a tall, bald man.  
 2 Q. Approximate age, best estimate?  
 3 A. His thirties.  
 4 (Discussion held off the record.)  
 5 BY MR. CRITTON:  
 6 Q. All right. The woman, describe her for me.  
 7 A. She was blond.  
 8 Q. Tall? Short? Medium?  
 9 A. I believe she was taller than I am.  
 10 Q. Approximate age?  
 11 A. She was probably in her thirties, also.  
 12 Q. Where did you meet them? Did you come to  
 13 them, or did they come to you?  
 14 A. They came to me.  
 15 Q. And where did they come -- where were you  
 16 living at that time that they came to interview you?  
 17 Were you still at [REDACTED]'s?  
 18 A. No.  
 19 Q. Now you were back at grandma -- at  
 20 [REDACTED] home?  
 21 A. Yes.  
 22 Q. Was anyone else present when they interviewed  
 23 you?  
 24 A. No.  
 25 Q. Did your grandmother know that they were

1 A. [REDACTED]  
 2 [REDACTED]  
 3 [REDACTED]  
 4 [REDACTED]  
 5 [REDACTED]  
 6 [REDACTED]  
 7 [REDACTED]  
 8 [REDACTED]  
 9 [REDACTED]  
 10 Q. You're currently living him -- with him and  
 11 your child at the address that your attorney has  
 12 instructed you not to provide me; correct?  
 13 A. Yes.  
 14 Q. And nobody else lives at that address with  
 15 you; is that correct?  
 16 MR. EDWARDS: Object to the form. Don't  
 17 answer.  
 18 MR. CRITTON: Well --  
 19 MR. EDWARDS: It's going to be identifying  
 20 information about the address.  
 21 BY MR. CRITTON:  
 22 Q. I want to know, does anyone else live with  
 23 you at your current address?  
 24 A. Besides who?  
 25 Q. Besides the father of the child, [REDACTED] --

1 [REDACTED]?

2 A. [REDACTED]

3 Q. [REDACTED]?

4 MR. EDWARDS: Don't answer.

5 MR. CRITTON: Well, just a yes or no, first.

6 How about that?

7 MR. EDWARDS: Don't answer.

8 MR. CRITTON: Okay.

9 MR. EDWARDS: Whether it's yes or no.

10 MR. CRITTON: And the basis -- the basis for

11 that, just so that the Court can --

12 MR. EDWARDS: Is that it's going to be

13 identifying information about the address, so that

14 you can give it to your client, so that he can go

15 and harass her or do whatever he wants to or

16 whatever he's done in the past to her. And that's

17 not going to happen to her or her daughter.

18 MR. CRITTON: That's absurd.

19 MR. EDWARDS: That's it.

20 MR. CRITTON: That's absurd.

21 MR. EDWARDS: Yeah, I agree; it is absurd.

22 What's happened --

23 MR. CRITTON: No, no. What --

24 MR. EDWARDS: -- in this case is absurd --

25 MR. CRITTON: Okay.

1 [REDACTED] house, 2008. Is it just the three of them,

2 the two of them and you?

3 A. Yes.

4 Q. Okay. Sitting at the kitchen table.

5 A. The porch.

6 Q. How much time did you spend with them?

7 A. I don't know.

8 Q. Was it a five-minute conversation? Was it an

9 hour? Was it multiple hours?

10 A. May have been like an hour.

11 Q. Did they ask you questions?

12 A. Yes.

13 Q. Did they take written notes?

14 A. I do not know.

15 Q. Did they have a tape recorder?

16 A. I don't believe so.

17 Q. Okay. So you didn't -- you did not give

18 anyone from the FBI authority to tape your statement;

19 correct?

20 MR. EDWARDS: Object to the form.

21 BY MR. CRITTON:

22 Q. And that is to take a tape-recorded statement

23 from you; is that correct?

24 MR. EDWARDS: Object to the form.

25 THE WITNESS: I don't remember if they did or

1 MR. EDWARDS: -- and what's going to happen

2 in the future in this case is absurd.

3 MR. CRITTON: All I'm asking is whether

4 anyone else lives with her at that address.

5 Obviously, that person may well have information

6 regarding the alleged damage claim that your

7 client's making.

8 MR. EDWARDS: Okay. Go to the Court to get

9 information.

10 MR. CRITTON: All right. And I just want

11 you -- and you're going to follow your lawyer's

12 advice?

13 MR. EDWARDS: Yes.

14 MR. CRITTON: Well, no, I'm asking her.

15 MR. EDWARDS: And she is.

16 BY MR. CRITTON:

17 Q. You're going to follow your lawyer's advice?

18 A. Yes.

19 Q. Okay. And we have to come back here and do

20 this in multiple times; and if the Court -- you

21 understand that the Court may grant sanctions under this

22 circumstance; do you understand that?

23 A. That's fine.

24 Q. Two FBI people, they come to your house

25 sometime in 2000 -- or the grandmother's house,

1 not.

2 BY MR. CRITTON:

3 Q. So in less than a year ago from today, maybe

4 just a little over a year, it's your testimony you don't

5 remember whether the FBI taped your statement or not; is

6 that correct?

7 MR. EDWARDS: Form.

8 BY MR. CRITTON:

9 Q. It's what you're telling us?

10 MR. EDWARDS: Form.

11 THE WITNESS: Yes.

12 BY MR. CRITTON:

13 Q. Did they have a stenographer with them,

14 similar to Pamela sitting to your immediate right?

15 A. No.

16 Q. Did they video the conference at all?

17 A. No.

18 Q. When you called -- well, from the time that

19 you called -- oh, I'm sorry -- did you call Jason or the

20 woman to set up the appointment, or did they contact

21 you?

22 A. I think I called them.

23 Q. And, and why did you call them? What caused

24 you to call the FBI? When they were trying to get ahold

25 of you in 2007, what caused you in late -- well,

1 sometime in 2008 to call them?

2 MR. EDWARDS: Object to the form.

3 THE WITNESS: I -- I was pregnant, and I was  
4 thinking more clearly. And I guess I pretty much  
5 realized that I needed to call them.

6 BY MR. CRITTON:

7 Q. Well, what -- now that you were pregnant,  
8 what caused -- well, how were you thinking more clearly  
9 because you were pregnant, versus when you were not  
10 pregnant?

11 A. I was not drinking or I wasn't -- I -- I just  
12 was taking better care of myself.

13 Q. Okay. Well, before you became pregnant, you  
14 also used illegal drugs; didn't you?

15 A. Yes.

16 Q. So were you drinking and using illegal drugs  
17 up through the time that you became pregnant?

18 A. Excuse me?

19 Q. Were -- did you continue to drink -- and I --  
20 when I say drink, you mean alcohol; don't you?

21 A. Yes.

22 Q. Okay. And I assume that when you say you  
23 weren't drinking, you would drink alcohol to excess  
24 prior to the time that you were pregnant with your  
25 daughter; correct?

1 BY MR. CRITTON:

2 Q. You used pot? How about Xanax?

3 A. From time to time.

4 Q. Ecstasy?

5 A. No.

6 Q. So it's your testimony that no one -- there  
7 should be no individual who could say Jane Doe took  
8 Ecstasy, because that would be --

9 A. I have taken it once.

10 Q. -- a boldfaced lie; is that right?

11 A. One time I have taken it, yes.

12 Q. Okay. So you have taken Ecstasy --

13 MR. EDWARDS: Object to the form.

14 BY MR. CRITTON:

15 Q. -- true?

16 A. One time, yes.

17 Q. You've used cocaine, as well; haven't you?

18 A. Yes, I have.

19 Q. On many occasions; true?

20 A. More than one.

21 Q. More than ten?

22 A. No.

23 Q. So if witnesses come in and say, yep, I've  
24 seen Jane Doe use coke a lot of times, they would be  
25 boldfaced liars; is that true?

1 MR. EDWARDS: Object to the form.

2 THE WITNESS: Yes.

3 BY MR. CRITTON:

4 Q. Okay. And you would drink to the extent that  
5 you would from time to time pass out; true?

6 MR. EDWARDS: Form.

7 THE WITNESS: No.

8 BY MR. CRITTON:

9 Q. Okay. So you would drink a lot, you would  
10 drink to excess, but you never passed out --

11 MR. EDWARDS: Object to the form.

12 BY MR. CRITTON:

13 Q. -- is that your testimony?

14 A. Yes.

15 Q. Okay. And prior to becoming pregnant, you  
16 also used illegal drugs on a regular basis; didn't you?

17 A. Not on a regular basis.

18 Q. Okay. Well, you -- you were using them at  
19 least a number of days out of every month prior to the  
20 time that you became pregnant for a long period of time;  
21 isn't that true?

22 A. Yes.

23 Q. And what kind of drugs did you use?

24 MR. EDWARDS: Form.

25 THE WITNESS: Marijuana.

1 MR. EDWARDS: Object to the form.

2 THE WITNESS: Yes.

3 BY MR. CRITTON:

4 Q. Okay. How many times do you think you used  
5 coke? Approximately ten?

6 MR. EDWARDS: Object to the form.

7 THE WITNESS: Five.

8 BY MR. CRITTON:

9 Q. Maybe more?

10 A. No.

11 Q. How about crack cocaine, do you use that?

12 A. No.

13 Q. Oxycontin?

14 A. No.

15 Q. How about Roxycotin --

16 A. No.

17 Q. -- Roxicodone?

18 A. No.

19 Q. Do you know what a roxy is?

20 A. Yes, I do.

21 Q. What is a roxy?

22 MR. EDWARDS: Object to the form.

23 THE WITNESS: It's a pill.

24 BY MR. CRITTON:

25 Q. Okay. And what does it do? What do you

1 understand a roxy does?  
 2 A. I do not know.  
 3 Q. Have you ever taken roxies?  
 4 A. No.  
 5 Q. So if someone said, I saw Jane Doe take  
 6 roxies, I've given her roxies, that person would be  
 7 lying; is that what you're saying?  
 8 MR. EDWARDS: Form.  
 9 THE WITNESS: Yes.  
 10 BY MR. CRITTON:  
 11 Q. Since the time you've had your daughter, do  
 12 you continue to drink?  
 13 A. I have not. I have drunken when I turned 21,  
 14 and that's it.  
 15 Q. How about drugs, have you continued to use  
 16 drugs since you gave birth to your daughter on [REDACTED]  
 17 [REDACTED]  
 18 A. No.  
 19 Q. Okay. So if someone said they'd seen you  
 20 using drugs, you're saying that person would be lying?  
 21 A. Absolutely.  
 22 Q. Back to the FBI. They came to your porch  
 23 sometime in 2008, spent about an hour with you, I think  
 24 you said?  
 25 MR. EDWARDS: Form.

1 and meet with you at the Edge Hill --  
 2 A. One or two.  
 3 Q. -- address? One or two days later?  
 4 A. One or two, yes.  
 5 Q. Did they give you any pieces of paper when  
 6 they met with you?  
 7 A. They gave me their card.  
 8 Q. Just their card?  
 9 A. Yes.  
 10 Q. So you had the cards that your family members  
 11 had given you, and you also had the cards that they gave  
 12 you that day?  
 13 A. Yes.  
 14 Q. And what did they tell you? That is, when  
 15 you called them to say, okay, I'll talk with you now, in  
 16 2008, did you say, what do you want to talk about? Did  
 17 you say, I'm Jane Doe, you've let me -- been trying to  
 18 get ahold of me.  
 19 A. Yes.  
 20 Q. So here I am; I'll talk to you --  
 21 A. Yes.  
 22 Q. -- right?  
 23 A. Yes.  
 24 Q. And what did you say to them? Did you say,  
 25 what do you want to talk about? Or did you know?

1 THE WITNESS: Uh-huh.  
 2 BY MR. CRITTON:  
 3 Q. Yes?  
 4 A. Yes.  
 5 Q. And you don't remember whether they took  
 6 notes, you don't remember giving them permission to  
 7 use -- to take a tape-recorded statement, and you don't  
 8 remember whether they took a tape-recorded statement,  
 9 all true; correct?  
 10 A. I'm sure that they took notes, but I do not  
 11 remember if they recorded it.  
 12 Q. Did you sign any -- excuse me -- did they  
 13 take any kind of statement from you in handwriting, and  
 14 then ask you to sign it?  
 15 A. I don't remember.  
 16 Q. Did they give you a copy of any notes or  
 17 statement that day?  
 18 A. No.  
 19 Q. Okay. Is that the only occasion, other  
 20 than -- well, let me strike that.  
 21 I think -- who did you say you called to set  
 22 up the appointment? Was it Jason or the woman?  
 23 A. I think it was the woman.  
 24 Q. Okay. And how many days after you called  
 25 them and say, I'll talk to you, did they come out and --

1 A. I don't remember.  
 2 Q. Did -- well, did you know that it involved  
 3 Mr. Epstein?  
 4 A. Yes, I did.  
 5 Q. How did you know that?  
 6 A. Because I have a brain.  
 7 Q. All right. That's good. We -- and -- and  
 8 you -- you don't have any type of mental disability;  
 9 correct?  
 10 A. Meaning?  
 11 Q. You don't have any mental disability; that is  
 12 you -- you understand when people talk to you? That is  
 13 you've never had any kind of learning disability?  
 14 MR. EDWARDS: Object to the form.  
 15 THE WITNESS: Yes.  
 16 BY MR. CRITTON:  
 17 Q. Pardon?  
 18 A. Yes.  
 19 Q. You -- you say you do have a learning  
 20 disability?  
 21 A. No, I don't.  
 22 Q. Okay. Well, that's what I'm saying is I've  
 23 looked at your school records, and I've looked at  
 24 your -- you know, the FCATS and some of those reports  
 25 that have been turned over to us in discovery. And it

1 appears that you have -- that you've scored pretty well,  
 2 very well in some instances, on standardized testing;  
 3 correct?  
 4 MR. EDWARDS: Form.  
 5 THE WITNESS: Yes.  
 6 BY MR. CRITTON:  
 7 Q. Okay. So you said you have a brain, and --  
 8 and you knew that's why the FBI wanted to talk to you.  
 9 How did you -- how did you know that? I mean, separate  
 10 from just being smart, how did you know that the FBI  
 11 wanted to talk to you about Mr. Epstein? That is, what  
 12 was going on that made you know that?  
 13 A. Because I watch the news.  
 14 Q. So in 2008 you had seen something on the news  
 15 about Mr. Epstein?  
 16 A. Yes.  
 17 Q. Okay. What had you seen?  
 18 A. I -- I think it was a newspaper where I just  
 19 saw his face.  
 20 Q. And you -- so you saw his face. Did you read  
 21 the article?  
 22 A. Yes.  
 23 Q. Okay. You -- and you -- did -- were you  
 24 reading the newspaper regularly at that time?  
 25 A. No. I just -- the newspaper was being

1 with you?  
 2 A. Yes.  
 3 Q. And they say, okay, we'll be out in two days,  
 4 or a day or two?  
 5 A. Yes.  
 6 Q. Okay. What, five-minute conversation?  
 7 A. Probably.  
 8 Q. So they come out. What did they tell you  
 9 before they started the conversation?  
 10 A. They wanted to show me their ID, so that I  
 11 knew that they were who they said they were.  
 12 Q. Okay. So they showed you the ID. Then what  
 13 did they say?  
 14 A. They wanted to talk to me about  
 15 Jeffrey Epstein.  
 16 Q. And did they -- and they proceeded to -- did  
 17 they both ask you questions, or just one person?  
 18 A. Mostly the woman.  
 19 Q. She asked what, 90 percent of the questions?  
 20 A. Yes.  
 21 Q. And what did you tell? What -- what  
 22 questions did she ask you; what's your best  
 23 recollection? Okay? And what did you tell her?  
 24 A. She asked me how many times I had gone to  
 25 Jeffrey Epstein's house.

1 delivered regularly to my house.  
 2 Q. So you happened to see some article about  
 3 Mr. Epstein?  
 4 A. Yes.  
 5 Q. Do you remember what the article was about,  
 6 other than seeing his face?  
 7 A. It was about him being arrested.  
 8 Q. All right. And was it after you saw that he  
 9 was arrested that then you called the FBI, or did you  
 10 continue to wait a lengthy period of time?  
 11 A. I waited --  
 12 Q. Why?  
 13 A. -- some time.  
 14 Excuse me?  
 15 Q. Just didn't want to be involved?  
 16 A. I was afraid.  
 17 Q. What were you afraid of?  
 18 A. I don't know.  
 19 Q. There were no cars watching you; right? And  
 20 you didn't see any suspicious activity; correct?  
 21 A. Not at that time.  
 22 Q. All right. So they come out; they spend an  
 23 hour with you. What did they ask you? Well, let me --  
 24 let me go back to when you set up the appointment. How  
 25 long was that? Did you say, I'm Jane Doe, I'll talk

1 Q. And --  
 2 A. And I told her that I couldn't remember  
 3 exactly how many times it was. It was probably at least  
 4 20.  
 5 Q. Did you tell her that?  
 6 A. Yes. She asked me who brought me to  
 7 Jeffrey Epstein's house.  
 8 Q. What did you tell her?  
 9 A. I told her that [REDACTED] brought me there.  
 10 Q. [REDACTED].?  
 11 A. Yes.  
 12 Q. All right. Let me just -- and then I'm going  
 13 to get back to the conversation.  
 14 At the time that you saw or were staying with  
 15 [REDACTED] either on the first occasion or the second  
 16 occasion, I assume you were friends at that time, good  
 17 friends?  
 18 A. Yes.  
 19 Q. Okay. And you continued to be good friends,  
 20 even when you were apart, during that interim time  
 21 period between the first and second; correct?  
 22 A. You mean, were we still friends after I  
 23 didn't live with her?  
 24 Q. Yeah. After the first time and you went back  
 25 to your grandmother's house, you still continued to be

1 good friends with [REDACTED]. --  
 2 A. Yes.  
 3 Q. -- before you went back the second time;  
 4 correct?  
 5 A. Yes.  
 6 Q. And when you were with [REDACTED], did you see [REDACTED].  
 7 from time to time?  
 8 A. Yes.  
 9 Q. Okay. And would -- did you consider [REDACTED]. to  
 10 be one of your good friends?  
 11 A. Yes.  
 12 Q. And is she still one of your good friends  
 13 today?  
 14 A. Yes.  
 15 Q. And you said [REDACTED]. is not a good friend  
 16 today --  
 17 MR. EDWARDS: Object to the form.  
 18 BY MR. CRITTON:  
 19 Q. -- is that correct?  
 20 A. I haven't spoken to [REDACTED]. in some time.  
 21 Q. How long?  
 22 A. About -- at least six months. I'm not  
 23 positive.  
 24 Q. And what happened to cause you not to be  
 25 friends?

1 A. She was living in the same neighborhood as  
 2 me, and she moved. I don't know. We just --  
 3 Q. Call her by cell phone?  
 4 A. We just lost contact. I don't know.  
 5 Q. Do you know what she's doing now?  
 6 A. No, I do not.  
 7 Q. And you don't know where she's living now?  
 8 A. No, I do not.  
 9 Q. But you've stayed in touch with [REDACTED].?  
 10 A. We talk probably once every other month.  
 11 Q. Did you talk to her after she gave her  
 12 deposition last week?  
 13 A. No, I have not.  
 14 Q. Did you read her deposition?  
 15 A. No, I did not.  
 16 Q. Have you seen any portions of her deposition?  
 17 A. I haven't read it.  
 18 Q. Okay. My question is: Have you seen any  
 19 portion of [REDACTED].'s deposition?  
 20 A. No.  
 21 Q. Okay. Has anyone read any portions of that  
 22 deposition to you?  
 23 MR. EDWARDS: Object to the form. She's not  
 24 answering the question, attorney-client privilege.  
 25

1 BY MR. CRITTON:  
 2 Q. Separate and apart from what Mr. Edwards may  
 3 or may not have read to you, has anyone else shown you  
 4 or read to you portions of [REDACTED].'s deposition?  
 5 A. No.  
 6 Q. Are you aware that she was deposed last  
 7 week --  
 8 MR. EDWARDS: Objection. Attorney/client  
 9 privilege.  
 10 BY MR. CRITTON:  
 11 Q. -- and had given her deposition --  
 12 MR. EDWARDS: You're not answering the  
 13 question.  
 14 BY MR. CRITTON:  
 15 Q. Let me ask you this: Separate and apart from  
 16 Mr. Edwards, were you aware that [REDACTED]. was going to give  
 17 a deposition?  
 18 A. No, I was not.  
 19 Q. After -- and so -- let me strike that.  
 20 So separate and apart from whatever your  
 21 attorney may have told you, you had no knowledge that  
 22 [REDACTED]. either was going to give a deposition or had given  
 23 a deposition; is that correct?  
 24 A. That is correct.  
 25 Q. Did [REDACTED]. -- did [REDACTED]. -- did -- did you tell

1 either [REDACTED]. or [REDACTED]. that you were going to meet with the  
 2 FBI?  
 3 A. No.  
 4 Q. Did they tell you that they had met with the  
 5 FBI?  
 6 A. No.  
 7 Q. Or anyone else?  
 8 A. No.  
 9 Q. Did you tell anyone, other than -- let me  
 10 strike that.  
 11 Did you tell your grandmother you were going  
 12 to meet with the FBI?  
 13 A. Yes.  
 14 Q. Did you tell any other family member you were  
 15 going to meet with the FBI?  
 16 A. No.  
 17 Q. Did your grand -- your grandmother knew that  
 18 you had gone to Mr. Epstein's home; didn't she?  
 19 A. She didn't know any details.  
 20 Q. Let me ask -- answer my question.  
 21 Your grandmother knew that you had gone to  
 22 Mr. Epstein's home on a number of occasions; true?  
 23 MR. EDWARDS: Object to the form.  
 24 THE WITNESS: She knew after I told her, yes.  
 25

25 (Pages 94 to 97)

1 BY MR. CRITTON:

2 Q. But even during that time period she knew  
3 that you were going to Mr. Epstein's home from time to  
4 time?

5 MR. EDWARDS: Object to the form.

6 THE WITNESS: During what time period?

7 BY MR. CRITTON:

8 Q. During the time you -- time period that you  
9 went to Mr. Epstein's home.

10 A. No, she did not know.

11 Q. Didn't you give your grandmother's cell phone  
12 to someone at Mr. Epstein's home -- not Mr. Epstein, but  
13 to someone at Mr. Epstein's home?

14 A. Her cell phone?

15 Q. Or her phone number?

16 A. It was a phone number that I was using, yes.

17 Q. And that phone number belonged to whom?

18 A. Me -- well, [REDACTED] was paying for it,  
19 but it was my phone number.

20 Q. All right. So other than your grandmother,  
21 did anyone know -- else know that the FBI was coming?

22 A. No.

23 Q. So they asked you the number of times you had  
24 gone to Mr. Epstein's house. You said you didn't  
25 remember, but you thought it was about 20 times. They

1 A. No, that is not true.

2 Q. Well, what makes you think it was February,  
3 or plus or minus a month?

4 A. Because I told Jeffrey Epstein that I was 15  
5 and that my birthday was in January. And I knew that it

6 [REDACTED]  
7 Q. Okay. And why would you tell him you were  
8 15, rather 14 --

9 A. I don't --

10 Q. -- assuming that's true? What was -- what  
11 was the big difference to you about that?

12 A. I have no idea.

13 Q. Did [REDACTED] tell you to say that?

14 A. No.

15 Q. In fact, [REDACTED] had told you to say that you  
16 were 18; isn't that true?

17 A. That is not true.

18 Q. Okay. Well, didn't [REDACTED], before she took you  
19 there the first time, say, look, tell Mr. Epstein you  
20 are 18, if he's -- if you're asked?

21 A. That is absolutely not true.

22 Q. So if [REDACTED] would -- has testified to that  
23 under oath, that would be a lie?

24 MR. EDWARDS: Object to the form.

25 THE WITNESS: Yes.

1 asked you --

2 A. Yes.

3 Q. Correct?

4 A. Yes.

5 Q. And they asked you who brought you, and you  
6 said, [REDACTED] --

7 A. Yes.

8 Q. -- correct?

9 What else did they ask you?

10 A. They asked me -- they asked me what happened  
11 the first time I went to Jeffrey Epstein's house.

12 Q. Did -- did you tell them the first time that  
13 you went to Mr. Epstein's house?

14 A. Yes.

15 Q. Okay. And when was the first date that you  
16 went to Mr. Epstein's home?

17 A. I believe that it was in February of '03.

18 Q. And what makes you think it was in February  
19 of '03?

20 A. Because I was -- I was definitely 14, and  
21 I'm -- I'm not exactly positive that it was -- like if  
22 it was February or the month before or after. I just  
23 know it was around that time.

24 Q. Isn't it true, ma'am, the first time you went  
25 to Mr. Epstein's home you were 15 years old?

1 BY MR. CRITTON:

2 Q. Did you ever keep a log or any kind of diary  
3 or paperwork of any kind that -- as to the dates that  
4 you went to Mr. Epstein's home?

5 A. No.

6 Q. When is the last time you went to  
7 Mr. Epstein's home?

8 A. I was 17.

9 Q. Give me a date.

10 A. It was after I turned 17. It must have been  
11 very shortly after June something.

12 Q. So it would have been June, July of '05?

13 A. The beginning of July, though.

14 Q. So you're -- is it -- are you telling us that  
15 over basically a three-, almost four-year span, you went  
16 to Mr. Epstein's -- which is about 48 months or  
17 something less, 40 to 48 months -- you went to  
18 Mr. Epstein's house approximately 20 times?

19 A. Probably more, but, yes.

20 Q. Well, you told the FBI it was approximately  
21 20; right?

22 A. Yes.

23 Q. And they asked you what happened on the first  
24 occasion, and did you tell them?

25 A. Yes, I did.

1 Q. Okay. And did you tell the FBI that you were  
2 14 years old when you went?  
3 A. Yes, I did.  
4 Q. You're sure of that?  
5 A. Yes.  
6 Q. Other than telling them what happened on the  
7 first occasion, what else did they ask you?  
8 A. What happened on every other.  
9 Q. Did they go through all 20 -- approximately  
10 20 occasions that you were at Mr. Epstein's home?  
11 A. No. They just wanted to know what normally  
12 would happen.  
13 Q. And at the end of the conversation, what did  
14 they tell you -- or the end of the interview?  
15 A. I don't remember. I'm sure that I -- I know  
16 that the woman was telling me somewhere along the lines  
17 that it was wrong. She was telling me that it was  
18 wrong, and --  
19 Q. The FBI lady told you that?  
20 A. Yes.  
21 Q. All right. And did the man say anything?  
22 A. He -- he pretty much just agreed with her.  
23 He didn't say much.  
24 Q. Did you ask any questions?  
25 A. No.

1 Q. Like, what are they doing with Mr. Epstein?  
2 A. No, I did not.  
3 Q. And what did you think would happen as a  
4 result of your interviewing with the FBI or talking to  
5 them?  
6 A. I just thought that it would help. I just  
7 thought it would help.  
8 Q. What -- when they left that day -- or before  
9 they left that day, did they give you any paperwork or  
10 any documents?  
11 A. No.  
12 Q. Okay. Did they subsequently, after the  
13 interview, send you some documents later on?  
14 A. Yes.  
15 Q. Okay. Like a week later, couple of days  
16 later?  
17 A. Probably a week.  
18 Q. And what did you receive?  
19 A. I just received some papers saying that they  
20 would help me by giving me a phone number to something  
21 called Victim Services, where I could talk to somebody.  
22 Q. And did you subsequently call the Victim  
23 Service person?  
24 A. Yes, I did.  
25 Q. Is that in the Federal system?

1 MR. EDWARDS: Object to the form.  
2 BY MR. CRITTON:  
3 Q. Do you know the difference between the State  
4 and the Federal system?  
5 A. No.  
6 Q. All right. As of the time that you received  
7 the letter from the FBI, they talked to you about Victim  
8 Services, had you at this time retained Mr. Edwards?  
9 A. Before I went to Victim Services, yes, I did.  
10 Q. Okay. Do you remember when you first went to  
11 Victim Services?  
12 A. No, I don't.  
13 Q. Did the people -- did the woman and the man  
14 from the FBI discuss with you that you could bring a  
15 civil suit and recover substantial money damages from  
16 Mr. Epstein?  
17 A. I don't remember.  
18 Q. Okay. Well, in fact -- well, let me strike  
19 that.  
20 Did the FBI tell you at all that you might  
21 have a civil cause of action against Mr. Epstein?  
22 A. I don't remember.  
23 Q. That's pretty -- would be pretty significant,  
24 because you filed a lawsuit in this instance, against  
25 Mr. Epstein; true?

1 A. Yes.  
2 Q. All right. And how much money do you want  
3 from Mr. Epstein?  
4 MR. EDWARDS: Object to the form.  
5 THE WITNESS: I don't care about  
6 Jeffrey Epstein's money.  
7 BY MR. CRITTON:  
8 Q. Okay. What do you want?  
9 A. I want Jeffrey Epstein to go to prison for  
10 the rest of his life.  
11 Q. Okay. Is it your -- do you believe that the  
12 lawsuit that you have filed against Mr. Epstein will  
13 cause him to go to prison for the rest of his life?  
14 A. No, I do not.  
15 Q. Do you believe that the -- well, what do you  
16 believe the purpose of your lawsuit is in this instance,  
17 that is that we're here on today that you're giving a  
18 deposition?  
19 A. I know that Jeffrey Epstein will not go to  
20 prison for what he did, and so...  
21 Q. Are you aware he's been in prison?  
22 MR. EDWARDS: Object to the form.  
23 THE WITNESS: Yes, but he didn't go to prison  
24 for the time he deserved to.  
25

1 BY MR. CRITTON:

2 Q. From your perception; right?

3 MR. EDWARDS: Object to the form.

4 BY MR. CRITTON:

5 Q. You believe he should have gone away longer?

6 A. I know that he hurt a lot of people, and he  
7 deserves it.

8 Q. The question to you is, is your opinion is,  
9 is that Mr. Epstein should have gone to prison for a  
10 longer period of time; correct?

11 A. I believe that is a fact.

12 Q. Okay. Now, with regard to this lawsuit, what  
13 do you want from this lawsuit, then? If you -- if you  
14 can't send him to prison, what do you want?

15 A. I want to hurt him.

16 Q. Okay. So you want to hurt him. And what do  
17 you want in this lawsuit? Do you want money?

18 A. I want something that will hurt him.

19 Q. Okay. And what is that?

20 A. Whatever he's got.

21 Q. What do you mean, whatever he's got?

22 A. Well, if he loves money, and I can take that  
23 away from him, then I hurt him.

24 Q. So you're asking for money in this instance  
25 from him; correct?

1 MR. EDWARDS: Object to the form.

2 BY MR. CRITTON:

3 Q. Do you know whether you're asking for money  
4 in this instance?

5 A. Yes.

6 Q. How much money do you want?

7 A. I don't care.

8 Q. A dollar? A hundred dollars?

9 A. I don't care.

10 Q. Do you know what you've asked for?

11 A. No.

12 Q. How much money do you want in this -- how  
13 much money would you like to -- in order to resolve this  
14 case with Mr. Epstein, how much money would you take?

15 MR. EDWARDS: Object to the form.

16 THE WITNESS: Whatever would hurt him.

17 BY MR. CRITTON:

18 Q. Okay. So you want to hurt Mr. Epstein, as  
19 distinct from really getting any money yourself; is that  
20 a fair statement?

21 A. I don't understand.

22 Q. Okay. Well, if you want to hurt Mr. Epstein  
23 by taking money, then what do you want for yourself?

24 A. I want --

25 Q. Where do you think the money is going to come

1 from? Well, if it comes from Mr. Epstein, where do you  
2 think it goes?

3 A. I just want something -- I just want some  
4 sort of justice. It's not -- it hasn't been --

5 Q. I'm sorry?

6 A. -- it hasn't been right in this. Just  
7 because Jeffrey Epstein has money, he doesn't have to go  
8 to prison; that's not fair.

9 Q. So in order to resolve this case with  
10 Mr. Epstein, how much money do you want?

11 MR. EDWARDS: Object --

12 THE WITNESS: It doesn't matter.

13 BY MR. CRITTON:

14 Q. If I say, I'll pay you X-amount of dollars  
15 today, how much do you want?

16 MR. EDWARDS: Object to the form.

17 THE WITNESS: It doesn't matter. It doesn't  
18 matter. That is not the point.

19 BY MR. CRITTON:

20 Q. So whether it's a dollar or a million dollars  
21 doesn't make any difference to you?

22 MR. EDWARDS: Object to the form.

23 BY MR. CRITTON:

24 Q. It's just getting some money from  
25 Mr. Epstein; is that true?

1 A. No.

2 Q. Okay. Well, what -- what do you want, then,  
3 from Mr. Epstein? What do you think this case is about?

4 A. Getting justice.

5 Q. Okay. And how would you intend to get  
6 justice? What's your perception of getting Mister --  
7 justice for Mr. Epstein?

8 A. Well, he hurt me and changed my life, and  
9 that's what I would like to do to him.

10 Q. What? To hurt him and change his life?

11 A. Yes.

12 Q. But you have no idea whether you want a  
13 dollar in this case, a hundred thousand dollars, more or  
14 less; is that a fair statement?

15 MR. EDWARDS: Object to the form.

16 BY MR. CRITTON:

17 Q. Is that true?

18 A. I just want to take something from him.

19 Q. Okay. And whether it's a dollar or a hundred  
20 dollars or a hundred thousand dollars, you don't care  
21 one --

22 MR. EDWARDS: Objection to the form. Asked  
23 and answered.

24 BY MR. CRITTON:

25 Q. You just want something from him; true?

1 A. No.  
 2 Q. What do you want, then?  
 3 A. I want something that will cause him damage,  
 4 something that will hurt him like he hurt me.  
 5 Q. And what is that something?  
 6 A. If there's nothing else, it's obviously that.  
 7 Q. It's money. So how much?  
 8 A. I don't know.  
 9 Q. Let me ask you: On the -- back to the FBI.  
 10 Did you ever tell -- when the FBI left that day, did you  
 11 tell your grandmother what your conversation had  
 12 consisted of?  
 13 A. No.  
 14 Q. Okay. Did you tell anyone at that time?  
 15 A. No.  
 16 Q. Again, at some point, then, you got this card  
 17 from Mr. Edwards -- from Mr. Edwards about -- let me  
 18 start again.  
 19 At some point you got a card that had  
 20 Mr. Edwards' name on it, law offices of Brad Edwards or  
 21 something like that; correct?  
 22 A. Yes.  
 23 Q. All right. So people just generally don't  
 24 give out lawyer cards to individuals for no reason at  
 25 all. What occurred? What did you say? You must have

1 [REDACTED]  
 2 [REDACTED]  
 3 [REDACTED]  
 4 [REDACTED]  
 5 [REDACTED]  
 6 [REDACTED]  
 7 [REDACTED]  
 8 [REDACTED]  
 9 [REDACTED]  
 10 [REDACTED]  
 11 [REDACTED]  
 12 Q. Where does he live, or where did he live at  
 13 the time?  
 14 A. He -- he was living with [REDACTED].  
 15 Q. Does he still?  
 16 A. No.  
 17 Q. He moved out? Did --  
 18 A. Yes.  
 19 Q. When he would take you to Mr. Epstein's  
 20 house, would he wait for you?  
 21 A. No.  
 22 Q. He would just drop you off?  
 23 A. Yes.  
 24 Q. On how many occasions did [REDACTED] take  
 25 you -- [REDACTED] take you?

1 said something to somebody that resulted in you getting  
 2 Mr. Edwards' card.  
 3 MR. EDWARDS: Object to the form.  
 4 BY MR. CRITTON:  
 5 Q. And I want to know --  
 6 MR. EDWARDS: It's been asked and answered.  
 7 BY MR. CRITTON:  
 8 Q. -- what was that?  
 9 A. Well, obviously, it was somebody who knew.  
 10 Q. Who was that person who knew? Who had you  
 11 told about what had occurred at Mr. Epstein's or that  
 12 you had been to Mr. Epstein's, other than your  
 13 grandmother, who knew you had gone; right?  
 14 A. Yes.  
 15 Q. Okay. Did -- and I think you told us earlier  
 16 [REDACTED], your sister, knew you had gone, because she  
 17 had driven you on a number of occasions, three or four  
 18 times; correct?  
 19 A. Yes.  
 20 Q. All right. Had anyone else taken you or  
 21 driven you to Mr. Epstein's home, other than [REDACTED]?  
 22 A. Yes.  
 23 Q. Who?  
 24 A. My uncle.  
 25 Q. What's his name?

1 A. About two.  
 2 Q. Did anyone else drive you to Mr. Epstein's  
 3 home, other than your uncle and [REDACTED]?  
 4 A. Cabs.  
 5 Q. Okay. Separate and apart from a cab.  
 6 A. No.  
 7 Q. At the time you saw Mr. Edwards for the very  
 8 first time, had [REDACTED] already retained his services?  
 9 MR. EDWARDS: Object to the form.  
 10 THE WITNESS: I don't know.  
 11 BY MR. CRITTON:  
 12 Q. Had [REDACTED] retained his services?  
 13 MR. EDWARDS: Same objection.  
 14 THE WITNESS: I don't know.  
 15 BY MR. CRITTON:  
 16 Q. You were aware that Mr. Edwards represents  
 17 [REDACTED] and [REDACTED], in addition to you?  
 18 MR. EDWARDS: Objection. Don't answer.  
 19 Attorney-client privilege.  
 20 BY MR. CRITTON:  
 21 Q. Well, I don't want to know what he's told  
 22 you. Are you aware that Mr. Edwards represents [REDACTED]?  
 23 MR. EDWARDS: Outside of any conversations  
 24 I've ever had with my client?  
 25 MR. CRITTON: Sure.

1 BY MR. CRITTON:  
 2 Q. She's told you that; hasn't she?  
 3 A. What?  
 4 Q. [REDACTED] has told you that Brad Edwards  
 5 represents her; hasn't she?  
 6 A. She may have.  
 7 Q. Okay. And -- and you know that Brad Edwards  
 8 represents [REDACTED], separate and apart from anything  
 9 Mr. Edwards has told you; true?  
 10 A. [REDACTED] may have told me before.  
 11 Q. And you're aware that Mr. Edwards, separate  
 12 and apart from anything that Brad may have said,  
 13 represents [REDACTED], too, t-o-o; correct?  
 14 A. Excuse me?  
 15 Q. Separate and apart from anything Mr. Edwards  
 16 told you, you're aware that [REDACTED] is a -- is a Plaintiff.  
 17 She's suing Mr. Epstein, as well; right? You're aware  
 18 of that fact?  
 19 A. I have never spoke about this really with  
 20 [REDACTED].  
 21 Q. So it's your testimony that you have never  
 22 discussed the fact, even, that Mr. Edwards represents  
 23 you in a lawsuit against Mr. Epstein? You've never  
 24 discussed that with [REDACTED] at any time up through today's  
 25 date, which is September 30, 2009; correct?

1 through today's date?  
 2 A. No.  
 3 Q. Okay. Not even casually? Not over the  
 4 phone, not when you would get together? When you would  
 5 get together, you two would just simply not talk about  
 6 these lawsuits at all; correct?  
 7 A. Yes.  
 8 Q. Okay. Same thing with [REDACTED] is, is that, even  
 9 though you would see each other or talk with each other  
 10 occasionally, or once a month, as you -- I think you've  
 11 described, or once every other month, as you've  
 12 described, you've never discussed the lawsuits at all;  
 13 correct?  
 14 A. Yes.  
 15 Q. That's correct?  
 16 A. Yes.  
 17 Q. Let me show you what I'll mark as Exhibit 2.  
 18 I'll just write -- handwrite down at the bottom for  
 19 right now, and then Pamela can come back and do  
 20 something with it.  
 21 And that's for you.  
 22 (Defendant's Exhibit No. 2 was marked for  
 23 identification.)  
 24 BY MR. CRITTON:  
 25 Q. This is a document entitled, In Re:

1 MR. EDWARDS: Object to the form.  
 2 THE WITNESS: I'm not sure.  
 3 BY MR. CRITTON:  
 4 Q. Now you're not sure.  
 5 Is -- is -- were you aware that [REDACTED] -- well,  
 6 let me strike that.  
 7 Has [REDACTED] ever told you that she -- that  
 8 Mr. Edwards represents her?  
 9 A. Not specifically, no.  
 10 Q. How about unspecifically?  
 11 MR. EDWARDS: Object to the form.  
 12 BY MR. CRITTON:  
 13 Q. What do you mean by, not specifically?  
 14 A. She has not actually said to me, Brad Edwards  
 15 represents me.  
 16 Q. And if I understood your testimony earlier,  
 17 you -- you have never discussed -- she's never discussed  
 18 any aspects of her lawsuit with you since the time it  
 19 was filed; correct?  
 20 A. Yes.  
 21 Q. Okay. And [REDACTED], while she represented to you  
 22 or told you that Mr. Edwards represents her, has she  
 23 ever discussed her lawsuit --  
 24 A. No.  
 25 Q. -- up through from the time it was filed up

1 Jane Doe, Emergency Victim's Petition for Enforcement of  
 2 Crime Victim's Rights. And that's your copy.  
 3 Take a look at that, if you would, please.  
 4 MR. EDWARDS: Do you want her to read the  
 5 whole thing? Is that what you're asking her to do?  
 6 MR. CRITTON: Just look at -- just look --  
 7 just look at the --  
 8 MR. EDWARDS: The style or something.  
 9 MR. CRITTON: -- look at the first page.  
 10 BY MR. CRITTON:  
 11 Q. Does anything on this first page look in any  
 12 way familiar you to, ma'am?  
 13 A. You mean, have I ever seen this?  
 14 Q. Yes.  
 15 A. No, I haven't.  
 16 Q. All right. This was a pleading that  
 17 Mr. Edwards filed on behalf of a Jane Doe on July 7th,  
 18 2008. And it's to assert -- at least the allegations  
 19 are that -- that the Jane Doe, as a minor child, was a  
 20 victim of Federal crimes. And -- and then it goes on to  
 21 attempt to assert certain rights.  
 22 Are you the Jane Doe who's in this lawsuit?  
 23 Do you know whether you're the Jane Doe who's in this  
 24 lawsuit?  
 25 MR. EDWARDS: Object to the form.

1 THE WITNESS: I don't know.  
 2 BY MR. CRITTON:  
 3 Q. Well, you've never given Mr. Edwards  
 4 permission to file any lawsuit, other than the lawsuit  
 5 that's currently pending; is that correct?  
 6 A. I'm sure that if he asked, I would, without  
 7 even reading.  
 8 Q. Okay. Well, did you ever tell -- well, did  
 9 he -- let me strike that.  
 10 You just don't know whether you're this  
 11 Jane Doe --  
 12 A. No, I don't.  
 13 Q. -- in this lawsuit; correct?  
 14 A. That's correct.  
 15 Q. Let me show you Exhibit 2 (sic).  
 16 MR. CRITTON: And I'm going to blot out with  
 17 the copy that I give the Court Reporter, because  
 18 it's just my initials. There's a reference here,  
 19 and then my initials and an F, for filing. And  
 20 I'll blot that out on the exhibit that we use, if  
 21 that's okay with everyone.  
 22 (Defendant's Exhibit No. 3 was marked for  
 23 identification.)  
 24 BY MR. CRITTON:  
 25 Q. Let me show you Exhibit 2 (sic) --

1 agreement?  
 2 A. Yes, I have.  
 3 Q. All right. And do you have it in your  
 4 possession -- not today, but do you have a copy of it at  
 5 home?  
 6 A. Yes, I do.  
 7 Q. Okay. And did you review it?  
 8 A. Yes, I did.  
 9 Q. And with the nonprosecution agreement --  
 10 excuse me -- or looking at Exhibit 3, now, Victim's  
 11 Motion to Unseal Nonprosecution Agreement, are you  
 12 Jane Doe One or Jane Doe Two?  
 13 MR. EDWARDS: Object to the form.  
 14 BY MR. CRITTON:  
 15 Q. Or do you know?  
 16 A. I don't know.  
 17 Q. Would it be a correct statement as to  
 18 Exhibits 2 and 3, you've never seen those exhibits  
 19 before today's date?  
 20 A. I could have, without remembering.  
 21 Q. But at least as of today's date, you're not  
 22 sure, one way or the other; is that correct?  
 23 A. Not sure, no.  
 24 MR. CRITTON: Let me show you what I'll mark  
 25 as Exhibit 4.

1 MR. CRITTON: Here's your copy, Brad.  
 2 BY MR. CRITTON:  
 3 Q. -- I'm sorry, Exhibit 3.  
 4 And this document is entitled Victim's Motion  
 5 to Unseal Nonprosecution Agreement. And it looks -- it  
 6 appears to be a pleading that was electronically filed  
 7 by Mr. Edwards on or about September 25th of '08.  
 8 And if you will just read -- excuse me -- the  
 9 first paragraph refers to now, it's the -- it's the same  
 10 case style, except now there's a Jane Doe One and a  
 11 Jane Doe Two that are referenced -- excuse me -- that  
 12 Mr. Edwards represents. And it's a Motion to Unseal the  
 13 Nonprosecution Agreement that has been provided -- that  
 14 was provided to both Jane Doe One and Jane Doe Two.  
 15 Do you know what the -- if I use the term  
 16 nonprosecution or NPA, does that mean anything to you?  
 17 Or am I --  
 18 A. Yes.  
 19 Q. -- speaking Greek?  
 20 A. Yes.  
 21 Q. I'm speaking Greek?  
 22 A. No.  
 23 Q. You understand what it is?  
 24 A. Yes.  
 25 Q. Okay. Have you seen the nonprosecution

1 And here's your copy, Brad.  
 2 (Defendant's Exhibit No. 4 was marked for  
 3 identification.)  
 4 BY MR. CRITTON:  
 5 Q. And this is Declaration of [REDACTED]  
 6 in Support of the United States Response to Victim's  
 7 Emergency Petition. And it was -- at least, it was  
 8 entered on the system on July 15th of '08, but there's a  
 9 stamp for July 9th of '08.  
 10 Do you know who [REDACTED] is?  
 11 A. No, I do not.  
 12 Q. I would represent to you that -- let me  
 13 strike that.  
 14 Do you know what an affidavit is?  
 15 A. No, I don't.  
 16 Q. Or a declaration is?  
 17 A. No.  
 18 Q. Okay. Do you know what an -- and I think you  
 19 said you don't know what an affidavit is, either;  
 20 correct?  
 21 A. No, I do not.  
 22 Q. All right. When you signed your  
 23 interrogatories in this case that -- you received  
 24 written questions from me that I sent to your lawyer.  
 25 You and your lawyer put together the answers, and you

1 had to sign an affirmation or an oath that everything  
 2 set forth on those answers to interrogatories, other  
 3 than the objections, was true and correct, under penalty  
 4 of perjury; do you understand that?  
 5 A. No.  
 6 Q. Okay. Do you remember signing  
 7 interrogatories that said these are my answers to  
 8 written questions?  
 9 A. What questions?  
 10 Q. Okay. Do you ever remember answering some  
 11 questions in this case?  
 12 A. Yes.  
 13 Q. Okay. And I assume -- and I don't want to  
 14 know what Mr. Edwards said -- but I assume that you  
 15 worked with your attorney to get the correct answers or  
 16 responses to those questions; true?  
 17 A. What questions are we talking about?  
 18 Q. Well, you've only received one set of written  
 19 questions in this case; correct? That is, I sent you  
 20 questions like, state your name and address, et cetera.  
 21 A. Oh, okay. Yes. I do know.  
 22 Q. All right. And you answered them in  
 23 conjunction with your attorney?  
 24 A. Yes.  
 25 Q. All right. And when you finished answering

1 question was wrong, here is the correct answer. Are you  
 2 aware of any document that's been prepared that you've  
 3 signed that said, prior answers to interrogatories were  
 4 wrong, these are correct, these are the new -- the new,  
 5 improved version, or the better answers?  
 6 MR. EDWARDS: Object to the form.  
 7 THE WITNESS: No.  
 8 BY MR. CRITTON:  
 9 Q. All right. Anyhow, let me get back to  
 10 Exhibit --  
 11 MR. CRITTON: How much time do I have?  
 12 VIDEOGRAPHER: One minute.  
 13 MR. CRITTON: Okay. Let's take a break.  
 14 VIDEOGRAPHER: Off the record at 11:34.  
 15 MR. CRITTON: Let's take five.  
 16 (A brief recess was taken.)  
 17 (Continued in Volume II of the same day.)  
 18 - - -  
 19  
 20  
 21  
 22  
 23  
 24  
 25

1 those questions, you reviewed them to make sure that  
 2 they were accurate; correct?  
 3 A. There were some that were not.  
 4 Q. Okay. Well, at the time you reviewed -- did  
 5 you review them at the time and sign them, under penalty  
 6 of perjury? We'll get to that later, but you remember  
 7 answering the questions and then signing your name;  
 8 correct?  
 9 A. I answered them over the phone.  
 10 Q. That's not my question. Do you remember  
 11 signing them?  
 12 MR. EDWARDS: Object to the form.  
 13 BY MR. CRITTON:  
 14 Q. Did you -- do you remember giving answers to  
 15 your attorney or a representative in his office, in  
 16 order to answer those questions?  
 17 A. I answered these questions over the phone.  
 18 Q. Okay. So is -- if you answer something over  
 19 the phone, they don't have to be true, but if you answer  
 20 something in person, it does have to be true; is that  
 21 how you interpret the law?  
 22 A. No, but there were some things that he  
 23 obviously typed up wrong.  
 24 Q. You've never filed any -- at least as of  
 25 today I haven't seen any document that says, that

1  
 2  
 3 CERTIFICATE OF OATH  
 4 THE STATE OF FLORIDA  
 5 COUNTY OF PALM BEACH  
 6  
 7 I, the undersigned authority, certify that  
 8 JANE DOE personally appeared before me and was duly  
 9 sworn.  
 10  
 11 Dated this 13th day of October, 2009.  
 12  
 13  
 14  
 15  
 16  
 17  
 18  
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 25

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



CERTIFICATE  
THE STATE OF FLORIDA  
COUNTY OF PALM BEACH

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

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

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

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

Dated this 13th day of October, 2009.

  
Pamela J. Sullivan, RPR, FPR, CLR

CERTIFICATE

THE STATE OF FLORIDA  
COUNTY OF PALM BEACH

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

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

JANE DOE

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

IN RE: SHORT STYLE  
CASE NO.: 08-cv-80119-MARRA/JOHNSON

Dear Ms. Jane Doe:

Please take notice that on Wednesday, the SEP of 30, 2009, you gave your deposition in the above-referenced matter. At that time, you did not waive signature. It is now necessary that you sign your deposition.

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

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

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

Very truly yours,

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

I do hereby waive my signature.

JANE DOE  
JANE DOE

ERRATA SHEET

IN RE: JANE DOE V. JEFFREY EPSTEIN  
CR: PAMELA J. SULLIVAN, RPR, FPR, CLR  
DEPOSITION OF: JANE DOE  
DATE TAKEN: September 30, 2009

DO NOT WRITE ON TRANSCRIPT - ENTER CHANGES HERE  
PAGE# LINE# CHANGE REASON

Table with 4 columns: PAGE#, LINE#, CHANGE, REASON. The table is currently empty.

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: \_\_\_\_\_